FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1353

Date Filmed 4/29/83 Camera No. --- 2

Cameraman J. A. Q

FEDERAL ELECTION COMMISSION

Internal memoranda

Material relating to Conciliation

Attorney Work Product

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy.
___	(2) Internal rules and practices	___	(7) Investigatory files
✓	(3) Exempted by other statute	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed Michael Dymally

date March 3, 1983

FEC 9-21-77

MJ

3/3/83.

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Dymersby

Rec'd FEC
Rec'd 9593
83 FEB 28 AM : 31

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON *
EILEEN M. STEIN

*ADMITTED IN D. C. ONLY

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

83 FEB 28 P1:17

February 25, 1983

Kenneth Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

re: MURs 1284, 1353, 1361, 1389

Dear Mr. Gross:

On behalf of the Carter/Mondale Presidential Committee, Inc. and the Carter/Mondale Reelection Committee, Inc., I am enclosing a check for $13,000 payable to the United States Treasury. This check covers the total amount of the civil penalty provided for in the conciliation agreement which resolved the captioned matters.

Sincerely,

Douglas B. Huron

Enclosure

8304039210 9

CARTER-MONDALE RE-ELECTION COMMITTEE, INC.
COMPLIANCE ACCOUNT
2000 L STREET, NW.
WASHINGTON, D.C. 20036

1ST AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
McLEAN, VIRGINIA 22102

1983

FEB 25 1083

55-424
560

PAY Thirteen thousand and no/100 DOLLARS $ 13,000.00

TO THE ORDER OF U.S. TREASURER

Douglas B. Bowen

⑈0 3 0 4 0 5 9 2 1 9 0 ⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chan Jor Louie
30 Henry Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chan Jor Louie:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039211

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chun Sing Au
52 Bowery
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chun Sing Au:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039202

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Shui K. Lee
394 Chestnut,
Kearny, New Jersey 07032

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Shui K. Lee:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039219 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Shui Sum Leung
117 Mulberry Street, (Apt. 2),
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Shui Sum Leung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039219 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Tse Wai Chun
5 Mott Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Tse Wai Chun:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

0304039219 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Milton A. Gordon, Esq.,
733 Park Avenue,
New York, N.Y. 10021

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mr. Gordon:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039219 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Norman Lau Kee, Esq.
11 Mott Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mr. Kee:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039217

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Stephen P. Gleit, Esq.
Suite 704
2 Mott Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mr. Gleit:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039219

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Trinh Hao, Esq.
Director
Immigrant Social Service, Inc.,
Indochinese Refugee Project
142 Henry Street (3rd Floor)
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mr. Hao:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

2304039219

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

David D. H. Kim
38 W. 32nd Street,
New York, N.Y. 10001

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear David D. H. Kim:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Bob Leu
5 Mott Street,
New York, N. Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Bob Leu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Yeun May Leung
145 E. 27th Street,
New York, N.Y. 10016

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Yeun May Leung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304059202

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Hong Chi
410 E. 6th Street,
New York, N.Y. 10009

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Hong Chi:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Ruby Chi
410 E. 6th Street,
New York, N.Y. 10009

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Ruby Chi:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Choi Luen Cheing
64 Rutger Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Choi Luen Cheing:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Ngan Chan
64 Rutger Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Ngan Chan:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

K. G. Yeung
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11373

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear K. G. Yeung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039207

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Frank Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Frank Wang:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Cheung Yeun Ting
75 Baxter Street
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Cheung Yeun Ting:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039220 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chung Sing Au
856 Carrol Street
Brooklyn, N.Y. 11215

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chung Sing Au:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039216

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Kwok Hung Chan
66 Bayard Street
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Kwok Hung Chan:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chan Wai Kuen
66 Mulberry Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chan Wai Kuen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chan Sui Wing
1259 - 57th Street,
Brooklyn, N.Y. 11219

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chan Sui Wing:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039213

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lee Cheung Kwir
375 Broome Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lee Cheung Kwir:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Yang Kuo Shio
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11372

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

8304092215

Dear Yang Kuo Shio:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chung Hop Ping
54 Rutgers Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chung Hop Ping:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304059216

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Mieh Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mieh Hu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039217

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Bernakella Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Bernakella Hu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lui Hor Kuen
66 Bayard Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lui Hor Kuen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Young Kim
38 W. 32nd Street,
New York, N.Y. 10001

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Young Kim:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lam Chit Cheung
633 E. 16th Street,
Brooklyn, N.Y. 11218

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lam Chit Cheung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Johnson Chu
32 Monroe Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Johnson Chu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lee Yim Sun
32 Henry Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lee Yim Sun:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039223

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lau Yem Chou
19 Division Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lau Yem Chou:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Lucia Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Lucia Wang:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

T.T. Wang
300 E. 75th Street,
New York, N.Y. 10021

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear T. T. Wang:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3304039222 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Mrs. T. T. Wang
300 E. 75th Street,
New York, N.Y. 10021

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Mrs. T. T. Wang:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039227

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Sim Fuey Chow
830 Avenue H,
Brooklyn, N.Y. 11233

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Sim Fuey Chow:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Kwei Tik Yum-Sum
48 - 11 - 91st Street,
Elmhurst, N. Y. 11372

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Kwei Tik Yum-Sum:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Irene Sun
48 - 11 - 91st Street,
Elmhurst, N.Y. 11372

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Irene Sun:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8340302240

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Shun-Fook Yeung
94 - 36 Alstyne Avenue,
Elmhurst, N.Y. 11373

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Yeung Shun-Fook:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3304039223

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Yin Young Leung
7 Elizabeth Street,
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Yin Young Leung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039232

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Suey Jin Chih Leung
7 Elizabeth Street
New York, N.Y. 10013

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Suey Jin Chih Leung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Tao T. Wei
2081 2nd Avenue,
New York, N.Y. 10029

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Tao T. Wei:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Terrin Hwang
3345 - 90th Street,
Jackson Heights, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Terrin Hwang:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Ming Wha Woo
20 Confucius Plaza
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Ming Wha Woo:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Sin Joung Ha
34 - 44 - 59th Street,
Woodstock, N. Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Sin Joung Ha:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039223 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Joyce Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Joyce Hu:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Chi Ping Leung
92 Madison Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Chi Ping Leung:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1983

Leong Ching Wo Wong
127 Henry Street,
New York, N.Y. 10002

RE: MUR 1353
Carter/Mondale
Presidential
Committee et al.

Dear Leong Ching Wo Wong:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days.

Should you have any questions, contact Michael Dymersky, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039240

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission decided by a vote of 5-1 to approve the conciliation agreement submitted with the General Counsel's January 24, 1983 report in the above-captioned matters, and close the file.

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

Attest:

February 2, 1983

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission decided by a vote of 5-1 to approve the conciliation agreement submitted with the General Counsel's January 24, 1983 report in the above-captioned matters, and close the file.

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

Attest:

February 2, 1983

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

8304039224

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1983

Douglas B. Huron
STEIN AND HURON
1619 New Hampshire Avenue, NW
Washington, D.C. 20009

Re: MUR 1284, 1353, 1361, 1389

Dear Mr. Huron:

On February 1, 1983, the Commission accepted the conciliation agreement signed by you in settlement of violations of the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code by the Carter/Mondale Presidential Committee, Inc. and the Carter/Mondale Reelection Committee, Inc. Accordingly, the file has been closed in this matter and will become part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

8304092213

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Probable cause to believe has been found in MUR 1284 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 441a(f). Probable cause to believe has been found in MUR 1361 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 434(b)(8), § 441a(f), § 441b(a) and 11 C.F.R. § 104.3(d), § 104.11 and § 9033.1(a)(1). Reason to believe has been found in MUR 1353 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 432(c) and 11 C.F.R. § 110.4(c)(2). Probable cause to believe has been found in MUR 1389 that Carter-Mondale Reelection Committee, Inc. ("CMRC") violated 11 C.F.R. § 9004.4(b), § 9003.3(a), and § 9003.5(a).

NOW THEREFORE, the Commission and CMPC and CMRC having duly enter into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) and having participated in informal methods of conciliation,

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prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over CMPC and CMRC, and the subject matter of this proceeding. This agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) with regard to MUR 1353.

II. CMPC and CMRC have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. CMPC and CMRC enter voluntarily into this agreement with the Commission.

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IV. MUR 1284

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

2. During the period January 1, 1979, through February 29, 1980, Respondent received $80,149.99 in excessive contributions from one hundred forty-four individuals.

3. The Reports Analysis Division of the Federal Election Commission first notified Respondent of its apparent receipt of excessive contributions by letter dated September 10, 1979. The Reports Analysis Division continued to notify Respondent of apparent excessive contributions monitored on Respondent's reports up to and including the 1980 March Monthly Report.

4. Respondent has taken the following action on the $80,149.99 in excessive contributions: refunded $43,325; attributed $8,475 to spouse; and attributed $28,349.99 to the compliance fund for the general election.

5. The Respondent took an average of approximately six months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the beginning of August of 1981.

6. 2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidates and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

WHEREFORE, Respondent Agrees:

B. Respondent accepted $80,149.99 in excessive contributions from individuals, in violation of 2 U.S.C. § 441a(f).

V. MUR 1361

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

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2. During the period October 1, 1979 through August 31, 1980, Respondent received $37,100.48 in excessive contributions from 69 individuals.

3. On November 7, 1980, the Audit Division of the Federal Election Commission notified Respondent that it had not taken action on the excessive contributions.

4. Respondent has taken the following action on the $37,100.48 in excessive contributions: refunded $11,923; attributed $9,250 to spouse; and attributed $15,927.48 to the compliance fund for the general election.

5. The Respondent took an average of approximately nine months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the end of February, 1981.

6. 2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

8. Respondent received the following corporate contributions totaling $883.56: Pacific Mutual - $366.06 with respect to a fundraiser held January 8, 1980; Charles F. Curry Real Estate Co. - $67.50 on January 21, 1980; Strauss Realty Co. - $100.00 on February 15, 1980; and Russell Gower and Co. - $350.00 on March 28, 1980.

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9. Respondent refunded all four corporate contributions as follows: Pacific Mutual - $366.06 on March 17, 1980; Charles F. Curry Real Estate Co. - $67.50 on September 24, 1980; Strauss Realty Co. - $100.00 on September 24, 1980; and Russell Gower and Co. - $350.00 on December 9, 1980.

10. 2 U.S.C. § 441b(a) states in part that it is unlawful for any political committee to accept or receive a corporate contribution.

11. On its 1980 August Monthly Report, Respondent did not disclose $98,017.60 in debts in excess of $500, and understated its disclosed debts by $57,648.43.

12. Respondent has not amended its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

13. 2 U.S.C. § 434(b)(8) states in part that each report required to be filed shall disclose the amount and nature of outstanding debts and obligations owed. See also 11 C.F.R. § 104.3(d).

14. 11 C.F.R. § 104.11 states that a debt, obligation, or other promise to make an expenditure, the amount of which is $500 or less, shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred, whichever comes first. Any loan, debt, or obligation, the amount of which is over $500, shall be reported as of the time of the transaction.

15. Respondent has not provided the Commission access to detailed invoices from its media agent, Rafshoon

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Communications, Inc., so that media placement allocations might be verified.

16. 11 C.F.R. § 9033.1(a)(1) provides that, for the purpose of receiving Presidential primary matching fund payments, the candidate has the burden of proving that expenditures by the candidate, the principal campaign committee or any authorized committee are qualified campaign expenses.

WHEREFORE, Respondent agrees:

B. Respondent accepted $37,100.48 in excessive contributions from individuals, in violation of 2 U.S.C. § 441a(f).

C. Respondent received corporate contributions totaling $883.56, in violation of 2 U.S.C. § 441b(a).

D. Respondent on its 1980 August Monthly Report did not disclose $98,017.60 in excess of $500 and understated its disclosed debts by $57,648.43, in violation of 2 U.S.C. § 434(b)(8), 11 C.F.R. § 104.3(d) and § 104.11.

E. Respondent will file an amendment to its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

F. During the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement allocations in violation of 11 C.F.R. § 9033.1(a)(1).

G. Respondent agrees to make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures.

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1. An explanation of the methodology used by Rafshoon Communication, Inc. in allocating media expenditures between each of the states.

2. For each state, the total dollar amount of media time and space purchased and allocated to the state.

3. For each state, computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by counsel. (The total dollar amount reported by the computer summaries added to any communication paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshooon Communications.)

4. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

5. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

6. For each broadcast station, the total dollar amount of media time purchase by the Respondent and the total dollar amount allocated to each state.

7. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

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a. the dollar amount of the media purchased contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

c. the dates on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The sample of media buys selected will be drawn from New Hampshire, Maine, Iowa and their surrounding states. The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

8. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. It any potential violations are discovered as a result of the Audit, the Commission reserves it right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

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VI. MUR 1353

A. Pertinent facts in this matter are as follows:

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

2. On or about February 21, 1980, Respondent held a fundraising event at the Silver Palace Restaurant in New York City.

3. Respondent accepted $9,100 in cash receipts in increments of $100 or more at this event through its agents, Esther Kee and others.

4. Said receipts were not segregated by contributor and inaccurate and inadequate records were kept of the actual cash contributors.

5. Respondent's agents purchased money orders at the Manhattan Savings Bank, with the cash receipts in increments of $100 or more, on or about February 28, 1980, without consulting with, or acquiring the consent of the actual cash contributors.

6. Respondent's agents attributed the money orders thereby purchased to persons without having evidence that such persons were the actual cash contributors; many of the attributees were employees of the Silver Palace Restaurant.

7. Respondent's agents signed the remitter's signature lines of money orders rather than the actual contributors.

8. Seeking Presidential Primary Matching Funds, respondent furnished the money orders here involved to the Commission in Submission #14 (certified for payment by the Commission on June 4, 1980) and Submissin #17 (certified for payment by the Commission on July 16, 1980).

9. As a result of the above submissions and certifications, Respondent received $7,130.35 in Presidential Primary Matching funds.

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WHEREFORE, Respondent agrees:

B. Esther Kee and other volunteers, acting as Respondent's agents, failed to keep accurate contributor records in violation of 2 U.S.C. § 432(c).

C. Esther Kee and other volunteers, acting as Respondent's agents, received cash contributions in increments of $100 or more from six individuals, and, where cash contributions aggregated in excess of $100 from an individual, Respondent failed to return the amount over $100 cash to the contributor, in violation of 11 C.F.R. § 110.4(c)(2).

D. The money orders involved in this matter represent contributions by cash. Moreover, the money orders involved in this matter were signed by Respondent's agents, and not by the actual contributors. The written instruments were not accompanied by written documents signed by the actual contributors. Therefore, the money orders involved in this matter are not matchable.

E. Respondent shall repay $7,130.35 to the Secretary of the U.S. Treasury, which is the amount equal to the amount of Presidential primary matching funds improperly paid under 11 C.F.R. § 9038.2(a)(1). Respondent will make such repayment pursuant to this agreement in lieu of following the procedures set forth at 11 C.F.R. §§ 9038.2(a)(3), 9038.2(b), 9038.2(c), 9038.2(d) and 9038.2(e), and the analogous provisions of Chapter 96 of Title 26, United States Code.

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VII. MUR 1389

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

1. Respondent, Carter-Mondale Reelection Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 general election.

2. Respondent consists of two reporting entities, the "General Fund" which operates with funds received under 26 U.S.C. § 9006(b) and the "Compliance Fund" which is established in accordance with 11 C.F.R. § 9003.3.

3. Repondent made two expenditures totaling $4,507.66 from its General Fund account which were for fundraising events relating to the Compliance Fund.

4. 11 C.F.R. § 9004.4(b) states that a candidate shall not use payments received under 11 C.F.R. Part 9005 to solicit contributions to a legal and accounting fund established pursuant to 11 C.F.R. § 9003.3(a).

5. On November 13, 1980, the Committee Compliance Fund paid a telephone expenditure totaling $227,030.99 for the General Fund. The expenditure was reported in the appropriate General Fund report and the Compliance Fund was reimbursed in approximately one month.

6. Respondent's Compliance Fund made nine expenditures totaling $57,824.19 for telephone and general travel expenses related to General Fund activity. The expenditures were disclosed in the General Fund reports. These expenditures were offset against the Due-to-General fund account which reflected a

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total of $51,592.07 in the General Funds disbursements made for Compliance Fund expenses.

7. Respondent's Compliance Fund was reimbursed by the General Fund for the unreimbursed portion of telephone and travel expenses totaling $6,232.12.

8. Respondent made from the Compliance fund four disbursements totaling $25,484.90 for items which were General Fund expenses. The expenditures were for a campaign trip by the First Lady, a dinner at the Vice President's mansion, and a reimbursement for expenses described as for "tactical press relations".

9. Respondent's Compliance Fund was reimbursed from the General Fund for $25,484.90 in General Fund expenses, and the expenditures were itemized in an amendment to the April 10, 1981 report.

10. Respondent's Compliance Fund paid for 100% of the payroll for finance, budget, and legal cost centers and all computer costs. The Commission's audit staff determined that $77,815.82 in payroll should have been paid by the General Fund and $23,264.43 in computer rental and operation costs should have been paid by the General Fund.

11. Respondent's Compliance Fund was reimbursed for the General Fund's share of computer costs and salaries for legal, finance, and budget personnel, totaling $101,080.25. The reimbursement was itemized in an amendment to the April 10, 1981 Report.

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12. Pursuant to 11 C.F.R. § 9003.3(a)(2)(i), contributions to a Compliance fund may only be used to defray legal and accounting costs provided to ensure compliance with the Act, to defray any civil and criminal penalties, to make repayments under 11 C.F.R. § 9007.2, to defray the cost of soliciting contributions to the compliance fund, and to make a loan to the General Fund to defray qualified campaign expenses incurred prior to the expenditure report period or prior to the receipt of matching funds.

13. Respondent made eleven disbursements totaling $19,501,000 from its General Fund to Rafshoon Communications, Inc. for media expenses. Respondent has not provided access to detailed invoices from Rafshoon Communication, Inc. so that qualified campaign expenses may be verified.

14. 11 C.F.R. § 9003.5(a) states that the candidate has the burden of proving that disbursements made by the candidate or any authorized committee(s) are qualified campaign expenses. The candidate and his authorized committees shall obtain and furnish to the Commission at its request any evidence regarding qualified campaign expenses made by the candidate, all authorized committees and all agents thereof.

WHEREFORE, Respondent agrees:

B. Respondent violated 11 C.F.R. § 9004.4(b) by making fundraising expenditures relating to its Compliance Fund from its General Fund account.

C. Respondent violated 11 C.F.R. § 9003.3(a)(2)(i) by using Compliance Fund monies to defray General Fund expenses.

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D. At the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement expenses in violation of 11 C.F.R. § 9003.5(a).

E. Respondent shall make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures:

1. Computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by the counsel. (The total dollar amount reported by the computer summaries added to any commission paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshoon Communications.)

2. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

3. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

4. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

a. the dollar amount of the media purchase contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

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c. the date on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

5. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. If any potential violations are discovered as a result of the Audit, the Commission reserves its right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

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WHEREFORE, Carter/Mondale Presidential Committee, Inc. ("CMPC") and the Carter/Mondale Relection Committee, Inc. ("CMRC") have agreed to the following general provisions which are applicable to MURs 1284, 1361, 1353 and 1389.

VIII. CMPC and CMRC will pay a civil penalty to the Treasurer of the United States in the amount of Thirteen thousand dollars ($13,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

IX. CMPC and CMRC agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

XII. CMPC and CMRC shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission, except that the repayment required by Paragraph VI.E may be made within ninety (90) days from the date this agreement becomes effective.

6304059225

Charles N. Steele
General Counsel

February 3, 1983
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

1/11/83
Date

Carter/Mondale Presidential
Committee, Inc.

BY: Douglas B. Sosnik

ITS: Counsel

1/11/83
Date

Carter/Mondale Reelection
Committee, Inc.

BY: Douglas B. Sosnik

ITS: Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission decided by a vote of 5-1 to approve the conciliation agreement submitted with the General Counsel's January 24, 1983 report in the above-captioned matters.

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

Attest:

February 2, 1983

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
83 JAN 24 A10: 20

January 24, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MURs 1284, 1353, 1361 and 1389

Attached for the Commission's approval is a conciliation agreement signed by Douglas Huron, counsel for the Carter/Mondale Presidential Committe, Inc. ("CMPC") and the Carter/Mondale Reelection Committee, Inc. ("CMRC").

The Office of General Counsel recommends that the Commission accept the attached agreement in settlement of MURs 1284, 1353, 1361, 1389 and to close the files.

Attachments
1. Conciliation Agreement
2. Letter to Huron

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2:3767 GCC# 9330

83 JAN 14 P 1:28

STEIN & HURON
1819 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON*
EILEEN M. STEIN

*ADMITTED IN D. C. ONLY

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 652-9220

83 JAN 14 P 2:39

January 11, 1983

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

re: MURs 1284, 1353, 1361, 1389
MUR 1392

Dear Mr. Gross:

The Commission has forwarded two conciliation agreements concerning the captioned MURs to the Carter/Mondale Presidential Committee, Inc. and the Carter/Mondale Reelection Committee, Inc. The first agreement resolves four MURs: 1284, 1353, 1361 and 1389. The second deals only with MUR 1392.

I have signed both agreements as counsel for the Carter/Mondale Committees. In accordance with our telephone conversation of January 11, 1983, I have revised Paragraph XII of the first agreement to make it clear that our primary committee has 90, rather than 30, days to repay $7130.35 in matching funds under MUR 1353. This revision was made because the conciliation agreement for MUR 1392 -- under which our primary committee will receive $9750 from the Kennedy for President Committee -- has a 90-day implementation period, and we intend to use the money received from the Kennedy committee to defray the matching funds payback. In fact, our decision to agree to repay the matching funds in question was premised upon receipt of all monies specified by MUR 1392.

Thank you for your continued cooperation.

Sincerely,

Douglas B. Huron

Douglas B. Huron

Enclosures
cc: Charles Kirbo, Esq.

8304092236

ATTACHMENT I pg 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Probable cause to believe has been found in MUR 1284 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 441a(f). Probable cause to believe has been found in MUR 1361 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 434(b)(8), § 441a(f), § 441b(a) and 11 C.F.R. § 104.3(d), § 104.11 and § 9033.1(a)(1). Reason to believe has been found in MUR 1353 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 432(c) and 11 C.F.R. § 110.4(c)(2). Probable cause to believe has been found in MUR 1389 that Carter-Mondale Reelection Committee, Inc. ("CMRC") violated 11 C.F.R. § 9004.4(b), § 9003.3(a), and § 9003.5(a).

NOW THEREFORE, the Commission and CMPC and CMRC having duly enter into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) and having participated in informal methods of conciliation,

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pg 2

prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over CMPC and CMRC, and the subject matter of this proceeding. This agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) with regard to MUR 1353.

II. CMPC and CMRC have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. CMPC and CMRC enter voluntarily into this agreement with the Commission.

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IV. MUR 1284

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

2. During the period January 1, 1979, through February 29, 1980, Respondent received $80,149.99 in excessive contributions from one hundred forty-four individuals.

3. The Reports Analysis Division of the Federal Election Commission first notified Respondent of its apparent receipt of excessive contributions by letter dated September 10, 1979. The Reports Analysis Division continued to notify Respondent of apparent excessive contributions monitored on Respondent's reports up to and including the 1980 March Monthly Report.

4. Respondent has taken the following action on the $80,149.99 in excessive contributions: refunded $43,325; attributed $8,475 to spouse; and attributed $28,349.99 to the compliance fund for the general election.

5. The Respondent took an average of approximately six months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the beginning of August of 1981.

6. 2 U.S.C. § 44la(a)(l)(A) states that no person shall make contributions to any candidates and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 44la(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 44la.

WHEREFORE, Respondent Agrees:

B. Respondent accepted $80,149.99 in excessive contributions from individuals, in violation of 2 U.S.C. § 44la(f).

V. MUR 1361

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

2. During the period October 1, 1979 through August 31, 1980, Respondent received $37,100.48 in excessive contributions from 69 individuals.

3. On November 7, 1980, the Audit Division of the Federal Election Commission notified Respondent that it had not taken action on the excessive contributions.

4. Respondent has taken the following action on the $37,100.48 in excessive contributions: refunded $11,923; attributed $9,250 to spouse; and attributed $15,927.48 to the compliance fund for the general election.

5. The Respondent took an average of approximately nine months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the end of February, 1981.

6. 2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

8. Respondent received the following corporate contributions totaling $883.56: Pacific Mutual - $366.06 with respect to a fundraiser held January 8, 1980; Charles F. Curry Real Estate Co. - $67.50 on January 21, 1980; Strauss Realty Co. - $100.00 on February 15, 1980; and Russell Gower and Co. - $350.00 on March 28, 1980.

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9. Respondent refunded all four corporate contributions as follows: Pacific Mutual - $366.06 on March 17, 1980; Charles F. Curry Real Estate Co. - $67.50 on September 24, 1980; Strauss Realty Co. - $100.00 on September 24, 1980; and Russell Gower and Co. - $350.00 on December 9, 1980.

10. 2 U.S.C. § 441b(a) states in part that it is unlawful for any political committee to accept or receive a corporate contribution.

11. On its 1980 August Monthly Report, Respondent did not disclose $98,017.60 in debts in excess of $500, and understated its disclosed debts by $57,648.43.

12. Respondent has not amended its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

13. 2 U.S.C. § 434(b)(8) states in part that each report required to be filed shall disclose the amount and nature of outstanding debts and obligations owed. See also 11 C.F.R. § 104.3(d).

14. 11 C.F.R. § 104.11 states that a debt, obligation, or other promise to make an expenditure, the amount of which is $500 or less, shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred, whichever comes first. Any loan, debt, or obligation, the amount of which is over $500, shall be reported as of the time of the transaction.

15. Respondent has not provided the Commission access to detailed invoices from its media agent, Rafshoon

Communications, Inc., so that media placement allocations might be verified.

16. 11 C.F.R. § 9033.1(a)(1) provides that, for the purpose of receiving Presidential primary matching fund payments, the candidate has the burden of proving that expenditures by the candidate, the principal campaign committee or any authorized committee are qualified campaign expenses.

WHEREFORE, Respondent agrees:

B. Respondent accepted $37,100.48 in excessive contributions from individuals, in violation of 2 U.S.C. § 441a(f).

C. Respondent received corporate contributions totaling $883.56, in violation of 2 U.S.C. § 441b(a).

D. Respondent on its 1980 August Monthly Report did not disclose $98,017.60 in excess of $500 and understated its disclosed debts by $57,648.43, in violation of 2 U.S.C. § 434(b)(8), 11 C.F.R. § 104.3(d) and § 104.11.

E. Respondent will file an amendment to its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

F. During the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement allocations in violation of 11 C.F.R. § 9033.1(a)(1).

G. Respondent agrees to make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures.

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1. An explanation of the methodology used by Rafshoon Communication, Inc. in allocating media expenditures between each of the states.

2. For each state, the total dollar amount of media time and space purchased and allocated to the state.

3. For each state, computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by counsel. (The total dollar amount reported by the computer summaries added to any communication paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshooon Communications.)

4. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

5. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

6. For each broadcast station, the total dollar amount of media time purchase by the Respondent and the total dollar amount allocated to each state.

7. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

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pg 8

a. the dollar amount of the media purchased contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

c. the dates on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The sample of media buys selected will be drawn from New Hampshire, Maine, Iowa and their surrounding states. The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

8. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. It any potential violations are discovered as a result of the Audit, the Commission reserves it right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

VI. MUR 1353

A. Pertinent facts in this matter are as follows:

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

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2. On or about February 21, 1980, Respondent held a fundraising event at the Silver Palace Restaurant in New York City.

3. Respondent accepted $9,100 in cash receipts in increments of $100 or more at this event through its agents, Esther Kee and others.

4. Said receipts were not segregated by contributor and inaccurate and inadequate records were kept of the actual cash contributors.

5. Respondent's agents purchased money orders at the Manhattan Savings Bank, with the cash receipts in increments of $100 or more, on or about February 28, 1980, without consulting with, or acquiring the consent of the actual cash contributors.

6. Respondent's agents attributed the money orders thereby purchased to persons without having evidence that such persons were the actual cash contributors; many of the attributees were employees of the Silver Palace Restaurant.

7. Respondent's agents signed the remitter's signature lines of money orders rather than the actual contributors.

8. Seeking Presidential Primary Matching Funds, respondent furnished the money orders here involved to the Commission in Submission #14 (certified for payment by the Commission on June 4, 1980) and Submissin #17 (certified for payment by the Commission on July 16, 1980).

9. As a result of the above submissions and certifications, Respondent received $7,130.35 in Presidential Primary Matching funds.

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WHEREFORE, Respondent agrees:

B. Esther Kee and other volunteers, acting as Respondent's agents, failed to keep accurate contributor records in violation of 2 U.S.C. § 432(c).

C. Esther Kee and other volunteers, acting as Respondent's agents, received cash contributions in increments of $100 or more from six individuals, and, where cash contributions aggregated in excess of $100 from an individual, Respondent failed to return the amount over $100 cash to the contributor, in violation of 11 C.F.R. § 110.4(c)(2).

D. The money orders involved in this matter represent contributions by cash. Moreover, the money orders involved in this matter were signed by Respondent's agents, and not by the actual contributors. The written instruments were not accompanied by written documents signed by the actual contributors. Therefore, the money orders involved in this matter are not matchable.

E. Respondent shall repay $7,130.35 to the Secretary of the U.S. Treasury, which is the amount equal to the amount of Presidential primary matching funds improperly paid under 11 C.F.R. § 9038.2(a)(1). Respondent will make such repayment pursuant to this agreement in lieu of following the procedures set forth at 11 C.F.R. §§ 9038.2(a)(3), 9038.2(b), 9038.2(c), 9038.2(d) and 9038.2(e), and the analogous provisions of Chapter 96 of Title 26, United States Code.

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VII. MUR 1389

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

1. Respondent, Carter-Mondale Reelection Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 general election.

2. Respondent consists of two reporting entities, the "General Fund" which operates with funds received under 26 U.S.C. § 9006(b) and the "Compliance Fund" which is established in accordance with 11 C.F.R. § 9003.3.

3. Repondent made two expenditures totaling $4,507.66 from its General Fund account which were for fundraising events relating to the Compliance Fund.

4. 11 C.F.R. § 9004.4(b) states that a candidate shall not use payments received under 11 C.F.R. Part 9005 to solicit contributions to a legal and accounting fund established pursuant to 11 C.F.R. § 9003.3(a).

5. On November 13, 1980, the Committee Compliance Fund paid a telephone expenditure totaling $227,030.99 for the General Fund. The expenditure was reported in the appropriate General Fund report and the Compliance Fund was reimbursed in approximately one month.

6. Respondent's Compliance Fund made nine expenditures totaling $57,824.19 for telephone and general travel expenses related to General Fund activity. The expenditures were disclosed in the General Fund reports. These expenditures were offset against the Due-to-General fund account which reflected a

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total of $51,592.07 in the General Funds disbursements made for Compliance Fund expenses.

7. Respondent's Compliance Fund was reimbursed by the General Fund for the unreimbursed portion of telephone and travel expenses totaling $6,232.12.

8. Respondent made from the Compliance fund four disbursements totaling $25,484.90 for items which were General Fund expenses. The expenditures were for a campaign trip by the First Lady, a dinner at the Vice President's mansion, and a reimbursement for expenses described as for "tactical press relations".

9. Respondent's Compliance Fund was reimbursed from the General Fund for $25,484.90 in General Fund expenses, and the expenditures were itemized in an amendment to the April 10, 1981 report.

10. Respondent's Compliance Fund paid for 100% of the payroll for finance, budget, and legal cost centers and all computer costs. The Commission's audit staff determined that $77,815.82 in payroll should have been paid by the General Fund and $23,264.43 in computer rental and operation costs should have been paid by the General Fund.

11. Respondent's Compliance Fund was reimbursed for the General Fund's share of computer costs and salaries for legal, finance, and budget personnel, totaling $101,080.25. The reimbursement was itemized in an amendment to the April 10, 1981 Report.

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12. Pursuant to 11 C.F.R. § 9003.3(a)(2)(i), contributions to a Compliance fund may only be used to defray legal and accounting costs provided to ensure compliance with the Act, to defray any civil and criminal penalties, to make repayments under 11 C.F.R. § 9007.2, to defray the cost of soliciting contributions to the compliance fund, and to make a loan to the General Fund to defray qualified campaign expenses incurred prior to the expenditure report period or prior to the receipt of matching funds.

13. Respondent made eleven disbursements totaling $19,501,000 from its General Fund to Rafshoon Communications, Inc. for media expenses. Respondent has not provided access to detailed invoices from Rafshoon Communication, Inc. so that qualified campaign expenses may be verified.

14. 11 C.F.R. § 9003.5(a) states that the candidate has the burden of proving that disbursements made by the candidate or any authorized committee(s) are qualified campaign expenses. The candidate and his authorized committees shall obtain and furnish to the Commission at its request any evidence regarding qualified campaign expenses made by the candidate, all authorized committees and all agents thereof.

WHEREFORE, Respondent agrees:

B. Respondent violated 11 C.F.R. § 9004.4(b) by making fundraising expenditures relating to its Compliance Fund from its General Fund account.

C. Respondent violated 11 C.F.R. § 9003.3(a)(2)(i) by using Compliance Fund monies to defray General Fund expenses.

pg. 14.

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D. At the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement expenses in violation of 11 C.F.R. § 9003.5(a).

E. Respondent shall make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures:

1. Computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by the counsel. (The total dollar amount reported by the computer summaries added to any commission paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshoon Communications.)

2. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

3. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

4. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

a. the dollar amount of the media purchase contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

c. the date on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

5. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. If any potential violations are discovered as a result of the Audit, the Commission reserves its right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

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WHEREFORE, Carter/Mondale Presidential Committee, Inc. ("CMPC") and the Carter/Mondale Relection Committee, Inc. ("CMRC") have agreed to the following general provisions which are applicable to MURs 1284, 1361, 1353 and 1389.

VIII. CMPC and CMRC will pay a civil penalty to the Treasurer of the United States in the amount of Thirteen thousand dollars ($13,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

IX. CMPC and CMRC agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

XII. CMPC and CMRC shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission, except that the repayment required by Paragraph VI.E may be made within ninety (90) days from the date this agreement becomes effective.

Charles N. Steele
General Counsel

_____ BY: _____
Date Kenneth A. Gross
Associate General Counsel

1/11/83
Date

Carter/Mondale Presidential
Committee, Inc.

BY: Douglas B. Green

ITS: Counsel

1/11/83
Date

Carter/Mondale Reelection
Committee, Inc.

BY: Douglas B. Green

ITS: Counsel

pg. 17

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas B. Huron
STEIN AND HURON
1619 New Hampshire Avenue, NW
Washington, D.C. 20009

Re: MUR 1284, 1353, 1361, 1389

Dear Mr. Huron:

On January , 1983, the Commission accepted the conciliation agreement signed by you in settlement of violations of the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code by the Carter/Mondale Presidential Committee, Inc. and the Carter/Mondale Reelection Committee, Inc. Accordingly, the file has been closed in this matter and will become part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY:
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation agreement

ATTACHMENT II pg. 18

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STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON *
EILEEN M. STEIN

*ADMITTED IN D. C. ONLY

MARYLAND OFFICE
7504 SYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 652-9220

January 11, 1983

83 JAN 14 P2:39

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

re: MURs 1284, 1353, 1361, 1389
MUR 1392

Dear Mr. Gross:

The Commission has forwarded two conciliation agreements concerning the captioned MURs to the Carter/Mondale Presidential Committee, Inc. and the Carter/Mondale Reelection Committee, Inc. The first agreement resolves four MURs: 1284, 1353, 1361 and 1389. The second deals only with MUR 1392.

I have signed both agreements as counsel for the Carter/Mondale Committees. In accordance with our telephone conversation of January 11, 1983, I have revised Paragraph XII of the first agreement to make it clear that our primary committee has 90, rather than 30, days to repay $7130.35 in matching funds under MUR 1353. This revision was made because the conciliation agreement for MUR 1392 -- under which our primary committee will receive $9750 from the Kennedy for President Committee -- has a 90-day implementation period, and we intend to use the money received from the Kennedy committee to defray the matching funds payback. In fact, our decision to agree to repay the matching funds in question was premised upon receipt of all monies specified by MUR 1392.

Thank you for your continued cooperation.

Sincerely,

Douglas B. Huron

Douglas B. Huron

Enclosures
cc: Charles Kirbo, Esq.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1353, 1361, and 1389
Carter-Mondale Reelection Committee, Inc.	)	
	)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Probable cause to believe has been found in MUR 1284 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 441a(f). Probable cause to believe has been found in MUR 1361 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 434(b)(8), § 441a(f), § 441b(a) and 11 C.F.R. § 104.3(d), § 104.11 and § 9033.1(a)(1). Reason to believe has been found in MUR 1353 that the Carter/Mondale Presidential Committee, Inc. ("CMPC") violated 2 U.S.C. § 432(c) and 11 C.F.R. § 110.4(c)(2). Probable cause to believe has been found in MUR 1389 that Carter-Mondale Reelection Committee, Inc. ("CMRC") violated 11 C.F.R. § 9004.4(b), § 9003.3(a), and § 9003.5(a).

NOW THEREFORE, the Commission and CMPC and CMRC having duly enter into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) and having participated in informal methods of conciliation,

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prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over CMPC and CMRC, and the subject matter of this proceeding. This agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) with regard to MUR 1353.

II. CMPC and CMRC have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. CMPC and CMRC enter voluntarily into this agreement with the Commission.

IV. MUR 1284

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

2. During the period January 1, 1979, through February 29, 1980, Respondent received $80,149.99 in excessive contributions from one hundred forty-four individuals.

3. The Reports Analysis Division of the Federal Election Commission first notified Respondent of its apparent receipt of excessive contributions by letter dated September 10, 1979. The Reports Analysis Division continued to notify Respondent of apparent excessive contributions monitored on Respondent's reports up to and including the 1980 March Monthly Report.

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4. Respondent has taken the following action on the $80,149.99 in excessive contributions: refunded $43,325; attributed $8,475 to spouse; and attributed $28,349.99 to the compliance fund for the general election.

5. The Respondent took an average of approximately six months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the beginning of August of 1981.

6. 2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidates and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 441a.

WHEREFORE, Respondent Agrees:

B. Respondent accepted $80,149.99 in excessive contributions from individuals, in violation of 2 U.S.C. § 441a(f).

V. MUR 1361

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

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

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2. During the period October 1, 1979 through August 31, 1980, Respondent received $37,100.48 in excessive contributions from 69 individuals.

3. On November 7, 1980, the Audit Division of the Federal Election Commission notified Respondent that it had not taken action on the excessive contributions.

4. Respondent has taken the following action on the $37,100.48 in excessive contributions: refunded $11,923; attributed $9,250 to spouse; and attributed $15,927.48 to the compliance fund for the general election.

5. The Respondent took an average of approximately nine months to refund or attribute the excessive contributions. All the excessive contributions were refunded or attributed by the Respondent by the end of February, 1981.

6. 2 U.S.C. § 44la(a)(1)(A) states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000.

7. 2 U.S.C. § 44la(f) states that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of § 44la.

8. Respondent received the following corporate contributions totaling $883.56: Pacific Mutual - $366.06 with respect to a fundraiser held January 8, 1980; Charles F. Curry Real Estate Co. - $67.50 on January 21, 1980; Strauss Realty Co. - $100.00 on February 15, 1980; and Russell Gower and Co. - $350.00 on March 28, 1980.

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9. Respondent refunded all four corporate contributions as follows: Pacific Mutual - $366.06 on March 17, 1980; Charles F. Curry Real Estate Co. - $67.50 on September 24, 1980; Strauss Realty Co. - $100.00 on September 24, 1980; and Russell Gower and Co. - $350.00 on December 9, 1980.

10. 2 U.S.C. § 441b(a) states in part that it is unlawful for any political committee to accept or receive a corporate contribution.

11. On its 1980 August Monthly Report, Respondent did not disclose $98,017.60 in debts in excess of $500, and understated its disclosed debts by $57,648.43.

12. Respondent has not amended its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

13. 2 U.S.C. § 434(b)(8) states in part that each report required to be filed shall disclose the amount and nature of outstanding debts and obligations owed. See also 11 C.F.R. § 104.3(d).

14. 11 C.F.R. § 104.11 states that a debt, obligation, or other promise to make an expenditure, the amount of which is $500 or less, shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred, whichever comes first. Any loan, debt, or obligation, the amount of which is over $500, shall be reported as of the time of the transaction.

15. Respondent has not provided the Commission access to detailed invoices from its media agent, Rafshoon

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Communications, Inc., so that media placement allocations might be verified.

16. 11 C.F.R. § 9033.1(a)(1) provides that, for the purpose of receiving Presidential primary matching fund payments, the candidate has the burden of proving that expenditures by the candidate, the principal campaign committee or any authorized committee are qualified campaign expenses.

WHEREFORE, Respondent agrees:

B. Respondent accepted $37,100.48 in excessive contributions from individuals, in violation of 2 U.S.C. § 441a(f).

C. Respondent received corporate contributions totaling $883.56, in violation of 2 U.S.C. § 441b(a).

D. Respondent on its 1980 August Monthly Report did not disclose $98,017.60 in excess of $500 and understated its disclosed debts by $57,648.43, in violation of 2 U.S.C. § 434(b)(8), 11 C.F.R. § 104.3(d) and § 104.11.

E. Respondent will file an amendment to its August Monthly Report to reflect the $155,666.03 in undisclosed and understated debts.

F. During the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement allocations in violation of 11 C.F.R. § 9033.1(a)(1).

G. Respondent agrees to make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures.

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1. An explanation of the methodology used by Rafshoon Communication, Inc. in allocating media expenditures between each of the states.

2. For each state, the total dollar amount of media time and space purchased and allocated to the state.

3. For each state, computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by counsel. (The total dollar amount reported by the computer summaries added to any communication paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshooon Communications.)

4. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

5. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

6. For each broadcast station, the total dollar amount of media time purchase by the Respondent and the total dollar amount allocated to each state.

7. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

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a. the dollar amount of the media purchased contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

c. the dates on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The sample of media buys selected will be drawn from New Hampshire, Maine, Iowa and their surrounding states. The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

8. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. It any potential violations are discovered as a result of the Audit, the Commission reserves it right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

VI. MUR 1353

A. Pertinent facts in this matter are as follows:

1. Respondent, Carter/Mondale Presidential Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 primary election.

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2. On or about February 21, 1980, Respondent held a fundraising event at the Silver Palace Restaurant in New York City.

3. Respondent accepted $9,100 in cash receipts in increments of $100 or more at this event through its agents, Esther Kee and others.

4. Said receipts were not segregated by contributor and inaccurate and inadequate records were kept of the actual cash contributors.

5. Respondent's agents purchased money orders at the Manhattan Savings Bank, with the cash receipts in increments of $100 or more, on or about February 28, 1980, without consulting with, or acquiring the consent of the actual cash contributors.

6. Respondent's agents attributed the money orders thereby purchased to persons without having evidence that such persons were the actual cash contributors; many of the attributees were employees of the Silver Palace Restaurant.

7. Respondent's agents signed the remitter's signature lines of money orders rather than the actual contributors.

8. Seeking Presidential Primary Matching Funds, respondent furnished the money orders here involved to the Commission in Submission #14 (certified for payment by the Commission on June 4, 1980) and Submissin #17 (certified for payment by the Commission on July 16, 1980).

9. As a result of the above submissions and certifications, Respondent received $7,130.35 in Presidential Primary Matching funds.

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WHEREFORE, Respondent agrees:

B. Esther Kee and other volunteers, acting as Respondent's agents, failed to keep accurate contributor records in violation of 2 U.S.C. § 432(c).

C. Esther Kee and other volunteers, acting as Respondent's agents, received cash contributions in increments of $100 or more from six individuals, and, where cash contributions aggregated in excess of $100 from an individual, Respondent failed to return the amount over $100 cash to the contributor, in violation of 11 C.F.R. § 110.4(c)(2).

D. The money orders involved in this matter represent contributions by cash. Moreover, the money orders involved in this matter were signed by Respondent's agents, and not by the actual contributors. The written instruments were not accompanied by written documents signed by the actual contributors. Therefore, the money orders involved in this matter are not matchable.

E. Respondent shall repay $7,130.35 to the Secretary of the U.S. Treasury, which is the amount equal to the amount of Presidential primary matching funds improperly paid under 11 C.F.R. § 9038.2(a)(1). Respondent will make such repayment pursuant to this agreement in lieu of following the procedures set forth at 11 C.F.R. §§ 9038.2(a)(3), 9038.2(b), 9038.2(c), 9038.2(d) and 9038.2(e), and the analogous provisions of Chapter 96 of Title 26, United States Code.

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VII. MUR 1389

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

1. Respondent, Carter-Mondale Reelection Committee, Inc., is the principal campaign committee for Presidential candidate Jimmy Carter in the 1980 general election.

2. Respondent consists of two reporting entities, the "General Fund" which operates with funds received under 26 U.S.C. § 9006(b) and the "Compliance Fund" which is established in accordance with 11 C.F.R. § 9003.3.

3. Repondent made two expenditures totaling $4,507.66 from its General Fund account which were for fundraising events relating to the Compliance Fund.

4. 11 C.F.R. § 9004.4(b) states that a candidate shall not use payments received under 11 C.F.R. Part 9005 to solicit contributions to a legal and accounting fund established pursuant to 11 C.F.R. § 9003.3(a).

5. On November 13, 1980, the Committee Compliance Fund paid a telephone expenditure totaling $227,030.99 for the General Fund. The expenditure was reported in the appropriate General Fund report and the Compliance Fund was reimbursed in approximately one month.

6. Respondent's Compliance Fund made nine expenditures totaling $57,824.19 for telephone and general travel expenses related to General Fund activity. The expenditures were disclosed in the General Fund reports. These expenditures were offset against the Due-to-General fund account which reflected a

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total of $51,592.07 in the General Funds disbursements made for Compliance Fund expenses.

7. Respondent's Compliance Fund was reimbursed by the General Fund for the unreimbursed portion of telephone and travel expenses totaling $6,232.12.

8. Respondent made from the Compliance fund four disbursements totaling $25,484.90 for items which were General Fund expenses. The expenditures were for a campaign trip by the First Lady, a dinner at the Vice President's mansion, and a reimbursement for expenses described as for "tactical press relations".

9. Respondent's Compliance Fund was reimbursed from the General Fund for $25,484.90 in General Fund expenses, and the expenditures were itemized in an amendment to the April 10, 1981 report.

10. Respondent's Compliance Fund paid for 100% of the payroll for finance, budget, and legal cost centers and all computer costs. The Commission's audit staff determined that $77,815.82 in payroll should have been paid by the General Fund and $23,264.43 in computer rental and operation costs should have been paid by the General Fund.

11. Respondent's Compliance Fund was reimbursed for the General Fund's share of computer costs and salaries for legal, finance, and budget personnel, totaling $101,080.25. The reimbursement was itemized in an amendment to the April 10, 1981 Report.

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12. Pursuant to 11 C.F.R. § 9003.3(a)(2)(i), contributions to a Compliance fund may only be used to defray legal and accounting costs provided to ensure compliance with the Act, to defray any civil and criminal penalties, to make repayments under 11 C.F.R. § 9007.2, to defray the cost of soliciting contributions to the compliance fund, and to make a loan to the General Fund to defray qualified campaign expenses incurred prior to the expenditure report period or prior to the receipt of matching funds.

13. Respondent made eleven disbursements totaling $19,501,000 from its General Fund to Rafshoon Communications, Inc. for media expenses. Respondent has not provided access to detailed invoices from Rafshoon Communication, Inc. so that qualified campaign expenses may be verified.

14. 11 C.F.R. § 9003.5(a) states that the candidate has the burden of proving that disbursements made by the candidate or any authorized committee(s) are qualified campaign expenses. The candidate and his authorized committees shall obtain and furnish to the Commission at its request any evidence regarding qualified campaign expenses made by the candidate, all authorized committees and all agents thereof.

WHEREFORE, Respondent agrees:

B. Respondent violated 11 C.F.R. § 9004.4(b) by making fundraising expenditures relating to its Compliance Fund from its General Fund account.

C. Respondent violated 11 C.F.R. § 9003.3(a)(2)(i) by using Compliance Fund monies to defray General Fund expenses.

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D. At the time of the audit, Respondent failed to furnish the Commission with requested documentation to verify media placement expenses in violation of 11 C.F.R. § 9003.5(a).

E. Respondent shall make the following information and documents available to the Commission staff concerning the Rafshoon Communication media expenditures:

1. Computer summaries of media purchase contracts. These summaries must provide the same information and otherwise be similar to the sample computer summary which was supplied informally to the Audit Division by the counsel. (The total dollar amount reported by the computer summaries added to any commission paid to Rafshoon Communications must equal the total payments from the Respondent to Rafshoon Communications.)

2. An explanation of the computer summaries, including but not limited to an explanation of the codes used on the computer summaries.

3. An explanation of the policy and procedures used when broadcast stations refunded or credited monies to Respondent for media time which was purchased but not used.

4. For specific media buys, selected at the discretion of the Audit Division, original documentation from the broadcast station which shows:

a. the dollar amount of the media purchase contract (if such documentation is not available, a copy of the media purchase contract);

b. the number of broadcasts actually run by the broadcast station;

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c. the date on which the broadcasts were run; and

d. the amount of any refund or credit for any media time which was purchased but not used.

The documentation shall be pulled from the Rafshoon files by or in the presence of Audit Division personnel.

5. If errors are ascertained in the course of the audit, the Audit Division reserves its right to proceed with other procedures and request such other information as would insure a complete and accurate audit. If any potential violations are discovered as a result of the Audit, the Commission reserves its right to proceed with an enforcement action or bring a legal proceeding pursuant to 2 U.S.C. § 437g.

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WHEREFORE, Carter/Mondale Presidential Committee, Inc. ("CMPC") and the Carter/Mondale Relection Committee, Inc. ("CMRC") have agreed to the following general provisions which are applicable to MURs 1284, 1361, 1353 and 1389.

VIII. CMPC and CMRC will pay a civil penalty to the Treasurer of the United States in the amount of Thirteen thousand dollars ($13,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

IX. CMPC and CMRC agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this

agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

XII. CMPC and CMRC shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission, except that the repayment required by Paragraph VI.E may be made within ninety (90) days from the date this agreement becomes effective.

Charles N. Steele
General Counsel

Date

BY: _____
Kenneth A. Gross
Associate General Counsel

1/11/83
Date

Carter/Mondale Presidential Committee, Inc.

BY: Douglas B. Sosnik

ITS: Counsel

1/11/83
Date

Carter/Mondale Reelection Committee, Inc.

BY: Douglas B. Sosnik

ITS: Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 16, 1982

Joel D. Joseph, Esquire
Joel Joseph & Associates
4801 Massachusetts Ave., N.W.
Suite 400
Washington, D.C. 20016

RE: MUR 1555
(Sandy McLean)

Dear Mr. Joseph:

On March 2, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 441f, a provision 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 as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Michael Dymersky at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 16, 1982

Margaret P. McCormick, Esquire
Legal Department, AFL-CIO
Room 804
815 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 1353
(Esther Kee)

Dear Ms. McCormick:

On March 2, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 441f, a provision 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 as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Michael Dymersky at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 16, 1982

Douglas B. Huron
Stein and Huron
[illegible]
Washington, D.C. 20009

Re: MURs 1284, 1353, 1361, 1389

Dear Mr. Huron:

On November 30, 1982, the Commission determined there is probable cause to believe that the Carter/Mondale Reelection Committee, Inc. committed violations of the Code of Federal Regulations and determined to take no further action with regard to the violation of 11 C.F.R. § 9004.7(b)(5). On December 14, 1982, the Commission determined to take no further action against the Carter/Mondale Presidential Committee, Inc.'s violation of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A); and approved the sending of the attached conciliation agreement in settlement of MURs 1284, 1353, 1361 and 1389.

If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Judy Thedford at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Douglas B. Huron
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

Re: MURs 1284, 1353, 1361, 1389

Dear Mr. Huron:

On November 30, 1982, the Commission determined there is probable cause to believe that the Carter/Mondale Reelection Committee, Inc. committed violations of the Code of Federal Regulations and determined to take no further action with regard to the violation of 11 C.F.R. § 9004.7(b)(5). On December 14, 1982, the Commission determined to take no further action against the Carter/Mondale Presidential Committee, Inc.'s violation of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A); and approved the sending of the attached conciliation agreement in settlement of MURs 1284, 1353, 1361 and 1389.

If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Judy Thedford at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

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Margaret F. McCormick, Esquire
Legal Department, AFL-CIO
Room 804
815 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 1353
(Esther Kee)

Dear Ms. McCormick:

On March 2, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 441f, a provision 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 as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Michael Dymersky at 523-4057.

Sincerely,

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Joel D. Joseph, Esquire
Joel Joseph & Associates
1801 Massachusetts Ave., N.W.
Suite 400
Washington, D.C. 20016

RE: MUR 1353
(Sandy McLean)

Dear Mr. Joseph:

On March 2, 1982, the Commission found reason to believe that your client had violated 2 U.S.C. § 441f, a provision 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 as it pertains to your client. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Michael Dymersky at 202-4057.

Sincerely,

O.K. TD 3/5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1361, 1353, 1389
Carter/Mondale Relection Committee, Inc.	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on December 14, 1982, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions with respect to the above-captioned matters:

1. With respect to MUR 1353 -

   a) take no further action against Sandy Oreste and close the file as to her;

   b) take no further action against Esther Kee and close the file as to her;

   c) take no further action against the Carter/Mondale Presidential Committee, Inc. with regard to possible violations of 2 U.S.C. §441f and 26 U.S.C. §9042(c)(1)(A), but proceed with the remaining possible violations of 2 U.S.C. §432(c) and 11 C.F.R. §110.4(c)(2); and,

   d) approve and send the notification letters to Sandy Oreste and Esther Kee as recommended in the General Counsel's report dated December 3, 1982.

2. [redacted]

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OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1361, 1353, 1389
	)	
Carter/Mondale Reelection Committee, Inc.	)	
	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

II. FACTUAL AND LEGAL ANALYSIS

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B. MUR 1353 Carter/Mondale Presidential Committee, Inc.

1. Respondent Sandy Oreste (a.k.a. Carolyn McLean and Sandy McLean)

On March 2, 1982, the Commission concluded that there was reason to believe that Sandy Oreste violated 2 U.S.C. § 441f. Her response asserted that as secretary to the Primary Committee's director of fundraising activities, Evan Dobelle, she was exclusively involved in clerical tasks. (Attachment IV). Her clerical duties happened to include the preparation of contributor cards from information on money orders submitted to the Committee by Esther Kee. These money orders are the subject of this MUR and represent funds contributed to the Committee at a fundraiser in New York City.

Oreste's response as well as the factual background so far adduced, make it clear that while she was the only paid Committee

agent actually at the Silver Palace Restuarant fundraiser, she was not involved with the failure of other volunteer Committee agents to keep accurate records of cash contributions made by many attendees. Contributions she accepted, if any, were made entirely by personal check. In addition, Oreste asserts that she had difficulty communicating with the participants of the principally Asian-American event. Moreover, even though she was the only paid Committee agent present, she was not functioning as the individual primarily responsible for overseeing the Committee's benefit. As the organizer of the fundraiser, this function fell to Esther Kee. It is also evident that Oreste was not involved in the purchasing of money orders with the cash proceeds of the fundraiser, nor the placing of names and other information derived from lists of attendees on those money orders. She was merely involved in the preparation of contributor information cards from the money orders previously prepared by Kee and other volunteers, and thereafter submitted to the Committee by Kee.

Available evidence makes it difficult to maintain that Oreste knew that the money orders brought to the Committee by Kee bore names of people who had not contributed - - including waiters and cooks employed by the host restaurant. Therefore, the General Counsel recommends that the Commission take no further action against Oreste, and close the file as to her.

2. Respondent Esther Kee

On March 2, 1982, the Commission concluded that there was reason to believe that Esther Kee violated 2 U.S.C. § 441f. Kee

argues that she neither made contributions in the names of others as the Act and Commission regulations define the offense, nor concealed the identities of cash contributors, deliberately or otherwise, when she placed names of people who were at the Silver Palace Restaurant fundraiser on money orders purchased with the cash proceeds. (Attachment III).

No contrary evidence exits which would dispute the fact that the fundraiser attendees who gained admission to the event by contributing cash did so by using funds from their own personal accounts and in their own names. Therefore, the actual tender of cash at the Silver Palace did not violate 2 U.S.C. § 441f at that point in either its contribution or its acceptance. As the individual principally responsible for the Committee's Silver Palace event, Kee delivered the proceeds derived therefrom to the Committee. These proceeds included cash. Apparently as a recordkeeping tool, the Committee requested Kee to secure moneyorders in place of the cash. On the advice of her husband, an attorney, she agreed. In her efforts to comply, Kee strove to ensure that the actual cash contributors would be aware of her intended actions on their and the Committee's behalf (See affidavits from other volunteers at pp 14-18 of attachment III). And, upon learning the extent of the difficulty she would face in correctly attributing the money orders to the actual cash contributors, Kee quickly compiled the disparate lists of those in attendance at the fundraiser, and made every effort to distinguish those who might have contributed in cash. She did

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her best with the inadequate records and presented money orders to the Committee bearing names and other information of those who attended the event and might have, in her judgment, contributed cash. It is evident from the record that at no time did Kee intentionally act in a way toward the cash proceeds which was inconsistent with the interests of either the actual cash contributors (they wanted their money in what ever form to benefit the Committee) or the Committee (as mentioned above, the money order form was at that time intended to be solely a recordkeeping tool. Indeed, contributor information cards were prepared by Sandy Oreste based on the information on the face of the money orders).

Based on the facts developed from the existing evidence of Kee's actions with respect to the cash (and subsequently money order) proceeds, there appears to be no support in the General Counsel's view for a recommendation of probable cause to believe that Kee violated Section 441f. Therefore, the General Counsel recommends that the Commission take no further action against Kee, and close the file as to her.

3. Respondent Carter/Mondale Presidential Committee

On May 5, 1981, the Commission determined that there was reason to believe that the Primary Committee violated 2 U.S.C. § 441f. In addition, on March 2, 1982, the Commission found reason to believe that the Committee violated 2 U.S.C. § 432(c), 11 C.F.R. § 110.4(c)(2) and 26 U.S.C. § 9042(c)(1)(A)

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the Commission findings in this matter are reflective of the belief that the Committee may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c),

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C. MUR 1389 Carter/Mondale Reelection Committee, Inc.

On November 30, 1982, the Commission found probable cause to believe that the Carter/Mondale Reelection Committee violated 11 C.F.R. §§ 9004.4(b), 9003.3(a)(2)(i) and 9003.5(a). Conciliation was not immediately initiated as the proposed agreement was referred back to the Office of General Counsel for redrafting.

III. DISCUSSION OF CIVIL PENALTY

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IV. RECOMMENDATION

1. With respect to MUR 1353, the Office of General Counsel recommends that the Commission:

a) Take no further action against Sandy Oreste and close the file as to her;

b) Take no further action against Esther Kee and close the file as to her;

c) Take no further action against the Carter/Mondale Presidential Committee, Inc. with regard to possible violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042(c)(1)(A), but proceed with the remaining possible violations of 2 U.S.C. § 432(c) and 11 C.F.R. § 110.4(c)(2); and,

d) Approve and authorize sending of the attached notification letters to Sandy Oreste and Esther Kee.

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Charles N. Steele
General Counsel

December 3, 1982
Date

BY: [signature]
Kenneth A. Gross
Associate General Counsel

Attachments

I.
II.
III
IV.
V.
VI.
VI:

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1361, 1353, 1389
Carter/Mondale Reelection Committee, Inc.	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on November 30, 1982, do hereby certify that the Commission took the following actions with respect to the above-captioned matter:

1.

2. Decided by a vote of 5-0 to

a) Find probable cause to believe that Carter/Mondale Reelection Committee, Inc. violated 11 C.F.R. §§9004.4(b), 9003.3(a)(2)(i) and 9003.5(a); and

b) Take no further action against the Carter/Mondale Reelection Committee, Inc. with respect to the violation of 11 C.F.R. §9004.7(b)(5).

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Aikens was not present at the time of the vote.

Attest:

12/2/82
Date

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

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Carter/Mondale Presidential Committee, Inc.	)	MURs 1284, 1361, 1353, 1389
Carter/Mondale Reelection Committee, Inc.	)	

EXECUTIVE SESSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
1982 NOV 22 AIO: 01

GENERAL COUNSEL'S REPORT

I. BACKGROUND

NOV 30 1982

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[illegible] MUR 1353 is in the investigative stage; MUR 1389 has been briefed and a response brief was filed by Huron in August of this year. This report will discuss each matter and make further recommendations to the Commission.

II. FACTUAL AND LEGAL ANALYSIS

On July 13, 1982, the Commission found probable cause to believe that the Carter/Mondale Presidential Committee, Inc. violated 2 U.S.C. § 441a(f) with respect to MUR 1284 and 2 U.S.C. §§ 441a(f), 434(b)(8), 441b(a) and 11 C.F.R. §§ 104.3(d), 104.11, and 9033.1(a)(1) with respect to MUR 1361. The respondent was sent separate agreements in settlement of these matters.

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B. MUR 1353 Carter/Mondale Presidential Committee, Inc.

1. Respondent Sandy Oreste (a.k.a. Carolyn McLean and Sandy McLean)

On March 2, 1982, the Commission concluded that there was reason to believe that Sandy Oreste violated 2 U.S.C. § 441f. In a response on her behalf (See attachment IV), Joel Joseph asserts that as secretary to the Carter/Mondale Presidential Committee, Inc.'s ("the Committee") director of fundraising activities, Evan Dobelle, Oreste was exclusively involved in clerical tasks. Her clerical duties happened to include the preparation of

contributor cards from information on money orders submitted to the Committee by Esther Kee. These money orders are the subject of the instant MUR, and represent funds contributed to the Committee at a fundraiser in New York City.

Mr. Joseph's response as well as the factual background so far adduced, make it clear that while Oreste was the only paid Committee agent actually at the Silver Palace Restuarant fundraiser, she was not involved with the failure of other volunteer Committee agents to keep accurate records of cash contributions made by many attendees. Contributions she accepted, if any, were made entirely by personal check. In addition, Joseph suggests that language incompatibilities caused Oreste to be unable to communicate with and understand others at the principally Asian-American event. Moreover, even though she was the only paid Committee agent present, she was not functioning as the individual primarily responsible for overseeing the Committee's benefit. As the organizer of the fundraiser, this function fell to Esther Kee. It is also evident that Oreste was not involved in the purchasing of money orders with the cash proceeds of the fundraiser, nor the placing of names and other information derived from lists of attendees on those money orders. She was merely involved in the preparation of contributor information cards from the money orders previously prepared by Kee and other volunteers, and thereafter submitted to the Committee by Kee.

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Available evidence makes it difficult to maintain that Oreste knew that the money orders brought to the Committee by Kee bore names of people who had not contributed - - including waiters and cooks employed by the host restaurant. Therefore, the General Counsel recommends that the Commission take no further action against Oreste, and close the file as to her.

2. Respondent Esther Kee

On March 2, 1982, the Commission concluded that there was reason to believe that Esther Kee violated 2 U.S.C. § 441f. In a response on her behalf, (See attachment III), Margaret McCormick maintains that Kee neither made contributions in the names of others as the Act and Commission regulations define the offense, nor concealed the identities of cash contributors, deliberately or otherwise, when she placed names of people who were at the Silver Palace Restaurant fundraiser on money orders purchased with the cash proceeds.

No contrary evidence exits which would dispute the fact that the fundraiser attendees who gained admission to the event by contributing cash did so by using funds from their own personal accounts and in their own names. Therefore, the actual tender of cash at the Silver Palace did not violate 2 U.S.C. § 441f at that point in either its contribution or its acceptance. As the individual principally responsible for the Committee's Silver Palace event, Kee delivered the proceeds derived therefrom to the Committee. These proceeds included cash. Apparently as a recordkeeping tool, the Committee requested Kee to secure money

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orders in place of the cash. On the advice of her husband, an attorney, she agreed. In her efforts to comply, Kee strove to ensure that the actual cash contributors would be aware of her intended actions on their and the Committee's behalf (See affidavits from other volunteers at pp 14-18 of attachment III). And, upon learning the extent of the difficulty she would face in correctly attributing the money orders to the actual cash contributors, Kee quickly compiled the disparate lists of those in attendance at the fundraiser, and made every effort to distinguish those who might have contributed in cash. She did her best with the inadequate records and presented money orders to the Committee bearing names and other information of those who attended the event and might have, in her judgment, contributed cash. It is evident from the record that at no time did Kee intentionally act in a way toward the cash proceeds which was inconsistent with the interests of either the actual cash contributors (they wanted their money in what ever form to benefit the Committee) or the Committee (as mentioned above, the money order form was at that time intended to be solely a recordkeeping tool. Indeed, contributor information cards were prepared by Sandy Oreste based on the information on the face of the money orders).

Based on the facts developed from the existing evidence of Kee's actions with respect to the cash (and subsequently money order) proceeds, there appears to be no support in the General Counsel's view for a recommendation of probable cause to believe

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that Kee violated Section 441f. Therefore, the General Counsel recommends that the Commission take no further action against Kee, and close the file as to her.

3. Respondent Carter/Mondale Presidential Committee

On May 5, 1981, the Commission determined that there was reason to believe that the Committee violated 2 U.S.C. § 441f. In addition, on March 2, 1982, the Commission found reason to believe that the Committee violated 2 U.S.C. § 432(c), 11 C.F.R. § 110.4(c)(2) and 26 U.S.C. § 9042(c)(1)(A)

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the Commission findings in this matter are reflective of the belief that the Committee may have violated 2 U.S.C. § 441f and 26 U.S.C. § 9042(c),

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C. MUR 1389 Carter/Mondale Reelection Committee, Inc.

On July 8, 1982, a brief stating the position of the General Counsel on the legal and factual issues of this matter was sent to Douglas Huron, counsel for the Carter/Mondale Reelection Committee, Inc. ("the Committee"). The brief recommended that the Commission find probable cause to believe the Committee violated 11 C.F.R. §§ 9004.4(b), 9003.3(a)(2)(i), and 9003.5(a)and to take no further action with respect to the 11 C.F.R. § 9004.7(b)(5) violation. Mr. Huron requested a fifteen day extension which was granted by the Office of General Counsel on July 28, 1982.

The Committee filed a letter dated August 13, 1982 in response to the OGC brief. The Office of General Counsel's position is stated in the July 8, 1982 brief.

The Office of General Counsel recommends finding probable cause to believe that the Carter/Mondale Reelection Committee, Inc. violated 11 C.F.R. §§ 9004.4(b), 9003.3(a)(2)(i), and 9003.5(a) and taking no further action with respect to the Committee's violation of 11 C.F.R. § 9004.7(b)(5).

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III. DISCUSSION OF CIVIL PENALTY

IV. RECOMMENDATION

1. With respect to MUR 1389, the Office of General Counsel recommends that the Commission:

a) Find probable cause to believe that Carter/Mondale Reelection Committee, Inc. violated 11 C.F.R. §§ 9004.4(b), 9003.3(a)(2)(i) and 9003.5(a); and,

b) Take no further action against the Carter/Mondale Reelection Committee, Inc. with respect to the violation of 11 C.F.R. § 9004.7(b)(5).

2. With respect to MUR 1353, the Office of General Counsel recommends that the Commission:

a) Take no further action against Sandy Oreste and close the file as to her;

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b) Take no further action against Esther Kee and close the file as to her;

;

d) Take no further action against the Carter/Mondale Presidential Committee, Inc. with regard to possible violations of 2 U.S.C. § 441f and 26 U.S.C. § 9042.(c)(1)(A); and,

e) Approve and authorization sending of the attached notification letters to Sandy Oreste and Esther Kee.

3.

19 December 1982
Date

Charles N. Steele
General Counsel

Attachments

I.
II.
III.
IV.
V.
VI.
VII.

8304039232

RECEIVED AT THE FEC
Ccc# 8554
82 SEP 29 P12:

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON *
EILEEN M. STEIN

*ADMITTED IN D.C. ONLY

MARYLAND OFFICE
7504 WOODBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

82 SEP 29 P3:21

September 28, 1982

Michael Dymersky, Esquire
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1353

Dear Mr. Dymersky:

Enclosed is an affidavit from Evan Dobelle concerning this matter.

Sincerely,

DOUGLAS B. HURON

8304032

AFFIDAVIT

COUNTY OF BERKSHIRE)
) ss:
STATE OF MASSACHUSETTS)

EVAN S. DOBELLE, being duly sworn, deposes and says:

1. I was the National Finance Chairman of the Carter/Mondale Presidential Committee, Inc.

2. I am aware that the Committee held a fundraiser in the Asian American community in New York City in February 1980. I am also aware that Esther Kee volunteered to coordinate this fundraiser for the Committee.

3. I did not attend the fundraiser in question, but I believe that my secretary, Sandy Oreste, attended it.

4. I was not aware that Mrs. Kee attempted to secure money orders in lieu of cash contributions that had been received in connection with the fundraiser. I did not ask that she do so.

Evan S. Dobelle

EVAN S. DOBELLE

Subscribed and sworn to before me this 22nd day of September, 1982.

Terrence M. Hanlon

Notary Public

My Commission expires: March 14, 1986

S30403925

STEIN & HURON
1010 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20008

Michael Dymersky, Esquire
Federal Election Commission
Washington, D.C. 20463

82 SEP 29 P12:42

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82 OCT 4 P1:

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MARGARET E. MCCORMICK
SPECIAL COUNSEL

MARYLAND OFFICE:
5907 BALTIMORE AVE.
BETHESDA, MD. 20816

VIRGINIA OFFICE:
6065 WESLEY COURT
ANNANDALE, VA. 22003

September 22, 1982

11:2

Mr. Michael Dymersky
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20643

Re: FEC MUR 1353

Dear Mr. Dymersky:

This is to notify you that as of September 20, 1982, I will be joining the Legal Department of the AFL-CIO. I have discussed this change with Mrs. Kee and we have agreed that I will continue to represent her in the above-referenced matter. My new office address will be: Legal Department, AFL-CIO, Room 804, 815 16th Street, N.W., Washington, D.C. 20006. My new phone number will be 202-637-5397. Please send any future correspondence in connection with the above-referenced matter to my new address.

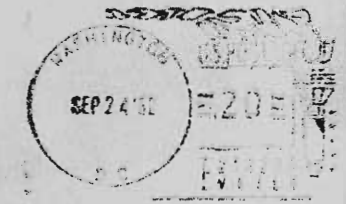
Sincerely,

Margaret E. McCormick

Margaret E. McCormick

8304039237

LAW OFFICES
ZWEIBEL, SCHLOSSBERG, LEIBIG & KAHN
1730 K STREET, N. W.
WASHINGTON, D. C. 20006



Mr. Michael Dymersky
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Bcc# 8536
82 SEP 27 P2:

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ATTORNEYS AT LAW

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(202) 362-6222

75 PUBLIC SQUARE
SUITE 714
CLEVELAND, OHIO 44113
(216) 621-2424

JOEL D. JOSEPH * □ +

OF COUNSEL:

RAYMOND A. OLIVER * ■

STANLEY E. STEIN +

* DISTRICT OF COLUMBIA BAR
□ MARYLAND BAR
+ OHIO BAR
■ NEW JERSEY BAR

82 SEP 27 P3:17

September 20, 1982

Michael Dymersky
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Dymersky,

Re: MUR NO. 1353

As we have discussed I am representing Sandy McLean, who is named in this MUR as Sandy Oreste, her former name.

Ms. McLean did attend a fundraiser for the Carter-Mondale campaign in New York City in February, 1980. However, as secretary to Evan Dobelle, her duties were strictly clerical. Ms. Tricia Segall Davis was coordinator of fundraising for the campaign and Mrs. Kee was responsible for the fundraiser in question.

At the fundraiser, Ms. McLean sat with the volunteers at the will-call table, but she was not much help as she does not speak any asian language. Most of the conversations were not understandable to Ms. McLean and she did not observe anything improper.

The FEC alleges that Mrs. Kee converted cash contributions into money orders without contacting the original contributors. Ms. McLean had no reason to believe that the contributions were not from the persons whose names appeared on the money orders.

Ms. McLean knows Mrs. Kee to be a person of integrity, and still does not believe that she would knowingly violate the laws in question.

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Ms. McLean filled out contributor cards from the information on the money orders. Her function was exclusively clerical.

As a former FEC attorney, I am shocked that the Commission would assume that someone in Ms. McLean's position would have had knowledge that names on money orders were incorrect or unauthorized. By wrongfully accusing Ms. McLean you have put her to great personal expense and inconvenience. I sincerely trust that you will dismiss the matter concerning Sandy McLean and be more careful when accusing a clerical employee of violating federal law.

Sincerely yours,

Joel D. Joseph

8304039233O

GCC #8248

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SPECIAL COUNSEL

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6365 WESLEY COURT
ANNANDALE, VA. 22003

August 11, 1982

The Honorable Frank P. Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

82 AUG 11 AM 11:43

Re: FEC MUR 1353
(Esther Kee, Respondent)

Dear Chairman Reiche:

On July 23, 1982, Mrs. Esther Kee responded to the Commission's Notice, dated May 19, 1982, that it had "reason to believe" that Mrs. Kee had violated 2 U.S.C. §441f by making contributions in the names of other persons. Our response made clear that Mrs. Kee did not violate §441f when, in the course of her volunteer service to the Carter/Mondale campaign, she accepted legal cash contributions from individual contributors to a fundraising event and later, along with several other volunteers, purchased money orders with those contributions. Rather, as our response indicates, Mrs. Kee at all times acted in a manner consistent with what she believed to be the intent of the original contributors and the Carter/Mondale Committee; she did not "convert" the contributions in question to her own use; and neither she nor anyone else engaged in any conduct cognizable under §441f.

Subsequent to the filing of the aforementioned letter of response, the General Counsel's Office for the first time -- despite the already lengthy history of this matter - raised the question of how and by whom the costs of the money orders purchased by Mrs. Kee and several other volunteers were paid.

The purpose of the General Counsel's inquiry is far from clear since the issue of who paid the fees for the money orders purchased by Mrs. Kee and other volunteers is irrelevant to the Commission's allegation that Mrs. Kee violated §441f. Furthermore, regardless of the purpose behind this request, the Office of General Counsel's failure to seek this information until now is contrary to the Commission's own procedures, procedures which require that respondents be informed not only of the nature of their alleged violation but also of the "legal basis and alleged facts" that support the Commission's determination that a violation may have occurred. 11 C.F.R. 111.8(b). Hence, the General Counsel's delay in raising this issue threatens Mrs. Kee's right to both procedural and substantive due process.

Nonetheless, in the interests of resolving this matter without further delay and without waiver of any of her rights as set forth above, Mrs. Kee has determined to respond to the General Counsel's question.

To the best of her recollection, Mrs. Kee paid for the costs of the money orders that she and several volunteers purchased with the cash contributions from the Silver Palace event out of a small petty cash fund that she established out of her personal funds to cover the incidental costs of organizing that event. Following the event, Mrs. Kee requested and received reimbursement for her petty cash expenses (including the cost of purchasing the money orders) from the Carter/Mondale Committee.

The cost of the money orders that Mrs. Kee and her volunteers purchased was minimal: as the attached letter verified by the Manhattan Savings Bank indicates, the fee for each money order was 25 cents. While neither the record nor Mrs. Kee's recollection is clear as to the exact number of money orders purchased representing the contributions from the Silver Palace event, the total fees at issue could not have exceeded $22.75 ($9,100 in $100 money orders x 25 cents = $22.75).

Since the General Counsel's factual and legal analysis upon which the Commission's reason-to-believe determination is predicated fails to propound any theory under which the payment of money order fees is relevant to Mrs. Kee's alleged violation of 2 U.S.C. §441f and since Mrs. Kee has been given no other notice of the relevance of the information sought, Mrs. Kee is limited in her ability to respond further by way of legal rebuttal. Should the General Counsel's Office choose to develop such a theory and afford Respondent proper notice, we would be pleased to respond further.

For the reasons set forth in our response dated July 23, 1982 and those herein, the Commission should take no further action in this matter and should close the case against Mrs. Kee.

Respectfully submitted,

Margaret E. McCormick

Margaret E. McCormick
Attorney for Respondent
Esther Kee

MEMcC:ifc
Attachment

6 cc #8248

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3045 WESLEY COURT
ANNANDALE, VA. 22003

August 4, 1982

2 AUG 11 AM : 43

Mr. McKinley Askew
Supervisor
Manhattan Savings Bank
99 Park Avenue
New York, New York 10016

Dear Mr. Askew:

This letter is to request written confirmation of the information which you conveyed to me during our telephone conversation today, viz, that in March 1980 the Manhattan Savings Bank charged a flat fee of 25 cents ($0.25) per money order for money orders of any amount up to $500.00(the highest amount in which the Bank issues a money order).

Please send such confirmation to me at the address listed above. Since I need the Bank's confirmation of the above-mentioned information immediately, I would greatly appreciate a reply by return mail.

Thank you very much for your assistance in this matter.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick

MEM/bj

August 5, 1982

Dear Ms. McCormick:

The above information is true and correct pertaining to the 25 cents flat fee that this bank charged for money orders issued in March 1980.

Very truly yours,

McKinley Askew
Bank Floor Supervisor

The Manhattan Savings Bank
99 PARK AVENUE
NEW YORK, NEW YORK 10016

LAW OFFICES
ZWERDLING, SCHLOSSBERG, LEIBIG & KAHN
1730 K STREET, N. W.
WASHINGTON, D. C. 20006

▼

The Honorable Frank P. Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

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RECEIVED
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JUL 26 2 03

July 23, 1982

The Honorable Frank P. Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Dear Chairman Reiche:

This letter constitutes the response of Mrs. Esther Kee to the Commission's Notice, dated May 19, 1982, stating that the Commission had determined that there was reason to believe that Mrs. Kee violated 2 U.S.C. §441f by making contributions in the names of other persons.

I. SUMMARY OF RESPONSE

A. Facts

Mrs. Esther Kee was a volunteer who coordinated, on short notice, a political reception for members of the Asian-American community in New York City. The tickets were $100 each. A number of contributors paid for their tickets in cash. Because of language problems, logistical difficulties and Secret Service pressure, the system set up to ensure the collection of contributor data and the correlation of that data to contributions partially broke down. Nine Thousand One Hundred dollars ($9,100) of the proceeds of the event were in the form of cash received from contributors.

Mrs. Kee tendered the proceeds to the campaign following the event. Sometime later, the campaign asked Mrs. Kee to secure money orders in lieu of the cash contributions collected at the event. The reason given for the campaign's request was that it would create a better record of the contributors and that the campaign did not want a lot of cash lying around. Mrs. Kee and several volunteers purchased money orders with the cash contributions, in $100 denominations. They then filled in the contributor names and other information based on the best available data, and submitted the instruments to the campaign.

The funds in question did not come from and are not alleged to have originated with Mrs. Kee. The funds came instead from individual contributors who voluntarily and knowingly gave them to the campaign for which Mrs. Kee was serving as a collecting agent. Mrs. Kee did not, after receiving the funds

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convert them to her own use; nor at any time did she do with the funds anything whatever which was inconsistent with the donative purpose of the contributors.

B. General Counsel' Theory

In light of the foregoing, essentially undisputed facts, the basis for the allegation that a contribution was made by Mrs. Kee in the name of another is difficult to suppose. The General Counsel's apparent theory is that when the Committee asked Mrs. Kee to obtain money orders, in lieu of cash (which the General Counsel characterizes as a "rejection"), Mrs. Kee's compliance with that request somehow changed the cash contributions to Mrs. Kee's own funds and rendered the money orders she purchased her money, therefore rendering the identification of the contributors on those money orders a sham to cover the use of her money.

C. Summary of Argument

The General Counsel's theory is factually and legally without foundation. The monies in question undisputedly came from and at all times represented the donations of individual contributors to the campaign. The facts, set out in more detail at Section II below, clearly show that the funds never belonged to, became the property of, or were treated by Mrs. Kee as her funds. The money orders she purchased in lieu of the contributions did not as a matter of fact and, under the legislative intent, commission regulations and precedent, could not as a matter of law constitute contributions by Mrs. Kee in the name of another. The legal analysis is set forth in detail at Section III, below.

II. STATEMENT OF FACTS

During the 1980 Presidential primary campaign, Esther Kee, a leader in the Asian-American community, served in a volunteer capacity as the Democratic National Committee's liaison with Asian-Americans. The Asian-American community with which Mrs. Kee was concerned included, among others, such diverse linguistic and cultural groups as Chinese Americans, Japanese-Americans, Korean-Americans, Indian-Asian-Americans, and Filipino-Americans.

On occasion, Mrs. Kee also volunteered her services to the Carter/Mondale Committee. As with the DNC, Mrs. Kee's work with the Carter/Mondale Committee primarily involved liaison with the Asian-American community. Early in 1980, Mrs. Kee requested the Carter/Mondale campaign to hold an event featuring Rosalynn Carter for the Asian-American community in New York City. (Kee Dep. 7-8). In her mind, the primary purpose of the event was to involve the Asian-American community in the political process rather than to raise money for the Carter campaign. (Kee Dep.

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19-20). In February of 1980, the Carter/Mondale Committee advised Mrs. Kee that Mrs. Carter would be available to attend a fundraising event in Chinatown at the Silver Palace Restaurant in New York City on February 21, 1980. Mrs. Kee agreed to organize the event. (Kee Dep. 9).

Prior to the event, Mrs. Kee and the Carter/Mondale Committee had several discussions about what the event tickets should cost. At first, the Committee wanted to set the admission price at $500.00 per person. Mrs. Kee, however, persuaded the Committee that $500.00 was unacceptable not only because she felt it was too high, but also because she learned during her discussions with the Committee that cash contributions could only be accepted up to $100 and that contributions over $100.00 had to be by check. Mrs. Kee explained to the Committee that many Asian-Americans do not have checking accounts because, among other things, they do not understand how to write the figures. (Kee Dep. 11-12). It was therefore agreed that the ticket price of the event would be set at $100.00.

At the time Mrs. Kee organized the Silver Palace event, she knew very little about the requirements of the Federal Election Campaign Act. She was told by the Committee that cash contributions could be accepted up to $100.00, but checks were required above that. (Kee Dep. 11). She was also told by the Committee that it needed contributor information for those individuals buying tickets to the event and was provided with contributor cards. But she knew nothing about how the matching fund process worked or that the FECA required certain documentation for contributions submitted for matching funds. In fact, she believed that only large contributions could be matched and that contributions of only $100.00 were too low for matching. (Kee Dep. 43). Mrs. Kee did not discuss the FECA's matching fund requirements with anyone at the Carter/Mondale Committee nor was there any discussion of whether the contributions from her event would be matched. (Kee Dep. 43).

By the time the event was approved by the Carter/Mondale Committee, Mrs. Kee had only two weeks in which to organize it. Because of the short time period involved, it was impossible to mail out invitations to the event. Instead, Mrs. Kee organized a loose committee of contact people from various parts of the Asian-American community in New York City to help invite people to the event. These individuals, like Mrs. Kee, were all volunteers and were not familiar with the requirements of the FECA. Each of Mrs. Kee's contact persons was given invitations to the event. They were then asked to invite people from their part of the community to attend and to call in information about how many people they had coming to the fundraiser. (Kee Dep. 9, 18-20).

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Replies to the invitations were handled by phone. Mrs. Kee and several volunteers set up a temporary office. The contact persons then called in to these volunteers with information on how many invitations they had sold and the names of the individuals who were coming. The office volunteers in turn took that information and constructed rough attendance lists by table. A separate list was kept for those persons invited by each contact person.

At some point during this process, Mrs. Kee was informed that the Secret Service required a list of everyone who would be attending the event, including staff, with the name, date of birth, and social security number of each such person. In order to get that information, Mrs. Kee had her volunteers re-contact each contact person and ask them to get the needed information.

Time being short, when it came time for the Secret Service list to be compiled, Mrs. Kee simply attached together all of her separate table lists (those compiled from information provided by the contact persons), plus a list provided by the owner of the Silver Palace Restaurant containing his employees' names, birthdates, and social security numbers. Thus, on the day of the event, Mrs. Kee only had one complete list - a list compiled by tacking together the names on a number of separate working lists, with the Secret Service information added to it. (Kee Dep. at 33).

Mrs. Kee made every effort to obtain contributor information from all of the persons contributing to the event. Since tickets for the event could not be printed in time to send them out in advance, Mrs. Kee arranged to give them out at the door from a "will-call" desk. Tickets were placed in envelopes with the name of the contributor on the outside and a contributor card inside. Volunteers who were taking payments and giving out tickets were told to fill out a contributor card for each contributor and to then put the contribution and the card back in the envelope that had been used for the contributor's ticket. (Kee Dep. at 38-39).

Despite these instructions, however, the contributor information obtained at the event was incomplete. This happened for two reasons:

First, because of some confusion over the arrangement of ticket envelopes at the "will-call" desk. Tickets at the desk were arranged alphabetically under the contributors' last name. Certain nationalities, however, customarily reverse a person's first and last name. (Kee Dep. 23-24). Because of this custom, there was a great deal of confusion about whether an envelope with two names - for example, one marked "Shin Lee" - contained

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tickets for Mr. Lee or Mr. Shin. Because of this confusion, many people who had reserved tickets were initially told that there were no tickets for them.

Second, just as the above problem was beginning to get straigtened out, the Secret Service came in and told the volunteers that everyone had to go upstairs right away. In order to comply, the volunteers were forced to simply hand the contributor cards to individual contributors and ask them to bring them back filled out. Thus, because of the sudden rush in processing the attendees at the event, the system for placing each contribution in an envelope marked with the contributor's name broke down.

After the event, Mrs. Kee took the receipts which included a large number of cash contributions and some checks, the contributor cards, and her list of attendees (which doubled as the Secret Service list) to the Carter/Mondale Committee, where she turned them over to a woman there. Sometime later, someone at the Committee contacted Mrs. Kee and asked her to get money orders in lieu of the cash contributions so that it would be easier for the Committee to list the contributors and because the Committee didn't want a lot of cash hanging around. (Kee Dep. 30-31).

Mrs. Kee then called her contact people (the individuals from various Asian- American communities who had helped her organize the event) and asked them for permission to buy money orders with the cash contributions given by people they had invited. Instead of doing that, the contact persons gave Mrs. Kee their permission to buy money orders for their guests who paid in cash. Mrs. Kee also asked at least some, if not all, of her contact people to tell the individuals who made cash contributions that she was going to buy a money orders on their behalf. (See attached affidavits). Finally, Mrs. Kee asked her husband, an attorney, whether it would be proper to sign the names of people who contributed to the event on the money orders. He told her it would be proper. (Kee Dep. at 69). After these contacts, Mrs. Kee asked several volunteers to buy money orders in denominations of $100.00 with the cash she received from the Carter/Mondale Committee.

Based on her conversations with the contact persons and her husband, Mrs. Kee believed that it was both legal and proper for her to buy money orders with the cash contributions given to her by the Carter/Mondale Committee and sign them in the names of the contributors to the Silver Palace event. She also felt comfortable with doing that because it is customary in the Asian-American community for one individual to sign another's signature, since many people can not write their signatures in English letters. For example, when Mrs. Kee worked as a travel agent she often signed her customers' checks for them. (Kee Dep. 12).

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After the money orders were purchased, Mrs. Kee directed her volunteers to begin what was to her simply a mechanical process - the filling out and signing the $100 money orders in the names of people who attended the event, and who - based on the best information available from her working lists, the Secret Service list, and what Mrs. Kee and her volunteers could recollect - bought their tickets in cash. After the money orders were filled out, Mrs. Kee delivered them along with a contributor list, completed to the best of her ability, to the Carter/Mondale Committee.

III. ARGUMENT

A. A Violation Of §441f Requires That A Person Make A Contribution In The Name Of Another Person; Mrs. Kee Made No Contribution Whatever And Hence Made No Contribution In The Name Of Another.

The Commission has found reason to believe that Esther Kee violated §441f of the Federal Election Campaign Act of 1971 (FECA), as amended. That section provides, in relevant part, that:

> "No person shall make a contribution in the name of another person" 2 U.S.C. §441f (emphasis added).

Thus by its own terms the conduct prohibited by §441f is the making of a contribution by one person in another person's name.

1. The Maker Of A Contribution Is The Person Who Supplies The Funds.

While the term "make" is not defined in §441f or elsewhere in the Act, it is clear from the context in which it is used both in §441f and in other sections of the Act, that the term refers to an act involving the payment of funds or provision of something of value for the purpose of influencing an election. See, e.g., 2 U.S.C. §431(8)(A). Accordingly, the Commission has taken the position in previous MURs involving §441f that the maker of a contribution is the person who supplies the funds or payment for the contribution. See, e.g., MUR 256-2, General Counsel's Report (dated 4/12/77) at 2, ("...the person supplying the funds is the person making the contribution"); see also, General Counsel's Brief (Jan. 14, 1981) in MUR 1053 at 5 ("[s]ince the funds contributed to the Committee were the personal funds of the contributor, there is no evidence that [X] made a contribution in the name of [another]").

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2. Mrs. Kee Did Not Supply The Funds In Question And Hence Did Not Make A Contribution Within The Meaning Of §441f.

a. The funds in question did not originate with or belong to Mrs. Kee.

There is no evidence in the record nor does the General Counsel even contend that Mrs. Kee supplied from her personal funds, the money which was contributed to the Carter/Mondale Committee at the Silver Palace event on February 21, 1980. To the contrary, the record clearly shows and the General Counsel's report concedes[1] that the cash contributions that were made to the Carter/Mondale Committee at the Rosalynn Carter event were made by the attendees at that event "in their own names, with funds from their own personal accounts" and that Mrs. Kee accepted those contributions as an agent of the Committee and thereafter transmitted the contributions to the Carter/Mondale Committee. Thus by the General Counsel's own admission, the facts show that the contributions received at the Silver Palace on February 21, 1980 were contributions from the personal funds of the contributors in their own names. Since Mrs. Kee did not make the "contributions" that were received at the Silver Palace event from her funds in her name or anyone else's, the allegation that Mrs. Kee violated §441f by "making a contribution in the name of another" must fail.

Notwithstanding the absence of any evidence of a contribution made by Mrs. Kee and the clear evidence in the record that Mrs. Kee merely served as a collecting agent for contributions given to the Carter/Mondale Committee, the General Counsel nonetheless maintains that Esther Kee violated §441f. The General Counsel's theory as to how this violation could have occurred in the absence of any contribution by Mrs. Kee is not clearly articulated in his Factual and Legal Analysis. It is clear from that analysis that the Commission does not contend that Esther Kee "made a contribution in the name of another" when she accepted contributions for the Carter/Mondale Committee from the attendees at the Silver Palace event and turned those contributions over to the Committee.

Instead, the Commission's argument appears to be that Esther Kee "made a contribution in the name of another" when she used the $100.00 cash contributions, at the Carter/Mondale Committee's request, to buy money orders in the same amount, signed what she believed to be the

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[1] At 4.

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contributors' names to those money orders and returned them to the Committee without the specific approval of the original contributors.

b. Mrs. Kee did not convert the contributors' money to her use.

The record clearly shows and the General Counsel concedes that the funds that Mrs. Kee used to buy the money orders which she subsequently delivered to the Carter/Mondale Committee came from the cash contributions to the Silver Palace event. In order to avoid the problem that Mrs. Kee never made a contribution, however, the General Counsel is forced to argue that Mrs. Kee "converted" those cash contributions when she used them to buy money orders without the original contributors' permission. This argument totally lacks support both in law and fact.

It is well-established that "conversion" means:

> "An unauthorized assumption and exercise of the right of ownership over goods or personal chattels belonging to another to the alteration of their condition or the exclusion of the owner's rights." Black's Law Dictionary at 402.

It is also well-established that the act of conversion requires a "positive wrong or act of malfeasance." Id.

The "conversion" argument fails at the outset because Mrs. Kee never assumed or exercised ownership rights over the cash contributions. She merely acted as a collecting agent for those contributions. Once they were collected at the Silver Palace event, she delivered them, along with the other receipts, to the Carter/Mondale Committee where they were accepted by a Committee employee. At that point, the contributions became the property of the Carter/Mondale Committee. Subsequently, the Committee asked Mrs. Kee to take the cash contributions and secure money orders with them. She complied with the Committee's request to the best of her ability and then returned the money orders to the Committee. Thus, at all times, Mrs. Kee acted in accordance with the wishes of the owners of the cash contributions: first, by tendering those contributions to the Carter/Mondale Committee as the original contributors intended; later, by securing money orders with the cash contributions at the request of the Carter/Mondale Committee. Since Esther Kee never assumed any ownership rights vis-a-vis the cash contributions, she could not, as a matter of law, have converted those contributions.

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Furthermore, the record is devoid of any evidence, nor does the General Counsel even contend, that Mrs. Kee used the cash contributions for her own purposes. She didn't for example, use the money to make a contribution in her own name; nor did she use it to buy a mink coat. Instead, the record clearly reflects that Mrs. Kee made every effort to use the money that was contributed at the Silver Palace event as its original owners intended -- as contributions to the Carter/Mondale campaign.

Nor did Mrs. Kee alter the nature or condition of the contributions given to the Carter/Mondale Committee in a manner that was inconsistent with the rights or intent of the original owners of the funds -- i.e., the contributors. In fact, the record demonstrates precisely the opposite, i.e., that Mrs. Kee's use of the cash to buy money orders was intended to facilitate the original owners' intent to make contributions to the Carter/Mondale Committee.

Finally, the General Counsel does not allege, nor does the record support, that Mrs. Kee ever had any intent to use the cash contributions for her own purposes or in a manner inconsistent with the desires of the original contributors. In this regard, Mrs. Kee's actions speak for themselves. The record clearly shows that Mrs. Kee' s only motive in buying the money orders with the cash contributions was to facilitate the return of the contributions to the Carter/Mondale Commitee so that the money could be used for the purposes intended by the original contributors. It also shows that Mrs. Kee acted only after she received what she believed to be sufficient authorization from persons acting on behalf of the original contributors to buy money orders for those contributors. The record (see attached affidavits) also reflects that Mrs. Kee asked her contact persons to notify the contributors that she was going to buy money orders on their behalf.

Thus, even when it is viewed in the most favorable light, the General Counsel's argument that Esther Kee "converted" the cash contributions by buying money orders with them fails for lack of support in either law for fact. For regardless of how one characterizes Mrs. Kee's actions in buying the money orders and signing the contributors' names to them, it is clear that her intent was to carry out what she believed to be the desires of the contributors. Mrs. Kee therefore lacked the "evil" intent that is required for an act of conversion.

And, since Mrs. Kee did not "convert" the contributions and therefore did not "make" a contribution when she returned the money orders to the Committee, the

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Commission's allegation that Esther Kee violated §441f by making contributions in the name of other persons also fails.

B. The Purpose Of Section 441f Is To Prevent Deliberate Evasion Of The Act's Contribution Limits And Disclosure Requirements. Application Of §441f To Mrs. Kee's Conduct Is Inconsistent With The Commission's Interpretation Of The Meaning And Purpose Of That Provision.

1. The Purpose of Section 441f Is To Prevent Deliberate Evasion Of The Act's Contribution Limits And Contributor Disclosure Provisions

It is clear from the limited legislative history of §441f that §441f (and its predecessor 18 U.S.C. §614) was intended to prevent deliberate evasion of the Act's disclosure requirements and contribution limits resulting from the channeling of contributions to a candidate or political committee through an undisclosed intermediary or conduit.

The Conference Report on the 1974 Amendments to the Act clearly identifies this statutory purpose:

> "The bill prohibits contributions in the name of another and provides that, for purposes of limitations and reporting requirements, any contribution by a person which is earmarked or directed through an intermediary or conduit to a candidate shall be treated as a contribution from such person to that candidate." Legislative History Of The 1974 Amendments To The FECA, at 639.

Consistent with the legislative intent of §441f, the Commission's regulations provide that examples of "contribution in the name of another" include:

> "(i) giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of the money or the thing of value to the recipient candidate or committee at the time the contribution is made. See 110.6 (a reference to the Commission's regulation on earmarked contributions); or

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> (ii) making a contribution or money or anything of value and attributing the source of the money or thing of value [to] another person when in fact the contributor is the source."

Thus under the Commission's own interpretation, "making a contribution in the name of another" applies to two situations: (1) a situation in which a person takes money from someone else and gives it as a contribution in his or her name without disclosing that the funds came from someone else - the "true contributor"; or (2) a situation in which the true contributor takes his or her money and contributes it in someone else's name. In either case, the conduct described represents a deliberate attempt to evade the provisions of the FECA.

A review of the enforcement history of Section 441f further demonstrates that the Commission has interpreted that provision as reaching only situations in which persons deliberately tried to evade either the Act's contribution limits or disclosure provisions (or both) by channeling their contributions through a conduit or intermediary. See, e.g., FEC MURs Nos. 256, 397, 373, 970, 1181.

2. <u>The Commission Has Properly Refused To Apply §441f In Circumstances Where The Conduct Was Unintentional Or The Result Of Mistake Or Mere Negligence</u>.

In contrast, the Commission has declined to find a violation of Section 441f in cases in which the conduct involved, i.e., the alleged contribution in the name of another, was unintentional - the result of a mistake. For example, in MUR 405, the Commission decided that a number of individuals who collected contributions from other persons, deposited the money into their personal accounts, and wrote a check in their name for the entire amount and then sent that check to the political committee along with a list of the contributors (which the committee then lost) did not violate §441f.

More importantly, the Commission declined to find a §441f violation in a case in which the mother of a candidate provided funds to that candidate who then loaned the money in his name to his campaign committee on the grounds that application of §441f to such a situation (a case of good faith mistake) would require "a more novel, tenous theory of the reach of §441f". See Counsel's Report, 9/25/79, MUR 659.

The Commission's enforcement of §441f thus confirms that the provision was intended to reach only intentional and deliberate efforts to evade the FECA through the making of contributions by one person in the name of another person.

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3. Application Of §441f To Mrs. Kee's Conduct Is Inconsistent With The Commission's Interpretation Of The Purpose Of That Provision Since Mrs. Kee Acted In Good Faith And Without Any Intent To Evade The Act.

In the instant case, not only is the prohibited conduct absent but so is the deliberate (and thus prohibited) intent which the Commission has found to be a prerequisite to finding a violation of Sec. 441f. It is neither alleged nor does the record show any evidence that Esther Kee either made contributions from her personal funds in the names of other persons or that she gave her money to another person to contribute in that person's name.

Nor is it alleged or evidenced by the facts that Mrs. Kee in any way tried to conceal the true identity of the cash contributors in order to evade the contribution limits or disclosure provisions of the Act. To the contrary, the record clearly shows that Mrs. Kee at all times intended and at all times acted for one purpose only and that was to transmit the contributions which she collected at the Silver Palace event to the Carter/Mondale Committee in the names of those individuals whom she believed to have made cash contributions to the event.

She may not have totally succeeded in this goal. But her lack of success stemmed not from any deliberate act on her part but from an unfortunate but understandable confusion of the contributor lists with a Secret Service list which also included the names of restaurant personnel who attended the event but did not contribute. The apparent confusion in some of the contributor names on the money orders filled out by Mrs. Kee and her volunteers thus flowed from a partial breakdown in the recordkeeping system, and not from a deliberate intent on the part of Mrs. Kee or any one else to conceal the identity of the cash contributors.

IV. CONCLUSION

Since Mrs. Kee neither "made a contribution in the name of another" as the statute and the Commission has defined that offense nor deliberately concealed the identity of the contributors of the cash contributions received at the Silver Palace event - either when they were contributed at the fundraising event or subsequently when she bought money orders with those contributions and filled them out in what she believed to be the names of the cash contributors to her event - there is no basis, either factual or legal, for the Commission's determination that there is reason to believe that Mrs. Kee violated 2 U.S.C. §441f. Furthermore, in view of the Commission's previous determinations that §441f is not violated where a contribution is attributed to the wrong person as the

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result of a good faith mistake (e.g., MUR 659), the Commission's application of §441f to Mrs. Kee's conduct is both improper and unjust.

Accordingly, I respectfully request that the Commission take no further action on this matter and that the case against Mrs. Kee be closed.

Respectfully submitted,

Margaret E. McCormick

Margaret E. McCormick
Attorney for Respondent
Esther Kee

MEM:ifc
Attachments

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AFFIDAVIT

STATE OF NEW YORK)
CITY OF NEW YORK) SS:

I, NORMAN LAU KEE, being duly sworn, depose and say:

That I participated as one of Asian-American Committee members with Mrs. Esther Kee at the event for Roslyn Carter in 1980 at Silver Palace Restaurant, New York, New York.

That I received a telephone call after the event from Mrs. Esther Kee telling me that the Carter/Mondale Committee asked us to buy money orders for some of the guests who paid cash at the event when they picked up their tickets.

That I trusted Mrs. Esther Kee and I gave her permission to buy the money orders for some of my guests who attended and paid cash at the door.

That Mrs. Esther Kee advised me to notify my guests that money orders would be bought in their behalf. I made an attempt to contact many of the guests.

That I was aware that Mrs. Kee purchased the money orders for some of my guests of the event who paid cash at the door.

Norman Lau Kee

Sworn to before me at New York,
N.Y., on this 22 day of July, 1982.

Notary Public

GLENN LAU KEE
NOTARY PUBLIC, STATE OF NEW YORK
No. 31-4601726
Qualified in New York County
Term Expires March 30, 1984

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AFFIDAVIT

STATE OF NEW YORK)
CITY OF NEW YORK) SS:

I, CHARLES KIM, being duly sworn, depose and say:

That I participated as one of Asian-American Committee members with Mrs. Esther Kee at the event for Roslyn Carter in 1980 at Silver Palace Restaurant, New York, New York.

That I received a telephone call after the event from Mrs. Esther Kee telling me that the Carter/Mondale Committee asked us to buy money orders for some of the guests who paid cash at the event when they picked up their tickets.

That I trusted Mrs. Esther Kee and I gave her permission to buy the money orders for some of my guests who attended and paid cash at the door.

That Mrs. Esther Kee advised me to notify my guests that money orders would be bought in their behalf. I made an attempt to contact many of the guests.

That I was aware that Mrs. Kee purchased the money orders for some of my guests of the event who paid cash at the door.

8304039230

Sworn to before me at New York,
N.Y., on this 22 day of July, 1982.

Notary Public

GLENN LAU-KEE
NOTARY PUBLIC, STATE OF NEW YORK
No. 31-4631483
Qualified in New York County
Term Expires March 30, 1984

AFFIDAVIT

STATE OF NEW YORK)
CITY OF NEW YORK) SS:

I, DANNY MARK, being duly sworn, depose and say:

That I participated as one of Asian-American Committee members with Mrs. Esther Kee at the event for Roslyn Carter in 1980 at Silver Palace Restaurant, New York, New York.

That I received a telephone call after the event from Mrs. Esther Kee telling me that the Carter/Mondale Committee asked us to buy money orders for some of the guests who paid cash at the event when they picked up their tickets.

That I trusted Mrs. Esther Kee and I gave her permission to buy the money orders for some of my guests who attended and paid cash at the door.

That Mrs. Esther Kee advised me to notify my guests that money orders would be bought in their behalf. I made an attempt to contact many of the guests.

That I was aware that Mrs. Kee purchased the money orders for some of my guests of the event who paid cash at the door.

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Danny Mark

Sworn to before me at New York,
N.Y., on this 22 day of July, 1982.

Glenn Lau-Kee
Notary Public

GLENN LAU-KEE
NOTARY PUBLIC, STATE OF NEW YORK
No. 31-4631483
Qualified in New York County
Term Expires March 30, 1984

AFFIDAVIT

STATE OF NEW YORK)
CITY OF NEW YORK) SS:

I, STEVE LEUNG, being duly sworn, depose and say:

That I participated as one of Asian-American Committee members with Mrs. Esther Kee at the event for Roslyn Carter in 1980 at Silver Palace Restaurant, New York, New York.

That I received a telephone call after the event from Mrs. Esther Kee telling me that the Carter/Mondale Committee asked us to buy money orders for some of the guests who paid cash at the event when they picked up their tickets.

That I trusted Mrs. Esther Kee and I gave her permission to buy the money orders for some of my guests who attended and paid cash at the door.

That Mrs. Esther Kee advised me to notify my guests that money orders would be bought in their behalf. I made an attempt to contact many of the guests.

That I was aware that Mrs. Kee purchased the money orders for some of my guests of the event who paid cash at the door.

8304039233

Sworn to before me at New York, N.Y., on this day of July, 1982.

Notary Public

AFFIDAVIT

STATE OF NEW YORK)
CITY OF NEW YORK) SS:

I, JAMES YING, being duly sworn, depose and say:

That I participated as one of Asian-American Committee members with Mrs. Esther Kee at the event for Roslyn Carter in 1980 at Silver Palace Restaurant, New York, New York.

That I received a telephone call after the event from Mrs. Esther Kee telling me that the Carter/Mondale Committee asked us to buy money orders for some of the guests who paid cash at the event when they picked up their tickets.

That I trusted Mrs. Esther Kee and I gave her permission to buy the money orders for some of my guests who attended and paid cash at the door.

That Mrs. Esther Kee advised me to notify my guests that money orders would be bought in their behalf. I made an attempt to contact many of the guests.

That I was aware that Mrs. Kee purchased the money orders for some of my guests of the event who paid cash at the door.

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Sworn to before me at New York,
N.Y., on this 22nd day of July, 1982.

Wonnor Yee
Notary Public

WONNOR YEE
NOTARY PUBLIC, STATE OF NEW YORK
No. 41-4505192
Qualified in Queens County
Certificate filed in New York County
Commission Expires March 30, 1983

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LAW OFFICES
ZWERDLING, SCHLOSSBERG, LEIBIG & KAHN
1730 K STREET, N. W.
WASHINGTON, D. C. 20006

The Honorable Frank P. Reiche
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

ATTENTION: MICHAEL DYMERSKY
Office of General Counsel

Cert 8084

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BETHESDA, MD. 20816

VIRGINIA OFFICE:
6315 WEBLEY COURT
ANNANDALE, VA. 22003

July 8, 1982

FEC MAIL CENTER
JUL 8 4:06

Michael Dymersky, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1353

Dear Mr. Dymersky:

This letter is to notify you that I have been retained to act as counsel for Mr. [redacted] in the above-referenced matter and that I am authorized to receive any notifications and other communications from the Commission and to act on her behalf before the Commission. My business telephone number is 223-6373; my business address is Zwerdling, Schlossberg, Leibig & Kahn, 1730 K Street, N.W., Suite 713, Washington, D.C. 20006.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick

MTL:ifc

AGREED TO:

Esther G. Kee

Esther G. Kee
2201 L Street, N.W.
Washington, D.C. 20036
Home Phone: 202-223-4995
Work Phone: 202-466-6124

Date: July 8, 1982

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1981

Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

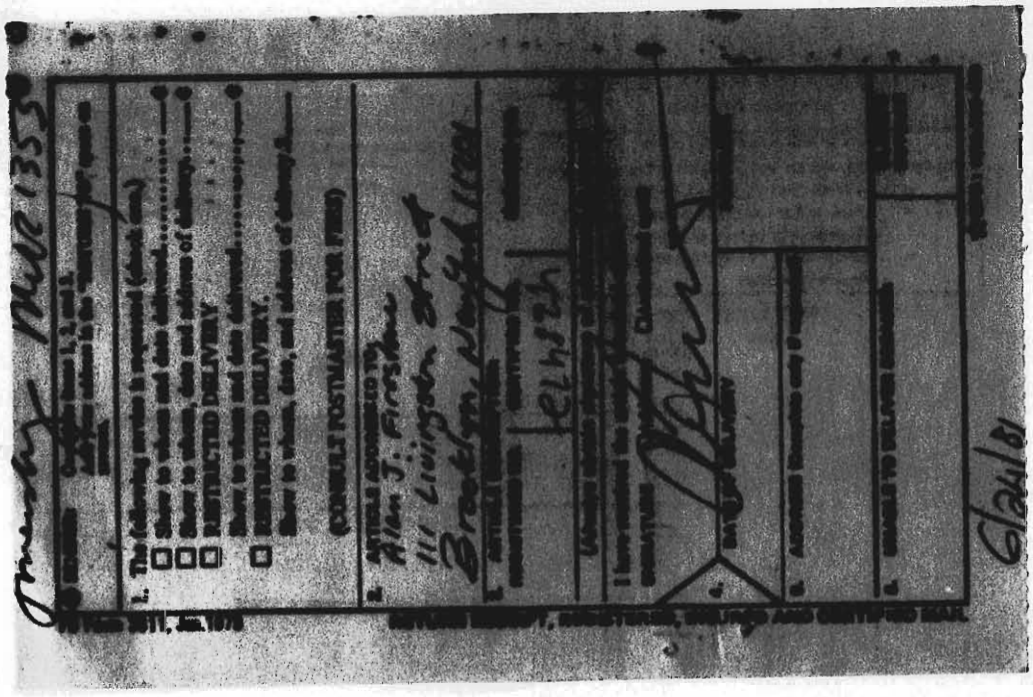
Re: MUR 1353

Dear Ms. Oreste:

This is to confirm our telephone conversation of today, July 7, 1981, concerning your deposition in the above-referenced matter. Your appearance is rescheduled for July 15, 1981, at 10:00 a.m. at the Office of General Counsel, Federal Election Commission.

Sincerely,

Scott E. Thomas
Assistant General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1982

MEMORANDUM

TO: Fred Eiland
Chief, Press Branch
(FOIA Officer)

THROUGH: B. Allen Clutter III
Staff Director

FROM: Kenneth A. Gross
Associate General Counsel

SUBJECT: FOIA Request; MUR 1353
(Carter/Mondale Presidential Committee)

In responding to a reason to believe notification from the Office of General Counsel in MUR 1353, counsel for the Carter/Mondale Presidential Committee included a Freedom of Information request. (See Attachment at page 9). Please handle this request in the normal course, but be advised that the matter is currently under investigation by this office.

Attachment

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STEIN & HURON
1819 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN

(202) 797-3660

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

June 29, 1982

Honorable Frank P. Reiche
Chairman
Federal Election Commission
Washington, DC 20463

re: MUR 1353

Dear Mr. Chairman:

I am writing in response to your letter to Carol Darr of May 19, 1982. We appreciate being given until July 2, 1982 to respond.

In MUR 1353, the Carter/Mondale Presidential Committee, Inc. is charged with violating (1) 2 U.S.C. 432(c); regarding maintenance of records on contributors, (2) 11 C.F.R. 110.4(c)(2); which requires refunds of cash contributions on excess of $100, and (3) 26 U.S.C. 9042(c)(1)(A), which prohibits the knowing and willful furnishing of "false, fictitious or fraudulent evidence, books or information" to the Commission. The Committee may also be charged with violating 2 U.S.C. 441f, which prohibits the making or receiving of contributions in the name of another.—1/ In addition, the Commission seeks repayment of $7130.35 in matching funds under 26 U.S.C. 9038(b)(1). We understand that Esther Kee has separately been charged with violations of 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f and that Sandy Oreste has been charged with violating 2 U.S.C. 441f.

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1/ The letter of May 19, 1982 does not refer to any 441f violations; nor does the Summary of Allegations in the attached General Counsel's Factual and Legal Analysis (hereafter GC Analysis). The body of the GC Analysis at 17, however, refers to the Commission's RTB finding of May 5, 1981 concerning 441f, but that finding was premised on factual assumptions which all parties now agree were inaccurate. We therefore doubt that any alleged violation by the Committee of 2 U.S.C. 441f is properly before the Commission.

With deference, we do not believe that MUR 1353 represents a responsible exercise in law enforcement. The principal allegations -- those involving 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f -- cannot be substantiated, and the Commission lacks jurisdiction to enforce the former. The remaining allegations are trivial or are outside the FEC's jurisdiction in an enforcement context.

Before proceeding with a discussion of the merits, we wish to direct the Commission's attention to the Freedom of Information Act request set forth below. We would appreciate a prompt response to this request.

The Facts

Rosalynn Carter attended a fundraiser at the Silver Palace Restaurant in New York City on February 21, 1980. Most of the contributors were Asian Americans and the affair was coordinated by Esther Kee, a Carter/Mondale volunteer who is active in the Asian American community. In fact, Mrs. Kee had asked that such an event be held, because she believed it was important that Asian Americans participate in our political process.[2/]

The price for tickets to the fundraiser was $100. Many individuals purchased their tickets at the door, and many paid in cash.[3/] According to the Commission, Mrs. Kee had instituted --

> measures . . . designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept.[4/]

2/ Kee deposition (hereafter Kee dep.) 7-9.

3/ Cash contributions of $100 or less are permitted under 2 U.S.C. 441g. Apparently $9100 in cash was received.

4/ GC Analysis at 2-3. It is clear that these mistakes were made by volunteers working at the door. Kee dep. 23-25, 38-39.

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After the fundraiser, Mrs. Kee turned her receipts and records over to the Committee.[5/] Because of the confusion in recordkeeping, her list of contributors was partially inaccurate and appears to have included the names of certain employees of the restaurant, whose names Mrs. Kee had been required to obtain and furnish to the Secret Service.[6/]

Shortly after the fundraiser, someone at the Committee told Mrs. Kee that money orders would be preferable to cash and asked her to attempt to obtain such instruments.[7/] Mrs. Kee then asked each of her "point people" -- i.e., those individuals charged with selling tickets -- whether they believed that the purchasers with whom they had dealt would object to the use of money orders. She was assured that there would be no objections.[8/] She then asked her husband, an attorney, whether it would be proper for her to purchase money orders without checking with each individual contributor. He said that he saw no problem with her doing so.[9/]

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The Committee used "best efforts" to keep track of information on contributors. That is, Mrs. Kee devised a sound system, but through no fault of her own the volunteers did not adhere to it. Under these circumstances, there is no basis for a finding of a violation of 2 U.S.C. 432(c).

12/ GC Analysis at 2.

13/ Id. at 6.

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The Commission suggests that the existence of four money orders in denominations greater than $100, as well as a few money orders for $100 which were attributed to the same person, mean that the Committee necessarily accepted cash contributions in excess of $100. The Commission has not proved this assertion, and it is just as likely that these apparent discrepancies arose from Mrs. Kee's reliance on a contributor list which later proved to be inaccurate in some respects.

The only certainty here is that the Committee instructed Mrs. Kee not to accept cash contributions over $100.[15/] Given this fact, coupled with the frailty of the other evidence, no enforcement action is warranted under 11 C.F.R. 110.4(c)(2).

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The prohibitions of Section 9042 in Title 26 are criminal in nature, and the Commission has no jurisdiction to enforce criminal statutes. The language in 2 U.S.C. 437g(a)(5)(B) and (a)(6)(B), which speaks generally of civil enforcement of "knowing and willful" violations of Chapter 96 of Title 26, quite plainly is intended to refer to violations of the several civil obligations created by that chapter -- not to the criminal prohibitions found in Section 9042.

In the 1976 amendments to the election laws, Congress moved some provisions which had been exclusively criminal in nature from Title 18 to Title 2 and provided for either civil or criminal enforcement.[16/] But there were no such changes for the criminal prohibitions in Chapter 96, i.e., 26 U.S.C. 9042. The most plausible inference is that Congress intended that enforcement of Section 9042 be limited to those situations in which there exists clear evidence of criminal intent. That is not the case here.

Even if the Commission had authority to enforce Section 9042, there would be no basis for exercising it in MUR 1353. The Commission attempts to argue -- against all evidence -- that Esther Kee knowingly and willfully submitted fraudulent information

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In order to establish that Mrs. Kee knowingly and willfully furnished fraudulent information as part of the matching fund process, two assertions would need to be proved: (1) that she knew that specific authorization from cash contributors was needed in order to obtain matchable money orders, and (2) that she attempted to claim that the money orders she obtained were specifically authorized.

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There is not enough evidence here to sustain a finding of a simple violation of any statutory provision, let alone a "knowing and willful" violation of 26 U.S.C. 9042(c)(1)(A). The Commission may wish to ignore AFL-CIO v. Federal Election Commission, supra, but it is an authoritative interpretation of a parallel "knowing and willful" provision of the Federal Election Campaign Act. That

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In short, there is no evidence to sustain a finding of any knowing and willful violation by Esther Kee. But even assuming that a case against Mrs. Kee could be made, her intent cannot be imputed to the Committee. The Commission relies on United States v. Beusch, 596 F.2d 871 (9th Cir. 1979), to attempt to impute intent, but Beusch was based on United States v. Hilton Hotels Corp., 467 F.2d 1000 (9th Cir. 1972). And the latter held that the intent of Congress should determine whether the acts of an agent are to be imputed to the principal. There is no basis for believing that Congress would have sanctioned imputing a fraudulent matching fund submission to a committee in a situation in which the Commission concedes that "the person charged by the Committee with responsibility for submitting Matching Fund Act information . . . does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors. . . ."19/

To summarize, the Federal Election Commission has no jurisdiction to enforce 26 U.S.C. 9042. Moreover, even if there were authority, there would be no factual basis for asserting it here. This is a classic example of overreaching, and the Commission should seriously reconsider its actions.

2 U.S.C. 441f

As footnote 1 above indicates, it is unclear whether the Carter/Mondale Committee remains charged with a 441f violation.

19/ GC Analysis at 15.

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The factual predicate upon which the original reason to believe determination was based evaporated long ago, and there is no suggestion that the Commission has reconsidered the 441f issue in light of any new facts and theories. Once again, there is a question whether the Commission properly has jurisdiction.

Assuming jurisdiction, the facts do not support a violation of 2 U.S.C. 441f, which proscribes contributions made in the name of another, i.e., one person acting as a conduit for another's contribution. There was no conduit activity here. Certain individuals made cash contributions. Mrs. Kee took their money -- which had never been "rejected" by the Committee -- and purchased money orders with it, making efforts to attribute it properly. There was nothing improper about this.

Perhaps understandably, the Commission's theory as to how and why a 441f violation occurred is never clearly articulated. It is evident, however, that the contributions in question had been made when they were initially accepted by the Committee. Esther Kee was not attempting to make contributions herself by purchasing money orders, and as a legal matter she could not have done so. The Commission itself has admitted this:

> "The evidence . . . runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.[20]

The Commission argues that the original cash contributions could not be matched without the specific consent of the contributors to purchase money orders. This proposition is debatable -- it nowhere appears in the statute or regulations -- but it has nothing to do with the question whether the contributors used their own money to make the contributions. Of course they did, and the Commission offers no evidence to suggest otherwise.

Esther Kee was not making contributions in the name of another. Sandy Oreste -- the pawn in this game[21] -- had no

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Repayment of Matching Funds

The Commission cites 26 U.S.C. 9038(b)(1) in requesting that the Committee repay $7130.35 in matching funds. This section of the statute, however, has to do with the Commission's audit authority -- not with enforcement actions.

If the Commission wished to pursue repayment of this amount, it should have done so in the course of the audit. It did not, and there is no authority to seek repayment of matching funds through the enforcement process.

The Charges Against Kee and Oreste

It is utterly unfair of the Commission to charge Esther Kee and Sandy Oreste with separate violations of the law. The former was a volunteer, the latter a secretary. Both acted in good faith. Now both must obtain legal representation to defend themselves against spurious charges. These should be dropped immediately.

F.O.I.A. Request

The Carter/Mondale Presidential Committee, Inc. hereby requests copies of all memoranda prepared by the General Counsel's office in connection with MUR 1353. Such memoranda will confirm our belief that many of the Commission's present assertions concerning MUR 1353 are unsupportable. This request is made pursuant to the Freedom of Information Act.

Conclusion

MUR 1353 was a small matter. For some reason having nothing to do with either the facts or the law, the Commission has decided to try to expand it beyond all reasonable proportion. We would urge you to reconsider this position.

Finally, we request the opportunity to be heard by the Commission before any further actions are taken on MUR 1353.

Sincerely,

Douglas B. Huron

cc: Charles Steele, Esq.

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82 JUL 2 P1:55

June 29, 1982

Honorable Frank P. Reiche
Chairman
Federal Election Commission
Washington, DC 20463

re: MUR 1353

Dear Mr. Chairman:

I am writing in response to your letter to Carol Darr of May 19, 1982. We appreciate being given until July 2, 1982 to respond.

In MUR 1353, the Carter/Mondale Presidential Committee, Inc. is charged with violating (1) 2 U.S.C. 432(c), regarding maintenance of records on contributors, (2) 11 C.F.R. 110.4(c)(2), which requires refunds of cash contributions on excess of $100, and (3) 26 U.S.C. 9042(c)(1)(A), which prohibits the knowing and willful furnishing of "false, fictitious or fraudulent evidence, books or information" to the Commission. The Committee may also be charged with violating 2 U.S.C. 441f, which prohibits the making or receiving of contributions in the name of another.[1/] In addition, the Commission seeks repayment of $7130.35 in matching funds under 26 U.S.C. 9038(b)(1). We understand that Esther Kee has separately been charged with violations of 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f and that Sandy Oreste has been charged with violating 2 U.S.C. 441f.

1/ The letter of May 19, 1982 does not refer to any 441f violations; nor does the Summary of Allegations in the attached General Counsel's Factual and Legal Analysis (hereafter GC Analysis). The body of the GC Analysis at 17, however, refers to the Commission's RTB finding of May 5, 1981 concerning 441f, but that finding was premised on factual assumptions which all parties now agree were inaccurate. We therefore doubt that any alleged violation by the Committee of 2 U.S.C. 441f is properly before the Commission.

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With deference, we do not believe that MUR 1353 represents a responsible exercise in law enforcement. The principal allegations -- those involving 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f -- cannot be substantiated, and the Commission lacks jurisdiction to enforce the former. The remaining allegations are trivial or are outside the FEC's jurisdiction in an enforcement context.

Before proceeding with a discussion of the merits, we wish to direct the Commission's attention to the Freedom of Information Act request set forth below. We would appreciate a prompt response to this request.

The Facts

Rosalynn Carter attended a fundraiser at the Silver Palace Restaurant in New York City on February 21, 1980. Most of the contributors were Asian Americans and the affair was coordinated by Esther Kee, a Carter/Mondale volunteer who is active in the Asian American community. In fact, Mrs. Kee had asked that such an event be held, because she believed it was important that Asian Americans participate in our political process.[2/]

The price for tickets to the fundraiser was $100. Many individuals purchased their tickets at the door, and many paid in cash.[3/] According to the Commission, Mrs. Kee had instituted --

> measures . . . designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept.[4/]

2/ Kee deposition (hereafter Kee dep.) 7-9.

3/ Cash contributions of $100 or less are permitted under 2 U.S.C. 441g. Apparently $9100 in cash was received.

4/ GC Analysis at 2-3. It is clear that these mistakes were made by volunteers working at the door. Kee dep. 23-25, 38-39.

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After the fundraiser, Mrs. Kee turned her receipts and records over to the Committee.[5] Because of the confusion in recordkeeping, her list of contributors was partially inaccurate and appears to have included the names of certain employees of the restaurant, whose names Mrs. Kee had been required to obtain and furnish to the Secret Service.[6]

Shortly after the fundraiser, someone at the Committee told Mrs. Kee that money orders would be preferable to cash and asked her to attempt to obtain such instruments.[7] Mrs. Kee then asked each of her "point people" -- i.e., those individuals charged with selling tickets -- whether they believed that the purchasers with whom they had dealt would object to the use of money orders. She was assured that there would be no objections.[8] She then asked her husband, an attorney, whether it would be proper for her to purchase money orders without checking with each individual contributor. He said that he saw no problem with her doing so.[9]

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cc: Charles Steele, Esq.

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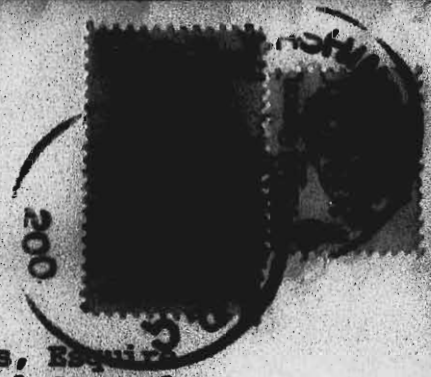

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Federal Election Commission
Washington, DC 20463

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June 29, 1982

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82 JUL 1 P12:17

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Federal Election Commission
Washington, DC 20463

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Dear Mr. Chairman:

I am writing in response to your letter to Carol Darr of May 19, 1982. We appreciate being given until July 2, 1982 to respond.

In MUR 1353, the Carter/Mondale Presidential Committee, Inc. is charged with violating (1) 2 U.S.C. 432(c), regarding maintenance of records on contributors, (2) 11 C.F.R. 110.4(c)(2), which requires refunds of cash contributions on excess of $100, and (3) 26 U.S.C. 9042(c)(1)(A), which prohibits the knowing and willful furnishing of "false, fictitious or fraudulent evidence, books or information" to the Commission. The Committee may also be charged with violating 2 U.S.C. 441f, which prohibits the making or receiving of contributions in the name of another.[1/] In addition, the Commission seeks repayment of $7130.35 in matching funds under 26 U.S.C. 9038(b)(1). We understand that Esther Kee has separately been charged with violations of 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f and that Sandy Oreste has been charged with violating 2 U.S.C. 441f.

1/ The letter of May 19, 1982 does not refer to any 441f violations; nor does the Summary of Allegations in the attached General Counsel's Factual and Legal Analysis (hereafter GC Analysis). The body of the GC Analysis at 17, however, refers to the Commission's RTB finding of May 5, 1981 concerning 441f, but that finding was premised on factual assumptions which all parties now agree were inaccurate. We therefore doubt that any alleged violation by the Committee of 2 U.S.C. 441f is properly before the Commission.

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With deference, we do not believe that MUR 1353 represents a responsible exercise in law enforcement. The principal allegations -- those involving 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f -- cannot be substantiated, and the Commission lacks jurisdiction to enforce the former. The remaining allegations are trivial or are outside the FEC's jurisdiction in an enforcement context.

Before proceeding with a discussion of the merits, we wish to direct the Commission's attention to the Freedom of Information Act request set forth below. We would appreciate a prompt response to this request.

The Facts

Rosalynn Carter attended a fundraiser at the Silver Palace Restaurant in New York City on February 21, 1980. Most of the contributors were Asian Americans and the affair was coordinated by Esther Kee, a Carter/Mondale volunteer who is active in the Asian American community. In fact, Mrs. Kee had asked that such an event be held, because she believed it was important that Asian Americans participate in our political process.[2/]

The price for tickets to the fundraiser was $100. Many individuals purchased their tickets at the door, and many paid in cash.[3/] According to the Commission, Mrs. Kee had instituted --

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After the fundraiser, Mrs. Kee turned her receipts and records over to the Committee.[5] Because of the confusion in recordkeeping, her list of contributors was partially inaccurate and appears to have included the names of certain employees of the restaurant, whose names Mrs. Kee had been required to obtain and furnish to the Secret Service.[6]

Shortly after the fundraiser, someone at the Committee told Mrs. Kee that money orders would be preferable to cash and asked her to attempt to obtain such instruments.[7] Mrs. Kee then asked each of her "point people" -- i.e., those individuals charged with selling tickets -- whether they believed that the purchasers with whom they had dealt would object to the use of money orders. She was assured that there would be no objections.[8] She then asked her husband, an attorney, whether it would be proper for her to purchase money orders without checking with each individual contributor. He said that he saw no problem with her doing so.[9]

After making these inquiries, Mrs. Kee purchased money orders with the cash contributions. Not realizing that the contributor list was partially inaccurate, she and some volunteers relied on the list to complete the information on the face of each instrument.[10] Mrs. Kee then turned the money orders and list over to Sandy Oreste, who filled out a contributor card for each person whose name appeared on a money order.[11]

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The Carter/Mondale Committee received these money orders in late February 1980. About six months later, a decision was made to submit such instruments for matching, and those from the Silver Palace fundraiser were among a larger submission. No one at the Committee had any reason to question the Silver Palace money orders, and the Commission does not attempt to assert otherwise.

2 U.S.C. 432(c)

This statutory provision requires the treasurer of a political committee to maintain certain records on each individual who has contributed more than $50 to the committee. In this case, because volunteers did not adhere to Esther Kee's directions, accurate records for all contributors were not maintained. Under 2 U.S.C. 432(i), however, inaccuracies will be forgiven if "best efforts" have been used to collect and maintain required data.

As the passage quoted on page 2 above makes clear, the Commission has conceded that good faith efforts were made to maintain accurate records. See also the Commission's admissions that "volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by Kee to keep any cash received in individualized envelopes, and fill out contributor cards,"[12/] and that "the evidence suggests that there was an intent to maintain accurate records of receipts. . . ."[13/] Mrs. Kee's efforts were not fully successful, but this was because volunteers at the door did not follow her directions; problems with language and surnames also appear to have aggravated the situation.[14/]

The Committee used "best efforts" to keep track of information on contributors. That is, Mrs. Kee devised a sound system, but through no fault of her own the volunteers did not adhere to it. Under these circumstances, there is no basis for a finding of a violation of 2 U.S.C. 432(c).

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The Commission suggests that the existence of four money orders in denominations greater than $100, as well as a few money orders for $100 which were attributed to the same person, mean that the Committee necessarily accepted cash contributions in excess of $100. The Commission has not proved this assertion, and it is just as likely that these apparent discrepancies arose from Mrs. Kee's reliance on a contributor list which later proved to be inaccurate in some respects.

The only certainty here is that the Committee instructed Mrs. Kee not to accept cash contributions over $100.[15/] Given this fact, coupled with the frailty of the other evidence, no enforcement action is warranted under 11 C.F.R. 110.4(c)(2).

26 U.S.C. 9042 (c)(1)(A)

The prohibitions of Section 9042 in Title 26 are criminal in nature, and the Commission has no jurisdiction to enforce criminal statutes. The language in 2 U.S.C. 437g(a)(5)(B) and (a)(6)(B), which speaks generally of civil enforcement of "knowing and willful" violations of Chapter 96 of Title 26, quite plainly is intended to refer to violations of the several civil obligations created by that chapter -- not to the criminal prohibitions found in Section 9042.

In the 1976 amendments to the election laws, Congress moved some provisions which had been exclusively criminal in nature from Title 18 to Title 2 and provided for either civil or criminal enforcement.[16/] But there were no such changes for the criminal prohibitions in Chapter 96, i.e., 26 U.S.C. 9042. The most plausible inference is that Congress intended that enforcement of Section 9042 be limited to those situations in which there exists clear evidence of criminal intent. That is not the case here.

Even if the Commission had authority to enforce Section 9042, there would be no basis for exercising it in MUR 1353. The Commission attempts to argue -- against all evidence -- that Esther Kee knowingly and willfully submitted fraudulent information

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in connection with matching fund applications. The Commission then attempts to impute Mrs. Kee's intent to our Committee. And both steps are taken in flagrant and cavalier disregard of the District of Columbia's Circuit's construction of the term "knowing and willful" in AFL-CIO v. Federal Election Commission, 628 F.2d 97 (D.C.Cir. 1980), cert. denied, 449 U.S. 982 (1980).

In order to establish that Mrs. Kee knowingly and willfully furnished fraudulent information as part of the matching fund process, two assertions would need to be proved: (1) that she knew that specific authorization from cash contributors was needed in order to obtain matchable money orders, and (2) that she attempted to claim that the money orders she obtained were specifically authorized.

There is no evidence to support either of these assertions. Esther Kee knew very little about matching fund procedures. Even the Commission characterizes her understanding of the process as "vague,"[17] and this overstates the case.[18] She certainly did not know that it mattered whether the money order purchases were specifically authorized, and she never attempted to suggest that there had been specific authorization.

Mrs. Kee knew only that the Committee preferred money orders to cash. She purchased the money orders after checking with her "point people" and her husband, an attorney. She then gave the money orders to the Committee, along with a contributor list used in connection with the purchases. The information on the contributor list was partially inaccurate, but Mrs. Kee did not know that at the time. She acted in complete good faith at each juncture.

There is not enough evidence here to sustain a finding of a simple violation of any statutory provision, let alone a "knowing and willful" violation of 26 U.S.C. 9042(c)(1)(A). The Commission may wish to ignore AFL-CIO v. Federal Election Commission, supra, but it is an authoritative interpretation of a parallel "knowing and willful" provision of the Federal Election Campaign Act. That

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In short, there is no evidence to sustain a finding of any knowing and willful violation by Esther Kee. But even assuming that a case against Mrs. Kee could be made, her intent cannot be imputed to the Committee. The Commission relies on United States v. Beusch, 596 F.2d 871 (9th Cir. 1979), to attempt to impute intent, but Beusch was based on United States v. Hilton Hotels Corp., 467 F.2d 1000 (9th Cir. 1972). And the latter held that the intent of Congress should determine whether the acts of an agent are to be imputed to the principal. There is no basis for believing that Congress would have sanctioned imputing a fraudulent matching fund submission to a committee in a situation in which the Commission concedes that "the person charged by the Committee with responsibility for submitting Matching Fund Act information . . . does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors. . . ."[19/]

To summarize, the Federal Election Commission has no jurisdiction to enforce 26 U.S.C. 9042. Moreover, even if there were authority, there would be no factual basis for asserting it here. This is a classic example of overreaching, and the Commission should seriously reconsider its actions.

2 U.S.C. 441f

As footnote 1 above indicates, it is unclear whether the Carter/Mondale Committee remains charged with a 441f violation.

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The factual predicate upon which the original reason to believe determination was based evaporated long ago, and there is no suggestion that the Commission has reconsidered the 441f issue in light of any new facts and theories. Once again, there is a question whether the Commission properly has jurisdiction.

Assuming jurisdiction, the facts do not support a violation of 2 U.S.C. 441f, which proscribes contributions made in the name of another, i.e., one person acting as a conduit for another's contribution. There was no conduit activity here. Certain individuals made cash contributions. Mrs. Kee took their money -- which had never been "rejected" by the Committee -- and purchased money orders with it, making efforts to attribute it properly. There was nothing improper about this.

Perhaps understandably, the Commission's theory as to how and why a 441f violation occurred is never clearly articulated. It is evident, however, that the contributions in question had been made when they were initially accepted by the Committee. Esther Kee was not attempting to make contributions herself by purchasing money orders, and as a legal matter she could not have done so. The Commission itself has admitted this:

> The evidence . . . runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.[20]

The Commission argues that the original cash contributions could not be matched without the specific consent of the contributors to purchase money orders. This proposition is debatable -- it nowhere appears in the statute or regulations -- but it has nothing to do with the question whether the contributors used their own money to make the contributions. Of course they did, and the Commission offers no evidence to suggest otherwise.

Esther Kee was not making contributions in the name of another. Sandy Oreste -- the pawn in this game[21] -- had no

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reason to believe that Mrs. Kee had made such contributions. And there is no basis for imputing the intent of either to the Committee.

Repayment of Matching Funds

The Commission cites 26 U.S.C. 9038(b)(1) in requesting that the Committee repay $7130.35 in matching funds. This section of the statute, however, has to do with the Commission's audit authority -- not with enforcement actions.

If the Commission wished to pursue repayment of this amount, it should have done so in the course of the audit. It did not, and there is no authority to seek repayment of matching funds through the enforcement process.

The Charges Against Kee and Oreste

It is utterly unfair of the Commission to charge Esther Kee and Sandy Oreste with separate violations of the law. The former was a volunteer, the latter a secretary. Both acted in good faith. Now both must obtain legal representation to defend themselves against spurious charges. These should be dropped immediately.

F.O.I.A. Request

The Carter/Mondale Presidential Committee, Inc. hereby requests copies of all memoranda prepared by the General Counsel's office in connection with MUR 1353. Such memoranda will confirm our belief that many of the Commission's present assertions concerning MUR 1353 are unsupportable. This request is made pursuant to the Freedom of Information Act.

Conclusion

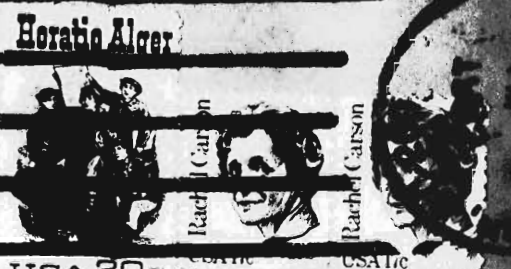
MUR 1353 was a small matter. For some reason having nothing to do with either the facts or the law, the Commission has decided to try to expand it beyond all reasonable proportion. We would urge you to reconsider this position.

Finally, we request the opportunity to be heard by the Commission before any further actions are taken on MUR 1353.

Sincerely,

Douglas B. Huron

cc: Charles Steele, Esq.



To

Honorable Frank P. Reiche
Chairman
Federal Election Commission
Washington, DC 20463

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June 29, 1982

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re: MUR 1353

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To summarize, the Federal Election Commission has no jurisdiction to enforce 26 U.S.C. 9042. Moreover, even if there were authority, there would be no factual basis for asserting it here. This is a classic example of overreaching, and the Commission should seriously reconsider its actions.

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As footnote 1 above indicates, it is unclear whether the Carter/Mondale Committee remains charged with a 441f violation.

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Repayment of Matching Funds

The Commission cites 26 U.S.C. 9038(b)(1) in requesting that the Committee repay $7130.35 in matching funds. This section of the statute, however, has to do with the Commission's audit authority -- not with enforcement actions.

If the Commission wished to pursue repayment of this amount, it should have done so in the course of the audit. It did not, and there is no authority to seek repayment of matching funds through the enforcement process.

The Charges Against Kee and Oreste

It is utterly unfair of the Commission to charge Esther Kee and Sandy Oreste with separate violations of the law. The former was a volunteer, the latter a secretary. Both acted in good faith. Now both must obtain legal representation to defend themselves against spurious charges. These should be dropped immediately.

F.O.I.A. Request

The Carter/Mondale Presidential Committee, Inc. hereby requests copies of all memoranda prepared by the General Counsel's office in connection with MUR 1353. Such memoranda will confirm our belief that many of the Commission's present assertions concerning MUR 1353 are unsupportable. This request is made pursuant to the Freedom of Information Act.

Conclusion

MUR 1353 was a small matter. For some reason having nothing to do with either the facts or the law, the Commission has decided to try to expand it beyond all reasonable proportion. We would urge you to reconsider this position.

Finally, we request the opportunity to be heard by the Commission before any further actions are taken on MUR 1353.

Sincerely,

Douglas B. Huron

cc: Charles Steele, Esq.

3304039237

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

8304039236

WASHINGTON, DC 330
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1982

Michael Dymersky, Esquire
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

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STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS S. HURON
EILEEN M. STEIN

(202) 797-3660

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

June 29, 1982

Honorable Frank P. Reiche
Chairman
Federal Election Commission
Washington, DC 20463

re: MUR 1353

Dear Mr. Chairman:

I am writing in response to your letter to Carol Darr of May 19, 1982. We appreciate being given until July 2, 1982 to respond.

In MUR 1353, the Carter/Mondale Presidential Committee, Inc. is charged with violating (1) 2 U.S.C. 432(c), regarding maintenance of records on contributors, (2) 11 C.F.R. 110.4(c)(2), which requires refunds of cash contributions on excess of $100, and (3) 26 U.S.C. 9042(c)(1)(A), which prohibits the knowing and willful furnishing of "false, fictitious or fraudulent evidence, books or information" to the Commission. The Committee may also be charged with violating 2 U.S.C. 441f, which prohibits the making or receiving of contributions in the name of another.—1/ In addition, the Commission seeks repayment of $7130.35 in matching funds under 26 U.S.C. 9038(b)(1). We understand that Esther Kee has separately been charged with violations of 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f and that Sandy Oreste has been charged with violating 2 U.S.C. 441f.

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1/ The letter of May 19, 1982 does not refer to any 441f violations; nor does the Summary of Allegations in the attached General Counsel's Factual and Legal Analysis (hereafter GC Analysis). The body of the GC Analysis at 17, however, refers to the Commission's RTB finding of May 5, 1981 concerning 441f, but that finding was premised on factual assumptions which all parties now agree were inaccurate. We therefore doubt that any alleged violation by the Committee of 2 U.S.C. 441f is properly before the Commission.

With deference, we do not believe that MUR 1353 represents a responsible exercise in law enforcement. The principal allegations -- those involving 26 U.S.C. 9042(c)(1)(A) and 2 U.S.C. 441f -- cannot be substantiated, and the Commission lacks jurisdiction to enforce the former. The remaining allegations are trivial or are outside the FEC's jurisdiction in an enforcement context.

Before proceeding with a discussion of the merits, we wish to direct the Commission's attention to the Freedom of Information Act request set forth below. We would appreciate a prompt response to this request.

The Facts

Rosalynn Carter attended a fundraiser at the Silver Palace Restaurant in New York City on February 21, 1980. Most of the contributors were Asian Americans and the affair was coordinated by Esther Kee, a Carter/Mondale volunteer who is active in the Asian American community. In fact, Mrs. Kee had asked that such an event be held, because she believed it was important that Asian Americans participate in our political process.[2/]

The price for tickets to the fundraiser was $100. Many individuals purchased their tickets at the door, and many paid in cash.[3/] According to the Commission, Mrs. Kee had instituted --

> measures . . . designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept.[4/]

2/ Kee deposition (hereafter Kee dep.) 7-9.

3/ Cash contributions of $100 or less are permitted under 2 U.S.C. 441g. Apparently $9100 in cash was received.

4/ GC Analysis at 2-3. It is clear that these mistakes were made by volunteers working at the door. Kee dep. 23-25, 38-39.

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After the fundraiser, Mrs. Kee turned her receipts and records over to the Committee.[5] Because of the confusion in recordkeeping, her list of contributors was partially inaccurate and appears to have included the names of certain employees of the restaurant, whose names Mrs. Kee had been required to obtain and furnish to the Secret Service.[6]

Shortly after the fundraiser, someone at the Committee told Mrs. Kee that money orders would be preferable to cash and asked her to attempt to obtain such instruments.[7] Mrs. Kee then asked each of her "point people" -- i.e., those individuals charged with selling tickets -- whether they believed that the purchasers with whom they had dealt would object to the use of money orders. She was assured that there would be no objections.[8] She then asked her husband, an attorney, whether it would be proper for her to purchase money orders without checking with each individual contributor. He said that he saw no problem with her doing so.[9]

After making these inquiries, Mrs. Kee purchased money orders with the cash contributions. Not realizing that the contributor list was partially inaccurate, she and some volunteers relied on the list to complete the information on the face of each instrument.[10] Mrs. Kee then turned the money orders and list over to Sandy Oreste, who filled out a contributor card for each person whose name appeared on a money order.[11]

5/ Kee dep. 26-27, 29-30.

6/ Kee dep. 14-16, 71-72.

7/ Id., 30-32. It is unclear from the record who asked Mrs. Kee to do this. Contrary to the Commission's assertion, the Committee never "rejected" the cash contributions; to do so would have been foolish.

8/ Kee dep. 39-40, 61-62. The Commission understates the inquiries made by Mrs. Kee. The record is clear that she checked with her "point" contacts, in addition to making other inquiries, before purchasing any money orders.

9/ Kee dep. 20, 69.

10/ Id., 32-33, 37.

11/ Oreste dep. 25,34.

The Carter/Mondale Committee received these money orders in late February 1980. About six months later, a decision was made to submit such instruments for matching, and those from the Silver Palace fundraiser were among a larger submission. No one at the Committee had any reason to question the Silver Palace money orders, and the Commission does not attempt to assert otherwise.

2 U.S.C. 432(c)

This statutory provision requires the treasurer of a political committee to maintain certain records on each individual who has contributed more than $50 to the committee. In this case, because volunteers did not adhere to Esther Kee's directions, accurate records for all contributors were not maintained. Under 2 U.S.C. 432(i), however, inaccuracies will be forgiven if "best efforts" have been used to collect and maintain required data.

As the passage quoted on page 2 above makes clear, the Commission has conceded that good faith efforts were made to maintain accurate records. See also the Commission's admissions that "volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by Kee to keep any cash received in individualized envelopes, and fill out contributor cards,"[12] and that "the evidence suggests that there was an intent to maintain accurate records of receipts. . . ."[13] Mrs. Kee's efforts were not fully successful, but this was because volunteers at the door did not follow her directions; problems with language and surnames also appear to have aggravated the situation.[14]

The Committee used "best efforts" to keep track of information on contributors. That is, Mrs. Kee devised a sound system, but through no fault of her own the volunteers did not adhere to it. Under these circumstances, there is no basis for a finding of a violation of 2 U.S.C. 432(c).

12/ GC Analysis at 2.

13/ Id. at 6.

14/ See Kee dep. 23-24. Sandy Oreste also worked at the door. Unlike the volunteers, she handled all recordkeeping matters properly. Oreste dep. 18.

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11 C.F.R. 110.4(c)(2)

The Commission suggests that the existence of four money orders in denominations greater than $100, as well as a few money orders for $100 which were attributed to the same person, mean that the Committee necessarily accepted cash contributions in excess of $100. The Commission has not proved this assertion, and it is just as likely that these apparent discrepancies arose from Mrs. Kee's reliance on a contributor list which later proved to be inaccurate in some respects.

The only certainty here is that the Committee instructed Mrs. Kee not to accept cash contributions over $100.[15/] Given this fact, coupled with the frailty of the other evidence, no enforcement action is warranted under 11 C.F.R. 110.4(c)(2).

26 U.S.C. 9042 (c)(1)(A)

The prohibitions of Section 9042 in Title 26 are criminal in nature, and the Commission has no jurisdiction to enforce criminal statutes. The language in 2 U.S.C. 437g(a)(5)(B) and (a)(6)(B), which speaks generally of civil enforcement of "knowing and willful" violations of Chapter 96 of Title 26, quite plainly is intended to refer to violations of the several civil obligations created by that chapter -- not to the criminal prohibitions found in Section 9042.

In the 1976 amendments to the election laws, Congress moved some provisions which had been exclusively criminal in nature from Title 18 to Title 2 and provided for either civil or criminal enforcement.[16/] But there were no such changes for the criminal prohibitions in Chapter 96, i.e., 26 U.S.C. 9042. The most plausible inference is that Congress intended that enforcement of Section 9042 be limited to those situations in which there exists clear evidence of criminal intent. That is not the case here.

Even if the Commission had authority to enforce Section 9042, there would be no basis for exercising it in MUR 1353. The Commission attempts to argue -- against all evidence -- that Esther Kee knowingly and willfully submitted fraudulent information

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15/ Kee dep. 13.

16/ See, e.g., 2 U.S.C. 441b, formerly 18 U.S.C. 610.

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in connection with matching fund applications. The Commission then attempts to impute Mrs. Kee's intent to our Committee. And both steps are taken in flagrant and cavalier disregard of the District of Columbia's Circuit's construction of the term "knowing and willful" in AFL-CIO v. Federal Election Commission, 628 F.2d 97 (D.C.Cir. 1980), cert. denied, 449 U.S. 982 (1980).

In order to establish that Mrs. Kee knowingly and willfully furnished fraudulent information as part of the matching fund process, two assertions would need to be proved: (1) that she knew that specific authorization from cash contributors was needed in order to obtain matchable money orders, and (2) that she attempted to claim that the money orders she obtained were specifically authorized.

There is no evidence to support either of these assertions. Esther Kee knew very little about matching fund procedures. Even the Commission characterizes her understanding of the process as "vague,"[17/] and this overstates the case.[18/] She certainly did not know that it mattered whether the money order purchases were specifically authorized, and she never attempted to suggest that there had been specific authorization.

Mrs. Kee knew only that the Committee preferred money orders to cash. She purchased the money orders after checking with her "point people" and her husband, an attorney. She then gave the money orders to the Committee, along with a contributor list used in connection with the purchases. The information on the contributor list was partially inaccurate, but Mrs. Kee did not know that at the time. She acted in complete good faith at each juncture.

There is not enough evidence here to sustain a finding of a simple violation of any statutory provision, let alone a "knowing and willful" violation of 26 U.S.C. 9042(c)(1)(A). The Commission may wish to ignore AFL-CIO v. Federal Election Commission, supra, but it is an authoritative interpretation of a parallel "knowing and willful" provision of the Federal Election Campaign Act. That

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17/ GC Analysis at 16.

18/ See Kee dep. 43-44.

is the law governing this case, not the 1938 construction of the Livestock Transportation Act of 1906 found in United States v. Illinois Central Railroad Co., 303 U.S. 239 (1938). But even Illinois Central does not help the Commission, for there the Supreme Court held that the lower threshold it was adopting for "knowing and willful" violations applied only to offenses which did not involve moral "turpitude." 303 U.S. at 242. Moral turpitude is not present when cattle are unloaded in an untimely fashion, but it is if a person commits a fraudulent act in violation of 26 U.S.C. 9042(c)(1)(A). And when an offense involves turpitude, the less stringent "knowing and willful" standard adopted in Illinois Central does not apply.

In short, there is no evidence to sustain a finding of any knowing and willful violation by Esther Kee. But even assuming that a case against Mrs. Kee could be made, her intent cannot be imputed to the Committee. The Commission relies on United States v. Beusch, 596 F.2d 871 (9th Cir. 1979), to attempt to impute intent, but Beusch was based on United States v. Hilton Hotels Corp., 467 F.2d 1000 (9th Cir. 1972). And the latter held that the intent of Congress should determine whether the acts of an agent are to be imputed to the principal. There is no basis for believing that Congress would have sanctioned imputing a fraudulent matching fund submission to a committee in a situation in which the Commission concedes that "the person charged by the Committee with responsibility for submitting Matching Fund Act information . . . does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors. . . ."[19]

To summarize, the Federal Election Commission has no jurisdiction to enforce 26 U.S.C. 9042. Moreover, even if there were authority, there would be no factual basis for asserting it here. This is a classic example of overreaching, and the Commission should seriously reconsider its actions.

2 U.S.C. 441f

As footnote 1 above indicates, it is unclear whether the Carter/Mondale Committee remains charged with a 441f violation.

19/ GC Analysis at 15.

The factual predicate upon which the original reason to believe determination was based evaporated long ago, and there is no suggestion that the Commission has reconsidered the 441f issue in light of any new facts and theories. Once again, there is a question whether the Commission properly has jurisdiction.

Assuming jurisdiction, the facts do not support a violation of 2 U.S.C. 441f, which proscribes contributions made in the name of another, i.e., one person acting as a conduit for another's contribution. There was no conduit activity here. Certain individuals made cash contributions. Mrs. Kee took their money -- which had never been "rejected" by the Committee -- and purchased money orders with it, making efforts to attribute it properly. There was nothing improper about this.

Perhaps understandably, the Commission's theory as to how and why a 441f violation occurred is never clearly articulated. It is evident, however, that the contributions in question had been made when they were initially accepted by the Committee. Esther Kee was not attempting to make contributions herself by purchasing money orders, and as a legal matter she could not have done so. The Commission itself has admitted this:

> The evidence . . . runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.[20]

The Commission argues that the original cash contributions could not be matched without the specific consent of the contributors to purchase money orders. This proposition is debatable -- it nowhere appears in the statute or regulations -- but it has nothing to do with the question whether the contributors used their own money to make the contributions. Of course they did, and the Commission offers no evidence to suggest otherwise.

Esther Kee was not making contributions in the name of another. Sandy Oreste -- the pawn in this game[21] -- had no

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20/ GC Analysis at 9.

21/ Oreste was Evan Dobelle's secretary. The Silver Palace event was the only fundraiser she attended in anything approaching an official capacity.

reason to believe that Mrs. Kee had made such contributions. And there is no basis for imputing the intent of either to the Committee.

Repayment of Matching Funds

The Commission cites 26 U.S.C. 9038(b)(1) in requesting that the Committee repay $7130.35 in matching funds. This section of the statute, however, has to do with the Commission's audit authority -- not with enforcement actions.

If the Commission wished to pursue repayment of this amount, it should have done so in the course of the audit. It did not, and there is no authority to seek repayment of matching funds through the enforcement process.

The Charges Against Kee and Oreste

It is utterly unfair of the Commission to charge Esther Kee and Sandy Oreste with separate violations of the law. The former was a volunteer, the latter a secretary. Both acted in good faith. Now both must obtain legal representation to defend themselves against spurious charges. These should be dropped immediately.

F.O.I.A. Request

The Carter/Mondale Presidential Committee, Inc. hereby requests copies of all memoranda prepared by the General Counsel's office in connection with MUR 1353. Such memoranda will confirm our belief that many of the Commission's present assertions concerning MUR 1353 are unsupportable. This request is made pursuant to the Freedom of Information Act.

Conclusion

MUR 1353 was a small matter. For some reason having nothing to do with either the facts or the law, the Commission has decided to try to expand it beyond all reasonable proportion. We would urge you to reconsider this position.

Finally, we request the opportunity to be heard by the Commission before any further actions are taken on MUR 1353.

Sincerely,

Douglas B. Huron

cc: Charles Steele, Esq.

8304039249

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

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WASHINGTON, DC 200
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1982

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1982

Ms. Esther Kee
2201 L Street, N.W.
Apartment 614
Washington, D.C. 20036

RE: MUR 1353
(Esther Kee)

Dear Ms. Kee:

Pursuant to your letter dated June 18, 1982, your time to file a response to the reason to believe allegations is hereby extended to July 16, 1982.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

2304039240?

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1982

Ms. Esther Kee
2201 L Street, N.W.
Apartment 614
Washington, D.C. 20036

RE: MUR 1353
(Esther Kee)

Dear Ms. Kee:

Pursuant to your letter dated June 8, 1982, please find a photocopy of your deposition dated July 17, 1981, enclosed.

Should you have any questions, please call Michael Dymersky at 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

8304039240 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1982

Douglas B. Huron, Esquire
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1353
(Carter/Mondale
Presidential
Committee)

Dear Mr. Huron:

Pursuant to your letter dated June 4, 1982, your time to file a response to the reason to believe allegations is hereby extended to July 2, 1982. In addition, please find copies of the depositions of Esther Kee and Carolyn McClean (a.k.a. Sandy Oreste) enclosed.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
GCC#7984
82 JUN22 P2:02

c/o US-Asia Institute
1015 20th Street NW #200
Washington, DC 20036
June 18, 1982

82 JUN22 P4:56
FEDERAL ELECTION COMMISSION

Mr. Michael Dymersky
Federal Election Commission
Washington, DC 20463

RE: MUR 1353 (Esther Kee)

Dear Mr. Dymersky:

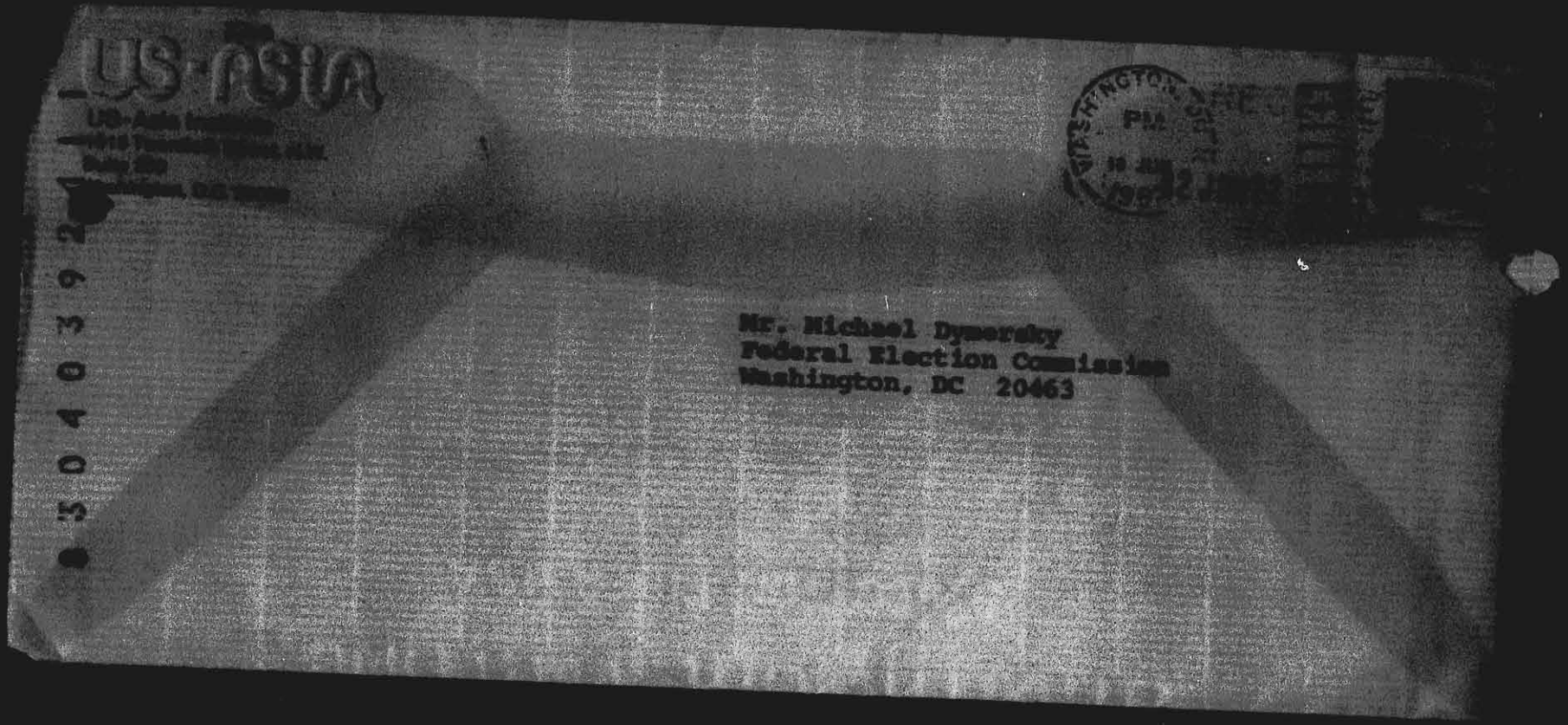
I am respectfully requesting an extension of time to file an answer to my above case number due to the fact I have not received the deposition requested by me. I will be out of town until June 22, 1982 and I will call your office as soon as I return.

Very truly yours,

Esther G. Kee

Esther G. Kee

8304039240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Mr. Michael Dymersky
Federal Election Commission
Washington, DC 20463

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82 JUN 10 A10:46

2201 L Street, N.W.
Apartment 614
Washington, DC 20036
June 8, 1982

82 JUN 10 P12:35

Mr. Michael Dymersky
Federal Election Commission
Washington, DC 20463

RE: MUR 1353

Dear Mr. Dymersky:

Per our telephone conversation of today re: MUR 1353, I request that you send me a copy of the deposition of my hearing at ~~submitted to~~ the Federal Election Commission re: my involvement in the February 21, 1980 fundraiser at the Silver Palace Restaurant in New York City.

Hopefully, by working together we can resolve this matter. Thank you for your cooperation.

Sincerely,

Esther G. Kee

Esther G. Kee

EGK/msb

8304039241 2

US-ASIA

US-Asia Institute
1901 Twentieth Street, N.W.
Suite 200
Washington, D.C. 20036

8304039 2

MR MICHAEL DYMERSKY
FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 3, 1982

Joel D. Joseph, Esquire
4801 Massachusetts Avenue, N.W.
Suite 400
Washington, D.C. 20016

RE: MUR 1353
(Carolyn McLean)

Dear Mr. Joseph:

Pursuant to your letter of May 24, 1982, please find enclosed a copy of the McLean deposition taken on July 15, 1981.

Should you have any further requests or questions, please contact Michael Dymersky at 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

3304039241

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

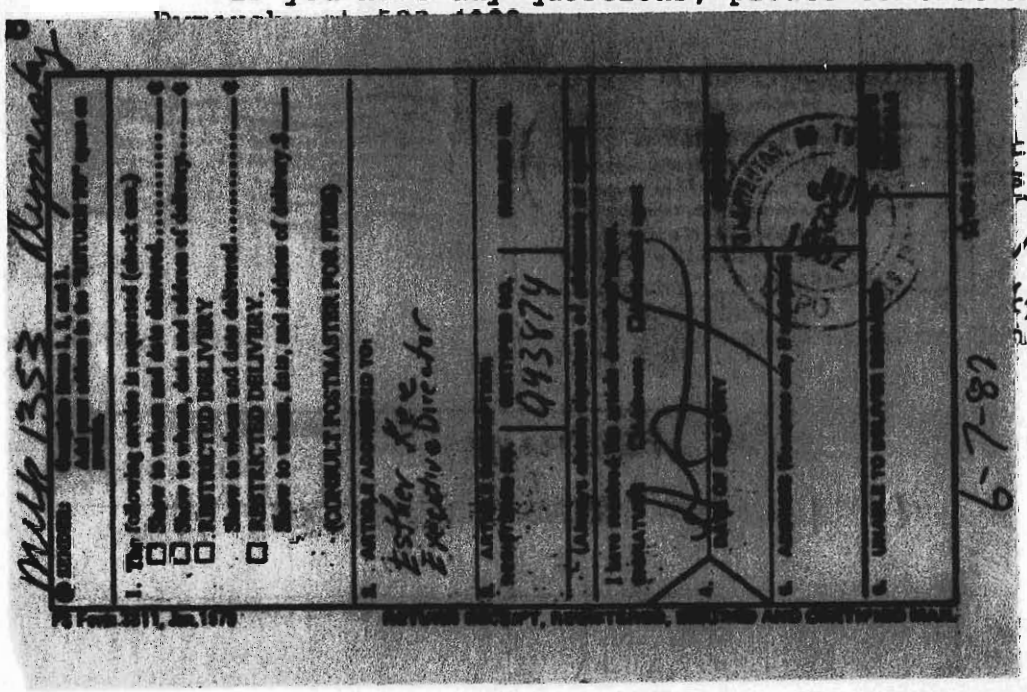
Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353
(Esther Kee)

Dear Ms. Kee

Since it is my understanding that you have not yet received the letter with factual and legal analysis notifying you of the Commission's determination that there is reason to believe that you have violated 2 U.S.C. § 441f (by making contributions in the names of other persons), please find photocopies of the pertinent documents enclosed. These documents were originally mailed on May 19, 1982.

If you have any questions, please contact Michael



eele
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353
(Esther Kee)

Dear Ms. Kee

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If you have any questions, please contact Michael Dymersky at 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY; Kenneth A. Gross
Associate General Counsel

Enclosures

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STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

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DOUGLAS B. HURON
EILEEN M. STEIN

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

June 4, 1982

82 JUN 7 P1:05

Michael Dymersky, Esquire
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

re: MUR 1353

Dear Mr. Dymersky:

I am writing in response to Chairman Reiche's letter of May 19, 1982 to Carol Darr. I will be responding on behalf of the Carter/Mondale Presidential Committee, Inc., and I request an extension until July 2, 1982 in which to file a response.

In addition, in order to respond as fully as possible, I would appreciate your sending me copies of the depositions of Esther Kee and Sandy Oreste.

Thank you for your cooperation.

Sincerely,

Douglas B. Huron

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STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

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Michael Dymersky, Esquire
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

201652

JOEL D. JOSEPH & ASSOCIATES, P.C.
ATTORNEYS AT LAW

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(202) 362-6222

75 PUBLIC SQUARE
SUITE 714
CLEVELAND, OHIO 44113
(216) 621-2424

JOEL D. JOSEPH * □ +

OF COUNSEL:

RAYMOND A. OLIVER * ■

STANLEY E. STEIN +

* DISTRICT OF COLUMBIA BAR
□ MARYLAND BAR
+ OHIO BAR
■ NEW JERSEY BAR

Gen Coun 7862
82 JUN 1 P1:33

May 24, 1982

Michael Dymersky
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

82 JUN 1 P3:25

Dear Mr. Dymersky,

Re: MUR 1353

I have been retained to represent Sandy Oreste in the above-captioned matter and enclose her designation of counsel form. Please note that "Sandy" is my client's nickname and that her true name is Carolyn. Also she has divorced and her name is now Carolyn McLean.

I request a copy of the deposition which was taken of Ms. McLean. After I have reviewed the deposition I will respond to the MUR on Ms. McLean's behalf.

Sincerely yours,

Joel D. Joseph

8304039245

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Joel Joseph

ADDRESS: 4801 Massachusetts Ave., N.W., Suite 400, Washington, D.C. 20016

TELEPHONE: 362-6222

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

5/24/82
Date

Carolyn Oreste McLean
Signature

NAME: CAROLYN ORESTE MCLEAN

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

8304039242

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1982

Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353

Dear Ms. Kee:

On March 2, 1982 and May 18, 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq; ("the Act") by making contributions in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. _____
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Esther Kee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Esther Kee violated 2 U.S.C. § 441f by making contributions in the names of other persons.

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee failed to return the cash receipts to the cash contributors, purchased money orders with the converted receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1982

Sandy Oreste
Shea and Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20016

RE: MUR 1353

Dear Ms. Oreste:

On March 2, 1982 and May 18, 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., ("the Act") by knowingly accepting contributions made by Esther Kee in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Sandy Oreste

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Sandy Oreste violated 2 U.S.C. § 441f by knowingly accepting contributions made by Esther Kee in the names of other persons.

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

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II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee possibly acting through Sandy Oreste, when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Sandy Oreste, having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors but had converted them by purchasing money orders, knowingly accepted contributions made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1982

Carol Darr
Deputy Counsel
Carter/Mondale Presidential Committee, Inc.
4710 Bethesda Ave., #302
Bethesda, Maryland 20014

RE: MUR 1353

Dear Ms. Darr:

On March 2, 1982 and May 18, 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 432(c) , 26 U.S.C. § 9042(c)(1)(A) and 11 C.F.R. § 110.4(c)(2). In addition, the Commission decided to seek a repayment of $7,130.35 in matching funds, pursuant to 11 C.F.R. § 9038.2(a). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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If you have any questions, please contact Michael Dymersky at 202/523-4039.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

Enclosure
General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

Date _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
(202) 523-4039

RESPONDENT Carter/Mondale Presidential Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. § 432(c); 11 C.F.R. § 110.4(c)(2); and 26 U.S.C. § 9042(c)(1)(A). In addition, the Committee should repay $7,130.35 in primary matching funds pursuant to 11 C.F.R. § 9038.2(a).

FACTUAL BASIS AND LEGAL ANALYSIS

I. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders that were made in amounts greater than $100. 1/ Also, a number of money orders bear the same name. 2/

1/ Money Order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and for $500 each.

2/ Aside from the two money orders bearing the name Shui K. Lee, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592-680, Money Order No. 592676 and Money Order No. 592675 bear the name David D.H. Kim, and are for $100 each; and Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

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Twenty-two of the 47 individuals who responded to the reason to believe notification declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made, 3/ while twenty-four of the 47 made no indication as to whether a contribution was made.

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her

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3/ This individual -- Do Young Paik -- said he contributed in cash. He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it.

directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were returned by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. Thus, the actual contributors never received

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their rejected cash contributions, nor agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 3, supra). Apparently, Sandy Oreste filled out the requisite contributor cards when Esther Kee gave her the filled out money orders, from lists of attendees supplied by Kee.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a computer. Verification letters were then automatically sent to the identified contributors. This verification process was conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence

that four (4) executed contribution verification letters were received. 4/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more stringent than necessary, it was relaxed. The money orders involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

4/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee; Tse Wai Chun; Yet Suey Gee (Tom); and Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution by money order.

II. Legal Analysis

A. Violation of 2 U.S.C. § 432(c)

The accounting provision of the Act at 2 U.S.C. § 432(c) makes it clear that the Committee must keep accurate records of contributions received. The evidence establishes that the Committee did not comply with the provision. While the evidence suggests that there was an intent to maintain accurate records of receipts at the Silver Palace Restaurant fundraiser, the plain fact is that only inadequate and inaccurate accounts were kept. Indeed, while Kee and other volunteers initially planned to keep any cash received in individualized envelopes, and fill out accompanying contributor cards, in fact, the cash was all combined, and an inaccurate and incomplete list of such cash contributors was kept, making it virtually impossible to ascertain exactly who had contributed what. As a result, accurate receipt accounts were not maintained by the Committee, and the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(c).

B. Repayments of Primary Matching Funds; 26 U.S.C. § 9038(b)(1)

The Presidential Matching Payment Account Act ("Matching Fund Act") states that:

> If the Commission determines that any portion of the payments made to a candidate . . . was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034 . . . the candidate shall pay . . . an amount equal to the amount of excess payments. 26 U.S.C. § 9038.

With respect to the Committee's entitlement to matching funds under Section 9034 for the contributions involved in this matter, the issue is whether the money orders involved herein represent matchable contributions. Section 9034 states that for matching fund purposes, the term "contribution" means " . . . a gift of money made by a written instrument which identifies the person making the contribution . . ." (emphasis added). See also 11 C.F.R. § 9034.2. When an individual contributes cash which is later converted into a written instrument by a third party without at least the tacit consent of the contributor, the contribution is not matchable in the General Counsel's view. 5/ A contributor could give cash to another as an agent for the purpose of purchasing a written instrument. Similarly, a contributor could give cash to a representative of a political committee as an agent for the same purpose. However, for such a transaction to render the resulting written instrument matchable for purposes of Section 9034, there would have to be some communication or conduct which would expressly or impliedly establish at least some intent between the individual contributor and "purchaser" Committee official to create the agency

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5/ Thus, there may even be a problem in terms of matchability if a contributor signs a contribution verification letter which fails to specify that the contribution was made by a written instrument. The four (4) verification letters produced by the Committee herein do not contain a statement that the contributions were made by written instrument.

relationship. See Universal Computer Systems, Inc. v. Medical Services Ass'n of Pennsylvania, 474 F. Supp. 472 (D.C. Pa. 1979). If the contributor has not intended that cash constitute the contribution and, instead intends the money order to so function, the actual contribution occurs when the money order has been purchased and given to the Committee. Then the contribution is "by a written instrument," and is matchable presuming that other requirements of 11 C.F.R. § 9034.2 have been fulfilled.

In the instant matter, the evidence suggests that Esther Kee and other volunteers accepted cash contributions at the Silver Palace Restaurant fundraiser on behalf of the Committee. The money orders were purchased by the volunteers only after a Committee representative mentioned to Kee that cash was not preferred by the Committee. Only the most cursory efforts were made to determine if the cash contributors would like to have the cash converted into written instrument, i.e., money order form. 6/ No efforts were made to return the rejected cash. Esther Kee has testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash

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6/ If the actual cash contributors had been consulted, then perhaps the problems of inaccurate attribution and contributions by cash could have been avoided.

contributions. No effort was made to contact the listed individuals and either get their acquiescence to, or even inform them of the purchase. 7/ The evidence thus runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.

Additionally, it follows from the regulatory requirement of 11 C.F.R. § 9034(c)(2) that any money orders which do not bear the contributor's signature or are not accompanied by a written document signed by the contributor are not matchable. Since the evidence makes it clear that the original cash contributors knew nothing of the money order purchases, and that Esther Kee and other volunteers filled in the instruments including the remitter lines with the names of persons other than to whom they belonged, a fortiori, the money orders involved in this matter were not signed by the actual contributors. Thus, with the exception of the four (4) money orders which were accompanied by four (4) verification letters (See fn. 4, supra), which are unmatchable for other reasons, the money orders involved in this matter are not matchable because they lack the necessary signature.

7/ The only apparent exception is Do Young Paik. See fn. 6, supra.

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Accordingly, the General Counsel recommends that the Commission seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a)(1) (an amount equal to the amount improperly paid).

C. Violation of 11 C.F.R. § 110.4(c)(2)

2 U.S.C. § 441g places a $100 limitation on aggregate cash contributions made to a single candidate or candidate's committee. Commission regulations at 11 C.F.R. § 110.4(c)(2) require a Committee receiving cash contributions aggregating in excess of $100 to return the amount over $100 to the contributor. As has been highlighted, there were four (4) money orders that were made in amounts greater than $100 (see fn. 1, supra), and a number of money orders for $100 which were attributed to the same person (see fn 2, supra).

Although Esther Kee has denied that these money orders represent cash contributions, the circumstances make it probable that they indeed represent the original cash contributions. The money order numbers on these money orders fit into the consecutive number sequence of others that are representative of cash contributions. Moreover, there is a distinct similarity in the handwriting patterns of the money orders as verified by Esther Kee's testimony. Finally, but no less significantly, the money orders are dated, and were therefore purchased days after the event.

Since there is evidence that most, if not all, of the money orders which are part of this matter represent at the initial stage actual cash contributions, the General Counsel recommends

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that the Commission find reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to return amounts aggregating in excess of $100 in U.S. currency.

D. Violation of 26 U.S.C. § 9042(c)(1)(A)

The Matching Fund Act makes it unlawful for any person knowingly and willfully

> (A) to furnish any false, fictitious, or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence, books, or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this chapter .... [26 U.S.C. § 9042(c)(1)(A)]

The Act extends the Commission's jurisdiction to "knowing and willful" violations of Chapter 26, Title 26, United States Code, in either an administrative or civil context. 2 U.S.C. §§ 437g(a)(5)(B) and (a)(6)(C). Since the § 9042(c)(1) provision is part of a grant of jurisdiction over Chapter 96, it can be civilly enforced by the Commission.

For the purpose of this analysis, then, it is important to determine whether the Committee can be held liable for the acts of its agents. A prerequisite to this determination, however, is to ascertain whether Esther Kee was the Committee's agent. From the General Counsel's point of view, Esther Kee was clearly an agent of the Committee.

The relationship between principal and agent is determined in general, by applying the law of the state which has the most

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significant relationship to the parties and the transaction at issue. Japan Petroleum Co. (Nigeria) Ltd. v. Ashland Oil, Inc., 456 F. Supp. 831, 840, n.17 (D. Del. 1978). The Committee maintained its principal place of business in the District of Columbia. The Silver Palace Restaurant fundraiser from which the contributions at issue were derived, took place in New York. As to the relationship between principal and agent, general common law principles of agency apply in both jurisdictions.

As a matter of common law, then, an agency relationship requires no special formality such as a writing, and arises when one authorizes another expressly or impliedly to act as an agent. Universal Computer Systems, Inc., 474 F. Supp. at 476. The deponents have uniformly stated that Esther Kee approached the Committee seeking to handle fundraising in the Asian-American community. Apparently she has extensive knowledge of and an ongoing relationship with that community. She volunteered her time on behalf of the Committee to seek financial support for the Carter/Mondale reelection bid. The Committee made her responsible for fundraising (title: "coordinator") at the Silver Palace Restaurant on February 21, 1980. Her duties included arranging the event generally, by seeking participation and financial support from within the resident Asian-American community. She recruited volunteers to collect receipts at the door. She solicited attendees. She sought and made pre-event ticket sales. She collected and supervised the collection of admission contributions. She met the guest of honor (Rosalynn Carter) at

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the airport and accompanied her to the event. After the event, Kee delivered the contributed funds to the Committee's headquarters. Not only was Esther Kee endowed by the Committee with the responsibility and authority to ensure that the event was a financial success, but third parties (such as the assigned Secret Service Agents) at the fundraiser acknowledged her as the Committee's representative charged with overall coordination of the event.

Sandy Oreste was the only paid Committee employee at the event, but the individual responsible for the event -- the Committee's "presence -- was Esther Kee. The fact that Kee was a volunteer is not significant. She may still be an agent of the Committee, albeit gratuitous. Sharpe v. Bradley Lumber Co., Inc., 446 F.2d 152, 155 (4th Cir. 1971), cert. denied, 405 U.S. 919 (1972).

It is a settled proposition that the principal is responsible for the acts of its agent(s) not only for the precise act which it expressly authorized the agent(s) to do, but also for whatever is necessary to its performance. Marohn v. Burnham Van Services, Inc., 478 F. Supp. 49, 51 (N.D. Ill. 1979); Southern Pac. Transp. Co. v. Continental Shippers Assn., Inc., 485 F. Supp. 1313, 1319 (W.D. Mo. 1965). And, it follows that the acts of an agent can be imputed to the principal. 8/ U.S. v.

8/ Acts of the agent may be imputed only if it is the agent's purpose or intent to benefit the principal. Actual benefit is largely irrelevant. Id.

Beusch, 596 F.2d 871, 877 (9th Cir. 1979). Moreover, the principal is considered to know what its agent knows within the scope of the agency. W.R. Grace & Co., Inc. v. Weston U.S. Industries, Inc., 608 F.2d 1214, 1218 (9th Cir. 1979). Indeed, the principal is chargeable with knowledge of the agent's conduct, which it could have ascertained if it had used ordinary care in looking at the activity in which its agent(s) was engaged. Tel-Ads, Inc. v. Trans-Lux Playhouse, Inc., 232 F. Supp. 198, 201 (D.D.C. 1964).

In her capacity as the Committee's agent, Esther Kee knew 1) that she and others accepted cash contributions on behalf of the Committee; 2) that she and others purchased money orders with the cash without the consent of the cash contributors; and, 3) that she and others filled in and signed those money orders. Clearly, Kee's knowledge of these facts can be imputed to the Committee.

Although in general, the Committee would be liable for the acts of its agents and would be held to have knowledge of its agents, the statute here at issue requires that the respondent "knowingly and willfully" submit false or misleading information to the Commission.

The Court of Appeals for the D.C. Circuit construed the term "knowing and willful" in the context of 2 U.S.C. § 437g(a)(7) (The 1979 amendments to the Act have moved § 437g(a)(7) to § 437g(a)(6)(C).) to require a showing of "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act."

American Federation of Labor and Congress of Industrial Organizations v. Federal Election Commission, 629 F. 2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 982 (1980). However, the U.S.C. Supreme Court has held that such a showing of evil intent in proving a civil violation of a "knowing and willfull" provision is not required. In the case of United States v. Illinois Central R.R. Co. 303 U.S. 239 (1938), the United States sued the railroad for "knowing and willfull" failure to timely unload cattle at their destination. The railroad's failure to unload cattle at their destination. The railroad's failure to unload the cattle was attributable to the negligent lack of cooperation between two of its agents. In adopting the language of a circuit court decision, the court reasoned that "knowing and willful" means "purposely or obstinately and is designed to describe [in this case] the attitude of a carrier, who, having a free will and choice, either intentionally disregards the statute or is plainly indifferent its requirements." Id. at 243.

Larry Hayes, as the person charged by the Committee with responsibility for submitting Matching Fund Act information to the Commission, does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors as did Esther Kee. The General Counsel is of the opinion that there would have to be some indication that a person involved in the preparation of the matching funds submissions actually knew the above-mentioned facts before there

could be any "knowing and willful" submission of false or misleading Matching Fund Act information to the Commission by the Committee.

Esther Kee indicated that she had a vague understanding that the money orders would be used for matching fund submissions. Given this understanding, however "vague," it is the opinion of the Commission that Esther Kee was involved in the gathering and submission of information for matching funds purposes. Indeed, the very instruments which she purchased and signed form the basis of the actual submission. Thus, she was certainly involved in the preparation of the matching fund submission. And, in that preparation she provided fraudulent evidence, and misrepresented a material fact.

Under these circumstances, there does seem to be a sufficient predicate for holding the Committee liable under Section 9042(c)(1). An individual involved in the preparation of the matching fund submission appears to have intentionally disregarded the statute or acted plainly indifferent to its requirements. Accordingly, the Commission has found reason to believe that the Committee violated 26 U.S.C. § 9042(c)(1)(A).

E. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

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The Commission has already found reason to believe a violation has occurred as to Section 441f on May 5, 1981. Moreover, the Committee has already received its notification as to this finding. The following analysis is provided to disclose the theory upon which the finding is based subsequent to a preliminary investigation.

The available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the minimum of $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such. It is also evident that those cash receipts were returned by the Committee when they were tendered as proceeds from the fundraiser.

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An unnamed Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks (see p.2, supra). After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delievered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee purchased money orders with the returned receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

Sandy Oreste, having knowledge that Esther Kee did not return the cash receipts to the actual cash contributors, but had converted them by purchasing money orders, knowingly accepted contributions, made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

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If you have any questions, please contact Michael Dymersky at 202/523-4039.

Sincerely,

Enclosure
General Counsel's Factual and Legal Analysis

8304039245

5/19/82

Carol Darr
Deputy Counsel
Carter/Mondale Presidential Committee, Inc.
4710 Bethesda Ave., #302
Bethesda, Maryland 20014

RE: MUR 1353

Dear Ms. Darr:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 432(c) , 26 U.S.C. § 9042(c)(1)(A) and 11 C.F.R. § 110.4(c)(2). In addition, the Commission decided to seek a repayment of $7,130.35 in matching funds, pursuant to 11 C.F.R. § 9038.2(a). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

8304039245

Sandy Oreste
Shea and Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20016

RE: MUR 1353

Dear Ms. Oreste:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., ("the Act") by knowingly accepting contributions made by Esther Kee in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

8304039245 7

MD 5/19/82

Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353

Dear Ms. Kee:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq; ("the Act") by making contributions in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

MD 5/19/92

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1353
Carter/Mondale Presidential Committee, et al.	)	

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on May 18, 1982, do hereby certify that the Commission took the following actions in the above-captioned matter:

1. Decided by a vote of 5-0 to amend the Factual and Legal Analysis attached to the General Counsel's Corrigendum to the May 5, 1982 report by substituting the word returned for the word rejected in line seven on page three.

   Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Harris abstained.

2. Decided by a vote of 5-0 to amend the Factual and Legal Analysis attached to the General Counsel's Corrigendum to the May 5, 1982 report by substituting the word returned for the word rejected in paragraph two on page seventeen and in the first line on page eighteen.

   Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Harris abstained.

3. Decided by a vote of 6-0 to take the following actions

   a) Approve and authorize the sending of the reason to believe notification attached to the General Counsel's May 5, 1982 report.

Continued

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b) Approve the Factual and Legal Analysis contained in the Corrigendum to the General Counsel's May 5, 1982 report, as amended above, and send it along with the notification letters to the Carter/Mondale Presidential Committee, Sandy Oreste and Esther Kee.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

5-18-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 MAY 13 P 4: 07

Submitted Late

SENSITIVE

MEMORANDUM

EXECUTIVE SESSION

MAY 18 1982

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1353; Corrigendum (Memorandum dated May 5, 1982)

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
82 MAY 14 A 9: 41
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This erratum is being circulated so that language contained in an attachment to a memorandum to the Commission dated May 5, 1982 may be corrected. Language appearing on page 12 of Attachment I (page 10 of the General Counsel's Factual and Legal Analysis to the Carter/Mondale Presidential Committee) which appears below, should be deleted.

> "Yet a third reason exists for not treating the money orders here involved as matchable. Because the Committee in effect rejected the cash receipts and returned the funds to Esther Kee who then converted them to money orders without getting authorization from the original contributors, Esther Kee can be viewed as having herself made contributions in the names of others. Under 26 U.S.C. § 9034(a) the money orders in question would thus not be matchable because they did not identify Esther Kee as the person making the contribution. Moreover, because the contributions by Kee consequently violated 2 U.S.C. §§ 441a and 441f (see full discussion infra, pp. 17-20), the Commission's regulations expressly preclude matchability. 11 C.F.R. § 9034.3(e)."

A corrected copy of the proposed Factual and Legal Analysis is attached hereto.

Attachment
General Counsel's Factual and Legal Analysis

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
82 MAY 5 P4:07

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 5, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1353 (Carter/Mondale Presidential Committee et al.); Circulation of Notification Letters and General Counsel's Factual and Legal Analyses

Attached for your information are reason to believe notification letters directed to Carol Darr, counsel to the Carter/Mondale Presidential Committee ("the Committee") in connection with this matter, Sandy Oreste and Esther Kee. In addition, General Counsel's Factual and Legal Analyses are included for each. Although the Commission made all of the findings and directed this office to "send the appropriate notification" to the respective respondents on March 2, 1982, the attached letters and analyses are being circulated on a 48 hour tally vote basis.

Recommendation

Approve and authorize the sending of the attached reason to believe notification letters and analyses to the Carter/Mondale Presidential Committee, Sandy Oreste and Esther Kee.

Attachments
1. Notification letter to Carter/Mondale with General Counsel's Factual and Legal Analysis
2. Notification letter to Esther Kee with General Counsel's Factual and Legal Analysis
3. Notification letter to Sandy Oreste with General Counsel's Factual and Legal Analysis

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(1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Carol Darr
Deputy Counsel
Carter/Mondale Presidential Committee, Inc.
4710 Bethesda Ave., #302
Bethesda, Maryland 20014

RE: MUR 1353

Dear Ms. Darr:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 432(c) , 26 U.S.C. § 9042(c)(1)(A) and 11 C.F.R. § 110.4(c)(2). In addition, the Commission decided to seek a repayment of $7,130.35 in matching funds, pursuant to 11 C.F.R. § 9038.2(a). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

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Attachment I - (1)

If you have any questions, please contact Michael Dymersky at 202/523-4039.

Sincerely,

Enclosure
General Counsel's Factual and Legal Analysis

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Attachment I - (2)

(3)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

Date _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
(202) 523-4039

RESPONDENT Carter/Mondale Presidential Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. § 432(c); 11 C.F.R. § 110.4(c)(2); and 26 U.S.C. § 9042(c)(1)(A). In addition, the Committee should repay $7,130.35 in primary matching funds pursuant to 11 C.F.R. § 9038.2(a).

FACTUAL BASIS AND LEGAL ANALYSIS

I. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders that were made in amounts greater than $100. 1/ Also, a number of money orders bear the same name. 2/

1/ Money Order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and for $500 each.

2/ Aside from the two money orders bearing the name Shui K. Lee, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592-680, Money Order No. 592676 and Money Order No. 592675 bear the name David D.H. Kim, and are for $100 each; and Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

Attachment I -(3)

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Twenty-two of the 47 individuals who responded to the reason to believe notification declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made, 3/ while twenty-four of the 47 made no indication as to whether a contribution was made.

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her

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3/ This individual -- Do Young Paik -- said he contributed in cash. He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it.

directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. Thus, the actual contributors never received

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(6)

their rejected cash contributions, nor agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 3, supra). Apparently, Sandy Oreste filled out the requisite contributor cards when Esther Kee gave her the filled out money orders, from lists of attendees supplied by Kee.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a computer. Verification letters were then automatically sent to the identified contributors. This verification process was conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence

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Attachment I -(6)

(7)

that four (4) executed contribution verification letters were received. 4/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more stringent than necessary, it was relaxed. The money orders involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

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4/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee; Tse Wai Chun; Yet Suey Gee (Tom); and Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution by money order.

Attachment 1 (7)

(8)

II. Legal Analysis

A. Violation of 2 U.S.C. § 432(c)

The accounting provision of the Act at 2 U.S.C. § 432(c) makes it clear that the Committee must keep accurate records of contributions received. The evidence establishes that the Committee did not comply with the provision. While the evidence suggests that there was an intent to maintain accurate records of receipts at the Silver Palace Restaurant fundraiser, the plain fact is that only inadequate and inaccurate accounts were kept. Indeed, while Kee and other volunteers initially planned to keep any cash received in individualized envelopes, and fill out accompanying contributor cards, in fact, the cash was all combined, and an inaccurate and incomplete list of such cash contributors was kept, making it virtually impossible to ascertain exactly who had contributed what. As a result, accurate receipt accounts were not maintained by the Committee, and the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(c).

B. Repayments of Primary Matching Funds; 26 U.S.C. § 9038(b)(1)

The Presidential Matching Payment Account Act ("Matching Fund Act") states that:

> If the Commission determines that any portion of the payments made to a candidate . . . was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034 . . . the candidate shall pay . . . an amount equal to the amount of excess payments. 26 U.S.C. § 9038.

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Attachment I - (8)

With respect to the Committee's entitlement to matching funds under Section 9034 for the contributions involved in this matter, the issue is whether the money orders involved herein represent matchable contributions. Section 9034 states that for matching fund purposes, the term "contribution" means " . . . a gift of money made by a written instrument which identifies the person making the contribution . . ." (emphasis added). See also 11 C.F.R. § 9034.2. When an individual contributes cash which is later converted into a written instrument by a third party without at least the tacit consent of the contributor, the contribution is not matchable in the General Counsel's view. 5/ A contributor could give cash to another as an agent for the purpose of purchasing a written instrument. Similarly, a contributor could give cash to a representative of a political committee as an agent for the same purpose. However, for such a transaction to render the resulting written instrument matchable for purposes of Section 9034, there would have to be some communication or conduct which would expressly or impliedly establish at least some intent between the individual contributor and "purchaser" Committee official to create the agency

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5/ Thus, there may even be a problem in terms of matchability if a contributor signs a contribution verification letter which fails to specify that the contribution was made by a written instrument. The four (4) verification letters produced by the Committee herein do not contain a statement that the contributions were made by written instrument.

relationship. See Universal Computer Systems, Inc. v. Medical Services Ass'n of Pennsylvania, 474 F. Supp. 472 (D.C. Pa. 1979). If the contributor has not intended that cash constitute the contribution and, instead intends the money order to so function, the actual contribution occurs when the money order has been purchased and given to the Committee. Then the contribution is "by a written instrument," and is matchable presuming that other requirements of 11 C.F.R. § 9034.2 have been fulfilled.

In the instant matter, the evidence suggests that Esther Kee and other volunteers accepted cash contributions at the Silver Palace Restaurant fundraiser on behalf of the Committee. The money orders were purchased by the volunteers only after a Committee representative mentioned to Kee that cash was not preferred by the Committee. Only the most cursory efforts were made to determine if the cash contributors would like to have the cash converted into written instrument, i.e., money order form. 6/ No efforts were made to return the rejected cash. Esther Kee has testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash

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6/ If the actual cash contributors had been consulted, then perhaps the problems of inaccurate attribution and contributions by cash could have been avoided.

(11)

contributions. No effort was made to contact the listed individuals and either get their acquiescence to, or even inform them of the purchase. 7/ The evidence thus runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.

Additionally, it follows from the regulatory requirement of 11 C.F.R. § 9034(c)(2) that any money orders which do not bear the contributor's signature or are not accompanied by a written document signed by the contributor are not matchable. Since the evidence makes it clear that the original cash contributors knew nothing of the money order purchases, and that Esther Kee and other volunteers filled in the instruments including the remitter lines with the names of persons other than to whom they belonged, a fortiori, the money orders involved in this matter were not signed by the actual contributors. Thus, with the exception of the four (4) money orders which were accompanied by four (4) verification letters (See fn. 4, supra), which are unmatchable for other reasons, the money orders involved in this matter are not matchable because they lack the necessary signature.

7/ The only apparent exception is Do Young Paik. See fn. 6, supra.

Attachment I-(11)

(12)

Yet a third reason exists for not treating the money orders here involved as matchable. Because the Committee in effect rejected the cash receipts and returned the funds to Esther Kee who then converted them to money orders without getting authorization from the original contributors, Esther Kee can be viewed as having herself made contributions in the names of others. Under 26 U.S.C. § 9034(a) the money orders in question would thus not be matchable because they did not identify Esther Kee as the person making the contribution. Moreover, because the contributions by Kee consequently violated 2 U.S.C. §§ 441a and 441f (see full discussion infra, pp. 17-20), the Commission's regulations expressly preclude matchability. 11 C.F.R. § 9034.3(e). Accordingly, the General Counsel recommends that the Commission seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a)(1) (an amount equal to the amount improperly paid.

C. Violation of 11 C.F.R. § 110.4(c)(2)

2 U.S.C. § 441g places a $100 limitation on aggregate cash contributions made to a single candidate or candidate's committee. Commission regulations at 11 C.F.R. § 110.4(c)(2) require a Committee receiving cash contributions aggregating in excess of $100 to return the amount over $100 to the contributor. As has been highlighted, there were four (4) money orders that were made in amounts greater than $100 (see fn. 1, supra), and a number of money orders for $100 which were attributed to the same person (see fn 2, supra).

Attachment I -(12)

Although Esther Kee has denied that these money orders represent cash contributions, the circumstances make it probable that they indeed represent the original cash contributions. The money order numbers on these money orders fit into the consecutive number sequence of others that are representative of cash contributions. Moreover, there is a distinct similarity in the handwriting patterns of the money orders as verified by Esther Kee's testimony. Finally, but no less significantly, the money orders are dated, and were therefore purchased days after the event.

Since there is evidence that most, if not all, of the money orders which are part of this matter represent at the initial stage actual cash contributions, the General Counsel recommends that the Commission find reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to return amounts aggregating in excess of $100 in U.S. currency.

D. Violation of 26 U.S.C. § 9042(c)(1)(A)

The Matching Fund Act makes it unlawful for any person knowingly and willfully

> (A) to furnish any false, fictitious, or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence, books, or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this chapter .... [26 U.S.C. § 9042(c)(1)(A)]

(14)

The Act extends the Commission's jurisdiction to "knowing and willful" violations of Chapter 26, Title 26, United States Code, in either an administrative or civil context. 2 U.S.C. §§ 437g(a)(5)(B) and (a)(6)(C). Since the § 9042(c)(1) provision is part of a grant of jurisdiction over Chapter 96, it can be civilly enforced by the Commission.

For the purpose of this analysis, then, it is important to determine whether the Committee can be held liable for the acts of its agents. A prerequisite to this determination, however, is to ascertain whether Esther Kee was the Committee's agent. From the General Counsel's point of view, Esther Kee was clearly an agent of the Committee.

The relationship between principal and agent is determined in general, by applying the law of the state which has the most significant relationship to the parties and the transaction at issue. Japan Petroleum Co. (Nigeria) Ltd. v. Ashland Oil, Inc., 456 F. Supp. 831, 840, n.17 (D. Del. 1978). The Committee maintained its principal place of business in the District of Columbia. The Silver Palace Restaurant fundraiser from which the contributions at issue were derived, took place in New York. As to the relationship between principal and agent, general common law principles of agency apply in both jurisdictions.

As a matter of common law, then, an agency relationship requires no special formality such as a writing, and arises when one authorizes another expressly or impliedly to act as an agent.

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Attachment I - (14)

Universal Computer Systems, Inc., 474 F. Supp. at 476. The deponents have uniformly stated that Esther Kee approached the Committee seeking to handle fundraising in the Asian-American community. Apparently she has extensive knowledge of and an ongoing relationship with that community. She volunteered her time on behalf of the Committee to seek financial support for the Carter/Mondale reelection bid. The Committee made her responsible for fundraising (title: "coordinator") at the Silver Palace Restaurant on February 21, 1980. Her duties included arranging the event generally, by seeking participation and financial support from within the resident Asian-American community. She recruited volunteers to collect receipts at the door. She solicited attendees. She sought and made pre-event ticket sales. She collected and supervised the collection of admission contributions. She met the guest of honor (Rosalynn Carter) at the airport and accompanied her to the event. After the event, Kee delivered the contributed funds to the Committee's headquarters. Not only was Esther Kee endowed by the Committee with the responsibility and authority to ensure that the event was a financial success, but third parties (such as the assigned Secret Service Agents) at the fundraiser acknowledged her as the Committee's representative charged with overall coordination of the event.

Sandy Oreste was the only paid Committee employee at the event, but the individual responsible for the event -- the Committee's "presence -- was Esther Kee. The fact that Kee was a

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volunteer is not significant. She may still be an agent of the Committee, albeit gratuitous. Sharpe v. Bradley Lumber Co., Inc., 446 F.2d 152, 155 (4th Cir. 1971), cert. denied, 405 U.S. 919 (1972).

It is a settled proposition that the principal is responsible for the acts of its agent(s) not only for the precise act which it expressly authorized the agent(s) to do, but also for whatever is necessary to its performance. Marohn v. Burnham Van Services, Inc., 478 F. Supp. 49, 51 (N.D. Ill. 1979); Southern Pac. Transp. Co. v. Continental Shippers Assn., Inc., 485 F. Supp. 1313, 1319 (W.D. Mo. 1965). And, it follows that the acts of an agent can be imputed to the principal. 8/ U.S. v. Beusch, 596 F.2d 871, 877 (9th Cir. 1979). Moreover, the principal is considered to know what its agent knows within the scope of the agency. W.R. Grace & Co., Inc. v. Weston U.S. Industries, Inc., 608 F.2d 1214, 1218 (9th Cir. 1979). Indeed, the principal is chargeable with knowledge of the agent's conduct, which it could have ascertained if it had used ordinary care in looking at the activity in which its agent(s) was engaged. Tel-Ads, Inc. v. Trans-Lux Playhouse, Inc., 232 F. Supp. 198, 201 (D.D.C. 1964).

In her capacity as the Committee's agent, Esther Kee knew 1) that she and others accepted cash contributions on behalf of

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8/ Acts of the agent may be imputed only if it is the agent's purpose or intent to benefit the principal. Actual benefit is largely irrelevant. Id.

the Committee; 2) that she and others purchased money orders with the cash without the consent of the cash contributors; and, 3) that she and others filled in and signed those money orders. Clearly, Kee's knowledge of these facts can be imputed to the Committee.

Although in general, the Committee would be liable for the acts of its agents and would be held to have knowledge of its agents, the statute here at issue requires that the respondent "knowingly and willfully" submit false or misleading information to the Commission.

The Court of Appeals for the D.C. Circuit construed the term "knowing and willful" in the context of 2 U.S.C. § 437g(a)(7) (The 1979 amendments to the Act have moved § 437g(a)(7) to § 437g(a)(6)(C).) to require a showing of "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act." American Federation of Labor and Congress of Industrial Organizations v. Federal Election Commission, 629 F. 2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 982 (1980). However, the U.S.C. Supreme Court has held that such a showing of evil intent in proving a civil violation of a "knowing and willfull" provision is not required. In the case of United States v. Illinois Central R.R. Co. 303 U.S. 239 (1938), the United States sued the railroad for "knowing and willfull" failure to timely unload cattle at their destination. The railroad's failure to unload cattle at their destination. The railroad's failure to unload the cattle was attributable to the negligent lack of

(A)

cooperation between two of its agents. In adopting the language of a circuit court decision, the court reasoned that "knowing and willful" means "purposely or obstinately and is designed to describe [in this case] the attitude of a carrier, who, having a free will and choice, either intentionally disregards the statute or is plainly indifferent its requirements." Id. at 243.

Larry Hayes, as the person charged by the Committee with responsibility for submitting Matching Fund Act information to the Commission, does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors as did Esther Kee. The General Counsel is of the opinion that there would have to be some indication that a person involved in the preparation of the matching funds submissions actually knew the above-mentioned facts before there could be any "knowing and willful" submission of false or misleading Matching Fund Act information to the Commission by the Committee.

Esther Kee indicated that she had a vague understanding that the money orders would be used for matching fund submissions. Given this understanding, however "vague," it is the opinion of the Commission that Esther Kee was involved in the gathering and submission of information for matching funds purposes. Indeed, the very instruments which she purchased and signed form the basis of the actual submission. Thus, she was certainly involved

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Attachment I -(18)

in the preparation of the matching fund submission. And, in that preparation she provided fraudulent evidence, and misrepresented a material fact.

Under these circumstances, there does seem to be a sufficient predicate for holding the Committee liable under Section 9042(c)(1). An individual involved in the preparation of the matching fund submission appears to have intentionally disregarded the statute or acted plainly indifferent to its requirements. Accordingly, the Commission has found reason to believe that the Committee violated 26 U.S.C. § 9042(c)(1)(A).

E. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

The Commission has already found reason to believe a violation has occurred as to Section 441f on May 5, 1981. Moreover, the Committee has already received its notification as to this finding. The following analysis is provided to disclose the theory upon which the finding is based subsequent to a preliminary investigation.

The available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the minimum of $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash

contributions as such. It is also evident that those cash receipts were rejected by the Committee when they were tendered as proceeds from the fundraiser.

An unnamed Committee official, when confronted with the cash reciepts, told Esther Kee that the Committee needed money orders or bank checks (see p.2, supra). After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delievered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee purchased money orders with the rejected receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

Sandy Oreste, having knowledge that Esther Kee did not return the cash receipts to the actual cash contributors, but had converted them by purchasing money orders, knowingly

accepted contributions, made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sandy Oreste
Shea and Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20016

RE: MUR 1353

Dear Ms. Oreste:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., ("the Act") by knowingly accepting contributions made by Esther Kee in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment II - (1)

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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Attachment II -(2)

(24)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Sandy Oreste

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Sandy Oreste violated 2 U.S.C. § 441f by knowingly accepting contributions made by Esther Kee in the names of other persons.

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

Attachment II - (3)

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

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Attachment II - (4)

other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

Attachment II -(5)

(27)

minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee possibly acting through Sandy Oreste, when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Sandy Oreste, having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors but had converted them by purchasing money orders, knowingly accepted contributions made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f.

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Attachment II - (6)

(28)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353

Dear Ms. Kee:

On March 2, 1982 and May , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq; ("the Act") by making contributions in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment III-(1)

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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Attachment III -(2)

(30)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. _____
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Esther Kee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Esther Kee violated 2 U.S.C. § 441f by making contributions in the names of other persons.

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

Attachment III - (3)

(31)

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

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Attachment III - (4)

other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee failed to return the cash receipts to the cash contributors, purchased money orders with the converted receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons.

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Attachment III (6)

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OFFICE OF THE
COMMISSION SECRETARY

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Carter/Mondale Presidential) MUR 1353
Committee, et al.)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A. Previous Commission Action

On May 5, 1981, the Commission found reason to believe that the Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. § 441f by knowingly accepting contributions made by persons in the names of other persons. The Commission also found reason to believe that 67 named individuals knowingly allowed their names to be used to effectuate contributions by other people.

On June 23, 1981, the Commission authorized the issuance of subpoenas directed to Mrs. Ester Kee and Ms. Sandy Oreste (a.k.a. Carolyn McLean).1/ On September 9, 1981, the Commission authorized the issuance of a subpoena directed to Mr. Larry Hayes.2/ On March 2, 1982, the Commission found no probable

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1/ Ms. Oreste appeared for depositon on July 15, 1981. Mrs. Kee appeared for deposition on July 17, 1981.

2/ Mr. Hayes appeared for deposition on September 28, 1981.

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cause to believe that the 67 individual respondents violated 2 U.S.C. § 441f. Accordingly, the appropriate notifications have been sent. In addition, the Commission found reason to believe that the Committee violated 2 U.S.C. § 432(c), 11 C.F.R. § 110.4(c)(2) and 26 U.S.C. § 9042(c)(1)(A). The Commission also decided to seek a repayment of $7,130.35 from the Committee, pursuant to 11 C.F.R. § 9038.2(a). As to Esther Kee and Sandy Oreste, the Commission found reason to believe that they violated 2 U.S.C. § 441f.

The purpose of this General Counsel's Report is to recommend that the Commission find reason to believe that Esther Kee violated 2 U.S.C. § 441a(a)(1)(A), and that Sandy Oreste and the Committee violated 2 U.S.C. § 441a(f). These violations would logically flow from the Commission's determination with regard to 2 U.S.C. § 441f. In addition, because the Commission's determination on March 2, 1982, differed in several respects from the General Counsel's recommendations, we have prepared new notification letters with revised legal and factual analyses for Commission approval.

B. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders

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that were made in amounts greater than $100.3/ Also, a number of money orders bear the same name.4/

Twenty two of the 47 individuals who responded to the reason to believe notification declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made,5/ while twenty four of the 47 made no indication as to whether a contribution was made.

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

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3/ Money order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and are for $500 each.

4/ Aside from the two money orders bearing the name Shui K. Lee, fn. 4, supra, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592680, Money Order No. 592676 and Money Order No. 592675 bear the name David D. H. Kim, and are for $100 each; and, Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

5/This individual -- Do Young Paik -- said he contributed in cash. (See fn. 5, supra, re: Mr. Paik). He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,200 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash

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receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 6, supra). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders, from lists of attendees supplied by Kee.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a computer. Verification letters were then automatically sent to the identified contributors. This verification process was

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conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence that four (4) executed contribution verification letters were received.6/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more stringent than necessary, it was relaxed, the money orders

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6/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee (see fn. 4, supra); Tse Wai Chun; Yet Suey Gee (Tom); and, Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution (by money orders).

involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

II. LEGAL ANALYSIS

The available evidence discloses that some persons in attendance at the Silver Place Restuarant fundraiser paid the minimum $100 entrance fee in cash, in their own names and from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such. It is also evident that those cash receipts were rejected by the Committee, apparently acting through Sandy Oreste, when they were tendered as proceeds from the fundraiser.

According to Kee, a Committee official whose identity she could not recall, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bankchecks. After this rejection, the cash receipts should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

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A. Violation of 2 U.S.C. § 441a(a)(1)(A)

Section 441a(a)(1)(A) of the Act provides that "No person shall make contributions to any candidate or his authorized political committees with respect to any election for Federal office which, in the aggregate exceed $1,000."

As has been described above, Esther Kee failed to return the rejected receipts to the original cash contributors or get their authorization for conversion to money orders, and instead purchased money orders independently . Essentially, these cash receipts became Esther Kee's personal funds which she thereafter contributed in the aggregate amount of $9,200 to the Committee in the names of other persons. In so doing she violated 2 U.S.C. § 441a(a)(1)(A) by contributing over $1,000 per election to a federal candidate. Accordingly, the General Counsel recommends that the Commission find reason to believe that Esther Kee violated 2 U.S.C. § 441a(a)(1)(A).

B. Violation of 2 U.S.C. § 441a(f)

Section 441a(f) of the Act provides that ". . . [N]o . . . political committee [or] employee of a political committee shall knowingly accept a contribution made for the benefit . . . of a candidate . . . in violation of any limit imposed on contributions . . . under this section."

As described above, Sandy Oreste, a paid Committee employee, apparently having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors but had converted them by purchasing money orders, knowingly accepted

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$9,200 in the aggregate from Kee in the form of various money orders which contained the names of other persons.

Since Esther Kee's contributions were limited by the express terms of 2 U.S.C. § 441a(a)(1)(A) to $1000 per election, Sandy Oreste violated 2 U.S.C. § 441a(f) by knowingly accepting the excess aggregate amount. Moreover, since Sandy Oreste was acting within the scope of her agency with an interest to benefit the Committee, her knowledge may be imputed to the latter, and the Committee can be said to have violated 2 U.S.C. § 441a(f) as well. See United States v. Beusch. 596 F.2d 871, 877 (9th Cir. 1979). Accordingly, the General Counsel recommends that the Commission find reason to believe that Sandy Oreste and the Committee violated 2 U.S.C. § 441a(f).

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Recommendations

1. Find reason to believe that Esther Kee violated 2 U.S.C. § 441a(a)(1)(A) by making contribution which aggregated in excess of $1000 per election to the Carter/Mondale Presidential Committee.

2. Find reason to believe that Sandy Oreste violated 2 U.S.C. § 441a(f) by knowingly accepting contributions from Esther Kee which aggregated in excess of $1,000 per election, on behalf of the Carter/Mondale Presidential Committee.

3. Find reason to believe that the Carter/Mondale Presidential Committee violated 2 U.S.C. § 441a(f) by knowingly accepting contributions from Esther Kee which aggregated in excess of $1,000 per election.

4. Approve and send the attached notification letters each with an accompanying General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

April 8, 1982
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments
1. Notification letter to Carter/Mondale with General Counsel's Factual and Legal Analysis
2. Notification letter to Esther Kee with General Counsel's Factual and Legal Analysis
3. Notification letter to Sandy Oreste with General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Carol Darr
Deputy Counsel
Carter/Mondale Presidential Committee, Inc.
4710 Bethesda Ave., #302
Bethesda, Maryland 20014

RE: MUR 1353

Dear Ms. Darr:

On March 2, 1982 and April , 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §§ 432(c) and 441a(f), 26 U.S.C. § 9042(c)(1)(A) and 11 C.F.R. § 110.4(c)(2). In addition, the Commission decided to seek a repayment of $7,130.35 in matching funds, pursuant to 11 C.F.R. § 9038.2(a). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

Attachment I - (1)

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If you have any questions, please contact Michael Dymersky at 202/523-4039.

Sincerely,

Enclosure
General Counsel's Factual and Legal Analysis

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Attachment I - (2)

(3)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

Date _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
(202) 523-4039

RESPONDENT Carter/Mondale Presidential Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. §§ 432(c) and 441a(f); 11 C.F.R. § 110.4(c)(2); and 26 U.S.C. § 9042(c)(1)(A). In addition, the Committee should repay $7,130.35 in primary matching funds pursuant to 11 C.F.R. § 9038.2(a).

FACTUAL BASIS AND LEGAL ANALYSIS

I. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders that were made in amounts greater than $100. 1/ Also, a number of money orders bear the same name. 2/

1/ Money Order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and for $500 each.

2/ Aside from the two money orders bearing the name Shui K. Lee, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592-680, Money Order No. 592676 and Money Order No. 592675 bear the name David D.H. Kim, and are for $100 each; and Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

Attachment I -(3)

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Twenty-two of the 47 individuals who responded to the reason to believe notification declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made, 3/ while twenty-four of the 47 made no indication as to whether a contribution was made.

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her

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3/ This individual -- Do Young Paik -- said he contributed in cash. He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it.

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Attachment I-(4)

directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. Thus, the actual contributors never received

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Attachment I-(5)

(6)

their rejected cash contributions, nor agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 3, supra). Apparently, Sandy Oreste filled out the requisite contributor cards when Esther Kee gave her the filled out money orders, from lists of attendees supplied by Kee.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a computer. Verification letters were then automatically sent to the identified contributors. This verification process was conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence

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Attachment I-(6)

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that four (4) executed contribution verification letters were received. 4/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more stringent than necessary, it was relaxed. The money orders involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

4/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee; Tse Wai Chun; Yet Suey Gee (Tom); and Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution by money order.

Attachment I (7)

(8)

II. Legal Analysis

A. Violation of 2 U.S.C. § 432(c)

The accounting provision of the Act at 2 U.S.C. § 432(c) makes it clear that the Committee must keep accurate records of contributions received. The evidence establishes that the Committee did not comply with the provision. While the evidence suggests that there was an intent to maintain accurate records of receipts at the Silver Palace Restaurant fundraiser, the plain fact is that only inadequate and inaccurate accounts were kept. Indeed, while Kee and other volunteers initially planned to keep any cash received in individualized envelopes, and fill out accompanying contributor cards, in fact, the cash was all combined, and an inaccurate and incomplete list of such cash contributors was kept, making it virtually impossible to ascertain exactly who had contributed what. As a result, accurate receipt accounts were not maintained by the Committee, and the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(c).

B. Repayments of Primary Matching Funds; 26 U.S.C. § 9038(b)(1)

The Presidential Matching Payment Account Act ("Matching Fund Act") states that:

> If the Commission determines that any portion of the payments made to a candidate . . . was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034 . . . the candidate shall pay . . . an amount equal to the amount of excess payments. 26 U.S.C. § 9038.

Attachment I-(8)

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With respect to the Committee's entitlement to matching funds under Section 9034 for the contributions involved in this matter, the issue is whether the money orders involved herein represent matchable contributions. Section 9034 states that for matching fund purposes, the term "contribution" means " . . . a gift of money made by a written instrument which identifies the person making the contribution . . ." (emphasis added). See also 11 C.F.R. § 9034.2. When an individual contributes cash which is later converted into a written instrument by a third party without at least the tacit consent of the contributor, the contribution is not matchable in the General Counsel's view. 5/ A contributor could give cash to another as an agent for the purpose of purchasing a written instrument. Similarly, a contributor could give cash to a representative of a political committee as an agent for the same purpose. However, for such a transaction to render the resulting written instrument matchable for purposes of Section 9034, there would have to be some communication or conduct which would expressly or impliedly establish at least some intent between the individual contributor and "purchaser" Committee official to create the agency

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5/ Thus, there may even be a problem in terms of matchability if a contributor signs a contribution verification letter which fails to specify that the contribution was made by a written instrument. The four (4) verification letters produced by the Committee herein do not contain a statement that the contributions were made by written instrument.

Attachment I -(9)

(10)

relationship. See Universal Computer Systems, Inc. v. Medical Services Ass'n of Pennsylvania, 474 F. Supp. 472 (D.C. Pa. 1979). If the contributor has not intended that cash constitute the contribution and, instead intends the money order to so function, the actual contribution occurs when the money order has been purchased and given to the Committee. Then the contribution is "by a written instrument," and is matchable presuming that other requirements of 11 C.F.R. § 9034.2 have been fulfilled.

In the instant matter, the evidence suggests that Esther Kee and other volunteers accepted cash contributions at the Silver Palace Restaurant fundraiser on behalf of the Committee. The money orders were purchased by the volunteers only after a Committee representative mentioned to Kee that cash was not preferred by the Committee. Only the most cursory efforts were made to determine if the cash contributors would like to have the cash converted into written instrument, i.e., money order form. 6/ No efforts were made to return the rejected cash. Esther Kee has testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash

6/ If the actual cash contributors had been consulted, then perhaps the problems of inaccurate attribution and contributions by cash could have been avoided.

Attachment I-(10)

contributions. No effort was made to contact the listed individuals and either get their acquiescence to, or even inform them of the purchase. 7/ The evidence thus runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.

Additionally, it follows from the regulatory requirement of 11 C.F.R. § 9034(c)(2) that any money orders which do not bear the contributor's signature or are not accompanied by a written document signed by the contributor are not matchable. Since the evidence makes it clear that the original cash contributors knew nothing of the money order purchases, and that Esther Kee and other volunteers filled in the instruments including the remitter lines with the names of persons other than to whom they belonged, a fortiori, the money orders involved in this matter were not signed by the actual contributors. Thus, with the exception of the four (4) money orders which were accompanied by four (4) verification letters (See fn. 4, supra), which are unmatchable for other reasons, the money orders involved in this matter are not matchable because they lack the necessary signature.

7/ The only apparent exception is Do Young Paik. See fn. 6, supra.

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Attachment I-(11)

Yet a third reason exists for not treating the money orders here involved as matchable. Because the Committee in effect rejected the cash receipts and returned the funds to Esther Kee who then converted them to money orders without getting authorization from the original contributors, Esther Kee can be viewed as having herself made contributions in the names of others. Under 26 U.S.C. § 9034(a) the money orders in question would thus not be matchable because they did not identify Esther Kee as the person making the contribution. Moreover, because the contributions by Kee consequently violated 2 U.S.C. §§ 441a and 441f (see full discussion infra, pp. 17-20), the Commission's regulations expressly preclude matchability. 11 C.F.R. § 9034.3(e). Accordingly, the General Counsel recommends that the Commission seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a)(1) (an amount equal to the amount improperly paid).

C. Violation of 11 C.F.R. § 110.4(c)(2)

2 U.S.C. § 441g places a $100 limitation on aggregate cash contributions made to a single candidate or candidate's committee. Commission regulations at 11 C.F.R. § 110.4(c)(2) require a Committee receiving cash contributions aggregating in excess of $100 to return the amount over $100 to the contributor. As has been highlighted, there were four (4) money orders that were made in amounts greater than $100 (see fn. 1, supra), and a number of money orders for $100 which were attributed to the same person (see fn 2, supra).

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Although Esther Kee has denied that these money orders represent cash contributions, the circumstances make it probable that they indeed represent the original cash contributions. The money order numbers on these money orders fit into the consecutive number sequence of others that are representative of cash contributions. Moreover, there is a distinct similarity in the handwriting patterns of the money orders as verified by Esther Kee's testimony. Finally, but no less significantly, the money orders are dated, and were therefore purchased days after the event.

Since there is evidence that most, if not all, of the money orders which are part of this matter represent at the initial stage actual cash contributions, the General Counsel recommends that the Commission find reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to return amounts aggregating in excess of $100 in U.S. currency.

D. Violation of 26 U.S.C. § 9042(c)(1)(A)

The Matching Fund Act makes it unlawful for any person knowingly and willfully

> (A) to furnish any false, fictitious, or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence, books, or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this chapter .... [26 U.S.C. § 9042(c)(1)(A)]

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Attachment I-(13)

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The Act extends the Commission's jurisdiction to "knowing and willful" violations of Chapter 26, Title 26, United States Code, in either an administrative or civil context. 2 U.S.C. §§ 437g(a)(5)(B) and (a)(6)(C). Presumably, since the § 9042(c)(1) provision is part of a grant of jurisdiction over Chapter 96, it can be civilly enforced by the Commission.

For the purpose of this analysis, then, it is important to determine whether the Committee can be held liable for the acts of its agents. A prerequisite to this determination, however, is to ascertain whether Esther Kee was the Committee's agent. From the General Counsel's point of view, Esther Kee was clearly an agent of the Committee.

The relationship between principal and agent is determined in general, by applying the law of the state which has the most significant relationship to the parties and the transaction at issue. Japan Petroleum Co. (Nigeria) Ltd. v. Ashland Oil, Inc., 456 F. Supp. 831, 840, n.17 (D. Del. 1978). The Committee maintained its principal place of business in the District of Columbia. The Silver Palace Restaurant fundraiser from which the contributions at issue were derived, took place in New York. As to the relationship between principal and agent, general common law principles of agency apply in both jurisdictions.

As a matter of common law, then, an agency relationship requires no special formality such as a writing, and arises when one authorizes another expressly or impliedly to act as an agent.

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Universal Computer Systems, Inc., 474 F. Supp. at 476. The deponents have uniformly stated that Esther Kee approached the Committee seeking to handle fundraising in the Asian-American community. Apparently she has extensive knowledge of and an ongoing relationship with that community. She volunteered her time on behalf of the Committee to seek financial support for the Carter/Mondale reelection bid. The Committee made her responsible for fundraising (title: "coordinator") at the Silver Palace Restaurant on February 21, 1980. Her duties included arranging the event generally, by seeking participation and financial support from within the resident Asian-American community. She recruited volunteers to collect receipts at the door. She solicited attendees. She sought and made pre-event ticket sales. She collected and supervised the collection of admission contributions. She met the guest of honor (Rosalynn Carter) at the airport and accompanied her to the event. After the event, Kee delivered the contributed funds to the Committee's headquarters. Not only was Esther Kee endowed by the Committee with the responsibility and authority to ensure that the event was a financial success, but third parties (such as the assigned Secret Service Agents) at the fundraiser acknowledged her as the Committee's representative charged with overall coordination of the event.

Sandy Oreste was the only paid Committee employee at the event, but the individual responsible for the event -- the Committee's "presence -- was Esther Kee. The fact that Kee was a

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Attachment I - (15)

volunteer is not significant. She may still be an agent of the Committee, albeit gratuitous. Sharpe v. Bradley Lumber Co., Inc., 446 F.2d 152, 155 (4th Cir. 1971), cert. denied, 405 U.S. 919 (1972).

It is a settled proposition that the principal is responsible for the acts of its agent(s) not only for the precise act which it expressly authorized the agent(s) to do, but also for whatever is necessary to its performance. Marohn v. Burnham Van Services, Inc., 478 F. Supp. 49, 51 (N.D. Ill. 1979); Southern Pac. Transp. Co. v. Continental Shippers Assn., Inc., 485 F. Supp. 1313, 1319 (W.D. Mo. 1965). And, it follows that the acts of an agent can be imputed to the principal. 8/ U.S. v. Beusch, 596 F.2d 871, 877 (9th Cir. 1979). Moreover, the principal is considered to know what its agent knows within the scope of the agency. W.R. Grace & Co., Inc. v. Weston U.S. Industries, Inc., 608 F.2d 1214, 1218 (9th Cir. 1979). Indeed, the principal is chargeable with knowledge of the agent's conduct, which it could have ascertained if it had used ordinary care in looking at the activity in which its agent(s) was engaged. Tel-Ads, Inc. v. Trans-Lux Playhouse, Inc., 232 F. Supp. 198, 201 (D.D.C. 1964).

In her capacity as the Committee's agent, Esther Kee knew 1) that she and others accepted cash contributions on behalf of

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8/ Acts of the agent may be imputed only if it is the agent's purpose or intent to benefit the principal. Actual benefit is largely irrelevant. Id.

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the Committee; 2) that she and others purchased money orders with the cash without the consent of the cash contributors; and, 3) that she and others filled in and signed those money orders. Clearly, Kee's knowledge of these facts can be imputed to the Committee.

Although in general, the Committee would be liable for the acts of its agents and would be held to have knowledge of its agents, the statute here at issue requires that the respondent "knowingly and willfully" submit false or misleading information to the Commission.

The Court of Appeals for the D.C. Circuit construed the term "knowing and willful" in the context of 2 U.S.C. § 437g(a)(7) (The 1979 amendments to the Act have moved § 437g(a)(7) to § 437g(a)(6)(C).) to require a showing of "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act." American Federation of Labor and Congress of Industrial Organizations v. Federal Election Commission, 629 F. 2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 982 (1980). However, the U.S.C. Supreme Court has held that such a showing of evil intent in proving a civil violation of a "knowing and willfull" provision is not required. In the case of United States v. Illinois Central R.R. Co. 303 U.S. 239 (1938), the United States sued the railroad for "knowing and willfull" failure to timely unload cattle at their destination. The railroad's failure to unload cattle at their destination. The railroad's failure to unload the cattle was attributable to the negligent lack of

Attachment I - (17)

cooperation between two of its agents. In adopting the language of a circuit court decision, the court reasoned that "knowing and willful" means "purposely or obstinately and is designed to describe [in this case] the attitude of a carrier, who, having a free will and choice, either intentionally disregards the statute or is plainly indifferent its requirements." Id. at 243.

Larry Hayes, as the person charged by the Committee with responsibility for submitting Matching Fund Act information to the Commission, does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors as did Esther Kee. The General Counsel is of the opinion that there would have to be some indication that a person involved in the preparation of the matching funds submissions actually knew the above-mentioned facts before there could be any "knowing and willful" submission of false or misleading Matching Fund Act information to the Commission by the Committee.

Esther Kee indicated that she had a vague understanding that the money orders would be used for matching fund submissions. Given this understanding, however "vague," it is the opinion of the Commission that Esther Kee was involved in the gathering and submission of information for matching funds purposes. Indeed, the very instruments which she purchased and signed form the basis of the actual submission. Thus, she was certainly involved

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in the preparation of the matching fund submission. And, in that preparation she provided fraudulent evidence, and misrepresented a material fact.

Under these circumstances, there does seem to be a sufficient predicate for holding the Committee liable under Section 9042(c)(1). An individual involved in the preparation of the matching fund submission appears to have intentionally disregarded the statute or acted plainly indifferent to its requirements. Accordingly, the Commission has found reason to believe that the Committee violated 26 U.S.C. § 9042(c)(1)(A).

E. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

The Commission has already found reason to believe a violation has occurred as to Section 441f on May 5, 1981. Moreover, the Committee has already received its notification as to this finding. The following analysis is provided to disclose the theory upon which the finding is based subsequent to a preliminary investigation.

The available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the minimum of $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash

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contributions as such. It is also evident that those cash receipts were rejected by the Committee when they were tendered as proceeds from the fundraiser.

An unnamed Committee official, when confronted with the cash reciepts, told Esther Kee that the Committee needed money orders or bank checks (see p.2, supra). After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delievered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee purchased money orders with the rejected receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

Sandy Oreste, apparently having knowledge that Esther Kee did not return the cash receipts to the actual cash contributors, but had converted them by purchasing money orders, knowingly

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accepted contributions, made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f, since the money orders did not contain Kee's name, but names of others. Since she was acting within the scope of her agency with an intent to benefit the Committee, the latter can be said to have violated 2 U.S.C. § 441f. See United States v. Beusch, supra.

F. Violation of 2 U.S.C. § 441a(f)

Section 441a(f) of the Act provides that ". . . [N]o . . . political committee [or] employee of a political committee shall knowingly accept a contribution made for the benefit . . . of a candidate . . . in violation of any limit imposed on contributions . . . under this section."

As described at p.18, supra, Sandy Oreste, a paid Committee employee, having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors, but had converted them by purchasing money orders, knowingly accepted $9,200 in the aggregate from Kee in the form of various money orders which contained the names of other persons.

Since Esther Kee's contributions were limited by the expess terms of 2 U.S.C. § 441a(a)(1)(A) to $1000 per election, Sandy Oreste violaed 2 U.S.C. § 441a(f) by knowingly accepting the excess aggregated amount. Moreover, since Sandy Oreste was acting within the scope of her agency with an intent to benefit the Committee, her knowledge may be imputed to the latter, and the Committee can be said to have violated 2 U.S.C. § 441a(f) as well. See U.S. v. Beusch, supra. Accordingly, the General

Attachment I -(21)

(22)

Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441a(f).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Esther Kee
Executive Director
U.S. Asia Institute
1015 20th Street, N.W.
Washington, D.C. 20036

RE: MUR 1353

Dear Ms. Kee:

On March 2, 1982 and April , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. §§ 441f and 441a(a)(1)(A), provisions of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq; ("the Act") by making contributions in the names of other persons which, in the aggregate, exceeded $1,000 per election. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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Attachment II (1)

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

[redacted]

[redacted]

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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Attachment II - (2)

(25)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. _____
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Esther Kee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Esther Kee violated 2 U.S.C. § 441f by making contributions in the names of other persons. In addition, she violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to a federal candidate, which, in the aggregate, exceeded $1000 per election.

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

Attachment II - (3)

(26)

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

(27)

other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

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II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

(28)

minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Once Esther Kee converted the cash receipts by failing to return them to the cash contributors, purchased money orders with the converted receipts, signed fundraiser attendee names on them, and delivered them to another person, she violated 2 U.S.C. § 441f by making contributions in the names of other persons.

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Attachment II - (c)

(29)

B. Violation of 2 U.S.C. § 441a(a)(1)(A)

Section 441a(a)(1)(A) of the Act provides that "No person shall make contributions to any candidate or his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000."

As has been described above, Esther Kee failed to return the rejected receipts to the original cash contributors or to get their authorization for the conversion to money orders, and instead purchased money orders independently. Essentially, these cash receipts became Esther Kee's personal funds which she thereafter contributed in the aggregate amount of $9,200 to the Committee in the names of other persons. In so doing she violated the express injunction of 2 U.S.C. § 441a(a)(1)(A) by contributing over $1,000 per election to a federal candidate.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sandy Oreste
Shea and Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20016

RE: MUR 1353

Dear Ms. Oreste:

On March 2, 1982 and April , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. §§ 441f and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended 2 U.S.C. § 431 et seq., ("the Act") by knowingly accepting contributions made by Esther Kee in the names of other persons, which were in excess of the aggregate amount allowed by 2 U.S.C. § 441a(a)(1)(A). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

w Attachment III - (1)

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, at 523-4039.

Sincerely,

[redacted]

[redacted]

Enclosures
General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

5304039253 7

Attachment III-(2)

FEDERAL ELECTION COMMISSION

(32)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. 1353
STAFF MEMBER & TEL. NO.
Michael Dymersky
202/523-4039

RESPONDENT: Sandy Oreste

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

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SUMMARY OF ALLEGATIONS

Sandy Oreste violated 2 U.S.C. § 441f by knowingly accepting contributions made by Esther Kee in the names of other persons. In addition, she violated 2 U.S.C. § 441a(f) by knowingly accepting contributions made by Esther Kee in excess of the aggregate amount allowed by 2 U.S.C. § 441a(a)(1)(A).

FACTUAL BASIS AND LEGAL ANALYSIS

I. FACTS

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

Attachment III-(3)

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event. However, the cash receipts were rejected by the Committee when Mrs. Kee was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of

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other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to return the rejected cash receipts to the actual cash contributors. Moreover, there was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never received their rejected cash contributions, nor agreed to the money order puchase (with the single exception of Do Young Paik). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders from lists of attendees supplied by Kee.

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II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

While the available evidence discloses that some persons in attendance at the Silver Palace Restaurant fundraiser paid the

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minimum $100 entrance fee in cash, in their own names, with funds from their own personal accounts, and it is true that Esther Kee, acting for the Committee, accepted the cash contributions as such, it is also evident that those cash receipts were rejected by the Committee possibly acting through Sandy Oreste, when they were tendered as proceeds from the fundraiser.

A Committee official, when confronted with the cash receipts, told Esther Kee that the Committee needed money orders or bank checks. After such a rejection, the cash should have been returned to the individuals from whom derived or the individuals should have been requested to give authorization to have their cash converted to money orders. There was no attempt to do so. Instead, Esther Kee converted the cash receipts she had been given without contacting the original contributors. Names of fundraiser attendees were signed ad hoc on the money orders by Esther Kee and other volunteers, and Esther Kee delivered the money orders along with various lists of fundraiser attendees to Sandy Oreste at the Committee's headquarters.

Sandy Oreste, apparently having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors but had converted them by purchasing money orders, knowingly accepted contributions made by Esther Kee in the names of other persons in violation of 2 U.S.C. § 441f, since the money orders did not contain Kee's name, but names of others.

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Attachment III - (6a)

(36)

B. Violation of 2 U.S.C. § 441a(f)

Section 441a(f) of the Act provides that ". . . [N]o . . . political committee [or] employee of a political committee shall knowingly accept a contribution made for the benefit . . . of a candidate . . . in violation of any limit imposed on contributions . . . under this section."

As described above Sandy Oreste, a paid Committee employee, apparently having knowledge that Esther Kee did not return the rejected cash receipts to the actual cash contributors but converted them by purchasing money orders, knowingly accepted $9,200 in the aggregate from Kee in the form of various money orders which contained the names of other persons.

Since Esther Kee's contributions were limited by the express terms of 2 U.S.C. § 441a(a)(1)(A) to $1000 per election, Sandy Oreste violated 2 U.S.C. § 441a(f) by knowingly accepting the excess aggregate amount.

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Attachment III - (7)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Michael C. Sloan, Esq.
Sloan, Taylor and Brown
Two Clifford Avenue
Pelham, N. Y. 10803

Re: MUR 1353

Dear Mr. Sloan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your clients, George Lau, Wah Chan, So Hung Shum, Kwok Tung Tom, Yet Sue Gee (Tom), Yew Leung Wong, Soo Ling Wong, and Kwan Ho violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your clients. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Casimir F. Sojka
Chemical Bank Building
80 Mott Street
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Sojka:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your clients, Cheng Wai Ming, Lo Ting, Fung Sik Yee, Hing Lit Chau, Bill S. Hui, Chiu Tak Foon, Lau Po Hing, Koon Kau Ng, and Chung Foo Louie violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your clients. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Trinh Hao, Esq.
Director
Immigrant Social Service, Inc.,
Indochinese Refugee Project
142 Henry Street (3rd Floor)
New York, N.Y. 10002

Re: MUR 1353

Dear Mr. Hao:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Lam The Hoa violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Stephen P. Gleit, Esq.
Suite 704
2 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Gleit:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Chau Chak Yum violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Norman Lau Kee, Esq.
11 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Kee:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Do Young Paik violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Milton A. Gordon, Esq.,
733 Park Avenue,
New York, N.Y. 10021

Re: MUR 1353

Dear Mr. Gordon:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Ja Fak Wei violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Tse Wai Chun
5 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Tse Wai Chun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Bob Leu
5 Mott Street,
New York, N. Y. 10013

Re: MUR 1353

Dear Bob Leu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Shui Sum Leung
117 Mulberry Street, (Apt. 2),
New York, N.Y. 10013

Re: MUR 1353

Dear Shui Sum Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Shui K. Lee
394 Chestnut,
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

David D. H. Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear David D. H. Kim:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chun Sing Au
52 Bowery
New York, N.Y. 10013

Re: MUR 1353

Dear Chun Sing Au:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chan Jor Louie
30 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chan Jor Louie:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

3040392555

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Leong Ching Wo Wong
127 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Leong Ching Wo Wong:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chi Ping Leung
92 Madison Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chi Ping Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Joyce Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Joyce Hu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

0340025

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Sin Joung Ha
34 - 44 - 59th Street,
Woodstock, N. Y.

Re: MUR 1353

Dear Sin Joung Ha:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Ming Wha Woo
20 Confucius Plaza
New York, N.Y. 10002

Re: MUR 1353

Dear Ming Wha Woo:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304032560

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Terrin Hwang
3345 - 90th Street,
Jackson Heights, N.Y.

Re: MUR 1353

Dear Terrin Hwang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

2340592351

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Tao T. Wei
2081 2nd Avenue,
New York, N.Y. 10029

Re: MUR 1353

Dear Tao T. Wei:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Suey Jin Chih Leung
7 Elizabeth Street
New York, N.Y. 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Yin Young Leung
7 Elizabeth Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Yin Young Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039255 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Yeun May Leung
145 E. 27th Street,
New York, N.Y. 10016

Re: MUR 1353

Dear Yeun May Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

3340392565

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Hong Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Hong Chi:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039256

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Ruby Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Ruby Chi:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Choi Luen Cheing
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Choi Luen Cheing:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039258

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Ngan Chan
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Ngan Chan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

K. G. Yeung
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear K. G. Yeung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Shun-Fook Yeung
94 - 36 Alstyne Avenue,
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Irene Sun
48 - 11 - 91st Street,
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Irene Sun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039257 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Kwei Tik Yum-Sum
48 - 11 - 91st Street,
Elmhurst, N. Y. 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Sim Fuey Chow
830 Avenue H,
Brooklyn, N.Y. 11233

Re: MUR 1353

Dear Sim Fuey Chow:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Mrs. T. T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear Mrs. T. T. Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

T.T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear T. T. Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lucia Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Lucia Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Frank Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Frank Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304023578

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lau Yem Chou
19 Division Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lau Yem Chou:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lee Yim Sun
32 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lee Yim Sun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8340392500

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Johnson Chu
32 Monroe Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Johnson Chu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039253 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lam Chit Cheung
633 E. 16th Street,
Brooklyn, N.Y. 11218

Re: MUR 1353

Dear Lam Chit Cheung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3304039253

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Young Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear Young Kim:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8040392583

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lui Hor Kuen
66 Bayard Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lui Hor Kuen:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304025534

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Bernakella Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Bernakella Hu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8040392533

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Mieh Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Mieh Hu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chung Hop Ping
54 Rutgers Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chung Hop Ping:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8 3 0 4 0 3 9 2 5 3 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Yang Kuo Shio
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Yang Kuo Shio:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039253 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Lee Cheung Kwir
375 Broome Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039253 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chan Sui Wing
1259 - 57th Street,
Brooklyn, N.Y. 11219

Re: MUR 1353

Dear Chan Sui Wing:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039252 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chan Wai Kuen
66 Mulberry Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Chan Wai Kuen:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039251

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Cheung Yeun Ting
75 Baxter Street
New York, N.Y. 10013

Re: MUR 1353

Dear Cheung Yeun Ting:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3304039259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Chung Sing Au
856 Carrol Street
Brooklyn, N.Y. 11215

Re: MUR 1353

Dear Chung Sing Au:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

8304039257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1982

Kwok Hung Chan
66 Bayard Street
New York, N.Y. 10013

Re: MUR 1353

Dear Kwok Hung Chan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304039254

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kwok Hung Chan
66 Bayard Street
New York, N.Y. 10013

Re: MUR 1353

Dear Kwok Hung Chan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

8304039259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chung Sing Au
856 Carrol Street
Brooklyn, N.Y. 11215

Re: MUR 1353

Dear Chung Sing Au:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039259 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Cheung Yeun Ting
75 Baxter Street
New York, N.Y. 10013

Re: MUR 1353

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

#7 3/9/82

8304039257

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Wai Kuen
66 Mulberry Street,
New York, N.Y. 10013

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039259 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Sui Wing
1259 - 57th Street,
Brooklyn, N.Y. 11219

Re: MUR 1353

Dear Chan Sui Wing:

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lee Cheung Kwir
375 Broome Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304032263

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Yang Kuo Shio
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Yang Kuo Shio:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

MD 3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

8304039260 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chung Hop Ping
54 Rutgers Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chung Hop Ping:

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If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039263

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mieh Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Mieh Hu:

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bernakella Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Bernakella Hu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

8304039260 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lui Hor Kuen
66 Bayard Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lui Hor Kuen:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039260

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Young Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear Young Kim:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039266

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lam Chit Cheung
633 E. 16th Street,
Brooklyn, N.Y. 11218

Re: MUR 1353

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Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039267

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Johnson Chu
32 Monroe Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Johnson Chu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039260 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lee Yim Sun
32 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lee Yim Sun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lau Yem Chou
19 Division Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lau Yem Chou:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

8304039261C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frank Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Frank Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

9304039261 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lucia Wang
96 - 10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Lucia Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

T.T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear T. T. Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

3304039261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mrs. T. T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear Mrs. T. T. Wang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

3304039261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sim Fuey Chow
830 Avenue H,
Brooklyn, N.Y. 11233

Re: MUR 1353

Dear Sim Fuey Chow:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kwei Tik Yum-Sum
48 - 11 - 91st Street,
Elmhurst, N. Y. 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

MD 3/9/82

8304039261 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Irene Sun
48 - 11 - 91st Street,
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Irene Sun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shun-Fook Yeung
94 - 36 Alstyne Avenue,
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

K. G. Yeung
94 - 36 Alstyne Avenue
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear K. G. Yeung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

3304059261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ngan Chan
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Ngan Chan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039262

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Choi Luen Cheing
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Choi Luen Cheing:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

3304092621

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ruby Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Ruby Chi:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039262

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Hong Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Hong Chi:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039262

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C 20463

Yeun May Leung
145 E. 27th Street,
New York, N.Y. 10016

Re: MUR 1353

Dear Yeun May Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Yin Young Leung
7 Elizabeth Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Yin Young Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304059252

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Suey Jin Chih Leung
7 Elizabeth Street
New York, N.Y. 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

MD 3/9/82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Tao T. Wei
2081 2nd Avenue,
New York, N.Y. 10029

Re: MUR 1353

Dear Tao T. Wei:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

5304039262

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Terrin Hwang
3345 - 90th Street,
Jackson Heights, N.Y.

Re: MUR 1353

Dear Terrin Hwang:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039266

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ming Wha Woo
20 Confucius Plaza
New York, N.Y. 10002

Re: MUR 1353

Dear Ming Wha Woo:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039225

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sin Joung Ha
34 - 44 - 59th Street,
Woodstock, N. Y.

Re: MUR 1353

Dear Sin Joung Ha:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039251

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joyce Hu
34 - 44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Joyce Hu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chi Ping Leung
92 Madison Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chi Ping Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

MD 3/9/82

3040326

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Leong Ching Wo Wong
127 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Leong Ching Wo Wong:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

MD 3/9/82

8204039263

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Jor Louie
30 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chan Jor Louie:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304032634

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chun Sing Au
52 Bowery
New York, N.Y. 10013

Re: MUR 1353

Dear Chun Sing Au:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David D. H. Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear David D. H. Kim:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shui K. Lee
394 Chestnut,
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shui Sum Leung
117 Mulberry Street, (Apt. 2),
New York, N.Y. 10013

Re: MUR 1353

Dear Shui Sum Leung:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bob Leu
5 Mott Street,
New York, N. Y. 10013

Re: MUR 1353

Dear Bob Leu:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Tse Wai Chun
5 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Tse Wai Chun:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to you. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g (a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

Milton A. Gordon, Esq.,
733 Park Avenue,
New York, N.Y. 10021

Re: MUR 1353

Dear Mr. Gordon:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Ja Fak Wei violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Norman Lau Kee, Esq.
11 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Kee:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Do Young Paik violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stephen P. Gleit, Esq.
Suite 704
2 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Gleit:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Chau Chak Yum violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

8304039261

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Trinh Hao, Esq.
Director
Immigrant Social Service, Inc.,
Indochinese Refugee Project
142 Henry Street (3rd Floor)
New York, N.Y. 10002

Re: MUR 1353

Dear Mr. Hao:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your client, Lam The Hoa violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your client. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Casimir F. Sojka
Chemical Bank Building
80 Mott Street
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Sojka:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your clients, Cheng Wai Ming, Lo Ting, Fung Sik Yee, Hing Lit Chau, Bill S. Hui, Chiu Tak Foon, Lau Po Hing, Koon Kau Ng, and Chung Foo Louie violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your clients. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: _____
Kenneth A. Gross
Associate General Counsel

3/9/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael C. Sloan, Esq.
Sloan, Taylor and Brown
Two Clifford Avenue
Pelham, N. Y. 10803

Re: MUR 1353

Dear Mr. Sloan:

This is to advise you that after an investigation was conducted, the Commission concluded on March 2, 1982, that there is no probable cause to believe that your clients, George Lau, Wah Chan, So Hung Shum, Kwok Tung Tom, Yet Sue Gee (Tom), Yew Leung Wong, Soo Ling Wong, and Kwan Ho violated the Act. Accordingly the file in this matter, numbered MUR 1353, has been closed as it pertains to your clients. This matter will become part of the public record within 30 days, after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

3/9/82

BY: _____
Kenneth A. Gross
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)
)
Carter/Mondale Presidential)
Committee, et al.)

MUR 1353

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission Executive Session on March 2, 1982, do hereby certify that the Commission took the following actions with regard to the General Counsel's Report dated January 29, 1982 in MUR 1353:

1. Decided to reject by a vote of 4-0 the recommendation of the General Counsel that the Commission take no further action against the Carter/Mondale Presidential Committee with respect to a possible violation of 2 U.S.C. §441f.

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

2. Decided to find no probable cause by a vote of 4-0 with respect to the 67 individual respondents and take no further action, notifying the respondents accordingly.

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

(continued)

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3. Decided to reject by a vote of 4-0 the recommendation of the General Counsel to find no reason to believe that Esther Kee and other Committee volunteers violated 2 U.S.C. §441f, and also decided to find reason to believe that Esther Kee and Sandy Oreste violated 2 U.S.C. §441f.

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

4. Decided to approve by a vote of 4-0 the General Counsel's recommendation that the Carter-Mondale Presidential Committee violated 2 U.S.C. §432(c).

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

5. Decided to approve by a vote of 4-0 the General Counsel's recommendation to seek a repayment of $7,130.35 pursuant to 11 C.F.R. §9038.2(a).

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

6. Decided to approve by a vote of 4-0 the General Counsel's recommendation to find reason to believe that the Carter/Mondale Presidential Committee violated 11 C.F.R. §110.4(c)(2).

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

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7. Decided to reject by a vote of 4-0 the recommendation of the General Counsel to find no reason to believe that the Carter/Mondale Presidential Committee knowingly and willfully violated 26 U.S.C. §9042(c)(1)(A), and also decided to find reason to believe that the Carter/Mondale Presidential Committee knowingly and willfully violated 26 U.S.C. §9042(c)(1)(A).

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

8. Decided by a vote of 4-0 to send the appropriate notification letters apprising the individuals and the Carter/Mondale Presidential Committee of the actions taken in the meeting.

   Commissioners Aikens, Elliott, Harris, and Reiche voted affirmatively. Commissioners McDonald and McGarry were not present at the time of the vote.

Attest:

3-4-82

Date

Lena L. Stafford

Lena L. Stafford
Recording Secretary

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION 82 FEB 4 P 2: 41

January 29, 1982

In the Matter of)
)
Carter/Mondale Presidential) MUR 1353
Committee, et al.)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A. Previous Commission Action

On May 5, 1981, the Commission found reason to believe that the Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. § 441f by knowingly accepting contributions made by persons in the names of other persons. The Commission also found reason to believe that 67 named individuals knowingly allowed their names to be used to effectuate contributions by other people.

On June 23, 1981, the Commission authorized the issuance of subpoenas directed to Mrs. Ester Kee and Ms. Sandy Oreste (a.k.a. Carolyn McLean).1/ On September 9, 1981, the Commission authorized the issuance of a subpoena directed to Mr. Larry Hayes.2/ Of the 67 individuals for whom reason to believe was

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1/ Ms. Oreste appeared for depositon on July 15, 1981. Mrs. Kee appeared for deposition on July 17, 1981.

2/ Mr. Hayes appeared for deposition on September 28, 1981.

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found, 56 were notified of the Commission's determination.3/ Of the 56 individuals notified, 47 were notified by certified mail.

B. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders that were made in amounts greater than $100.4/ Also, a number of money orders bear the same name.5/

In response to the reason to believe notification, twenty-two of the 47 individuals declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made,6/ while twenty four of the 47 made no indication as to whether a contribution was made.

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3/ General Counsel staff was unable to notify eleven of the 67 individuals for various reasons, most prevelant of which was that no forwarding address was available. Subsequent attempts to notify these people have been unsuccessful.

4/ Money order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and are for $500 each.

5/ Aside from the two money orders bearing the name Shui K. Lee, fn. 4, supra, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592680, Money Order No. 592676 and Money Order No. 592675 bear the name David D. H. Kim, and are for $100 each; and, Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

6/ This individual -- Do Young Paik -- said he contributed in cash. (See fn. 5, supra, re: Mr. Paik). He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it. Attachment I.

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event, and was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and

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they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 6, supra). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a

computer. Verification letters were then automatically sent to the identified contributors. This verification process was conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence that four (4) executed contribution verification letters were received.7/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more

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7/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee (see fn. 4, supra); Tse Wai Chun; Yet Suey Gee (Tom); and, Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution.

stringent than necessary, it was relaxed. The money orders involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

II. LEGAL ANALYSIS

A. Violation of 2 U.S.C. § 441f

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. Also, no person shall knowingly accept a contribution made by one person in the name of another.

1. Carter/Mondale Presidential Committee

There is no evidentiary basis upon which to assert that the Committee knowingly accepted contributions made by one person in the name of another person. The investigation indicated that Sandy Oreste, when confronted by Esther Kee with a large amount of cash, told Kee that the Committee would prefer cashier's checks or money orders. In response to this direction, Esther Kee and other volunteers assigned names from various lists to money orders purchased with the cash. As a result of the investigation, it is evident that the instant money orders represent contributions from people other than those to whom the contributions were attributed. However, the actual contributors did not "make contributions in the names of others." They had no basis for assuming that their contributions would be attributed to other persons. Since no contributions were made in the names

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of others, the Committee cannot be said to have knowingly received contributions made by one person in the name of another person. Therefore, the General Counsel recommends that the Commission take no further action against the Committee with regard to this provision.

2. The 67 Individuals

The evidence incates that none of the 67 individuals knowingly permitted his or her name to effect a contribution by another person. In fact, the unanimous position of those who responded that they made no contribution was that they were completely unaware of any contribution being made to the Committee at all. The "knowing permission" aspect of Section 441f is a pre-condition to the possibility of any violation of the relevant element of that provision. Moreover, if there were no contributions made in the names of others, there cannot possibly be any individuals who have permitted their names to be used to effect such contributions. Accordingly, no probable cause to believe briefs have been sent to the 67 individual respondents in this matter.

3. Esther Kee And Other Committee Volunteers

The Commission's regulations at 11 C.F.R. § 110.4(b)(2)(i) and (ii) provide two examples of "contributions in the name of another." The activity engaged in by Esther Kee and other volunteers fits neither of the examples found in the regulations. Though their activity was arguably irresponsible, Section 441f

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and the implementing regulatory provisions do not address it. These volunteers did not make contributions in the names of others. Rather, they attributed contributions made by cash to people other than to those who actually made them, by placing names ad hoc on money orders purchased with that cash. Esther Kee and other Committee volunteers at the Silver Palace Restaurant fundraiser, then, did not violate 2 U.S.C. § 441f.

B. Violation of 2 U.S.C. § 432(c)

The accounting provision of the Act at 2 U.S.C. § 432(c) makes it clear that the Commitee must keep accurate records of contributions received. The evidence establishes that the Committee did not comply with the provision. While the evidence suggests that there was an intent to maintain accurate records of receipts at the Silver Palace Restaurant fundraiser, the plain fact is that only inadequate and inaccurate accounts were kept. Indeed, while Kee and other volunteers initially planned to keep any cash received in individualized envelopes, and fill out accompanying contributor cards, in fact, the cash was all combined, and an inaccurate and incomplete list of such cash contributors was kept, making it virtually impossible to ascertain exactly who had contributed what. As a result, accurate receipt accounts were not maintained by the Committee, and the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(c).

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C. Repayments of Primary Matching Funds; 26 U.S.C. § 9038(b)(1).

The Presidential Matching Payment Account Act ("Matching Fund Act") states that:

> If the Commission determines that any portion of the payments made to a candidate . . . was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034 . . . the candidate shall pay . . . an amount equal to the amount of excess payments. 26 U.S.C. § 9038.

With respect to the Committee's entitlement to matching funds under Section 9034 for the contributions involved in this matter, the issue is whether the money orders involved herein represent matchable contributions. Section 9034 states that for matching fund purposes, the term "contribution" means ". . . a gift of money made by a written instrument which identifies the person making the contribution . . ." (emphasis added). See also 11 C.F.R. § 9034.2. When an individual contributes cash which is later converted into a written instrument by a third party without at least the tacit consent of the contributor, the contribution is not matchable in the General Counsel's view.8/ A contributor could give cash to another as an agent for the purpose of purchasing a written instrument. Similarly, a contributor could give cash to a representative of a political committee as an agent for the same purpose. However, for such a

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8/ Thus, there may even be a problem in terms of matchability if a contributor signs a contribution verificiation letter which fails to specify that the contribution was made by a written instrument. The four (4) verification letters produced by the Committee herein do not contain a statement that the contributions were made by written instrument.

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transaction to render the resulting written instrument matchable for purposes of Section 9034, there would have to be some communication or conduct which would expressly or impliedly establish at least some intent between the individual contributor and "purchaser" Committee official to create the agency relationship. See Universal Computer Systems, Inc. v. Medical Services Ass'n of Pennsylvania, 474 F. Supp. 472 (D.C. Pa. 1979). If the contributor has not intended that cash constitute the contribution and, instead intends the money order to so function, the actual contribution occurs when the money order has been purchased and given to the Committee. Then the contribution is "by a written instrument," and is matchable presuming that other requirements of 11 C.F.R. § 9034.2 have been fulfilled.

In the instant matter, the evidence suggests that Esther Kee and other volunteers accepted cash contributions at the Silver Palace Restaurant fundraiser on behalf of the Committee. The money orders were purchased by the volunteers only after a Committee representative mentioned to Kee that cash was not preferred by the Committee. Only the most cursory efforts were made to determine if the cash contributors would like to have the cash converted into written instrument, i.e. money order form.9/

9/ If the actual cash contributors had been consulted, then perhaps the problems of inaccurate attribution and contributions by cash could have been avoided.

Esther Kee has testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. No effort was made to contact the listed individuals and either get their acquiescence to, or even inform them of, the purchase.10/ The evidence thus runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.

Additionally, it follows from the regulatory requirement of 11 C.F.R. § 9034.2(c)(2) that any money orders which do not bear the contributor's signature or are not accompanied by a written document signed by the contributor are not matchable. Since the evidence makes it clear that the cash contributors knew nothing of the money order purchases, and that Esther Kee and other volunteers filled in the instruments including the remitter lines, a fortiori, the money orders involved in this matter were not signed by the actual contributors. Thus, with the exception of the four (4) money orders which were accompanied by four (4) verification letters (See fn. 7, supra), which are unmatchable for other reasons, the money orders involved in this

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10/ The only apparent exception is Do Young Paik. See fn. 6, supra.

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matter are not matchable because they lack the necessary signature. Accordingly, the General Counsel recommends that the Commission seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a)(1) (an amount equal to the amount improperly paid; see Attachment VI).11/

D. Violations of 2 U.S.C. § 441g and 11 C.F.R. § 110.4(c)(2)

2 U.S.C. § 441g places a $100 limitation on aggregate cash contributions made to a single candidate or candidate's committee. Commission regulations at 11 C.F.R. § 110.4(c)(2) require a Committee receiving cash contributions aggregating in excess of $100 to return the amount over $100 to the contributor. As has been highlighted, there were four (4) money orders that were made in amounts greater than $100 (see fn. 4, supra), and a number of money orders for $100 which were attributed to the same person (see fn. 5, supra).

Although Esther Kee has denied that these money orders represent cash contributions, the circumstances make it probable that they indeed represent cash contributions. The money order numbers on these money orders fit into the consecutive number sequence of others that are representative of cash contributions. Moreover, there is a distinct similarity in the handwriting patterns of the money orders as verified by Esther Kee's testimony. Finally, but no less significantly, the money orders

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11/ On December 2, 1982, the Committee indicated that it would be amenable to having the Commission seek a repayment in the context of a conciliation agreement. The Committee has sought pre-probable cause conciliation by letter dated November 13, 1981. See Attachment II.

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are dated, and were therefore purchased, days after the event.

Since there is evidence that most, if not all, of the money orders which are part of this matter represent actual cash contributions, the General Counsel recommends that the Commission find reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to return amounts aggregating in excess of $100 in U.S. currency.

E. Violation of 26 U.S.C. § 9042(c)(1)(A)

The Matching Fund Act makes it unlawful for any person knowingly and willfully

> (A) to furnish any false, fictitious, or fraudulent evidence, books, or information to the Commission under this chapter, or to include in any evidence, books, or information so furnished any misrepresentation of a material fact, or to falsify or conceal any evidence, books, or information relevant to a certification by the Commission or an examination and audit by the Commission under this chapter .... [26 U.S.C. § 9042(c)(1)(A)]

The Act extends the Commission's jurisdiction to "knowing and willful" violations of Chapter 26, Title 26, United States Code, in either an administrative or civil context. 2 U.S.C. §§ 437g(a)(5)(B) and (a)(6)(C). Presumably, since the 9042(c)(1) provision is part of a grant of jurisdiction over Chapter 96, it can be civilly enforced by the Commission.12/

12/ It is arguable that 26 U.S.C. § 9042(c)(1) is strictly a criminal provision. Paragraph (2) states that "[A]ny person who violates the provisions of paragraph (1) shall be fined . . . or imprisoned . . . or both." (emphasis added). The mandatory language of paragraph (2) suggests that criminal penalties must be applied if there is a violation of paragraph (1). This provision has been referred to as a criminal statute. See United States v. Donald L. Jackson, 2 Fed. Election Campaign Guide (CCH) ¶ 9048 (W.D.N.Y. June 14, 1977). Whether the Commission may administratively or civilly enforce § 9042 on the basis of language found in 2 U.S.C. §437g(a)(5)(B) or (a)(6)(C) has not been litigated.

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For the purpose of this analysis, then, it is important to determine whether the Committee can be held liable for the acts of its agents. A prerequisite to this determination, however, is to ascertain whether Esther Kee was the Committee's agent. From the General Counsel's point of view, Esther Kee was clearly an agent of the Committee.

The relationship between principal and agent is determined in general, by applying the law of the state which has the most significant relationship to the parties and the transaction at issue. Japan Petroleum Co. (Nigeria) Ltd. v. Ashland Oil, Inc., 456 F. Supp. 831, 840, n. 17 (D. Del. 1978). The Committee maintained its principal place of business in the District of Columbia. The Silver Palace Restaurant fundraiser from which the contributions at issue were derived, took place in New York. As to the relationship between principal and agent, general common law principles of agency apply in both jurisdictions.

As a matter of common law, then, an agency relationship requires no special formality such as a writing, and arises when one authorizes another expressly or impliedly to act as an agent. Universal Computer Systems, Inc., 474 F. Supp. at 476. The deponents have uniformly stated that Esther Kee approached the Committee seeking to handle fundraising in the Asian-American community. Apparently she has extensive knowledge of and an ongoing relationship with that community. She volunteered her time on behalf of the Committee to seek financial support for the

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Carter/Mondale reelection bid. The Committee made her responsible for fundraising (title: "coordinator") at the Silver Palace Restaurant on February 21, 1980. Her duties included arranging the event generally, by seeking participation and financial support from within the resident Asian-American community. She recruited volunteers to collect receipts at the door. She solicited attendees. She sought and made pre-event ticket sales. She collected and supervised the collection of admission contributions. She met the guest of honor (Rosalynn Carter) at the airport and accompanied her to the event. After the event, Kee delivered the contributed funds to the Committee's headquarters. Not only was Esther Kee endowed by the Committee with the responsibility and authority to ensure that the event was a financial success, but third parties (such as the assigned Secret Service Agents) at the fundraiser acknowledged her as the Committee's representative charged with overall coordination of the event.

Sandy Oreste was the only paid Committee employee at the event, but the individual responsible for the event -- the Committee's "presence" -- was Esther Kee. The fact that Kee was a volunteer is not significant. She may still be an agent of the Committee, albeit gratuitous. Sharpe v. Bradley Lumber Co., Inc., 446 F.2d 152, 155 (4th Cir. 1971), cert. denied 405 U.S. 919 (1972).

It is a settled proposition that the principal is responsible for the acts of its agent(s) not only for the precise

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act which it expressly authorized the agent(s) to do, but also for whatever is necessary to its performance. Marohn v. Burnham Van Services, Inc., 478 F. Supp. 49, 51 (N.D. Ill. 1979); Southern Pac. Transp. Co. v. Continental Shippers Assn., Inc., 485 F. Supp. 1313, 1319 9 (W.D. Mo. 1965). And, it follows that the acts of an agent can be imputed to the principal.13/ U.S. v. Beusch, 596 F.2d 871, 877 (9th Cir. 1979). Moreover, the principal is considered to know what its agent knows within the scope of the agency. W.R. Grace & Co., Inc. v. Weston U.S. Industries, Inc., 608 F.2d 1214, 1218 (9th Cir. 1979). Indeed, the principal is chargeable with knowledge of the agent's conduct, which it could have ascertained if it had used ordinary care in looking at the activity in which its agent(s) was engaged. Tel-Ads, Inc. v. Trans-Lux Playhouse, Inc., 232 F. Supp. 198, 201 (D.D.C. 1964).

In her capacity as the Committee's agent, Esther Kee knew 1) that she and others accepted cash contributions on behalf of the Committee; 2) that she and others purchased money orders with the cash without the consent of the cash contributors; and, 3) that she and others filled in and signed those money orders.

13/ Acts of the agent may be imputed only if it is the agent's purpose or intent to benefit the principal. Actual benefit is largely irrelevant. Id.

Clearly, Kee's knowledge of these facts can be imputed to the Committee.

Although in general, the Committee would be liable for the acts of its agents and would be held to have the knowledge of its agents, the statute here at issue requires that the respondent "knowingly and willfully" submit false or misleading information to the Commission.

The Court of Appeals for the D.C. Circuit construed the term "knowing and willful" in the context of 2 U.S.C. § 437g(a)(7) (The 1979 amendments to the Act have moved § 437g(a)(7) to § 437g(a)(6)(C).) to require a showing of "'defiance' or 'knowing, conscious and deliberate flaunting' of the Act." American Federation of Labor and Congress of Industrial Organizations v. Federal Election Commission, 628 F.2d 97, 101 (D.C. Cir. 1980), cert. denied, 449 U.S. 982 (1980). However, the U.S. Supreme Court has held that such a showing of evil intent in proving a civil violation of a "knowing and willful" provision is not required. In the case of United States v. Illinois Central R. R. Co. 303 U.S. 239 (1938), the United States sued the railroad for "knowing and willful" failure to timely unload cattle at their destination. The railroad's failure to unload the cattle was attributable to the negligent lack of cooperation between two of its agents. In adopting the language of a circuit court decision, the court reasoned that "knowing and willful" means "purposely or obstinately and is

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designed to describe [in this case] the attitude of a carrier, who, having a free will and choice, either intentionally disregards the statute or is plainly indifferent to its requirements." Id. at 243.

Larry Hayes, as the person charged by the Committee with responsibility for submitting Matching Fund Act information to the Commission, does not appear from the evidence to have actually known that the money orders were erroneously attributed, were obtained by exchanging cash contributions, and were not signed by the actual contributors. The General Counsel is of the opinion that there would have to be some indication that a person responsibile for the matching funds submissions actually knew the above-mentioned facts before there could be any "knowing and willful" submission of false or misleading Matching Fund Act information to the Commission by the Committee.

Esther Kee indicated that she had a vague understanding that the money orders would be used for matching fund submissions, but appears to have had no knowledge of what legal requirements were imposed by the Matching Fund Act. Moreover, she was not involved at all in the preparation of the matching fund submissions.

Under these circumstances, there does not seem to be a sufficient predicate for holding the Committee liable under Section 9042(c)(1). The individuals responsible for submitting information to the Commission appear not to have intentionally disregarded the statute or acted plainly indifferent to its requirements. Accordingly, we are not making a reason to believe recommendation as to this provision.

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III. RECOMMENDATIONS

1. Take no further action against the Carter/Mondale Presidential Committee with respect to a possible violation of 2 U.S.C. § 441f.

2. Find reason to believe that the Carter/Mondale Presidential Committee violated 2 U.S.C. § 432(c).

3 Find reason to believe that the Carter/Mondale Presidential Committee violated 11 C.F.R. § 110.4(c)(2).

4 Seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a) (an amount equal to the amount improperly paid).

Date: Feb. 3, 1982

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

I Letter from Do Young Paik (1 page)
II. Letter from Carol Darr dated November 13,1981 (1 page)
III. Letter to Carol Darr (2 pages)
IV. General Counsel's Factual & Legal Analysis (11 pages)
VI. Audit certification of matching funds paid (1 page)

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(1)

Federal Election Commission

Washington, D.C. 20463

3 money orders
7 $ 50 each : $350

TO THE FEDERAL ELECTION COMMISSION:

I had purchased tickets for a dinner given by the Carter-Mondale Campaign Committee at the Silver Palace Restaurant in Chinatown. The Dinner Committee did not advise me that I would have to make out a personal check. Therefore, I paid for my tickets with cash.

Later, I was advised by a member of the Dinner Committee that I would have to use checks so that there would be a record of payment.

I told him to buy a cashier's check or money order and sign my name on it.

The money was a voluntary contribution on my part and I gave implied permission to sign my name on the check.

Do Young Paik
Name:

Date:

Address: Do Young Paik
133-30 32nd Ave.
Flushing NY 11354

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Attachment I - (1)

(2)

CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.
4710 Bethesda Avenue #302
Bethesda, Maryland
20014

November 13, 1981

Michael Dymersky, Esq.
Scott Thomas, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MOR 1353

Dear Messrs. Dymersky and Thomas:

Enclosed are lists of names of individuals present at the Carter/Mondale fundraising event at the Silver Palace Restaurant in New York City, New York, on February 21, 1980. These lists were compiled by Mrs. Esther G. Kee who assisted with the event.

Sincerely,

Carol Darr

Carol Darr
Deputy Counsel

CD/dc

Attachment II - (1)

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(3)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Carol Darr, Esq.
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Ms. Darr:

On May 5, 1981, the Commission found reason to believe that your client, the Carter/Mondale Presidential Committee, Inc., had violated 2 U.S.C. § 441f, a provision 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 with respect to this possible violation.

However, on January , 1982, the Federal Election Commission determined that there is reason to believe that your client violated 2 U.S.C. § 432(c), by maintaining inaccurate records of receipts, and 11 C.F.R. § 110.4(c)(2), by accepting cash contributions aggregating in excess of $100 and failing to return the amount over $100 to the contributor. The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your client. In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred.

A review of the information obtained in the investigation also revealed that your client received public matching funds on the basis of contributions that were not properly matchable. Accordingly, the Commission has determined that $7,130.35 should be repaid to the United States Treasury. The factual and legal basis for this determination is included in the attached General Counsel's Factual and Legal Analysis.

Attachment III - (1)

(4)

If you have any questions or suggestions for changes in the enclosed agreement, please contact Michael Dymersky, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
1) General Counsel's Factual and Legal Analysis
2)

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Attachment III - (2)

(5)

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL & LEGAL ANALYSIS

DATE: January , 1982

Mur No. 1353
Staff Member & Telephone No.

RESPONDENT: Carter/Mondale Presidential Committee

Michael Dymersky
(202) 523-4039

SOURCE OF MUR: Internally Generated

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 432(c) by maintaining inaccurate records of receipts from the Silver Palace Restaurant fundraiser in New York City on February 21, 1980. Additionally, Respondent appears to have violated 11 C.F.R. § 110.4(c)(2) by accepting cash contributions aggregating in excess of $100 and failing to return the amount over $100 to the contributor.

FACTUAL AND LEGAL ANALYSIS

A. Previous Commission Action

On May 5, 1981, the Commission found reason to believe that the Carter/Mondale Presidential Committee ("the Committee") violated 2 U.S.C. § 441f by knowingly accepting a contribution made by one person in the name of another person.

On June 23, 1981, the Commission authorized the issuance of subpoenas directed to Mrs. Ester Kee and Ms. Sandy Oreste (a.k.a.

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Attachment IV -(1)

(6)

Carolyn McLean).1/ On September 9, 1981, the Commission authorized the issuance of a subpoena directed to Mr. Larry Hayes.2/

B. Facts

Most of the money orders involved in this matter were made in amounts of $100. However, there were four (4) money orders that were made in amounts greater than $100.3/ Also, a number of money orders bear the same name.4/

In response to the reason to believe notification, twenty two of the 47 individuals declared that they made no contribution. Only one of the 47 responding individuals affirmatively declared that a contribution was made,5/ while twenty four of the 47 made no indication as to whether a contribution was made.

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1/ Ms. Oreste appeared for depositon on July 15, 1981. Mrs. Kee appeared for deposition on July 17, 1981.

2/ Mr. Hayes appeared for deposition on September 28, 1981.

3/ Money order No. 591764 bearing the name of Tse Wai Chun is for $400; Money Order No. 591765 bearing the name Bob Leu is for $400; Money Order No. 591757 bearing the name Leung Shui Sum is for $500; Money Order No. 591754 and Money Order No. 591755 both bear the name Shui K. Lee, and are for $500 each.

4/ Aside from the two money orders bearing the name Shui K. Lee, fn. 3, supra, Money Order No. 592682, Money Order No. 592679 and Money Order No. 592678 bear the name Do Young Paik, and are for $100 each; Money Order No. 592680, Money Order No. 592676 and Money Order No. 592675 bear the name David D. H. Kim, and are for $100 each; and, Money Order No. 592644 and Money Order No. 592643 bear the name George Lau and are for $100 each.

5/ This individual -- Do Young Paik -- said he contributed in cash. (See fn. 4, supra, re: Mr. Paik). He also indicated that he instructed an unidentified member of the Committee's "Dinner Committee" to buy a money order, and sign his name to it.

Attachment IV-(2)

On the basis of testimony by Esther Kee, Sandy Oreste and Larry Hayes, the General Counsel can adduce the following facts. Esther Kee, as a volunteer of the Committee, was charged with conducting a fundraiser at the Silver Palace Restaurant in New York City, on February 21, 1980. (Rosalynn Carter was the guest of honor). Sandy Oreste, a secretary to Evan Dobelle, was the only Committee employee at the event.

The entrance price to the event was $100. Many persons made payment by cash, for which they received tickets of admission. Apparently, volunteers recruited by Esther Kee to collect entrance fees and issue admission tickets were instructed by her to keep any cash received in individualized envelopes, and fill out contributor cards. These measures were designed to cause contributions to be segregated by contributor, and adequate contributor records to be kept. However, in spite of her directions, the cash was commingled, and an incomplete list of cash contributors was kept. At the end of the event, Esther Kee was left with a large amount of cash (there appears to be $9,100 involved in this matter), and for many ticket-purchasers, contributor cards were not filled out. Mrs. Kee left the cash for Sandy Oreste at the Committee headquarters sometime after the event, and was told by someone at the Committee that the Committee needed money orders or bank checks.

Thereafter (on or about February 28, 1980) Kee purchased and caused other volunteers to purchase money orders from the Manhattan Savings Bank in increments of $100, in most cases, ($100 being the price of an entrance ticket to the event), and

Attachment IV-(3)

(8)

they filled out the payee lines and signed the remitter lines of the money orders using lists of names and addresses which they had. These lists included partial contributor lists and lists of other attendees such as cooks and waiters of the Silver Palace Restaurant. There was no attempt to inform the actual cash contributors of the money order purchase, or to secure their respective signatures on the instruments. Rather, Kee testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders with the cash contributions. Thus, the actual contributors never agreed to the money order purchase (with the single exception of Do Young Paik, see fn. 5, supra). Apparently, Sandy Oreste filled-out the requisite contributor cards when Esther Kee gave her the filled out money orders.

Larry Hayes stated in his deposition that all receipts for fundraising events, including money orders, would have gone to Tricia Segal Davis, who was the coordinator for all fundraiser activities generally, and would then be given to data entry staff for preparation of data entry information cards, copying of instruments, and entering information in the computer. At the stage when data entry information cards were prepared, a review was made as to whether the contribution was potentially matchable. During the period involved in the instant matter, all money orders were marked "later matchable." The Committee contracted with a computer firm to enter the information into a

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Attachment IV - (4)

(9)

computer. Verification letters were then automatically sent to the identified contributors. This verification process was conducted because the Committee believed that any writing on the remitter's signature line of a money order was irrelevant with respect to the signature requirement of the Commission's regulations. Significantly, money orders are bearer instruments and negotiable absent a signature. As to the instant 67 contributors, the Committee has only provided evidence that four (4) executed contribution verification letters were received.6/

Sometime during the Summer of 1980, the decision was made by Larry Hayes on behalf of the Committee, to change the category of money orders from "later matchable" to "matchable" if the instruments contained the required information and the apparent signature of the contributor. This was accomplished by a review of all "later matchable" contributions by the Committee's coding staff. If the money orders appeared to be signed and contain other formalities, the staff would re-code them as "matchable" and inform the computer firm accordingly. Thereafter, they would be submitted for primary matching funds. Apparently, the Committee was experiencing severe cash-flow problems. And, since their policy as to matchability of money orders was arguably more

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6/ Verification letters for the following individuals were included by the Committee in Submission 17 with respect to the individuals involved in this matter: Shui K. Lee (see fn. 3, supra); Tse Wai Chun; Yet Suey Gee (Tom); and, Kwok Tung Tam. The last two individuals, through their attorney, M. Sloan, have indicated in response to their reason to believe notifications that in fact they made no such contribution.

(10)

stringent than necessary, it was relaxed. The money orders involved in this matter furnished to the Commission by the Committee in Submissions 14 and 17 are a product of this policy change.

C. Violation of 2 U.S.C. § 432(c)

The accounting provision of the Act at 2 U.S.C. § 432(c) makes it clear that the Commitee must keep accurate records of contributions received. The evidence establishes that the Committee did not comply with the provision. While the evidence suggests that there was an intent to maintain accurate records of receipts at the Silver Palace Restaurant fundraiser, the plain fact is that only inadequate and inaccurate accounts were kept. Indeed, while Kee and other volunteers initially planned to keep any cash received in individualized envelopes, and fill out accompanying contributor cards, in fact, the cash was all combined, and an inaccurate and incomplete list of such cash contributors was kept, making it virtually impossible to ascertain exactly who had contributed what. As a result, accurate receipt accounts were not maintained by the Committee, and the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(c).

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Attachment IV - (6)

(11)

D. Repayments of Primary Matching Funds; 26 U.S.C. § 9038(b)(1).

The Presidential Matching Payment Account Act ("Matching Fund Act") states that:

> If the Commission determines that any portion of the payments made to a candidate . . . was in excess of the aggregate amount of payments to which such candidate was entitled under Section 9034 . . . the candidate shall pay . . . an amount equal to the amount of excess payments. 26 U.S.C. § 9038.

With respect to the Committee's entitlement to matching funds under Section 9034 for the contributions involved in this matter, the issue is whether the money orders involved herein represent matchable contributions. Section 9034 states that for matching fund purposes, the term "contribution" means ". . . a gift of money made by a written instrument which identifies the person making the contribution . . ." (emphasis added). See also 11 C.F.R. § 9034.2. When an individual contributes cash which is later converted into a written instrument by a third party without at least the tacit consent of the contributor, the contribution is not matchable in the General Counsel's view.7/ A contributor could give cash to another as an agent for the purpose of purchasing a written instrument. Similarly, a contributor could give cash to a representative of a political committee as an agent for the same purpose. However, for such a

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7/ Thus, there may even be a problem in terms of matchability if a contributor signs a contribution verificiation letter which fails to specify that the contribution was made by a written instrument. The four (4) verification letters produced by the Committee herein do not contain a statement that the contributions were made by written instrument.

transaction to render the resulting written instrument matchable for purposes of Section 9034, there would have to be some communication or conduct which would expressly or impliedly establish at least some intent between the individual contributor and "purchaser" Committee official to create the agency relationship. See Universal Computer Systems, Inc. v. Medical Services Ass'n of Pennsylvania, 474 F. Supp. 472 (D.C. Pa. 1979). If the contributor has not intended that cash constitute the contribution and, instead intends the money order to so function, the actual contribution occurs when the money order has been purchased and given to the Committee. Then the contribution is "by a written instrument," and is matchable presuming that other requirements of 11 C.F.R. § 9034.2 have been fulfilled.

In the instant matter, the evidence suggests that Esther Kee and other volunteers accepted cash contributions at the Silver Palace Restaurant fundraiser on behalf of the Committee. The money orders were purchased by the volunteers only after a Committee representative mentioned to Kee that cash was not preferred by the Committee. Only the most cursory efforts were made to determine if the cash contributors would like to have the cash converted into written instrument, i.e. money order form.8/

8/ If the actual cash contributors had been consulted, then perhaps the problems of inaccurate attribution and contributions by cash could have been avoided.

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Esther Kee has testified that she contacted only other volunteers and the manager of the Silver Palace Restaurant to inquire whether they thought the people on the various lists "would mind" the purchase of money orders in their names with the cash contributions. No effort was made to contact the listed individuals and either get their acquiescence to, or even inform them of the purchase.9/ The evidence thus runs contrary to any assertion that the actual contributors did not intend the cash paid for the admission tickets to constitute contributions, and that the actual contributions occurred only when money orders were purchased by Kee and other volunteers.

Additionally, it follows from the regulatory requirement of 11 C.F.R. § 9034.2(c)(2) that any money orders which do not bear the contributor's signature or are not accompanied by a written document signed by the contributor, are not matchable. Since the evidence makes it clear that the cash contributors knew nothing of the money order purchases, and that Esther Kee and other volunteers filled in the instruments including the remitter lines, a fortiori, the money orders involved in this matter were not signed by the actual contributors. Thus, with the exception of the four (4) money orders which were accompanied by four (4) verification letters (See fn. 7, supra), which are unmatchable for other reasons, the money orders involved in this

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9/ The only apparent exception is Do Young Paik. See fn. 5, supra.

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Attachment IV-(9)

matter are not matchable because they lack the necessary signature. Accordingly, the General Counsel recommends that the Commission seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a)(1) (an amount equal to the amount improperly paid).10/

E. Violations of 2 U.S.C. § 441g and 11 C.F.R. § 110.4(c)(2)

2 U.S.C. § 441g places a $100 limitation on aggregate cash contributions made to a single candidate or candidate's committee. Commission regulations at 11 C.F.R. § 110.4(c)(2) require a Committee receiving cash contributions aggregating in excess of $100 to return the amount over $100 to the contributor. As has been highlighted, there were four (4) money orders that were made in amounts greater than $100 (see fn. 3, supra), and a number of money orders for $100 which were attributed to the same person (see fn. 4, supra).

Although Esther Kee has denied that these money orders represent cash contributions, the circumstances make it probable that they indeed represent cash contributions. The money order numbers on these money orders fit into the consecutive number sequence of others that are representative of cash contributions. Moreover, there is a distinct similarity in the handwriting patterns of the money orders. Finally, but no less significantly, the money orders are dated, and were therefore

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purchased, days after the event.

Since there is evidence that most, if not all, of the money orders which are part of this matter represent actual cash contributions, the General Counsel recommends that the Commission find reason to believe that the Committee violated 11 C.F.R. § 110.4(c)(2) by failing to return amounts aggregating in excess of $100 in U.S. currency.

RECOMMENDATIONS

1. Take no further action against the Carter/Mondale Presidential Committee with respect to a possible violation of 2 U.S.C. § 441f.

2. Find reason to believe that the Carter/Mondale Presidential Committee violated 2 U.S.C. § 432(c).

3. Find reason to believe that the Carter/Mondale Presidential Committee violated 11 C.F.R. § 110.4(c)(2).

4. Seek a repayment of $7,130.35 pursuant to 11 C.F.R. § 9038.2(a) (an amount equal to the amount improperly paid).

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(21)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 22, 1981

MEMORANDUM

TO: MICHAEL DYMERSKY

THROUGH: B. ALLEN CLUTTER
STAFF DIRECTOR

FROM: BOB COSTA RJC

In response to your request for the amount of matching funds certified and paid to the Carter/Mondale Presidential Committee in connection with MUR 1353, the Audit staff reviewed Submission #14 and #17, and determined that $7,130.35 in matching funds were paid. Submission #14 was certified for payment on June 4, 1980, and Submission #17 was certified on July 16, 1980.

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Attachment VI - (1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

POSTAGE AND FEES PAID

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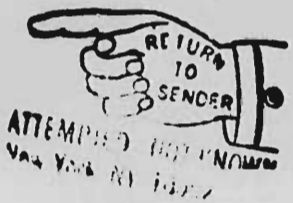
Ngan Chan
64 Rutger St.,
New York, N.Y. 10002



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OFFICE OF THE
COMMISSION SECRETARY

82 FEB 26 A 9: 59

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

February 26, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1353 (Carter/Mondale Presidential Committee)

QUESTION PRESENTED

Did a violation of 2 U.S.C. § 441f occur when agents of the Carter/Mondale Presidential Committee ("the Committee") attributed names of persons who made no contributions to the Committee at the Silver Palace Fundraiser, to certain money orders bought by them with cash received from other persons who did there contribute, and thereafter delivered the incorrectly attributed money orders to the Committee's headquarters?

CONCLUSION

No. The evidence discloses that the Committee's agents violated 2 U.S.C. § 432(c) by failing to maintain adequate records of cash receipts received at the fundraiser. Moreover, after accepting the cash contributions, some of which were in excess of $100 from certain individuals, the Committee's agents violated 11 C.F.R. § 110.4(c)(2) in failing to "promptly return the amount over $100" to the respective contributors. However, since the actual paying attendees at the fundraiser contributed on their own behalf from their own personal accounts, and not in the names of others, or in their own names with funds from others, the Committee cannot be said to have "accepted contributions made by one person in the name of another person" at the fundraiser, knowingly or otherwise. Therefore, 2 U.S.C. § 441f does not apply to the facts of this matter, since the Committee's agents purchased the money orders with cash actually contributed at the fundraiser, i.e. where the contributions were actually "made," and used the inaccurate records to assign names.

DISCUSSION

On the initial assumption that some person or persons had bought money orders with their own money intending to make contributions in the names of other persons, the Commission found

reason to believe, inter alia, that the Committee had violated 2 U.S.C. §441f by knowingly accepting contributions made by some persons in the names of other persons.

After investigating the matter, the evidence discloses that the Committee failed to keep adequate records of the cash receipts from the fundraiser in violation of 2 U.S.C. §432(c), and that the Committee failed to "promptly return the amount over $100" in the individual aggregate to the pertinent cash contributors as required by 11 C.F.R. §110.4(c)(2). Moreover, the money orders purchased with the cash receipts which were submitted to the Commission by the Committee in connection with Presidential Primary Matching Payments do not conform to the requirements of 11 C.F.R. §9034.2(a)(1) and 11 C.F.R. §9034.2 (c)(1) or (2), and are therefore rendered unmatchable and subject to the repayment provisions.

Turning to the question of whether there is sufficient evidence to recommend a finding of probable cause to believe that a 2 U.S.C. §441f violation has occurred, an analysis of the applicable provisions as applied to the instant facts is in order. Section 441f states that:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. (Emphasis added).

In defining the term "contribution," 2 U.S.C. §431(8)(A) states that the term includes, "any gift ... of money or anything of value made by any person for the purpose of influencing any election for Federal Office." (Emphasis added).

It is important to note that as used in 2 U.S.C. §§441f and 431(8)(A), the word "make" or "made" is used in the sense of "issuance" or "payment," meaning in this case the payment of cash as a contribution. The critical issue is to determine precisely when the payments or contributions were made. Did the contributions occur at the fundraiser when persons wishing to attend the event paid the entrance fee of $100 apiece to the Committee's agents? Or, did the contributions occur when the Committee's agents, using the cash receipts from the fundraiser, purchased money orders in increments of $100 (the price of admission), attributed to them names of people who, while present at the fundraiser made no contribution (i.e.Silver Palace Restaurant employees) and delivered the incorrectly attributed money orders to the Committee's headquarters? It is a settled proposition that contributions are viewed as "made" when the contri-

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butor relinquishes dominion and control of the thing of value (in this case cash) to the Committee or its duly appointed agent. In the General Counsel's view, then, the contributions occurred when payment of the fundraiser entrance fees were accepted by the Committee's agents who were expressly authorized by the Committee to accept receipts on its behalf.

The subject contributions of cash were "made" and "accepted" at the door of the Silver Palace Restaurant as entrance fees for the fundraiser. Available evidence discloses that the contributions were "made" by cash in increments of at least $100 in most instances. Thus, the Committee through its designated agents accepted large numbers of $100 cash contributions. Sometimes individuals contributed more than $100 cash. There is no evidence which suggests that the paying attendees "made" cash contributions in the names of anyone other than themselves. Nor is there any evidence which suggests that the contributed cash came from the personal accounts of anyone other than the actual paying attendee at the fundraiser. As far as can be determined, the Committee's agents accepted cash contributions at the fundraiser from individual attendees who paid the entrance fee on their own behalf, from their own personal accounts. Section 441f is directed toward contributions to a committee through "conduits". "Conduits" are people who allow their names to be used to effectuate a contribution to a committee from someone else. The evidence in this case discloses no "conduit" contributions. No individual has been disclosed as having "made" contributions in the names of others without the latter's consent, either. Therefore, Section 441f does not apply in this case.

The facts in the instant case are distinguishable from previous matters involving possible Section 441f violations. In MUR 256 (Shapp et al.), contributions were made through conduits by certain individuals. The conduits made contributions in their own names, but were reimbursed in full in most cases by someone else. In MUR 422 (Louis R. Lee), Mr. Lee used $9,200 to make contributions in the names of eleven conduits to the Carter primary campaign. In MUR 850 (Mastorelli), Dennis Salerno and Filmena Decresce made contributions in the names of others to the Mastorelli campaign. Again, they used their own money for this purpose. In MUR 970 (James Dennis), Mr. Dennis contributed $22,000, which was money he controlled, in the names of other people to the 1978 Stewart Senatorial campaign. Mr. Dennis made contributions of $12,000 of his corporation's money again by using other people's names, to the 1978 Peck congressional campaign. In MUR 1158 (Debra Hanania Freeman), Ms. Freeman, a volunteer of the Lyndon LaRouche

campaign, used her own personal funds to purchase a money order. On that money order she wrote the name "Dr. Harold Harrison." Mr. Harrison made no contribution, nor did he know that his name was being so used. In MUR 1237 (Stanley N. Kaplan et al.), Mr. Kaplan made contributions of $32,100 of his own personal funds through 22 conduits. These conduits allowed their names to be used to effectuate the contributions. In fact, each contributed a prescribed amount to the Friends of Luther H. Hodges, Jr., by personal check, for which they were immediately reimbursed by Mr. Kaplan or one of his two agents. In each of the above-described matters, some one individual was trying to circumvent the 2 U.S.C. § 441a ceiling on personal contributions per election by the use of names of other people who did not actually make a contribution. Or, in an effort to secure matching payments, some committee agents or other persons would use their own personal funds to purchase a written instrument and then attribute the contribution to someone else. Again, the central theme has been a person using their own funds to make a contribution in the name of another person, for whatever reason. Such activity is clearly proscribed by Section 441f on an analysis of the "making" of contributions.

The instant matter is similar to the situation in MUR 659 (Jeffrey Bell). Mr. Bell was a candidate for the U.S. Senate. His mother, Marjorie Bell, gave him a large amount of money derived from her personal funds. She also gave the money in her own name. Mr. Bell, as an agent of his campaign committee for the purposes of accepting contributions, accepted the money. However, when he delivered his mother's contribution to his committee, he represented it as his personal funds. It was reported as such, even though it was a contribution made by his mother. Section 432(c) was violated, not Section 441f.

In the instant case, what the Committee's agents did with the receipts subsequent to the accepting of the cash contributions are separate and distinct issues. The fact that they originally failed to keep accurate records of the cash receipts should be properly addressed as a violation of 2 U.S.C. § 432(c). The fact that the Committee's agents converted the cash receipts into money order form and attributed to them names of persons who did not contribute, in most instances, but were merely employees if the restaurant, should be viewed as a consequence of and an exacerbation of their failure to keep adequate records of the receipts. Again, such activity should be properly addressed through 2 U.S.C. § 432(c).

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The fact that they failed to return the aggregate excess of cash over $100 to some contributors should be properly addressed as violations of 11 C.F.R. § 110.4(c)(2). Finally, the fact that the Committee's agents accepted contributions made by cash, and that the money orders purchased therewith neither contained valid signatures nor were accompanied by verification letters signed by the actual contributors, causes the instruments to be unmatchable under the terms of 11 C.F.R. § 9034.2(a)(1) and 11 C.F.R. § 9034.2 (c)(1) or (2), and should be properly addressed by a repayment of matching funds received by the Committee on the basis of such instruments.

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RECEIVED
Book 7217

Immigrant Social Service, Inc.,/ Indochinese Refugee Project: 18

142 Henry Street, 3rd Floor, New York, N.Y. 10002

Tel: (212) 349-5181 & 349-5632

82 FEB 22 P3:07

February 16, 1982

The Secretary of
The Federal Election Commission
Washington D.C. 20463

Re: Case LAM THE HOA, MUR 1353

Dear Sir or Madam:

On May 14, 1981, Mr. LAM THE HOA, our client, received a letter from the Federal Election Commission/General Counsel's Factual and Legal Analysis, stating that the Commission found reason to believe that Mr. LAM THE HOA has allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee in violation of 2 U.S.C @ 441 f.

Accordingly, on behalf of our client, we have replied to the Commission, denying the allegation induced against our client, bringing to the knowledge of the Commission the fact that:

Mr. LAM THE HOA is a Vietnamese refugee who does not speak a single English word, and, due to this lack of English speaking, never knows anything about Election and Contribution in the matter of U.S. Public Affair, and, in fact, never made any contribution to anybody or any organization, nor allowed his name to be used to any purpose in matter of Election. He suspected somebody in the administration of the "Ngan Cung Restaurant"- in which he worked and in which the fund raising party has been organized - who knows his name and has used it to make the Contribution without his acknowledge or consentment. Recently, on February 8, 1982, we received a notice and a brief from the General Counsel stating that:

- there is no evidentiary basis upon which to assert that Respondent (Lam The Hoa) violated Section 441 f.

- and that the General Counsel recommends that the commission find no probable cause to believe that Lam The Hoa violated 2 U.S.C. @ 441 f.

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Immigrant Social Service, Inc.,/ Indochinese Refugee Project.
142 Henry Street, 3rd Floor, New York, N.Y. 10002
Tel: (212) 349-5181 & 349-5632

With the General Counsel, we are very honored to submit to your attention and Consideration this fact, and hops with the General Counsel that your Commission will agree with us that there is no probable cause to believe that a violation has occured.

Sincerely,

Trinh Hao

Brother Trinh Hao
Director

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BEFORE THE FEDERAL ELECTION COMMISSION
January 29, 1982

In the Matter of	)	
	)	
Lam The Hoa	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lam The Hoa ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lam The Hoa violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

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82 FEB 22 PM 1:18

Immigrant Social Service, Inc.,/ Indochinese Refugee Project
142 Henry Street, 3rd Floor, New York, N.Y. 10002
Tel: (212) 349-5181 & 349-5832

February 16, 1982

The Secretary of
The Federal Election Commission
Washington D.C. 20463

Re: Case LAM THE HOA, MUR 1353

Dear Sir or Madam:

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Accordingly, on behalf of our client, we have replied to the Commission, denying the allegation induced against our client, bringing to the knowledge of the Commission the fact that:

Mr. LAM THE HOA is a Vietnamese refugee who does not speak a single English word, and, due to this lack of English speaking, never knows anything about Election and Contribution in the matter of U.S. Public Affair, and, in fact, never made any contribution to anybody or any organization, nor allowed his name to be used to any purpose in matter of Election. He suspected somebody in the administrstion of the "Ngan Cung Restaurant"- in which he worked and in which the fund raising party has been organized - who knows his name and has used it to make the Contribution without his acknowledge or consentment. Recently, on February 8, 1982, we received a notice and a brief from the General Counsel stating that:

- there is no evidentiary basis upon which to assert that Respondent (Lam The Hoa) violated Section 441 f.

- and that the General Counsel recommends that the commission find no probable cause to believe that Lam The Hoa violated 2 U.S.C. § 441 f.

...2

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Immigrant Social Service, Inc.,/ Indochinese Refugee Project.
142 Henry Street, 3rd Floor, New York, N.Y. 10002
Tel: (212) 349-5181 & 349-5632

With the General Counsel, we are very honored to submit to your attention and Consideration this fact, and hope with the General Counsel that your Commission will agree with us that there is no probable cause to believe that a violation has occured.

Sincerely,

Trinh Hao

Brother Trinh Hao
Director

8304039267

BEFORE THE FEDERAL ELECTION COMMISSION
January 29, 1982

In the Matter of	)	
	)	
Lam The Hoa	)	MUR 1353
	)	
	)	

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There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lam The Hoa violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304026076

Brother TRINH HAO
Immigrant Social Service, Inc./ Indochinese Refugee Project.
142 HENRY STREET, 3rd FLOOR, NEW YORK, N.Y. 10002

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FIRST CLASS

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General Counsel
Federal Election Commission
WASHINGTON, D.C. 20463

Att. Charles N. Steele

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

8 10 40 1 6 2

Chan Sui Wing
1259 57th St.,
Brooklyn, N.Y. 11219

82 FEB 18 A9:37

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

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RETURN TO SENDER
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NEW YORK, N.Y. 10001

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85C

Young Kim
38 W. 32nd St.,
New York, N.Y. 10001

82 FEB 16 A 9:11

February 4, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1353

Please have the attached Memo and Briefs circulated to the Commission for this informational basis. Thank you.

Attachments

cc: Dymerskgy

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 FEB 4 P2: 41

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

February 4, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1353

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter regarding the 67 individuals the Commission found reason to believe violated 2 U.S.C. § 441f. Copies of the briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on February 4, 1982. Following receipt of the respondents' replies to this notice, if any, this Office will make a further report to the Commission.

Attachments

1. Letters to respondents (54 pages)
2. Briefs (134 pages)

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(1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Kwok Hung Chan
66 Bayard Street
New York, N.Y. 10013

Re: MUR 1353

Dear Kwok Hung Chan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039270 5

(2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chung Sing Au
856 Carrol Street
Brooklyn, N.Y. 11215

Re: MUR 1353

Dear Chung Sing Au:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(3)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Cheung Yeun Ting
75 Baxter Street
New York, N.Y. 10013

Re: MUR 1353

Dear Cheung Yeun Ting:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(4)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chan Wai Kuen
66 Mulberry Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Chan Wai Kuen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(5)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chan Sui Wing
1259 - 57th Street,
Brooklyn, N.Y. 11219

Re: MUR 1353

Dear Chan Sui Wing:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(6)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lee Cheung Kwir
375 Broome Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(7)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Yang Kuo Shio
94-36 Alstyne Avenue
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Yang Kuo Shio:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039271 1

(8)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chung Hop Ping
54 Rutgers Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chung Hop Ping:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039271 2

(9)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Mieh Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Mieh Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039271 3

(10)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Bernakella Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Bernadella Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039271

(11)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lui Hor Kuen
66 Bayard Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lui Hor Kuen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(12)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Young Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear Young Kim:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(13)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lam Chit Cheung
633 E. 16th Street,
Brooklyn, N.Y. 11218

Re: MUR 1353

Dear Lam Chit Cheung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039217

(14)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Johnson Chu
32 Monroe Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Johnson Chu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(15)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lee Yim Sun
32 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lee Yim Sun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(16)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lau Yem Chou
19 Division Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lau Yem Chou:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039270

(17)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Frank Wang
96-10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Frank Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039271

(18)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Lucia Wang
96-10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Lucia Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039227 2

(19)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

T.T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear T. T. Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8204039227

(20)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Mrs. T. T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear Mrs. T. T. Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039272 4

(21)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Sim Fuey Chow
830 Avenue H,
Brooklyn, N.Y. 11233

Re: MUR 1353

Dear Sim Fuey Chow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039227 25

(22)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Kwei Tik Yum-Sum
48-11 - 91st Street,
Elmhurst, N. Y. 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039226

(23)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Irene Sun
48-11 - 91st Street,
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Irene Sun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039227

(24)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Shun-Fook Yeung
94-36 Alstyne Avenue,
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039227

(25)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

K. G. Yeung
94-36 Alstyne Avenue
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear K. G. Yeung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(26)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Ngan Chan
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Ngan Chan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(21)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Choi Luen Cheing
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Choi Luen Cheing:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(28)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Ruby Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Ruby Chi:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273

(29)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Hong Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Hong Chi:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273

(30)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Yeun May Leung
145 E. 27th Street,
New York, N.Y. 10016

Re: MUR 1353

Dear Yeun May Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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8304039273 4

(81)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Yin Young Leung
7 Elizabeth Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Yin Young Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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Brief

8304039273

(32)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Suey Jin Chih Leung
7 Elizabeth Street
New York, N.Y. 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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(33)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Tao T. Wei
2081 2nd Avenue,
New York, N.Y. 10029

Re: MUR 1353

Dear Tao T. Wei:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039277

(34)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Terrin Hwang
3345 - 90th Street,
Jackson Heights, N.Y.

Re: MUR 1353

Dear Terrin Hwang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
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(35)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Ming Wha Woo
20 Confucius Plaza
New York, N.Y. 10002

Re: MUR 1353

Dear Ming Wha Woo:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
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8304039273

(36)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Sin Joung Ha
34-44 - 59th Street,
Woodstock, N. Y.

Re: MUR 1353

Dear Sin Joung Ha:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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8304039270

(87)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Joyce Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Joyce Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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8304039271

(38)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chi Ping Leung
92 Madison Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chi Ping Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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8304039274

(39)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Leong Ching Wo Wong
127 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Leong Ching Wo Wong:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
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8304039271

(40)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chan Jor Louie
30 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chan Jor Louie:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039271

(41)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Chun Sing Au
52 Bowery
New York, N.Y. 10013

Re: MUR 1353

Dear Chun Sing Au:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039274

(42)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

David D. H. Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear David D. H. Kim:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

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(43)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Shui K. Lee
394 Chestnut,
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304059217

(44)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Shui Sum Leung
117 Mulberry Street, (Apt. 2),
New York, N.Y. 10013

Re: MUR 1353

Dear Shui Sum Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039274

(45)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Bob Leu
5 Mott Street,
New York, N. Y. 10013

Re: MUR 1353

Dear Bob Leu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039274

(46)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Tse Wai Chun
5 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Tse Wai Chun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039275

(47)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Milton A. Gordon, Esq.,
733 Park Avenue,
New York, N.Y. 10021

Re: MUR 1353

Dear Mr. Gordon:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Ja Fak Wei had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8304039271

(48)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Norman Lau Kee, Esq.
11 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Kee:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Do Young Paik had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273 2

(49)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Stephen P. Gleit, Esq.
Suite 704
2 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Gleit:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Chau Chak Yum had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273

(50)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Trinh Hao, Esq., Director
Immigrant Social Service, Inc.,
Indochinese Refugee Project
142 Henry Street (3rd Floor)
New York, N.Y. 10002

Re: MUR 1353

Dear Mr. Hao:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Lam The Hoa had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273

(51)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Casimir F. Sojka
Chemical Bank Building
80 Mott Street
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Sojka:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your clients, Cheng Wai Ming, Lo Ting, Fung Sik Yee, Hing Lit Chau, Bill S. Hui, Chiu Tak Foon, Lau Po Hing, Koon Kau Ng, and Chung Foo Louie had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review are briefs stating the position of the General Counsel on the legal and factual issues of each case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such briefs should also be forwarded to the Office of the General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

8204039275

(52)

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273

(53)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 4, 1982

Michael C. Sloan, Esq.
Sloan, Taylor and Brown
Two Clifford Avenue
Pelham, N. Y. 10803

Re: MUR 1353

Dear Mr. Sloan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your clients, George Lau, Wah Chan, So Hung Shum, Kwok Tung Tom, Yet Sue Gee (Tom), Yew Leung Wong, Soo Ling Wong, and Kwan Ho had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review are briefs stating the position of the General Counsel on the legal and factual issues of each case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such briefs should also be forwarded to the Office of the General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

8304039273

(54)

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304039273 6

55

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Kwok Hung Chan	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Kwok Hung Chan ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039273S

Attachment II - (1)

56

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Knok Hung Chan violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3304039275C

(57)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chung Sing Au	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chung Sing Au ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment II - (3)

58

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chung Sing Au violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039275

(59)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Cheung Yeun Ting	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Cheung Yeun Ting ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304032763

Attachment II-(5)

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II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Cheung Yeun Ting violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

8304092754

(61)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chan Wai Kuen	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chan Wai Kuen ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039275

Attachment II - (7)

62

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chan Wai Kuen violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040392735

(63)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chan Sui Wing	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chan Sui Wing ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304029267

Attachment II - (9)

64

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chan Sui Wing violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040027 6

(65)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lee Cheung Kwir	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lee Cheung Kwir ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039275 5

Attachment II - (11)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lee Cheung Kwir violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8804027700

(67)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Yang Kuo Shio	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Yang Kuo Shio ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039271

Attachment II — (13)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Yang Kuo Shio violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039277

(69)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chung Hop Ping	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chung Hop Ping ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039273

(Attachment II-15)

70

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chung Hop Ping violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039277

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

71

In the Matter of	)	
	)	
Mieh Hu	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Mieh Hu ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039275

Attachment II -(17)

72

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Mieh Hu violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

6304039276

(73)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Bernakella Hu	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Bernakella Hu ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039277

Attachment II - (19)

74

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Bernakella Hu violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

8 February 1982
Date

Charles N. Steele
General Counsel

3040392778

75

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lui Hor Kuen	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lui Hor Kuen ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039279

Attachment II - (21)

76

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lui Hor Kuen violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039273

(77)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Young Kim	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Young Kim ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment II - (23)

78

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Young Kim violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039273

79

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lam Chit Cheung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lam Chit Cheung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304027373

Attachment II - (25)

80

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lam Chit Cheung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040392734

(81)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Johnson Chu	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Johnson Chu ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039273

Attachment II - (27)

82

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Johnson Chu violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304027336

(83)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lee Yim Sun	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lee Yim Sun ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039279

Attachment II - (29)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lee Yim Sun violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392738

(85)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lau Yem Chou	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lau Yem Chou ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039273 9

Attachment II — (31)

81

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lau Yem Chou violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8504039270

87

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Frank Wang	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Frank Wang ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039271

Attachment II-83)

88

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Frank Wang violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040327

(89)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lucia Wang	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lucia Wang ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039279 3

Attachment II - (35)

90

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lucia Wang violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392794

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

91

In the Matter of	)	
	)	
T.T. Wang	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that T.T. Wang ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039279 5

Attachment II - (37)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that T.T. Wang violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392734

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

93

In the Matter of	)	
	)	
Mrs. T.T. Wang	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Mrs. T.T. Wang ("Respondent") knowingly allowed her name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039277

Attachment II - (39)

94

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Mrs. T.T. Wang violated 2 U.S.C. § 441f by knowingly permitting her name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040327

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(95)

In the Matter of	)	
	)	
Sim Fuey Chow	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Sim Fuey Chow ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8240392729

Attachment II - (41)

96

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Sim Fuey Chow violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(97)

In the Matter of	)	
	)	
Kwei Tik Yum-Sum	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Kwei Tik Yum-Sum ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039230 1

Attachment II- (43)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Kwei Tik Yum-Sum violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 0 4 0 3 2 3 0 3 6

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(99)

In the Matter of	)	
	)	
Irene Sun	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Irene Sun ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039280

Attachment II - (45)

100

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Irene Sun violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

8 February 1982
Date

Charles N. Steele
General Counsel

8304039281

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(101)

In the Matter of	)	
	)	
Shun-Fook Yeung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Shun-Fook Yeung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039280

Attachment II-(47)

102

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Shun-Fook Yeung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392806

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

103

In the Matter of	)	
	)	
K.G. Yeung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that K.G. Yeung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304032807

Attachment IT - (49)

104

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that K.G. Yeung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

5 2 0 4 0 3 2 8 0 6

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

105

In the Matter of	)	
	)	
Ngan Chan	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Ngan Chan ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039280

Attachment IT (51)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Ngan Chan violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 0 4 0 3 6 2 8 1 5

107

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Choi Luen Cheing	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Choi Luen Cheing ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039281

Attachment II - (53)

108

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Choi Luen Cheing violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 0 4 0 3 9 2 9 1 2

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

109

In the Matter of	)	
	)	
Ruby Chi	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Ruby Chi ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8 3 0 4 0 3 2 2 8 1 0

Attachment II - (55)

110

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Ruby Chi violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

7 February 1992
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Hong Chi	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Hong Chi ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304032815

Attachment II - (57)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Hong Chi violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

804092813

(113)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Yeun May Leung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Yeun May Leung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment II - (59)

114

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Yuen May Leung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304039281

(115)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Yin Young Leung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Yin Young Leung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304059281 6

Attachment II-(61)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Yin Young Leung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

(117)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Suey Jin Chih Leung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Suey Jin Chih Leung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039291

Attachment II - (63)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Suey Jin Chih Leung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304059028

(919)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Tao T. Wei	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Tao T. Wei ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304028[illegible]

Attachment II - (105)

120

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Tao T. Wei violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040392824

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(121)

In the Matter of	)	
	)	
Terrin Hwang	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Terrin Hwang ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039282

Attachment II - (67)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Terrin Hwang violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

(123)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Ming Wha Woo	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Ming Wha Woo ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039282 7

Attachment II - (69)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Ming Wha Woo violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392838

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(125)

In the Matter of	)	
	)	
Sin Joung Ha	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Sin Joung Ha ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039238

Attachment II - (71)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Sin Joung Ha violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

3040392380

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(127)

In the Matter of	)	
	)	
Joyce Hu	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Joyce Hu ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039231

Attachment II - (73)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Joyce Hu violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

129

In the Matter of	)	
	)	
Chi Ping Leung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chi Ping Leung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039283

Attachment II- (75)

130

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chi Ping Leung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(131)

In the Matter of	)	
	)	
Leong Ching Wo Wong	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Leong Ching Wo Wong ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3040392831

Attachment II - (77)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Leong Ching Wo Wong violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3504028316

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

133

In the Matter of	)	
	)	
Chan Jor Louie	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chan Jor Louie ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039283 7

Attachment II (79)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chan Jor Louie violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

9 February 1982
Date

Charles N. Steele
General Counsel

3 3 0 4 0 5 6 2 8 3

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

135

In the Matter of	)	
	)	
Chun Sing Au	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chun Sing Au ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039285

Attachment II - (81)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chun Sing Au violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

3 4 0 3 9 2 8 1 3

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

137

In the Matter of	)	
	)	
David D. H. Kim	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that David D. H. Kim ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3040392811

Attachment II - (83)

138

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that David D. H. Kim violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 0 3 9 2 8 1 3 0 3 9 2 8 1

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(139)

In the Matter of	)	
	)	
Shui K. Lee	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Shi K. Lee ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3504039284

Attachment II - (85)

140

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Shi K. Lee violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

141

In the Matter of	)	
	)	
Shui Sum Leung	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Shui Sum Leung ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3049291

Attachment II - (87)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Shui Sum Leung violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

143

In the Matter of	)	
	)	
Bob Leu	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Bob Leu ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304028175

Attachment II - (89)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Bob Leu violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 0 4 0 3 2 2 7 6

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

145

In the Matter of	)	
	)	
Tse Wai Chun	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Tse Wai Chun ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3504038216

Attachment II-(91)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Tse Wai Chun violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

0040328

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

(147)

In the Matter of	)	
	)	
Ja Fak Wei	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Ja Fak Wei ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304028 51

LA Hackett II (93)

148

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Ja Fak Wei violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392

(149)

BEFORE THE FEDERAL ELECTION COMMISSION
January 22, 1982

In the Matter of)
)
Do Young Paik) MUR 1353

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Do Young Paik ("Respondent") knowingly allowed his name to be used to effect a contribution made by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f. In response to the Commission's reason to believe notification, the Respondent said that he made a cash contribution to the Committee during their Silver Palace Restaurant fundraising event in New York City, on February 21, 1980.

Respondent states that although he initially made a cash contribution, he was contacted at a later date by an unidentified member of the Committee's dinner committee. Respondent contends that he instructed the Committee agent to purchase a money order in his name, and sign his name to it.

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office. It appears from the evidence that

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Attachment II-(95)

Respondent made the contribution in his own name. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel's Recommendation

Find no probable cause to believe that Do Young Paik violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

3304022831

(151)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chau Chak Yum	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chau Chak Yum ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304028

Attachment II—(97)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chau Chak Yum violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1992
Date

Charles N. Steele
General Counsel

8304032236

153

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lam The Hoa	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lam The Hoa ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039285

Attachment II - (99)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lam The Hoa violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

(155)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Cheng Wai Ming	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Cheng Wai Ming ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment IV - (101)

156

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Cheng Wai Ming violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

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157

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lo Ting	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lo Ting ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment II - (103)

158

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lo Ting violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 4 0 3 9 2 1

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Fung Sik Yee	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Fung Sik Yee ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039235

160

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Fung Sik Yee violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392834

(161)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Hing Lit Chau	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Hing Lit Chau ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039285

Attachment II (107)

182

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Hing Lit Chau violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8040392834

163

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Bill S. Hui	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Bill S. Hui ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

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Attachment II (109)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Bill S. Hui violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

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(105)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Chiu Tak Foon	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chiu Tak Foon ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039283

Attachment II - (111)

166

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chiu Tak Foon violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040328

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Lau Po Hing	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Lau Po Hing ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039237

Attachment II - (113)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Lau Po Hing violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

0040302370

(169)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Koon Kau Ng	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Koon Kau Ng ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039287

Attachment IV - (115)

120

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Koon Kau Ng violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3340392887

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

171

In the Matter of	)	
	)	
Chung Foo Louie	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Chung Foo Louie ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304032287

Attachment II - (117)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Chung Foo Louie violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3304039287 6

(173)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
George Lau	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that George Lau ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039287

Attachment 1 (119)

179

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that George Lau violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

5304036376

(175)

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Wah Chan	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Wah Chan ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039237

Attachment II - (121)

178

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Wah Chan violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040392838

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

177

In the Matter of	)	
	)	
So Hung Shum	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that So Hung Shum ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039283

Attachment II - (123)

178

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that So Hung Shum violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

8304022833

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

179

In the Matter of	)	
	)	
Kwok Tung Tom	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Kwok Tung Tom ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3040392838

Attachment II (125)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Kwok Tung Tom violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

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181

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Yet Sue Gee (Tom)	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Yet Sue Gee (Tom) ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039283

Attachment II-(127)

102

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Yet Sue Gee (Tom) violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 3 0 4 0 5 6 2 8 3 3 6

183

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

In the Matter of	)	
	)	
Yew Leung Wong	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Yew Leung Wong ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8040392837

Attachment II-(129)

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Yew Leung Wong violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3040528836

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

185

In the Matter of	)	
	)	
Soo Ling Wong	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Soo Ling Wong ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

8304039283

Attachment II-(131)

186

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Soo Ling Wong violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3 5 0 4 0 3 2 3 7 5

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1982

187

In the Matter of	)	
	)	
Kwan Ho	)	MUR 1353
	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On May 5, 1981, the Commission found reason to believe that Kwan Ho ("Respondent") knowingly allowed his name to be used to effect a contribution by another person to the Carter/Mondale Presidential Committee ("the Committee") in violation of 2 U.S.C. § 441f.

Upon investigation it has become apparent that Committee volunteers who were responsible for conducting a fundraising event at the Silver Palace Restaurant in New York City on February 21, 1980, assigned names of fundraiser attendees to money orders purchased with cash receipts from other contributors at the event. It is evident that this attribution was accomplished without consultation with, or the consent of the individuals whose names appear on the money orders involved in this matter. In fact, the information available to the General Counsel with respect to the individuals whose names appear on the money orders evinces a lack of awareness that contributions were made at all.

3304039281

Attachment IV (133)

188

II. Legal Analysis

2 U.S.C. § 441f in pertinent part provides that no person shall knowingly permit his or her name to be used to effect a contribution by another person to a candidate for federal office.

There is no evidentiary basis upon which to assert that Respondent violated Section 441f. The "knowing permission" aspect of Section 441f is a precondition to the possibility of any violation. Since Respondent was unaware of either the contribution or the name attribution, the requisite "knowing permission" component of the provision is unfulfilled. Accordingly, the General Counsel recommends that the Commission find no probable cause to believe that Respondent violated 2 U.S.C. § 441f.

III. General Counsel'S Recommendation

Find no probable cause to believe that Kwan Ho violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution by another person to a federal candidate.

3 February 1982
Date

Charles N. Steele
General Counsel

3304039287

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael C. Sloan, Esq.
Sloan, Taylor and Brown
Two Clifford Avenue
Pelham, N. Y. 10803

Re: MUR 1353

Dear Mr. Sloan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your clients, George Lau, Wah Chan, So Hung Shum, Kwok Tung Tom, Yet Sue Gee (Tom), Yew Leung Wong, Soo Ling Wong, and Kwan Ho had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review are briefs stating the position of the General Counsel on the legal and factual issues of each case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such briefs should also be forwarded to the Office of the General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

8304039289

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

33040392824

MD 1/28/82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Casimir F. Sojka
Chemical Bank Building
80 Mott Street
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Sojka:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your clients, Cheng Wai Ming, Lo Ting, Fung Sik Yee, Hing Lit Chau, Bill S. Hui, Chiu Tak Foon, Lau Po Hing, Koon Kau Ng, and Chung Foo Louie had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review are briefs stating the position of the General Counsel on the legal and factual issues of each case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such briefs should also be forwarded to the Office of the General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

3304039289

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

930403928936

MD 1/28/82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David D. H. Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear David D. H. Kim:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039297

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shui K. Lee
394 Chestnut,
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039239

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shui Sum Leung
117 Mulberry Street, (Apt. 2),
New York, N.Y. 10013

Re: MUR 1353

Dear Shui Sum Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039285

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bob Leu
5 Mott Street,
New York, N. Y. 10013

Re: MUR 1353

Dear Bob Leu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/29/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Tse Wai Chun
5 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Tse Wai Chun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Milton A. Gordon, Esq.,
733 Park Avenue,
New York, N.Y. 10021

Re: MUR 1353

Dear Mr. Gordon:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Ja Fak Wei had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

3304030290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Norman Lau Kee, Esq.
11 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Kee:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Do Young Paik had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

4/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stephen P. Gleit, Esq.
Suite 704
2 Mott Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Mr. Gleit:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Chau Chak Yum had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Trinh Hao, Esq., Director
Immigrant Social Service, Inc.,
Indochinese Refugee Project
142 Henry Street (3rd Floor)
New York, N.Y. 10002

Re: MUR 1353

Dear Mr. Hao:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that your client, Lam The Hoa had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Tao T. Wei
2081 2nd Avenue,
New York, N.Y. 10029

Re: MUR 1353

Dear Tao T. Wei:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Terrin Hwang
3345 - 90th Street,
Jackson Heights, N.Y.

Re: MUR 1353

Dear Terrin Hwang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039297

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ming Wha Woo
20 Confucius Plaza
New York, N.Y. 10002

Re: MUR 1353

Dear Ming Wha Woo:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

2304032905

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sin Joung Ha
34-44 - 59th Street,
Woodstock, N. Y.

Re: MUR 1353

Dear Sin Joung Ha:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joyce Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Joyce Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chi Ping Leung
92 Madison Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chi Ping Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Leong Ching Wo Wong
127 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Leong Ching Wo Wong:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Jor Louie
30 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chan Jor Louie:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

4/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chun Sing Au
52 Bowery
New York, N.Y. 10013

Re: MUR 1353

Dear Chun Sing Au:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

K. G. Yeung
94-36 Alstyne Avenue
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear K. G. Yeung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3340392916

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ngan Chan
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Ngan Chan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Choi Luen Cheing
64 Rutger Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Choi Luen Cheing:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039217

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ruby Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Ruby Chi:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Hong Chi
410 E. 6th Street,
New York, N.Y. 10009

Re: MUR 1353

Dear Hong Chi:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3040392918

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Yeun May Leung
145 E. 27th Street,
New York, N.Y. 10016

Re: MUR 1353

Dear Yeun May Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039290

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Yin Young Leung
7 Elizabeth Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Yin Young Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Suey Jin Chih Leung
7 Elizabeth Street
New York, N.Y. 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039229

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Frank Wang
96-10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Frank Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039229

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lucia Wang
96-10 - 41st Avenue,
Corona, N.Y.

Re: MUR 1353

Dear Lucia Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039224

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

T.T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear T. T. Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mrs. T. T. Wang
300 E. 75th Street,
New York, N.Y. 10021

Re: MUR 1353

Dear Mrs. T. T. Wang:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

MD 1/22

Charles N. Steele
General Counsel

Enclosure
Brief

3304039226

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sim Fuey Chow
830 Avenue H,
Brooklyn, N.Y. 11233

Re: MUR 1353

Dear Sim Fuey Chow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

PD 1/27

3304039227

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kwei Tik Yum-Sum
48-11 - 91st Street,
Elmhurst, N. Y. 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

MD 1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039298

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Irene Sun
48-11 - 91st Street,
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Irene Sun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039229

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Shun-Fook Yeung
94-36 Alstyne Avenue,
Elmhurst, N.Y. 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

MD 1/27

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Wai Kuen
66 Mulberry Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Chan Wai Kuen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Cheung Yeun Ting
75 Baxter Street
New York, N.Y. 10013

Re: MUR 1353

Dear Cheung Yeun Ting:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Sincerely,

1/27/82.

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chan Sui Wing
1259 - 57th Street,
Brooklyn, N.Y. 11219

Re: MUR 1353

Dear Chan Sui Wing:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

1/27/82

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lee Cheung Kwir
375 Broome Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

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Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

1/27/82

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lam Chit Cheung
633 E. 16th Street,
Brooklyn, N.Y. 11218

Re: MUR 1353

Dear Lam Chit Cheung:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

1/27/82

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Johnson Chu
32 Monroe Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Johnson Chu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/22/82

Charles N. Steele
General Counsel

Enclosure
Brief

33040392936

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lee Yim Sun
32 Henry Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lee Yim Sun:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

D 1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039297

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lau Yem Chou
19 Division Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Lau Yem Chou:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

MD 1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293S

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Young Kim
38 W. 32nd Street,
New York, N.Y. 10001

Re: MUR 1353

Dear Young Kim:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

1/27/92

Sincerely,

MD

Charles N. Steele
General Counsel

Enclosure
Brief

3304039293

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lui Hor Kuen
66 Bayard Street,
New York, N.Y. 10013

Re: MUR 1353

Dear Lui Hor Kuen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27/82

MD

Charles N. Steele
General Counsel

Enclosure
Brief

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bernakella Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Bernadella Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039941

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mieh Hu
34-44 - 59th Street,
Woodstock, N.Y.

Re: MUR 1353

Dear Mieh Hu:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

MD 1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039292

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chung Hop Ping
54 Rutgers Street,
New York, N.Y. 10002

Re: MUR 1353

Dear Chung Hop Ping:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

1/27/82

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039294 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Chung Sing Au
856 Carrol Street
Brooklyn, N.Y. 11215

Re: MUR 1353

Dear Chung Sing Au:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

1/27/82

Charles N. Steele
General Counsel

Enclosure
Brief

3304039294

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Yang Kuo Shio
94-36 Alstyne Avenue
Elmhurst, N.Y. 11372

Re: MUR 1353

Dear Yang Kuo Shio:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

MD 1/27/82

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

3304039295

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kwok Hung Chan
66 Bayard Street
New York, N.Y. 10013

Re: MUR 1353

Dear Kwok Hung Chan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on May 5, 1981, found reason to believe that you had violated 2 U.S.C. § 441f, a provision of the Act and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Michael Dymersky at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

1/27/82

3304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1981

MEMORANDUM TO: Robert J. Costa
Assistant Staff Director, Audit Division

THROUGH: B. Allen Clutter
Staff Director

FROM: Charles N. Steele
General Counsel

Pursuant to discussion with your staff, this memo is to request formally audit assistance in connection with MUR 1353 (internally generated from Audit Division). Specifically, we request that your staff review the appropriate matching funds submission materials to ascertain the amount of matching funds certified and paid to the Carter/Mondale Presidential Committee in connection with the 67 purported contributors and 73 money orders involved in the MUR. All of these money orders were submitted in either submission #13 or submission #17.

We would like to have this information by Thursday, December 10. If you have any questions, please contact Michael Dymersky at 523-4039.

3304039217

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

October 15, 1981

Joel Joseph, Esq.
4801 Massachusetts Ave, N.W.
Washington, D.C. 20016

RE: MUR 1353
(Carolyn McLean
A.K.A. Sandy Oreste)

Dear Mr. Joseph:

Please be advised that thirty (30) days have lapsed since you were notified of the avaibility of your client's deposition transcript for inspection and signature. Milton Reporting, Inc. has since forwarded the original to the Commission, and it is on file in the Office of General Counsel.

If you have any questions, please contact Michael Dymersky, the staff member assigned to this matter, at (202) 523-4039.

Very truly yours,

Scott E. Thomas
Assistant General Counsel

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Elissa

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 15, 1981

Carol Darr, Esq.
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1353

Dear Ms. Darr:

Please be advised that thirty (30) days have lapsed since you were notified orally of the availability of the transcript of Esther Kee's deposition for inspection and signature. Milton Reporting, Inc. has since forwarded the original to the Commission and it is on file in the Office of General Counsel.

Additionally, we have yet to receive any of the "lists" that were required under the Commission Subpoena to Mrs. Kee. Please arrange to have the required material sent to this Office as soon as practicable.

If you have any questions, please contact Michael Dymersky, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Scott E. Thomas
Assistant General Counsel

2304029116

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: SEPTEMBER 18, 1981

SUBJECT: MUR 1353 Comprehensive Investigative Report #1, dated 9-4-81; Received in OCS, 9-17-81, 11:38

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, September 17, 1981.

There were no objections to the report at the time of the deadline.

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION
September 4, 1981

81 SEP 17 AM 11: 38

In the Matter of)
)
Carter/Mondale Presidential) MUR 1353

COMPREHENSIVE INVESTIGATIVE REPORT #1

On June 13, 1981, the Commission authorized the issuance of two subpoenas, one directed to Mrs. Esther Kee and the other to Ms. Sandy Oreste. Previously, on May 5, 1981, the Commission determined that their was reason to believe that both the Carter/ Mondale Presidential Committee ("the Committee") and 67 named individuals had violated 2 U.S.C. § 441f.

On July 15, 1981, members of my staff conducted the deposition of Carolyn McLean, a.k.a. Sandy Oreste. On July 17, 1981, the deposition of Mrs. Kee was conducted. Those depositions gleaned the following information:

Mrs. Kee, as a volunteer to the Committee, was in charge of a fundraising event at the Silver Palace Restaurant in New York City, on February 21, 1980. She claims that there was a high degree of confusion regarding the collecting of cash contributions and the recording of contributor names, occupations, principal places of business, addresses, etc. on requisite contributor lists. Sandy Oreste, the only paid staff member of the committee present, appears to have been aware of the confusion, though she was a non-participant.

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The entrance price to the event was $100. Few, if any of the attendees paid by personal check; rather, most made payment by cash, for which they received tickets of admission. When the volunteers were collecting the money, they were instructed to keep the cash in individualized envelopes, so that the contributions could be segregated by contributor. In the crush of queued entrants, and because of the Secret Service's adamant insistance that all attendees be in the restaurant and seated when Mrs. Carter, the guest of honor, arrived, these volunteers, including Mrs. Kee, commingled the cash and failed to maintain adequate records.

Sometime after the event, it was determined that the Committee could not accept the cash, and Sandy Oreste asked Esther Kee to "... get them [cash] into money orders or something so that we have a list of it." (Kee deposition). Since there was little possibility of determining who contributed what amount, or who contributed at all, Mrs. Kee used a list of all people who attended the function (including Silver Palace staff), and attempted to assign contributions in increments of $100 to individuals on that list. She then purchased money orders in increments of $100, and proceeded to fill them out as to name and address. Mrs. Kee stated that there was no attempt to get any of the putative contributors' signatures on the money orders. Thereafter, Mrs. Kee conveyed at least some of these money orders to Sandy Oreste, who, in turn, proceeded to fill out contributor cards for those whose names were on the money orders. It now appears that a number

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of people whose names appear on the money orders did not actually make a contribution.

During the deposition, Mrs. Kee was shown a number of photocopies of money orders submitted by the Committee to the Commission for matching fund purposes. She was able to identify her handwriting and signature on a number of the facsimile money orders.

In an effort to determine if the Committee had knowledge of the unlawful nature of the money orders in question, the General Counsel has sought the Commission's authorization to depose Larry Hayes, then chairman of the Committee's Finance Committee. His testimony should assist my staff in establishing whether their has been a violation of 2 U.S.C. § 441f. We hope to conduct this deposition by the end of September. No further investigation is contemplated at this time.

Charles N. Steele
General Counsel

Sept. 16, 1981
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

3304039293

Dynamics MIR 1363

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

PS Form 3811, Jan. 1979

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:
Carol Dorr, Esq.
1625 Mass. Ave., N.W.
Wash. D.C. 20036

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943131	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

M. Bro

4. DATE OF DELIVERY
5/22/81

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-289-469

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carol Darr, Esq.
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Ms. Darr:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires your client, Larry W. Hayes to appear and give sworn testimony on September 23, 1981, at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider Mr. Hayes a respondent in this matter; but rather as a witness only.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to Mr. Hayes in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

Please confirm your client's scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

3304039293

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carol Darr, Esq.
1025 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Ms. Darr:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires your client, Larry W. Hayes to appear and give sworn testimony on September 23, 1981, at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider Mr. Hayes a respondent in this matter; but rather as a witness only.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to Mr. Hayes in the amount of $30.25. If the estimated mileage is incorrect, please advise this office.

Please confirm your client's scheduled appearance with Michael Lymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Lymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

8/31/81

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

3 0 4 0 2 9 3 4

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and other Relevant Documents

TO: Mr. Larry W. Hayes
4416 Underwood Road
Baltimore, Maryland 21218

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to your activities on behalf of the Carter/Mondale Presidential Committee involving the submission for primary matching funds under Chapter 96 of Title 26, United States Code, of certain money orders dated February 28 and February 29 derived from a fundraising event at the Silver Palace Restuarant in New York, New York, on or about February 21, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at 10:00 a.m. on September 23, 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on September 23, 1981, at the above stated location:

any materials, lists, records, written communications and other relevant documents from Ms. Carolyn McLean, a.k.a. Ms. Sandy Oreste, Evan Dobelle, or anyone else, pertaining to certain money

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orders dated February 28 or February 29, derived from the fundraising event at the Silver Palace Restaurant in New York, New York, on or about February 21, 1980.

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 11th day of September, 1981.

Frank P. Reiche

Frank P. Reiche
Vice Chairman
Federal Election Commission

ATTEST:

Jody A. Custer for

Marjorie W. Emmons
Secretary to the Commission

3304039295

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TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER -- REQUIRE IDENTIFICATION

WASHINGTON, D. C.

Check No. 86,182,700
SYMBOL 3004

United States Treasury 15-51 / 000

PAY TO THE ORDER OF LARRY W HAYES

DOLLARS	CTS
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MUR 1353

Henry H. Eadon
REGIONAL DISBURSING OFFICER

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: SEPTEMBER 11, 1981

SUBJECT: SUBPOENA REGARDING MUR 1353

The attached subpoena regarding MUR 1353, which was Commission approved on September 9, 1981 by a vote of 6-0, has been signed and sealed this date.

3304029360

Attachment:
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Larry W. Hayes)

MUR 1353

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 9, 1981, the Commission approved by a vote of 6-0 the General Counsel's recommendation to authorize the Subpoena to Appear for Deposition and the accompanying letter to Mr. Hayes, as submitted with the General Counsel's September 3, 1981 Memorandum to the Commission regarding MUR 1353.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

9/9/81
Date

Jody a. Custer for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 9-3-81, 3:04
Circulated on 48 hour tally basis: 9-4-81, 2:00

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 SEP 3 P3: 04

September 3, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1353; Authorization to Issue Subpoena to Appear for Deposition Upon Oral Examination, and to Produce Relevant Documents

On May 5, 1981, the Commission determined that there was reason to believe that both the Carter/Mondale Presidential Committee ("the Committee") and 67 named individuals had violated 2 U.S.C. § 441f.

As a result of the preliminary investigation of the matter,*/ it has been determined that Mr. Larry W. Hayes, then Director of Finance for the primary campaign of the Carter/Mondale Presidential Committee, may have had knowledge of the manner in which the money orders here involved were purchased and signed previous to their transmission to Mr. Hayes for processing and submission to the Commission for matching funds.

Therefore, in an effort to acquire critical evidence in our investigation, the General Counsel recommends that the Commission authorize the attached Subpoena to Appear for Deposition, and the accompanying letter to Mr. Hayes.

Attachments
1. Proposed letter directed to Mr. Hayes.
2. Proposed subpoena directed to Mr. Hayes.

---

*/ My staff conducted depositions of Carolyn McLean, a.k.a. Sandy Oreste, on July 15, and Esther G. Kee on July 17, 1981, which were of great importance in establishing possible 2 U.S.C. § 441f and 26 U.S.C. § 9042 violations by the Committee.

8304029353

Attachment 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carol Darr, Esq.
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Ms. Darr:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires your client, Larry W. Hayes, to appear and give sworn testimony on September , 1981, at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider Mr. Hayes a respondent in this matter; but rather as a witness only.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to Mr. Hayes in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

Please confirm your client's scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

3 3 0 4 0 3 9 2 9 3 3

Attachment

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination
and to Produce Books, Records and other Relevant Documents

TO: Mr. Larry W. Hayes
4416 Underwood Road
Baltimore, Maryland 21218

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to your activities on behalf of the Carter/Mondale Presidential Committee involving the submission for primary matching funds under Chapter 96 of Title 26, United States Code, of certain money orders dated February 28 and February 29 derived from a fundraising event at the Silver Palace Restuarant in New York, New York, on or about February 21, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at 10:00 a.m. on September , 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on September , 1981, at the above stated location:

any materials, lists, records, written communications and other relevant documents from Ms. Carolyn McLean, a.k.a. Ms. Sandy Oreste, Evan Dobelle, or anyone else, pertaining to certain money

3304039294

orders dated February 28 or February 29, derived from the fundraising event at the Silver Palace Restaurant in New York, New York, on or about February 21, 1980.

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of September, 1981.

Frank P. Reiche
Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

3304039295

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1353

Dear Ms. Oreste:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on July 14, 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

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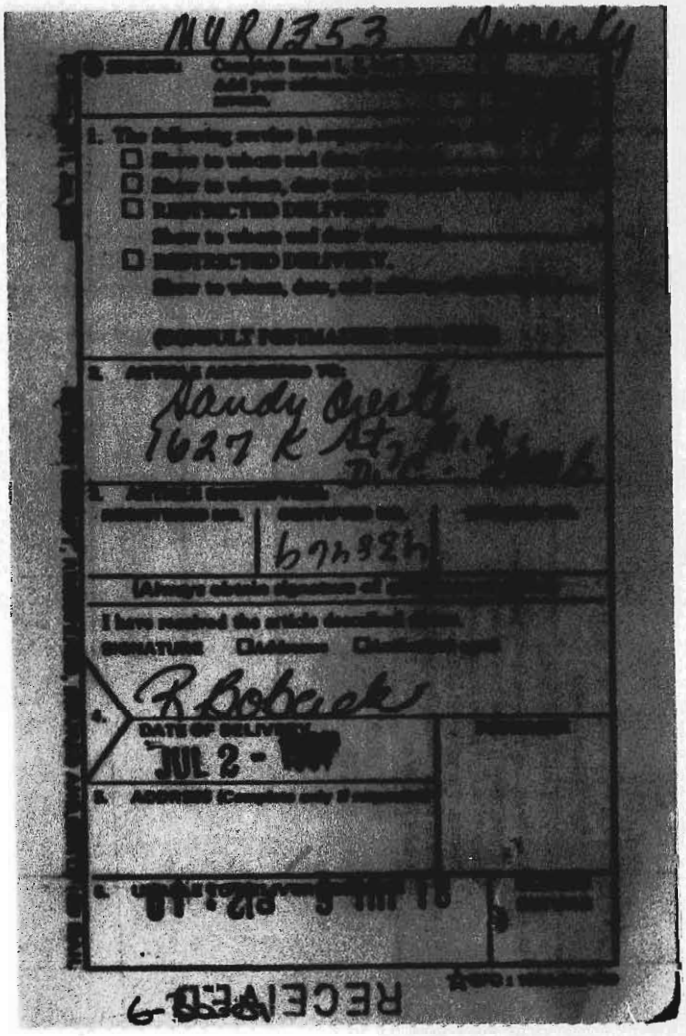
Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order



3304039267

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1353

Dear Ms. Oreste:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on July 14, 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

6/29

33040392955

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Ms. Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code (2 U.S.C. § 431 et. seq.), you are hereby subpoenaed to appear for deposition with regard to your fundraising activities on behalf of the Carter/Mondale Presidential Committee, on or about February 29, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at 10:00 a.m. on July 14, 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on July 14, 1981, at the above stated location:

(a) any training materials and other relevant documents pertaining to any and all training received by you from, or given by you on behalf of, the Carter/Mondale Presidential Committee in preparation for your fundraising activities.

(b) any records, lists and other relevant documents pertaining to your fundraising activities on behalf of the Carter/Mondale Presidential Committee at the Silver Palace Restaurant in New York, New York.

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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 24 th day of June, 1981.

John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

33040392971

A BUREAU OF FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 35,675,938

SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE - REQUIRE IDENTIFICATION - KNOW YOUR ENDORSER

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MUR 1353

Henry H. Eades
REGIONAL DISBURSING OFFICER

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Ester Kee
Executive Director
U.S. Asia Institute
1015 - 20th Street, N.W.
Washington, D.C.

Re: MUR 1353

Dear Mrs. Kee:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on July 14, 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

2304029297

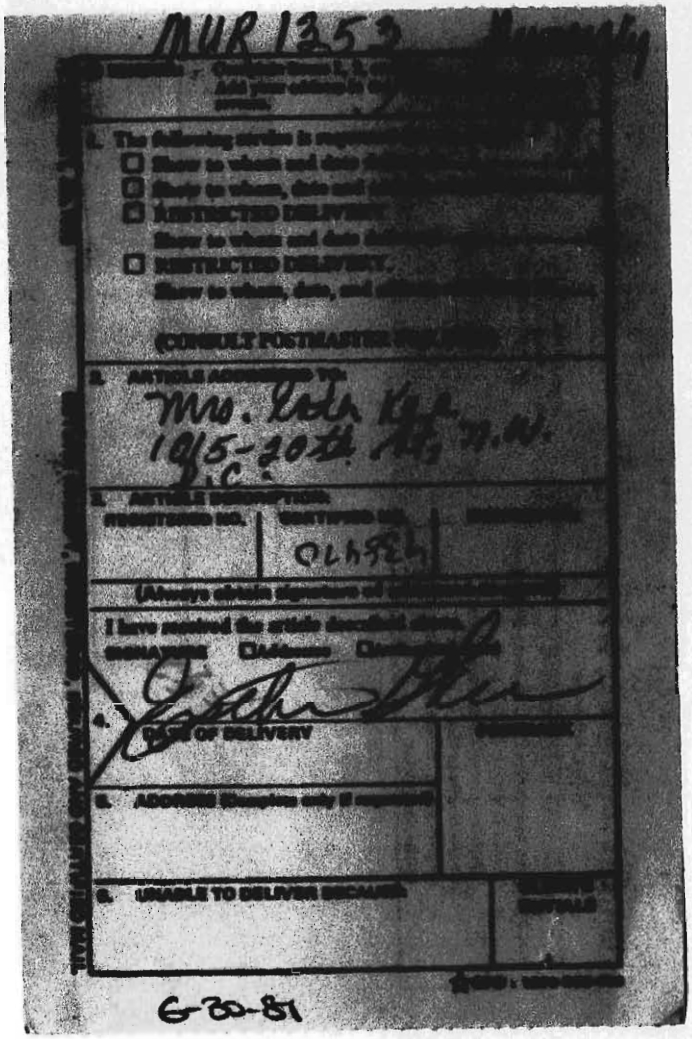
Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order



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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Lester Kee
Executive Director
U.S. Asia Institute
1015 - 20th Street, N.W.
Washington, D.C.

Re: MUR 1353

Dear Mrs. Kee:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on June 10, 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

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Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

a/29

13040392976

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Mrs. Ester Kee
Executive Director
U.S. Asia Institute
1015 - 20th Street, N.W.
Washington, D.C. 20036

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code (2 U.S.C. § 431 et. seq.), you are hereby subpoenaed to appear for deposition with regard to your fundraising activities on behalf of the Carter/Mondale Presidential Committee, on or about February 29, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at 2:00 p.m. on July 14, 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on July 14, 1981, at the above stated location:

(a) any training materials and other relevant documents pertaining to any and all training received by you from, or given by you on behalf of, the Carter/Mondale Presidential Committee in preparation for your fundraising activities.

(b) any records, lists and other relevant documents pertaining to your fundraising activities on behalf of the Carter/Mondale Presidential Committee at the Silver Palace Restaurant in New York, New York.

3304039297

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 24 th day of June, 1981.

John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

33040392976

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TREASURY
FISCAL SERVICE
DIVISION OF
DISBURSEMENT
DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER · REQUIRE IDENTIFICATION
PAY TO THE
ORDER OF ESTHER KEE
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MUR 1353
Henry H. Eddes
REGIONAL DISBURSING OFFICER
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE MWE

FROM: MARJORIE W. EMMONS/JODY CUSTER JC

DATE: JUNE 24, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1353

The attached subpoenas regarding MUR 1353, which were Commission approved on June 23, 1981 by a vote of 5-0, have been signed and sealed this date.

Attachment:
Subpoenas (2)

3 0 4 0 3 6 2 2 6 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1353
Carter/Mondale Presidential Committee	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 23, 1981, the Commission authorized by a vote of 5-0 issuance of subpoenas and accompanying letters directed to Mrs. Esther Kee and Ms. Sandy Oreste (Attachments 1 and 2 to the General Counsel's June 19, 1981 memorandum).

Commissioners Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

6/23/81
Date

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

Received in Office of the Commission Secretary: 6-19-81, 10:30
Circulated on 48 hour vote basis: 6-19-81, 2:00

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEC MAIL ROOM
SECRETARY
81 JUN 19 A10: 30

June 19, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1353; Authorization to Issue Subpoenas to Appear for Deposition Upon Oral Examination, and Other Relevant Documents

On May 5, 1981, the Commission determined that there was reason to believe that both the Carter/Mondale Presidential Committee ("the Committee") and 67 named individuals had violated 2 U.S.C. § 441f.

As a result of the preliminary investigation of the matter, it has been determined that a certain Mrs. Ester Kee has knowledge of the manner in which the money orders here involved were purchased, signed and transmitted thereafter to the Committee's "Dinner Committee" for processing and submission for matching funds. Moreover, Mrs. Kee is likely to be able to provide insight into the specific fundraising procedures utilized by the Committee at the Silver Palace Restaurant, (a subject locale involved in the instant matter), by virtue of her activities as a volunteer fundraiser for the Committee during the event.

Similarly, a Ms. Sandy Oreste, whose name appears on certain Committee documents resulting from the Silver Palace Restuarant fundraising event, may be able to further develop our understanding of the circumstances surrounding the subject money orders.

Therefore, in an effort to acquire critical evidence in our investigation, the General Counsel recommends that the Commission authorize the attached Subpoenas to Appear for Deposition, and the accompanying letters to Mrs. Kee and Ms. Oreste.

RECOMMENDATION

Authorize the attached Subpoenas and accompanying letters directed to Mrs. Esther Kee and Ms. Sandy Oreste.

Attachments

1. Proposed letters directed to Mrs. Kee and Ms. Oreste.
2. Proposed subpoenas directed to Mrs. Kee and Ms. Oreste.

Attachment 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Ester Kee
Executive Director
U.S. Asia Institute
1015 - 20th Street, N.W.
Washington, D.C.

Re: MUR 1353

Dear Mrs. Kee:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on June , 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

1 3 0 4 0 3 9 2 9 8

Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

3304592934

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1353

Dear Ms. Oreste:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, Title 2, United States Code (2 U.S.C. § 431 et. seq.), and Chapters 95 and 96 of Title 26, United States Code. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on June , 1981 at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., has been issued. The Commission does not consider you a respondent in this matter; but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30, plus mileage at the rate of 22.5 cents per mile. Enclosed is a money order made payable to you in the amount of $30.23. If the estimated mileage is incorrect, please advise this office.

2040029363

Please confirm your scheduled appearance with Michael Dymersky at 202-523-4039 within two days of your receipt of this notification.

If you have any questions please direct them to Michael Dymersky, the staff member handling this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Subpoena
Money Order

33040392936

Attachment 2

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Mrs. Ester Kee
Executive Director
U.S. Asia Institute
1015 - 20th Street, N.W.
Washington, D.C. 20036

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code (2 U.S.C. § 431 et. seq.), you are hereby subpoenaed to appear for deposition with regard to your fundraising activities on behalf of the Carter/Mondale Presidential Committee, on or about February 29, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at a.m. on June , 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on June , 1981, at the above stated location:

(a) any training materials and other relevant documents pertaining to any and all training received by you from, or given by you on behalf of, the Carter/Mondale Presidential Committee in preparation for your fundraising activities.

(b) any records, lists and other relevant documents pertaining to your fundraising activities on behalf of the Carter/Mondale Presidential Committee at the Silver Palace Restaurant in New York, New York.

3304029937

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of June, 1981.

John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

3304039293

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records and other Relevant Documents

TO: Ms. Sandy Oreste
Shea & Gould
Suite 1000
1627 K Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review 1353

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code (2 U.S.C. § 431 et. seq.), you are hereby subpoenaed to appear for deposition with regard to your fundraising activities on behalf of the Carter/Mondale Presidential Committee, on or about February 29, 1980. Notice is hereby given that the deposition is to be taken at the Federal Election Commission, Office of General Counsel, 7th Floor, 1325 K Street, N.W., Washington, D.C., beginning at a.m. on June , 1981, and continuing each day thereafter as necessary.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on June , 1981, at the above stated location:

(a) any training materials and other relevant documents pertaining to any and all training received by you from, or given by you on behalf of, the Carter/Mondale Presidential Committee in preparation for your fundraising activities.

(b) any records, lists and other relevant documents pertaining to your fundraising activities on behalf of the Carter/Mondale Presidential Committee at the Silver Palace Restaurant in New York, New York.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this day of June, 1981.

John Warren McGarry
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

3304039290

QCC#4980

CARTER/MONDALE RE-ELECTION COMMITTEE, INC.

Robert S. Strauss, Chairman
Tim Kraft, National Campaign Manager
S. Lee Kling, Treasurer

2000 L STREET, N.W., WASHINGTON, D.C. 20036 (202) 887-4700

June 28, 1981

81 JUN 29 P5:29

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

Re: MUR 1353

Dear Mr. Dymersky:

This is in response to Chairman McGarry's letter dated May 5, 1981, with attachments, which stated the Commission has determined there is reason to believe the Committee violated 2 U.S.C. §441f, by allegedly accepting contributions made in the name of other persons in connection with a fundraising event in February, 1980.

Owing to the fact that Committee counsel were both out of town at the time the letter was received, the Committee arranged informally with you to extend the time period for its initial written response until this time. This courtesy is much appreciated.

The following constitutes the Committee's initial response to this MUR. Attached are supporting affidavits of Larry Hayes and Esther Kee. Mr. Hayes was Director of Finance of the primary campaign and is familiar with the Committee's procedures for handling contributions. Ms. Kee was not a Committee employee or official, but was and is politically active, especially in the Asian-American community, and assisted the Committee from time to time in a volunteer capacity.

As further explained below, the Committee has no present basis for concluding that any of the contributions identified in the MUR documents represent other than an individual donation from an eligible contributor in the amount listed in the supporting documentation. In view of Chairman McGarry's letter, however, the Committee is attempting to obtain further written verifications in connection with each of the contributions in question.

Paid for by the Carter/Mondale Re-Election Committee, Inc.

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We understand that the Commission staff also is attempting to verify the same information. Under the circumstances, we would suggest working together to determine if there are substantial problems with any of the contributions in question and, if so, to correct them.

This response will now turn to an explanation of the factual background of this matter.

Background. As you know from our initial telephone conversation, this Committee fundraising event was held at the Silver Palace Restaurant in New York City on February 21, 1980. As noted in the audit division's report, the event involved Carter-Mondale supporters from the Asian-American community in New York. The event was attended by Rosalyn Carter. The security procedures surrounding a public appearance by the First Lady required that a list of all individuals present at the function, including restaurant personnel, be prepared for use by the Secret Service. This list was in addition to the list of contributors normally prepared by Committee staff and volunteers for a fundraising event.

Most of the contributors gave in the form of a personal check. A number of persons attending the event, however, arrived without personal checks but with cash, which they wished to contribute. The large number of Asian-Americans without checking accounts is a result of their difficulty with the written English language. Consequently, the financial activities of these individuals are transacted in cash. For this reason, Ms. Kee did not consider the number of cash contributions at the event to be surprising or improper. (Kee aff., #4) Finally, she and other organizers of the event were not aware of any Committee policy or Commission regulation requiring signatures for verification of each contribution. (Kee aff., #10)

After the fundraising event had taken place, Ms. Kee, one of the coordinators of the event, was informed that only written instruments should have been accepted as contributions to the fundraiser. (Kee aff., #5) To correct this error, the cash contributions were used to purchase money orders so that written documentation of the contributions would exist. (Kee aff., #6)

As the General Counsel's report notes, it is not necessary to have the payor or remitter of a money order himself or herself sign the instrument to make it negotiable. Thus, the organizers of the event -- who were not Committee officials or employees -- apparently concluded it was unnecessary to obtain individual signatures from each contributor for whom a money order was purchased.

The similarity of the handwriting of the signatures (or, more accurately, of the printed names) on the money orders in question was not noticed by those who processed the checks at campaign headquarters in Washington. (Hayes aff., #5) At this juncture -- the peak of the nominating campaign -- hundreds of contributions were received on a daily

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basis. Also, given the negotiability standards for money orders and so long as contributor cards were attached, the individual signatures normally were not subject to special scrutiny or review. (Of course, in the case of contributions up to $100, the use of a written instrument like a money order is not required at all.)

Ms. Sandy Oreste, a committee employee, was present at the event and assisted in the distribution of tickets. Ms. Oreste has been in the hospital and the Committee to date has been unable to obtain her affidavit. Before her hospitalization she spoke with Larry Hayes about this matter. (Hayes aff., #7) She has stated that those who contributed in cash all appeared to be doing so legitimately and solely on their own behalf. She saw no indications whatsoever of any contributions being made in the names of others. (Hayes aff., #7)

In her affidavit, Ms. Kee suggests the possibility that when money orders were matched against the list of those attending the event, the security list rather than the contributor list may have inadvertantly been used for filling out at least some of the money orders. (Kee aff., #9)

Thus, while the possibility exists that some of the contributions may have been misreported, this Committee's initial inquiry uncovered no evidence that any contributor made a contribution in the name of another person.

Conclusion. Based on the foregoing summary and the rest of the information contained in the attached affidavits, the Committee does not believe that the transactions in question constitute violations of 2 U.S.C. §441f. As indicated above, however, if any reporting or record-keeping mistakes were made, the Committee is willing to correct them and stands ready to cooperate with the Commission in any reasonable and constructive fashion,

If you have any further questions, please feel free to contact me.

Sincerely,

Carol Darr

Carol Darr
Deputy Counsel

Attachments

3304039292

Federal Election Commission

In Re MUR 1353

AFFIDAVIT

DISTRICT OF COLUMBIA, s.s.

I, Esther G. Kee, being duly sworn, depose and say:

1. My name is Esther G. Kee. My business address is 1015 20th Street, N.W., Suite 200, Washington, D.C. 20036.

2. During the primary election I assisted the Carter/Mondale Presidential Committee, Inc., (the "Committee") in a volunteer capacity in fundraising activities in the Asian-American community.

3. I assisted with the Committee's fundraising event held at the Silver Palace Restaurant in New York City on February 21, 1980.

4. The cost of a ticket to the event was set at $100 because many Asian-Americans have difficulty writing in English and do not have checking accounts. Consequently, some of their financial activities are transacted in cash. For this reason, I did not consider the number of cash contributions to be surprising or improper.

5. After the February 21, 1980 fundraising event had taken place, I was informed that the Committee would accept only written instruments.

6. To resolve this dilemma, money orders were purchased on behalf of those individuals who had contributed to the event in cash.

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7. These money orders were then matched against a list of those attending the event.

8. Owing to the fact that Rosalyn Carter also attended the event, a list of all individuals present at the event, including restaurant personnel, was prepared for security purpose.

9. I am uncertain whether the list of contributors was used to match against the money orders that were purchased with the contributors funds, or whether the security list was inadvertantly used for filling out at least some of the money orders.

10. I was not aware of any Committee policy or Commission regulation requiring verification of each contribution.

6/29/81
Date

Esther G. Kee
Esther G. Kee

District of Columbia:
Subscribed and sworn to before me this 29th day of June, 1981

Cleta M. Yarbrough
Notary Public
My Commission Expires Dec. 1, 1983

33040392929

2304029296

AFFIDAVIT

District of Columbia, s.s.:

I, Larry W. Hayes, being duly sworn, depose and say:

1. My name is Larry W. Hayes. My home address is 4416 Underwood Road, Baltimore, Maryland 21218.

2. During the primary election I was employed by the Carter/Mondale Presidential Committee, Inc. as Director of Finance.

3. I was responsible for the design, implementation and maintenance of contribution processing and reporting procedures.

4. The standards of negotiability of money orders caused the money order signature to be less than best evidence of fund ownership. Therefore, money order contributions were routinely coded in a manner which would require the sending of a contribution request to the stated contributor.

5. Because of the confirmation procedure there was no reason for the clerks to detect signature similarities of money orders.

6. Even though cash contributions of $100.00 were acceptable under FECA and related regulations, we actively discouraged the practice for reasons of internal control.

7. On May 20, 1981, I had a telephone conversation

with Sandy Oreste, a Committee employee, who attended the event. She stated that on the night of the event, a number of guests brought cash with which to purchase tickets to the event. She told me that those who contributed to the event in cash all appeared to be doing so legitimately and solely on their own behalf. She further stated that she saw no indications whatsoever of any contributions being in the name of others.

8. Ms. Oreste told me she was willing to make a written statement confirming the above description of events. Ms. Oreste, however, has subsequently been hospitalized and the Committee to date has been unable to obtain an affidavit from her.

33040292927

June 26, 1981
Date

Larry W. Hayes
Larry W. Hayes

Subscribed and sworn to before me this 26th day of June, 1981

Sandra D. Cooke
Notary Public

My Commission Expires Mar. 31, 1983

83040392998

P.O. Box 500
Washington, D.C. 20044

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

100775
GCC#4835

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803
(914) 738-5106

MICHAEL C. SLOANE
ROBERT B. TAYLOR
RONALD H. BROWN

MEMBERS:
NEW YORK STATE
DISTRICT OF COLUMBIA
FEDERAL BARS

JUN 8 A11 : 50

JUN 8 P1:03

June 6, 1981

Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 1353 George Lau
Wah Chan
So Hung Shum
Kwok Tung Tam
Yet Sue Gee (Tom)
Yew Leung Wong
Soo Ling Wong
Kwan Ho

Att: Mr. Dymersky

Dear Sir:

Enclosed please find an authorization signed by Soo Ling Wong in connection with the above-captioned matter. The authorizations for all the other individual respondents was mailed to you under separate cover on May 30, 1981.

Very truly yours,

Michael C. Sloane

Michael C. Sloane

MCS/bb
enc.

3304029929

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

RECEIVED
FEDERAL ELECTION COMMISSION
81 JUN 8 P1:03

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Soo Ling Wong
SOO LING WONG

3304039300

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803

33040193 JUL

81 JUL 8 AM : 50

Mr. John McGarry, Chairman
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

8 AM : 38

Att: Mr. Dymersky

100740

GCC#4820

Casimir F. Sojka

Counsellor at Law

Downtown Office - Chemical Bank Building
80 Nott Street
New York, New York 10013
CA 6-5354-5

81 JUN 5 AM 11:41

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

81 JUN 9 AM 11:41

June 2, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Chung Foo LOUIE

Dear Sirs:

Please take notice that my client, Chung Foo Louie made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED:

Chung Foo Louie

CFS:rn

3304069300

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 MAY 15 AM 11:41

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Foo Louie
127 Henry Street
New York, New York 10002

MUR 1303

Dear Chung Foo Louie:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

Casimir F. Sojka
Counsellor at Law
Patentees Office - Chemical Bank Building
20 Nott Street
New York, New York 10013
CA 8-5354-5

June 1,1981

Federal Election Commission
Washington, D.C. 20463

Re: Koon Kau Ng

Dear Sirs:

Please take notice that my client, Koon Kau NG made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fund-raising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED:

Koon Kau Ng

CFS:rn

33040393004

Casimir F. Sojka

Counsellor at Law

Downtown Office - Chemical Bank Building
80 Hatt Street
New York, New York 10013
CA 6-5354-5

May 25, 1981

FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

Dear Sirs:

Re: LAU Po Hing

Please take notice that my client LAU Po Hing made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order of otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owners to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED

Po hing Lau

CFS: rn

13040130035

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lau Po Hing
9-11 Delancey Street
New York, New York 10002

Re: MUR 1353

Dear Lau Po Hing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039303

Casimir F. Sojka

Counsellor at Law

Downtown Office - Chemical Bank Building
20 Nott Street
New York, New York 10013
CA 5-5354-5

May 25, 1981

FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Dear Sirs:

Re: CHIU Tak Foon

Please take notice that my client CHIU Tak Foon made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter Committee, and which Mrs. Carter attended, when he was obliged by the restaurant owners to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED

Tak Foon Chiu

CFS: rn

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chiu Tak Foon
32 Monroe Street
New York, New York 10002

Re: MUR 1353

Dear Chiu Tak Foon:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039300

Casimir F. Sojka
Counsellor at Law
Reception Office - Chemical Bank Building
80 Wall Street
New York, New York 10013
CA 8-5354-5

June 1, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Bill S. HUI

Dear Sirs:

Please take notice that my client, Bill S. HUI made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

APPROVED:

CFS: rn

33040393005

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill S. Hui
749 57th Street
Brooklyn, New York 11220

RE: MUR 1354

Dear Bill S. Hui:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

Casimir F. Sojka
Counsellor at Law
Downtown Office - Chemical Bank Building
30 Wall Street
New York, New York 10013
CA 6-5354-5

June 1, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Hing Lit CHAU

Dear Sirs:

Please take notice that my client, Hing Lit CHAU made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED:

Chan Hing Lit

CFS:rn

3304039301

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hing Lit Chau
92 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Hing Lit Chau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039301

Casimir F. Sojka
Counsellor at Law
Reception Office - Chemical Bank Building
80 Hatt Street
New York, New York 10013
CA 8-5354-5

June 1, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Fung Sik Yee

Dear Sirs:

Please take notice that my client, Fung Sik Yec made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was an an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED:

Sik Yee Fung

CFS:rn

33040393013

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fung Sik Yec
245 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Fung Sik Yec:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039301

Casimir F. Sojka
Counsellor at Law
Reception Office - Chemical Bank Building
80 Wall Street
New York, New York 10013
CA 8-5354-5

June 1, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Lo Ting

Dear Sirs:

Please take notice that my client, Lo Ting, make no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fund-raising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

Casimir F. Sojka

APPROVED:

Lo Ting

CFS:rn

33040393015

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lo Ting
3403 14th Avenue
New York, New York 10009

Re: MUR 1353

Dear Lo Ting:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq. A summary of the possible violation is enclosed.

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For your information, we have attached a brief descripti of the Commission's procedures for handling possible violatic

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039016

Casimir F. Sojka
Counsellor at Law
Downtown Office - Chemical Bank Building
80 Nassau Street
New York, New York 10013
CA 6-5354-5

June 1, 1981

Federal Election Commission
Washington, D.C. 20463

Re: Cheng Wai Ming

Dear Sirs:

Please take notice that my client, Cheng Wai Ming made no contribution to the Carter campaign, nor did he authorize anyone to make a contribution in his name to the Presidential Election Committee, by money order or otherwise.

He has no idea how his name is associated with an election contribution. His only association with the Campaign was as an employee at Silver Palace where a campaign fundraising dinner was held for the Carter committee, and which Mrs. Carter attended, when he was obliged by the restaurant owner to provide to the Secret Service his name and social security number.

Yours truly,

Casimir F. Sojka

APPROVED:

CFS:rn

33040593017

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cheng Wai Ming
57 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Cheng Wai Ming:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039301

3 3 0 4 0 3 9 3 0 1 9

CASIMIR F. SOJKA, ESQ.
80 MOTT STREET (ROOM 202)
NEW YORK, N. Y. 10013

Registered Mail

Federal Election Commission
Washington, D.C. 20463

REGISTERED
NO.
215786

180725
RECEIVED
GENERAL COUNSEL
Gac#4818

IMMIGRANT SOCIAL SERVICE ,Inc./Indochinese Refugee Project.
142 Henry street,3rd floor,New York,N.Y. 10002
Tel.(212)349 5181&349 5632

81 JUN 5 A8:33
JUN 5 P12:12
JUN 5 P12:46

Mr. Michael Dymersky
Federal Election Commission
Washington D.C. 20463

Re : MUR Nº 1353

Dear Sir,

On the behalf of our client,Mr. LAM THE HOA,a Vietnamese refugee who doesn't speak a single English word,and who,upon receiving a letter from the Federal Election Commission,has brought it to us to be translated into Vietnamese so that he could get an idea about the content of the letter and get help from us,we have the honor to convey to you the fact narrated to us by Mr. LAM THE HOA himself in response to the letter sent to him by the Federal Election Commission:

First at all,because of his lack of English speaking,he never knew anything about Election and contribution in the matter of US public affair,and,in fact,he never made any contribution to anybody or any organization or committee.Upon receiving the letter from the Federal Election Commission stating that he is believed to have violated 2 U.S.C.§ 441f by allowing his name to be used to effect a contribution to the Carter/Mondale Presidential Committee,and after having acknowledged the content of the letter,he has found that there are many other of his fellow workers in the'Ngan Cung Restaurant' at 50-52 Bowery Street,New York,N.Y.10013 who have been sent the same letter from the Federal Election Commission with the same allegation, while they never had done any contribution.They are suspecting some body in the administration of the restaurant who knows their names and has used their name to make the contribution without their knowledge,and consentment.

This letter is to deny the allegation induced against Mr. Lam The Hoa by the Federal Election Commission,and to bring the fact narrated above to the knowledge of the same Commission.

Sincerely,

Trinh Hao

CC. LAM THE HOA

Brother TRINH HAO,Director

3 3 0 4 0 5 9 3 0 2 0

IMMIGRANT SOCIAL SERVICE, Inc./Indochinese Refugee Project
142 Henry Street, 3rd floor, New York, New York 10002.

SPECIAL DELIVERY

Mr. Michael Dymersky
FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

SPECIAL DELIVERY

P 304039 307

100677
GCC#4793

OFFICE OF GENERAL COUNSEL
JUN 10 11 : 20

Louie, Chan Jor
#30 Henry Street #12A
New York, NY. 10002
May 29th 1981

Dear Sir,

In respond to your recent letter which dated the 14th of May 81, had been well received and acknowledged. In regard to your finding on my behalf pertaining to the alledged violation practice of 441F of title 2, United States Code, a provision of the Federal Campaign Act of 1972. Such allegation is unfound and fabricated, at least not on my behalf. I am a law abiding citizen, I have never been a active participant in any political process, nor have I belong to any political organization. Reason for such non involvement and nonparticipation because of my status in America. I was granted full citizenship as recently as January 21 1981. Whatever evidence and other factual materials that you have gathered or uncovered during the course of your investigation, it still could not substantiate my behalf.

You have further asserted that there were money orders which purchased through the Manhattan Saving Bank variously through the month of February 1980. During the course of this period or at any other period through the year I have never given consent to person or persons in using my name as endorser, if such act of impropriety did committed it is a clear case of forgery, invasion of privacy, our society will not tolerate such behavior. Hopefully that during the course of your investigation will uncover strong and solid evidence to divulge the culprit or culprits and serve them justice before the law.

Respectfully Yours
Louie, Chan Jor

May 29th, 1981.

Louie, Chan Jor
#30 Henry Street #12A
New York, NY. 10002

30403930223

REGISTERED
NO. 218499

Federal Election Commision
Washington, D. C. 20463

attn: Mr. Michael Dymersky

100680
GCC#4789

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803
(914) 738-5106

MICHAEL C. SLOANE
ROBERT B. TAYLOR
RONALD H. BROWN

MEMBERS:
NEW YORK STATE
DISTRICT OF COLUMBIA
FEDERAL BARS

81 JUN 1 P12:16

81 JUN 1 P1:21

May 30, 1981

Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 1353 George Lau
Wah Chan
So Hung Shum
Kwok Tung Tam
Yet Sue Gee (Tom)
Yew Leung Wong
Soo Ling Wong

also: Kwan Ho

Att: Mr. Dymersky

Dear Sir:

This correspondence and enclosures will supplement my letter of May 26, 1981 (see copy attached) in connection with the above-captioned matter. My office inadvertantly failed to enclose the within authorizations signed by the above named individuals, all of whom received letters from your Commission dated May 14, 1981. Please also note that Kwan Ho, one of the original respondents, was mistakenly left off the list of names appearing on my letter although having executed an authorization on May 26th.

I trust you have not been caused any inconvenience by reason of the above.

Very truly yours,

Michael C. Sloane

MCS/bb
enc.

3 5 0 4 0 3 9 3 0 2 4

33040393025

May 26, 1981

12:1 PM '81

Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMITTEE
Washington, D.C. 20463

Re: MUR 1353 George Lau
Wah Chan
So Hung Shum
Kwok Tung Tam
Yet Sue Gee (Tom)
Yew Leung Wong
Soo Ling Wong

Dear Sir:

Please be advised that I have been retained by the above-captioned respondents to represent them in connection with an investigation being conducted by Mr. Michael Dymersky of your office. Kindly send all future notifications and communications to my attention.

For your immediate information, I have been informed by my clients that they never purchased any money orders from either the Manhattan Savings Bank or any other banking institution in order to contribute to the Carter/Mondale Presidential Committee. Neither did any of the respondents ever consent or authorize any other person to make such contribution in their respective names. In sum, these alleged money orders were purchased by a person or persons unknown to the above-named respondents and said person or persons used their names without the respondents' knowledge or consent.

My clients will be most happy to cooperate with your investigation in order to resolve this matter to your satisfaction.

Very truly yours,

Michael C. Sloane

MCS/bbs

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Yet Sue Gee TOM

YET SUE GEE (TOM)

01 JUN 7 GENERAL

3304039302 6

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Kwok Tung Tam

KWOK TUNG TAM

33040393027

RECEIVED
JUN 1 P1:27
OFFICE OF GENERAL COUNSEL

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

So Hung Shum

SO HUNG SHUM

33040393026

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
81 JUN 1 P1:21

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Kwan Ho

KWAN HO

33040393029

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Wai Chan
WAH CHAN

3304039303

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

GEORGE LAU

33040393031

AUTHORIZATION

In The Matter of The Investigation By The
FEDERAL ELECTION COMMISSION
MUR 1353

RECEIVED
81 JUN 1 P1:22
GENERAL COUNSEL

The undersigned Respondent hereby authorizes and empowers MICHAEL C. SLOANE, Esq., 2 Clifford Avenue, Pelham, New York ((914) 738-5106)) to appear and represent me in all matters connected with the above entitled proceeding and is hereby authorized to receive any and all written notifications and communications from the Commission.

Dated: May 26, 1981
Pelham, N.Y.

Yee Leung Wong
YEE LEUNG WONG

3304039302

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803

Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Att: Mr. Michael Dymersky

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81 MAY 28 AM : 48

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803
(914) 738-5106

MICHAEL C. SLOANE
ROBERT B. TAYLOR
RONALD H. BROWN

MEMBERS:
NEW YORK STATE
DISTRICT OF COLUMBIA
FEDERAL BARS

May 26, 1981

81 MAY 29 P12:46

Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMITTEE
Washington, D.C. 20463

Re: MUR 1353 George Lau
Wah Chan
So Hung Shum
Kwok Tung Tam
Yet Sue Gee (Tom)
Yew Leung Wong
Soo Ling Wong

3 3 0 4 0 0 9 5 0 3 4

Dear Sir:

Please be advised that I have been retained by the above-captioned respondents to represent them in connection with an investigation being conducted by Mr. Michael Dymersky of your office. Kindly send all future notifications and communications to my attention.

For your immediate information, I have been informed by my clients that they never purchased any money orders from either the Manhattan Savings Bank or any other banking institution in order to contribute to the Carter/Mondale Presidential Committee. Neither did any of the respondents ever consent or authorize any other person to make such contribution in their respective names. In sum, these alleged money orders were purchased by a person or persons unknown to the above-named respondents and said person or persons used their names without the respondents' knowledge or consent.

My clients will be most happy to cooperate with your investigation in order to resolve this matter to your satisfaction.

Very truly yours,

Michael C. Sloane

Michael C. Sloane

MCS/bbs

SLOANE, TAYLOR AND BROWN
ATTORNEYS AND COUNSELLORS AT LAW
TWO CLIFFORD AVENUE
PELHAM, NEW YORK 10803

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81 MAY28

81 MAY28 All:10
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Mr. John Warren McGarry, Chairman
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Att: Michael Dymersky

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81 MAY26 A9:24

MILTON A. GORDON

NEW YORK

May 22, 1981

81 MAY26 A11:10
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FEC MAIL CONTROL

Federal Election Commission
Washington D. C. 20463

Attn: Michael Dymersky

RE: MUR 1353

Dear Sir:

This letter is in response to your letter of May 14, 1981 to Ja Fak Wei of 2081 2nd Avenue, New York, New York. The letter was received by Mr. Jai Fah Wei at that address.

Mr. Wei has been employed by me as a cook for over twenty years. He is illiterate and speaks very little English. He has no knowledge of anyone using his name to make a political contribution as set forth in your communication.

Very truly yours,

Milton A. Gordon

MAG/s

733 Park Avenue
New York, N.Y. 10021

3304036014

830403900037

NEW YORK, NY
-PM
22 MAY
1981

RECEIVED
MAY 26 1981
FEDERAL ELECTION COMMISSION

Federal Election Commission
Washington, D. C. 20463

Attn: Michael Dymersky

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 22, 1981

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Larry F. Hayes
Director of Finance
Carter/Mondale Presidential
Committee, Inc.
2000 L Street, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Mr. Hayes:

Since Carol Darr, the Committee's in-house counsel, is out of town, and will not return until June 8, 1981, and the expense of retaining outside counsel for this particular matter would be prohibitive, you are hereby granted a thirty day extension of time with regard to submission of factual and legal materials regarding this matter, per your request.

If you have any questions as regards this matter, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

3304059303

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Larry F. Hayes
Director of Finance
Carter/Mondale Presidential
Committee, Inc.
2000 L Street, N.W.
Washington, D.C. 20036

Re: MUR 1353

Dear Mr. Hayes:

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If you have any questions as regards this matter, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

5/21/81

Charles N. Steele
General Counsel

3304039303

GCC# 4728 100576 RECEIVED

CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.
2000 L STREET, N.W., WASHINGTON, D.C. 20036
(202) 887-4700

81 MAY 20 AM : 08

Robert S. Strauss, Chairman
Tim Kraft, National Campaign Manager
S. Lee Kling, Treasurer

May 19, 1981

Mr. Michael Dymersky
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Dymersky:

This is to request a thirty day extension on submission of factual and legal materials regarding MUR 1353.

This Committee's in-house counsel, Carol Darr, is out of the country and will not return until June 8, 1981. The expense of retaining outside counsel would be particularly burdensome for the Committee in light of its current debt.

Thank you for your consideration.

Sincerely,

Larry Hayes

Larry Hayes
Director of Finance

81 MAY 20 P12:53

33040393016

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.
2000 L Street, N.W.
Washington, D.C. 20036

WASHINGTON, DC 20
PM
19 MAY
1981

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81 MAY 20 AM 8:

Mr. Michael Dymersky
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

9304036

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1981

Lily Wong, Esq.
11 Maiden Lane
Apartment 9D
New York, New York 10038

Re: MUR 1353; Yew Leung Wong and
Soo Ling Wong

Dear Ms. Wong:

Pursuant to a telephone conversation with a member of my staff, I am forwarding herewith, at your request, xerographic copies of Money Order No. C592645 and Money Order No. C592645.

If you have any further questions, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Scott Thomas
Assistant General Counsel

Attachments

Money Order No. C592645
Money Order No. C592646

3304039301

Doc 4798

Mrs. Yuen May Leung
145 East 27th Street
New York, NY 10016

May 20, 1981

81 JUN 1 P12:38

81 JUN 2 A9:37

Federal Election Commission
Mr. John Warren McGarry
Washington, D.C. 20463

RE: MUR 1353

Dear Mr. McGarry:

This letter is to infrom you that I am not in violation of § 441f of Title 2, of the United States Code. This is to notify you (under oath) that I, Mrs. Yuen May Leung did not make a contribution to the Carter/Mondale Presidential Committee, nor have I ever given authorization or permission to any person to use my name in making a contribution to "the Committee".

Specifically, I Mrs. Yuen May Leung, (under oath) deny ever having purchased a money order from the Manhattan Saving's Bank for the purpose of making a contribution to the Committee.

I also deny (under oath) that I ever knowingly allowed another person to use or sign my name on a money order for the purpose of making a contribution to "the Committee".

I possess no factual materials or evidence to submit to the Federal Election Commission since I have no knowledge of ever having made a contribution or ever having allowed another person to use my name in making a contribution to the Committee.

Please notify me at the completion of your investigation as to the identity of the individual or organization that is using my name for the purpose of making political contributions.

Sincerely yours,

Yuen May Leung

Yuen May Leung

33040393013

Mrs. Yuen May Leung
145 East 27th Street 7P
New York, NY 10016

Federal Election Commission
Mr. John Warren McGarry
Washington, D.C. 20463

83040320044

100681
GCC #4790

STEPHEN GLEIT
ATTORNEY AT LAW

SUITE 704
2 MOTT STREET
NEW YORK, NEW YORK 10013
TEL. (212) 964-7167

81 JUN 1 PM 12:21

May 26, 1981

Mr. Michael Dymersky
Federal Election Commission
Washington, D.C. 20463

Re: MUR No. 1353

Dear Mr. Dymersky

Please find enclosed the affidavit of my client Chak Yam CHAU and his letter authorizing this office to represent him in regard to the above matter.

I look forward to hearing from you.

Sincerely yours

Stephen P. Gleit

SPG:dk

Encls.

3304036945

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss:

CHAK YAM CHAU, residing at 44 Eldridge Street, New York, New York, being duly sworn does depose and say:

1. I am the respondent in this action.

2. I deny all of the allegations against me and that I submit this affidavit in support of my position.

3. I deny that I had any knowledge that my name was being used by people other than myself for purposes of illegally contributing to the selection of Mr. Carter.

4. That the person(s) responsible for the unauthorized use of my name made two errors in its use:

A. My middle name is Yam not Yum; and,

B. At the time that the money order was prepared I was not living at the Elmhurst, New York address but rather was living at my present address.

5. My only contact with Mr. Carter's relection was my several conversations with my relative, Mr. Howard Low, who lives at the Elmhurst address.

6. That in the course of these conversations my relative encouraged me to contribute to the campaign but that I refused this suggestion.

7. That I never authorized any one to use my name and that I had no knowledge that it was going to be used, or afterward, had been used for purposes of an illegal campaign contribution.

3304039014

8. Finally, I do not know who signed my name.

9. Prior to signing this affidavit, it was read to me in my native Chinese since I speak very little English.

Sworn to before me this
26th day of May, 1981.

NOTARY PUBLIC

STEPHEN CLEIT
NOTARY PUBLIC, State of New York
No. 4713425
Qualified in Suffolk County
Commission Expires March30, 1982

Chak Yam Chan

3304039307

81 JUN 1 P1:28

May 24, 1981

Federal Election Commission
Washington, D.C. 20463

Re: MUR No. 1353

Dear Sir/Madam

This is to inform you that I retained the law offices of Stephen Gliet, Esq. to represent me before the Commission. I further authorize Mr. Gleit to receive all notifications and communications from the Commission. His address is:

Stephen Gleit
2 Mott Street, Suite 704
New York, N.Y. 10013
(212) 964-7167

Thank you.

Sincerely yours

Chak Yam Chau

3 3 0 4 0 4 0 3 0 3 6

STEPHEN GILBERT
ATTORNEY AT LAW
SUITE 704
9 EAST 69TH STREET
NEW YORK, NEW YORK 10021

P 304 039 049

RETURN RECEIPT REQUESTED

CERTIFIED
P35 3069741
MAIL

Mr. Michael Dynersky
Federal Election Commission
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION 100889

GCC 4921

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Do Young Paik

SOURCE OF MUR: INTERNALLY GENERATED

81 JUN 22 AM 10:50

GENERAL COUNSEL

RECEIVED

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304010503

Federal Election Commission

Washington, D.C. 20463

TO THE FEDERAL ELECTION COMMISSION:

I had purchased tickets for a dinner given by the Carter-Mondale Campaign Committee at the Silver Palace Restaurant in Chinatown. The Dinner Committee did not advise me that I would have to make out a personal check. Therefore, I paid for my tickets with cash.

Later, I was advised by a member of the Dinner Committee that I would have to use checks so that there would be a record of payment.

I told him to buy a cashier's check or money order and sign my name on it.

The money was a voluntary contribution on my part and I gave implied permission to sign my name on the check.

Do Young Paik
Name:

Date:

Address: Do Young Paik
133-30 32nd Ave.
Flushing NY 11354

33040393051

I hereby authorize NORMAN LAU KEE, Esq., Attorney at Law, 11 Mott Street, New York, N.Y. 10013, to submit the attached letter to the Federal Election Commission.

Doyoung Park

Name: Do Young Paik

Date:

Address: 133-30 32ND AVE
Flushing NY 11354

83040393052

Do Young Paik
UNION DIA-TEK CORP.
[illegible]-35 32nd AVE.
FLUSHING, N.Y. 11354

UDC

FLUSHING, NY 11
PM
18 JUN
1981

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attn: MUR NO. 1353
MR. MICHAEL DYMERSKY

830403G

Olympusky MOR 1353

PS Form 3811 Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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: [illegible]

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	820824	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

[signature]

DATE OF DELIVERY: 8/12 : 11a 7 MAY

POSTMARK: U.S. SHIPPING NY CORONA MAY 30 1991

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977 – O – 240-865

8 3 0 4 6 0 3 9 3 0 3

ROUTING SLIP FOR RTB LETTERS

TO: Chairman/Vice Chairman

FROM: Elissa T. Garr
OGC Enforcement Docket

DATE: 5-13-81

MUR # 1353

Date RTB Found 5-5-81

Date Cert. Rec'd in OGC 5-7-81

Staff Assigned Dymerosky

STAFF CHECK:

✓ Accuracy

✓ Enclosures

✓ Certification

Date Rec'd in OGC From Chairman/Vice Chairman

5-14-81

30403930

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

Mr. S. Lee Kling
Treasurer
Carter/Mondale Presidential
Committee, Inc.
2000 L Street, Northwest
Washington, D. C. 20036

Re: MUR 1353

Dear Mr. Kling:

On May 5, 1981, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting contributions made in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten (10) days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

3040393054

The investigation now being conducted will be confidential in accordance with 2 U.S.C. Section 437g(a)(4)(B) and Section 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

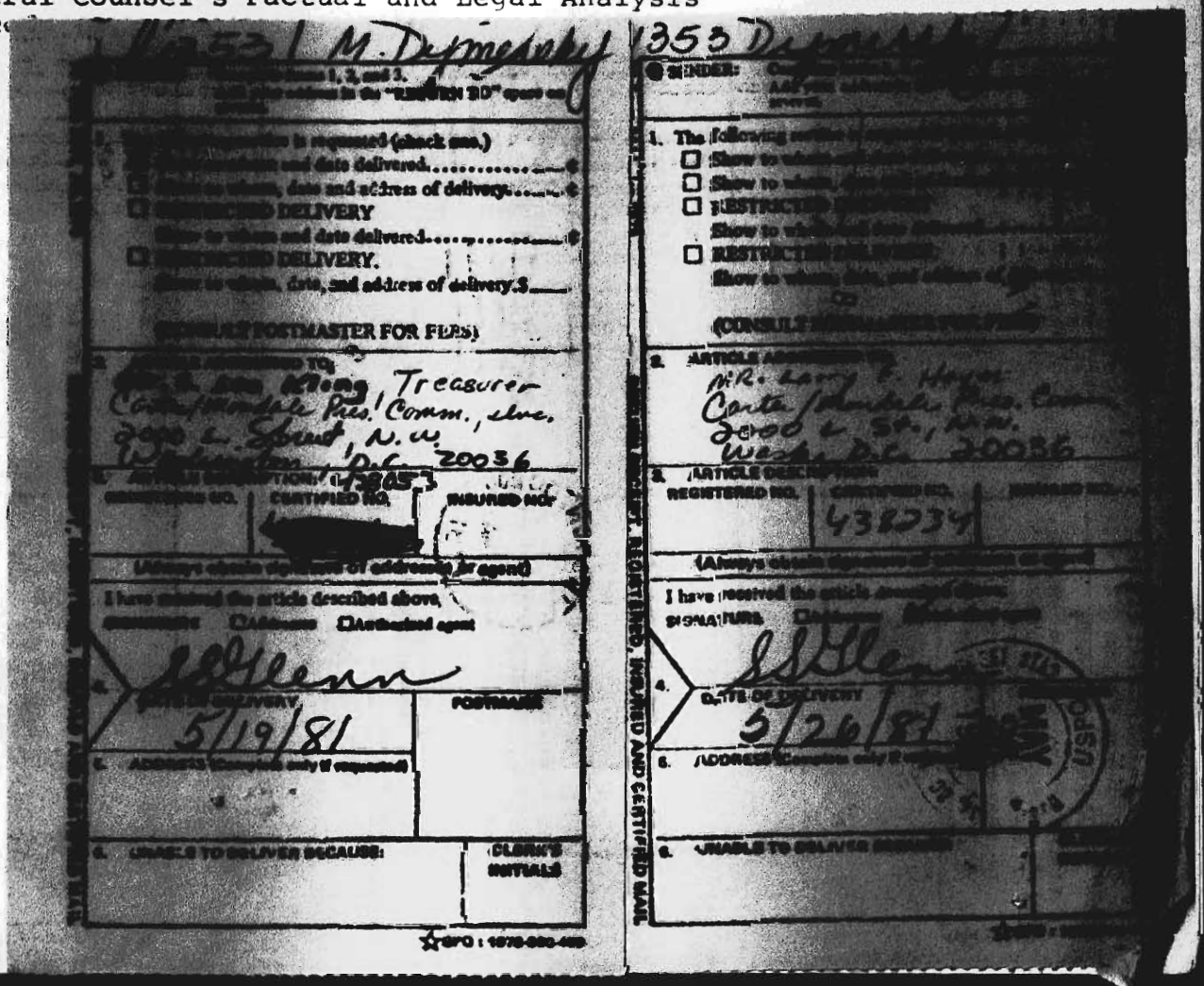
For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Proc



8304029357

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR 1353
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Carter/Mondale Presidential Committee, Inc.

Michael Dymersky
202-523-4039

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

8 3 0 4 0 0 7 3 0 3 6

SUMMARY OF ALLEGATIONS

This matter was generated as the result of information compiled by the Audit Division during its review of Matching Fund Submissions received from the Carter/Mondale Presidential Committee, Inc. ("the Committee"). In its referral, the Audit Division raised questions concerning the validity/matchability of seventy-three money orders contained in matching fund submissions #17 and #13. (See attached memoranda to Charles N. Steele, dated August 12, 1980, and December 1, 1980, with accompanying attachments).

FACTUAL AND LEGAL ANALYSIS

All of the money orders involved in the referral were issued by the Manhattan Savings Bank. Seven (7) of these money orders were dated February 28, 1980, and the rest February 29, 1980; those with the earlier date were in the amounts of $100, $400 and $500, while all of those dated February 29, 1980, were in the amount of $100. The money orders were numbered in three series of exact or near sequence as follows: 106522-106524, 106526-106527, 106530-106533, 106535-106537, 106540, 106543, 592615, 592617, 592619, 592622-592634, 592639-592650, 592652-592654, 592657-592664, 592666-592670, 592673-592676, 592678-592680, 592682, 591754-591755, 591757, 591764-591765.

Twenty-five of the persons whose names appeared as remitters are waiters or cooks at the Silver Palace Restaurant in New York City where the Committee apparently held a fund-raiser on February 21, 1980. Five of the alleged remitters are employed

elsewhere while no occupation or principal place of business was provided for the remaining 35 individuals involved. (The names of five (5) persons appear on more than one money order.) All of the money orders were matched with public funds up to the $250 limit per person.

It is recognized by this Office that handwriting similarities and differences can be determined authoritatively only by experts within the field of handwriting analysis. However, it appears that the handwriting used in inserting the payee's name on each of the money orders is that of the same person. This handwriting appears to differ from that of all signatures on the remitter's signature lines. It also seems that the handwriting on the remitter's signature lines falls into two or three groupings of striking similarities, making it appear likely that one, two or three persons wrote in all of the names of the contributors. (See attached copies of money orders numbered 106522, 106530, 592627, 592628, 592630, 592623, 592624, 592625 and 592626 as examples.) In the four instances in which the committee obtained confirmation from the contributors, the signatures on the confirmations are strikingly different from those on the relevant remitter's signature lines. 1/ (See attached copies of money orders numbered 591755, 591764, 592636 and 592635 and accompanying confirmations.) On two of the money orders, the name on the remitter line appears to be the same but the handwriting differs. (See attached copies of money orders numbered 592643 and 592644.)

2 U.S.C. §441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. (Emphasis added).

In the present situation, the apparent similarities in the handwriting on the money orders' remitters' signature lines, the consecutive numbering of the instruments, (most of which are in the same amount), the common place of employment of almost 1/3 of the alleged contributors, and the apparent differences between certain money order signatures and corresponding verification signatures raise serious questions as to the source of the contributions.

1/ Despite the fact that the signature on the remitter's signature line may not be that of the remitter, the money order is still negotiable. Therefore, a money order so signed would be a valid instrument for purposes other than matching, no matter who supplied the signature.

8304029358

From this evidence, the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

As to the ostensible contributors involved, the General Counsel recommends that the Commission defer taking action until a response from the Committee is received.

RECOMMENDATION

1) Find reason to believe that the Carter/Mondale Presidential Committee, Inc., violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

2) Send the attached notification letter and General Counsel's Legal and Factual Analysis.

Attachments

1) Analysis of Submission 17 for Carter/Mondale Presidential Committee, Inc. dated August 12, 1980.

2) Money orders

8304039306 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

B.L.

THROUGH: WILLIAM P. LOUGHREY
ACTING STAFF DIRECTOR

FROM: BOB COSTA

SUBJECT: ANALYSIS OF SUBMISSION 17 FOR CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.

8304093051

During the review of Submission 17 of the Carter/Mondale Presidential Committee, Inc., a similarity between six (6) money orders included in the sample was noted. The six (6) money orders were drawn on the Manhattan Savings Bank on February 29, 1980 in the amount of one hundred dollars each. 1/ The serial numbers in the six (6) money orders were from two (2) numerical series (106522, 106531, 106543 & 592622, 592624, 592643), and four (4) of the money orders listed the contributors' place of employment as the Silver Palace Restaurant in New York City.

Further review of copies of written instruments submitted from New York and New Jersey revealed 64 additional Manhattan Savings Bank money orders which were generally sequentially ordered and apparently from individuals of oriental descent (see Attachment I). Sixty (60) of these money orders were for the amount of one hundred dollars ($100.00) and dated February 29, 1980. 1/

For twenty five (25) of the one hundred dollar money orders (including the 6 sample items) the contributors' occupation and principal place of business on the attached contributor card was shown as a waiter or cook employed by the Silver Palace Restaurant. In addition, three (3) money orders were attributed to a businessman working for the Young Jin Trading Company. No occupation or principal place of business was given for the remaining $100 money orders.

1/ Both the amount and date on the money orders are machine encoded which indicates that the money orders were all purchased on the same date.

A review of prior submissions for money orders from these sequential series identified an additional three (3) money orders dated February 28, 1980.* These money orders were from contributors of apparent oriental descent, but differed in amount, and/or place of employment. (see Attachment II).

Further, a review of the Committee's disclosure reports around the time of the contributions indicated that a fundraising event took place at the Silver Palace Restaurant in New York City on approximately March 3, 1980.

One additional aspect relating to these money orders should be noted. In several instances the handwriting on the "Remitter's Signature" line of the money order differs from the handwriting on the line "(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)" located on the attached contribution verification form (see Attachment III and IV). Also, it appears that the same handwriting exists on all the money orders for the payee line "Carter/Mondale Presidential Committee." The money orders submitted for matching are available for your review and are located in the Audit Division's Matching Fund files.

This matter is being referred to your office for review with the Audit staff recommendation that the Office of General Counsel send positive confirmation letters to each of these contributors to gain assurance as to the validity/matchability of these contributions.

If you have any questions regarding the above information, please do not hesitate to contact Ray Lisi or Glen Buco on extension 3-4155.

Attachments as stated

* See footnote 1/

8304093065

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Chan Kwok Hung	Waiter/Silver Palace Restaurant	106522	02/29/80	$ 100.00
Au C. Sing	Waiter/Silver Palace Restaurant	106523	02/29/80	100.00
Chiu Tak Foon	Waiter/Silver Palace Restaurant	106524	02/29/80	100.00
Cheung Yuen Ting	Waiter/Silver Palace Restaurant	106526	02/29/80	100.00
Cheng Wai Ming	Waiter/Silver Palace Restaurant	106527	02/29/80	100.00
Chau Hing Lit	Waiter/Silver Palace Restaurant	106530	02/29/80	100.00
Chau Chak Yum	Waiter/Silver Palace Restaurant	106531	02/29/80	100.00
Chan Wai Kuen	Waiter/Silver Palace Restaurant	106532	02/29/80	100.00
Chan Sui Wing	Waiter/Silver Palace Restaurant	106533	02/29/80	100.00
Lam The Hoa	Waiter/Silver Palace Restaurant	106535	02/29/80	100.00
Lam Chit Cheung	Waiter/Silver Palace Restaurant	106536	02/29/80	100.00
Bill S. Hui	Waiter/Silver Palace Restaurant	106537	02/29/80	100.00
Fung Sik Yec	Waiter/Silver Palace Restaurant	106540	02/29/80	100.00
Johnson Chu	Waiter/Silver Palace Restaurant	106543	02/29/80	100.00
Lee Yim Sun	Waiter/Silver Palace Restaurant	592615	02/29/80	100.00
Lee Cheung Kwei	Waiter/Silver Palace Restaurant	592617	02/29/80	100.00
Lau Yem Chou	Waiter/Silver Palace Restaurant	592619	02/29/80	100.00
Lau P. Hing	Waiter/Silver Palace Restaurant	592622	02/29/80	100.00
Frank Wang	None Listed	592623	02/29/80	100.00
Lucia Wang	" "	592624	02/29/80	100.00
T. T. Wang	" "	592625	02/29/80	100.00
T. T. Wang	" "	592626	02/29/80	100.00
Sim F. Chow	" "	592627	02/29/80	100.00
Kwei T. Yu-Sum	" "	592628	02/29/80	100.00
Irene Sun	" "	592629	02/29/80	100.00
Yang Kuo-Shio	" "	592630	02/29/80	100.00

8304093

Page 3 of 14

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Yeung Shun-Fook	None Listed	592631	02/29/80	$ 100.00
K. G. Yeung	" "	592632	02/29/80	100.00
Ngan Chan	" "	592633	02/29/80	100.00
Choi Cheing	" "	592634	02/29/80	100.00
Kwan Ho	" "	592639	02/29/80	100.00
Ruby Chi	" "	592640	02/29/80	100.00
So Hung Shum	" "	592641	02/29/80	100.00
Hong Chi	" "	592642	02/29/80	100.00
George Lau	" "	592643	02/29/80	100.00
George Lau	" "	592644	02/29/80	100.00
Yew Leung Wong	" "	592645	02/29/80	100.00
Soo Ling Wong	" "	592646	02/29/80	100.00
Wah Chan	" "	592647	02/29/80	100.00
Yuen May Leung	" "	592648	02/29/80	100.00
Yin Young Leung	" "	592649	02/29/80	100.00
Suey Jin Chih Leung	" "	592650	02/29/80	100.00
Chung Hop Ping	" "	592652	02/29/80	100.00
Tao T. Wei	" "	592653	02/29/80	100.00
Ja F. Wei	" "	592654	02/29/80	100.00
Terrin Hwang	" "	592657	02/29/80	100.00
Ming Wha Woo	" "	592658	02/29/80	100.00
Mieh Hu	" "	592659	02/29/80	100.00
Sin Joung Ha	" "	592660	02/29/80	100.00
Joyce Hu	" "	592661	02/29/80	100.00
Bernakella Hu	" "	592662	02/29/80	100.00
Leung C. Ping	Cook/Silver Palace Restaurant	592663	02/29/80	100.00
Leung W. Kwong	Cook/Silver Palace Restaurant	592664	02/29/80	100.00
Lo Ting	Cook/Silver Palace Restaurant	592666	02/29/80	100.00
Louie C. Jor	Cook/Silver Palace Restaurant	592667	02/29/80	100.00
Louie C. Foo	Cook/Silver Palace Restaurant	592668	02/29/80	100.00

8304039306

Page 4 of 14

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Lui H. Kuen	Cook/Silver Palace Restaurant	592669	02/29/80	$ 100.00
Na Koon Kau	Cook/Silver Palace Restaurant	592670	02/29/80	100.00
Chun S. Au	None Listed	592673	02/29/80	100.00
Young Kim	None Listed	592674	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592675	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592676	02/29/80	100.00
Do Young Paik	None Listed	592678	02/29/80	100.00
Do Young Paik	None Listed	592679	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592680	02/29/80	100.00
Do Young Paik	None Listed	592682	02/29/80	100.00
Shui K. Lee	Owner liquor store/Sun Wai Liquor Store	591754	02/28/80	500.00
Shui K. Lee	Owner/liquor store/Sun Wai Liquor Store	591755	02/28/80	500.00
Leung Shui Sum	Businessman/None listed	591757	02/28/80	500.00
Bob Leu	Businesswoman/None Listed	591765	02/28/80	400.00
			Total	$8,500.00

3040393005

Page 5 of 14

Attachment II

CART 13

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Tse W. Chun	Businessman/Dinlay Co.	591764	02/28/80	$400.00
Yet Suey Gee (Tom)	Factory worker/Easeley Sport Short Co.	592636	02/28/80	100.00
Kwok Tung Tam	Restaurant Mgr./Chinese Republic Restaurant	592635	02/28/80	100.00

30403930

Page 2 of 14

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS NO. 00241

VINGS BANK MONEY ORDER

DATE FEB2880 PAY $ $400.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

THE ER OF Committee to Re-elect [illegible]

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

Tse Wai Chun

REMITTER SIGNATURE

5 Mott St. NY NY 10013

ADDRESS

BANKS TRUST COMPANY
NEW YORK, N. Y.

⑆026007943⑆ 0024 1⑈0710⑈

CANTERBURY [illegible]
PRINCIPLE ACCOUNT 20

DATE 2/28/80

25 00

Attachment III

Page 7 of 14

NAME CHUN, TSE WAI CO.

5 Mott Street

NY NY 10013

CITY STATE ZIP

PAYEE: Committee

COMPANY:

CITY STATE ZIP

CHUN

3040393007

3040393008

6 13

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-791
260
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS. No. C592635

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $. $100.00
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwok Tung Tam
REMITTER'S SIGNATURE

71-11 31 St NY
ADDRESS Jackson Heights

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"03592635" :026007948: 0024 "0710"

BATCH: 031880007 TC: 02 SC: EC: 5494

FOR TYPE OR PRINT OTHER: NAME: Tung Tam, Kwok

ADDRESS: 71-11 31st St.

Jackson Heights, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP
1 P
1 PC

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., IN
PRINCIPLE ACCOUNT 20

The Riggs BANK OF WASHINGTON

DATE 031880 19

007

LIST CHECKS SINGLY OR AT

CASH

25 3,000 0

$ 3,000

:054000072: 4 62 E90 "

Page 8 of 14

Page 292

Attachment IV

pg 1 of 2

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE THAT YOUR CONTRIBUTION WILL QUALIFY FOR FEDERAL MATCHING FUNDS WE

00000000000027171310 032180027 L 02 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. TSE W CHUN

5 MOTT ST

NY NY 10013

( )- -

BUSINESSMAN

PLACE OF BUSINESS?

NY NY 10013

AMOUNT OF CONTRIBUTION $ 400.00

102	TITLE	NAME (LAST, FIRST, MI) TSE WAI CHUN
104	ADDRESS	394 [illegible]
105	ADDRESS	
106	CITY	STATE ZIP N.J. 07032
116	TEL #	[illegible] 4175
103	OCCUPATION	[illegible]
111	COMPANY NAME	DINLAY CO.
112	CITY	STATE ZIP N.Y. 10013
131	CATEGORY	CONTRIBUTION # 1 of 4

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

[signature]

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

05228077 5

P. 29

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000026019610 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

~~MR. KWOK TUNG~~

71-11 31TH ST

JACKSON HEIGHTS NY

( )- -

OCCUPATION?

PLACE OF BUSINESS?

AMOUNT OF CONTRIBUTION $ 100.00

	TITLE	NAME (LAST, FIRST, MI)
102	~~MR.~~	011 Tom, KWOK ~~TUNG~~
	ADDRESS	
104	71-11 31 AVENUE	
	ADDRESS	
105		
	CITY	STATE ZIP
106	JACKSON HEIGHTS	NY 11370
	TEL #	
116	(212) 457-1327	
	OCCUPATION	
103	~~RESTAURANT MANAGER~~	
	COMPANY NAME	
111	~~CHINESE REPUBLIC RESTAURANT~~	
	CITY	STATE ZIP
112	NEW YORK	~~NY 10036~~
	CATEGORY	CONTRIBUTION #
131		1

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Kwok Tung Tom *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

05220076

A-869

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 1, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER, III
STAFF DIRECTOR

FROM: ROBERT J. COSTA

SUBJECT: A. UPDATE OF ANALYSIS OF CARTER/MONDALE SUBMISSION 17

A. In reference to the Submission 17 matter previously referred to your office on August 12, 1980, attached please find copies of the check and check request relating to the fundraising event held at the Silver Palace Restaurant, (Attachments I and II). Please note that the check request provides information concerning the expected number of participants, and the charge per person to the Committee.

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Page 11 of 14

8304039307

Attachments as stated

COMMITTEE, INC.
OPERATING ACCOUNT

The National Bank of Washington Washington, D.C.

March 3 19 80 — 15-7/540 20

PAY PHOTOCOPY $ 5,600.00
TO THE ORDER OF

Silver Palace Restaurant
52 Bowery
New York, NY

NON NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT — THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW — IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIR

DATE	DESCRIPTION	AMOUNT
3-3-80	Meetings - Food (Fundraising) FL04, 2-21, NYC	$5,600.00

V2-1

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
OPERATING ACCOUNT

Cost Estimate Attached _____ Other Form Attached _____

Proposal Attached _____ Agreement/Contract Attached _____

Receipts Attached _____

(Do Not Write Below This Line - For Approval Purposes Only)

Cost Center Director — Date _____ Amount _____

Treasurer/Controller — Date 3-3-80 C/C _____

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

EXPENDITURE/CHECK REQUE

TO: Evan Dobelle, Cost Center Director DATE 2/27/80

FROM: Sandy Oreste

SUBJECT: Request for Expenditure Approval/Check Request
(Give Complete Details of Request)

FL04

Silver Palace Restaurant need by Feb. 29, 1980
Name to be Used on Check

52 Bowery
Address

New York New York
Address

PURPOSE OF EXPENDITURE: DETAILED PARTICULARS

Cost of food, etc. for Fundraiser Feb. 21 $5,600.00
$8 per person X 700 people
(includes guest, price, silent service)

DOCUMENTATION:

Purchase Order Attached	____	Invoice Attached	____
Cost Estimate Attached	____	Order Form Attached	____
Proposal Attached	____	Agreement/Contract Attached	____
		Receipts Attached	____

8 3 0 4 0 5 3 9 3 0 7

(Do Not Write Below This Line - For Approval Purposes Only)

Cost Center Director Date Amount

Treasurer/Controller Date 2-3-80 C/C

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

Page 14 of 14

Attachment 2

330403250 7

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. CS106522

SAVINGS BANK MONEY ORDER

FEB2980 $100.00

DATE PAY $

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Chan Kwok Hung
REMITTER'S SIGNATURE

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

66 Bayard St.
ADDRESS NY, NY

⑈6106522⑈ ⑆026007948⑆ 0024⑉0710⑈

BATCH: 032180025 TC: 02 SC: EC: Feb04

H.

MR. MRS. MS. OTHER: NAME: Chan Kwok ~~Hung~~

ADDRESS: ~~66 Bayard St.~~ 66 BAYARD ST

New York ~~NY~~ NY, N.Y.
CITY STATE ZIP

OCCUPATION: Waiter F M

NAME OF COMPANY: ~~Silver Palace Restaurant~~ SILVER PALACE RESTAURANT

New York ~~NY~~ NY.
CITY STATE ZIP

TEL # ( ) AMOUNT $ ~~100.00~~ 100.00

4 TYP
1 F
4 PC

⑆026007948⑆ 0024⑉0710⑈

DEPOSIT TICKET
ER-MONDALE PRESIDENTIAL COMM., INC.
CIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 032180 19
025

USE CHECKS SHOWN ON REVERSE SIDE

24 2,520 —

Page 1 of 19

$ 2,520 —

This deposit is accepted subject to verification and to our rules and regulations

C.Y.H

8304039307 6

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS
No. CS106530

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

Chan Hing Lit
REMITTER'S SIGNATURE

92 East Broadway
ADDRESS
NY NY

GS BANKS TRUST COMPANY
NEW YORK, N. Y.

106530" :026007948: 0024 6" 0710"

71

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 032180
025

LIST CHECKS SINGLY OR IN TOTAL

24 2,520

:054000072: "063 29 4"

$ 2,520

This deposit is accepted subject to verification and to our rules and regulations

DATE: 032180025 TC: 02 SC: FL04

NAME: ~~Chan, Hing Lit~~ CHAN, HING L

ADDRESS: ~~92 East Broadway~~ 92 EAST BROADWAY

NY, NY
CITY STATE ZIP

OCCUPATION: ~~Waiter~~ EM
NAME OF COMPANY: SILVER PALACE RESTAURANT ~~Silver Palace Restaurant~~

~~52 Bowery~~ New York ~~NY~~, NY.
CITY STATE ZIP

ID: AMOUNT: ~~100.00~~ 100.00

4 TYP
1
6 PC

CY-H

Page 2 of 19

23

8 3 0 4 0 3 9 3 0 7 7

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-784
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS — No. C592627

SAVINGS BANK MONEY ORDER

FEB2980 — $100.00

DATE — PAY $

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

Sim Fuey Chow
REMITTER'S SIGNATURE

830 Ave H
Brklyn NY
ADDRESS

⑈035926 27⑈ ⑆026007948⑆ 0024⑉0710⑈

BATCH: 03180807 TC: 72 SC: EC: FEB84

OTHER: NAME: Fuey Chow, Sim

ADDRESS: 830 Avenue H.

Brooklyn, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL. # ( )

AMOUNT $ 100.00

4 TYP
F
PC

B/N 60187

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY

CASH

25 3,000 00

$ 3,000 0

⑆054000022⑆ 1⑈0E3 29 4⑈

Page 3 of 19

8'3 0 4 0 3 9 3 0 7 8

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS
No. C592628

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwei Tik Yu Sum
REMITTER'S SIGNATURE
48-11 91 St.
ADDRESS Elmhurst NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"0359 26 28" :0260079481: 0024 "0710"

BATCH: 03180001 TC: 02 SC: EC: 0104

MR. MRS. MS. OTHER:
NAME: Yu Sum, Kwei Tik
ADDRESS: 48-11 91th St.
Elmhurst, N.Y.
CITY STATE ZIP
OCCUPATION:
NAME OF COMPANY:
CITY STATE ZIP
TEL # ( )
AMOUNT $ 100.00

4 TYP
1 F
1 PC

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY OR ATTACH

CASH 25 3,000 00

:0540002 2: 1"063 29 4"

$ 3,000 00

Pay to the order of

24

6 3 0 4 0 3 9 3 0 7 9

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

1-794/260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592630

SAVINGS BANK MONEY ORDER

DATE FEB2900 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Yang Kuo-Shiu
REMITTER'S SIGNATURE

94-36 Alstyne Ave
ADDRESS Elmhurst, NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"035926 30" :026007948: 00241 "0710"

BATCH: 031800007 TC: 02 SC: EC: F10 4

MR. MRS. MS. OTHER: NAME: Kuo-Shiu, Yang

ADDRESS: 94-36 Alstyne Ave

Elmhurst, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP
4
4 PC

s/N 60197

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY

CASH 25 3,000 00

Page 5 of 19

:054000072: 0363 29 4#

$ 3,000

8 3 0 4 0 3 9 3 0 3 0

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

1794 / 260

No. C592623

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

Frank Wang
REMITTER'S SIGNATURE

96-10 41st Ave Corona NY
ADDRESS

⑈03592623⑈ ⑆026007948⑆ 00241⑈0710⑈

BATCH: 03188001 TC: 12 SC: EC: 4

MR. MRS. MS. OTHER:

NAME: WANG, FRANK

ADDRESS: 9610 41th Ave.

Corona, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

AMOUNT $ 100.00

4 TYP
1 F
L PC

S/N 40197

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR AT

CASH

15 3,000 00

$ 3,000 00

This deposit is accepted subject to collection

⑆0540007⑆ 1:0903 29 4⑈

Rec'd 6/6 9 mail

S 3 0 4 0 3 9 3 0 3 1

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794/260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592624

SAVINGS BANK MONEY ORDER

FEB2980 $100.00

DATE PAY $

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Lucia Wang

REMITTER'S SIGNATURE

96-10 41st Ave Corona NY

ADDRESS

SAVINGS BANKS TRUST COMPANY

NEW YORK, N. Y.

⑈035926 24⑈ ⑆026007948⑆ 0024 1⑈0710⑈

B/N 60197

9337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC.

PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH LIST

	CASH	
15	3,000	0

⑆0560000721⑆ 0363 29 4⑈

$ 3,000 0

Rec'd 3/18

BATCH: 03188005 TC: 03 SC: EC: FLP4

MR. MRS. MS. OTHER: NAME: Wang, Lucia

ADDRESS: 96-10 41st Ave.

Corona, NY,

CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL: ( ) AMOUNT $ 100.00

4 TYP

1 F

1 PC

21

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THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592625

SAVINGS BANK MONEY ORDER

DATE FEB2980

PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

T. T. Wang
REMITTER'S SIGNATURE

300 E. 75 St. NYC
ADDRESS

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"03592625" :026007948: 0024 1"0710"

ATCH: 03188807 TC: 02 SC: EC: E1004

ICR: NAME: WANG, T.T.

DRESS: 300 East 75th St.

New York, N.Y.
CITY STATE ZIP

CUPATION:

ME OF COMPANY:

CITY STATE ZIP

AMOUNT 100.00

4 TYP
1 F
1 PC

B/N 60187

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH

CASH

25 3,000 : 0

Rec'd 3/19

:0540000221: 1"063 29 4"

$ 3,000

This deposit is received subject to verification

0 3 0 4 0 3 9 3 0 3 3

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-794
260
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS
No. C592626

SAVINGS BANK MONEY ORDER

FEB2980 $100.00
DATE PAY $
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

T. T. Wang
REMITTER'S SIGNATURE
300 E 75th St
ADDRESS nyc

"035926 26" :026007948: 0024 "0710"

BATCH: 03180007 TC: 03 SC: EC: FL04

MR. MRS. MS. OTHER: NAME: WANG, T.T.

ADDRESS: 300 East 75th St.

New York, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( ) AMOUNT $ 100.00

4 TYP
F
L PC

S/N 60187
6337
DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY OR ATTACH

CASH
CHECKS
25 3,000 00

Rec'd 3-19

:054000072: 1"063 29 4"

$ 3,000 00

This deposit is received subject to applicable

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., IN
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 042480 003 19-

6,555.00

20.

Rec 10 719

$ 6.555.02

This deposit is accepted subject to verification and to our rules and regulations

0 3 0 4 0 3 9 5 0 3

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS No. 0591755

SAVINGS BANK MONEY ORDER

DATE FEB2880 PAY $ $500.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

LEE SHUI KUEN

REMITTER'S SIGNATURE

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y. SS#058-46-5943

394 Chestnut St. Kearny, N.J. 07032
ADDRESS

"03591755" :026007948: 00241"0710"

:0500004750: 24 "0 03 95 0 4"

BATCH: 042480003 TC: 22 SC: FEC: FL04

MRS.
MS.
OTHER: NAME: Lee, Shui K.

ADDRESS: 394 Chesnut St.

Kearny, NJ. 07032
CITY STATE ZIP

OCCUPATION: ~~Owner, Liquor Store~~ J6

NAME OF COMPANY: 17 E. Broadway

NY, NY.
CITY STATE ZIP

TEL. # ( )

AMOUNT $ ~~1000.00~~ 1,000.00

4 TYP
1 F
M PC

CAB[redacted]/MONDALE PRESIDENTIAL CA[redacted]IGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

CC00000000031469560 042480003 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. LEE S KUEN

394 CHESNUT ST

KEARNY NJ 07032

( )- -

OWNER

17 E BROADWAY

NY NY

AMOUNT OF CONTRIBUTION $ 1,000.00

	TITLE	NAME (LAST, FIRST, MI)
102	101	LEE SHUI KUEN
104	ADDRESS	394 CHESTNUT ST.
105	ADDRESS	
106	CITY	KEARNY
	STATE	N.J.
	ZIP	07032
115	TEL #	
103	OCCUPATION	MANAGER
111	COMPANY NAME	SUN WAI LIQUOR STORE
112	CITY	N.Y.
	STATE	N.Y.
	ZIP	10002
131	CATEGORY	CONTRIBUTION #

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

8304039303

[signature] *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

062580751

Page 11 of 19

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS NO. 830403930 3 Sub 13

INGS BANK MONEY ORDER

DATE FEB2860 PAY $ $400.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

E OF Center/Manhattan Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Tse Wai Chun

REMITTER'S SIGNATURE

5 Mott St. N.Y. N.Y. 10013

ADDRESS

ANKS TRUST COMPANY
EW YORK, N. Y.

⑆026007948⑆ 0024 1⑈0710⑈

CARTER-MONDALE REGIONAL CO ..., INC
PRINCIPLE ACCOUNT 20

DATE 03/01/80 19

06-7

25. 9,330 1

⑆ 42 E60⑈ ⑆240004505⑆ 0541

Page 12 of 19

NAME: CHUN, TSE WAI LO.

5 Mott Street

NY New York NY 10013
CITY STATE ZIP

ATION: Solicitation

OF COMPANY:

CITY STATE ZIP

AMOUNT $400.00

9,330 1

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE THAT YOUR CONTRIBUTION WILL QUALIFY FOR FEDERAL MATCHING FUNDS WE

00000000000027171310 032180027 L 02 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. TSE W CHUN

5 MOTT ST

NY NY 10013

( )- -

BUSINESSMAN

PLACE OF BUSINESS?

NY NY 10013

AMOUNT OF CONTRIBUTION $ 400.00

102 TITLE	101 NAME (LAST, FIRST, MI)	TSE WAI CHUN
104 ADDRESS		394 Chrystie St. Apt. 4
105 ADDRESS		
106 CITY		Kearny
STATE	ZIP	N.J. 07032
116 TEL #		997-4175
103 OCCUPATION		Businessman
111 COMPANY NAME		DIN LAY CO.
112 CITY		N.Y.C.
STATE	ZIP	N.Y. 10013
131 CATEGORY	CONTRIBUTION #	400

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

052280775

Page 13 of 19

Sub 13

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

1-794
260

No. C592636

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Yet Suey Gee
REMITTER'S SIGNATURE

71-11 31st Ave
ADDRESS Jackson Heights NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈03592636⑈ ⑆026007948⑆ 0024⑈0710⑈

⑆054000022⑆ 1⑈03 29 4⑈

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR

	CASH
25	3,000

Page 14 of 19

BATCH: 03188007 TC: 02 SC: EC: Feb 04

MR.
MRS.
MS.
OTHER: NAME: Suey Gee, Yet

ADDRESS: 71-11 31th Ave.

Jackson Heights, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

ZIP

4 TYP
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L PC

$ 3,000

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000026019280 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

02|03

MRS YET SUEY GEE TOM

71-11 31TH AVE

JACKSON HEIGHTS NY

( )- -

OCCUPATION?

PLACE OF BUSINESS?

AMOUNT OF CONTRIBUTION $ 100.00

	TITLE	NAME (LAST, FIRST, MI)
102	MRS.	011 TOM, YET SUEY GEE

	ADDRESS
104	71 11 31 AVE.

	ADDRESS
105	

	CITY	STATE	ZIP
106	JACKSON HTS.	N.Y.	11370

	TEL #
116	(212) 457-1327

	OCCUPATION
103	FACTORY WORKER

	COMPANY NAME
111	EASELEY SPORTSHORT CO.

	CITY	STATE	ZIP
112	NEW YORK	N.Y.	11370

	CATEGORY	CONTRIBUTION #
131		

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Yet Suey Gee Tom *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

052280776

3 0 0 4 0 3 9 3 0 Sub 13

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592635

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $. $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwok Tung Tam
REMITTER'S SIGNATURE

71-11 31st Ave
ADDRESS Jackson Heights ny

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"03592635" :026007948: 0024 "0710"

BATCH: 031880007 TC: 02 SC: EC: F6104

MR. MRS. MS. OTHER: NAME: Tung Tam, Kwok

ADDRESS: 71-11 31th St.

Jackson Heights, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL. # ( )

AMOUNT $ 100.00

4 TYP
4 F
L PC

W

S/N 60167

Rissman 8337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM.: IN
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH

CASH

25 3,000

:056000728: "4 62 E90"

$ 3,000

Page 16 of 190

72-6

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

0000000000026019610 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

~~MR. KWOK TUNG~~

~~71-11 31TH ST~~

JACKSON HEIGHTS NY

( )- -

OCCUPATION?

PLACE OF BUSINESS?

AMOUNT OF CONTRIBUTION $ 100.00

	TITLE	NAME (LAST, FIRST, MI)
102	~~MR.~~	011 Tom, KWOK ~~TUNG~~

	ADDRESS
104	71-11 31 AVENUE

	ADDRESS
105	

	CITY	STATE	ZIP
106	JACKSON HEIGHTS	NY	11370

	TEL #
116	(212) 457-1327

	OCCUPATION
103	RESTAURANT MANAGER

	COMPANY NAME
111	CHINESE REPUBLIC RESTAURANT

	CITY	STATE	ZIP
112	NEW YORK	NY	10036

	CATEGORY	CONTRIBUTION #
131		

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Kwok Tung Tom *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

052230776

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THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-794/260
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS
No. C592643

SAVINGS BANK MONEY ORDER

FEB2980 $100.00
DATE PAY $
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

George Law
REMITTER'S SIGNATURE
80 Beekman St NYC
ADDRESS

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"03592643" :026007948: 0024 "0710"

BATCH: 03180007 TC: 02 SC: EC: 5164

SIR.
OTHER: NAME: LAW, George
ADDRESS: 80 Beekman St.
New York, N.Y.
CITY STATE ZIP
OCCUPATION:
NAME OF COMPANY:
CITY STATE ZIP
TEL # ( ) AMOUNT $ 100.00

TYP
F
PC

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY
CASH
25 3,000 00

Page 18 of 18

:054000072: 1:0063 29 4:

$ 3,000 00

8 3 0 4 0 3 9 3 0 9 3

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592644

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

George Law
REMITTER'S SIGNATURE

80 Beekman St
ADDRESS

NYC

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

"0359264 4" :026007948: 0024 4"0710"

BATCH: 031818000017 TC: 012 SC: EC: 51864

MR.
MRS.
MS.
OTHER: NAME: LAW, George

ADDRESS: 80 Beekman St.

New York, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

4 TYP
1 F
1 PC

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007

LIST CHECKS SINGLY

CASH
25 3,000

:0260007948: 0024 4"0710"

Page 19 of 119

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hong Chi
410 E. 6th Street
New York, New York 10009

Re: MUR 1353

Dear Hong Chi:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039309

Klimesakys MUR 1353

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:
Hong Chi

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 150824 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
X Ruby Chi

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆GPO: 1979 O-281-529

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

USPO

830403730 95

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Hong Chi

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

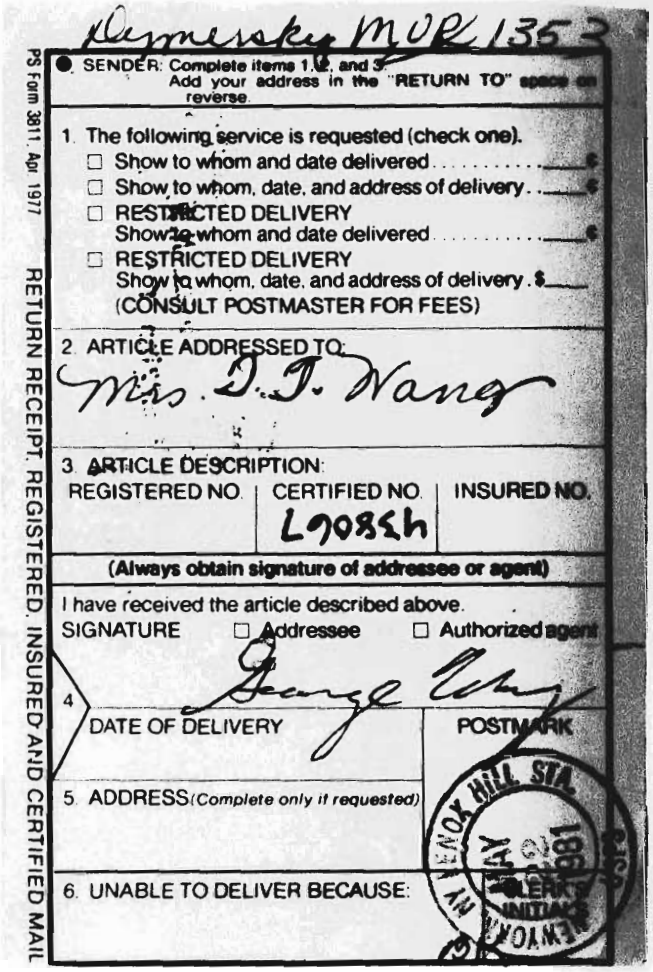
Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304093096



Reynolds MOR 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Mrs. D. T. Nance

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	L70854	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

George Nance

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NY LENOX HILL STA. MAY 1981 CLERK INITIALS

8304039307

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. T.T. Wang
300 E. 75th Street
New York, New York 10021

Re: MUR 1353

Dear Mrs. T.T. Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304059370

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Mrs. T.T. Wang

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 5 9 3 0 9 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sim Fuey Chow
830 Avenue H
Brooklyn, New York 11233

Re: MUR 1353

Dear Sim Fuey Chow:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039310 0

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Sim Fuey Chow

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwei Tik Yum-Sum
48-11 91st Street
Elmhurst, New York 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039310 3

Dimmerskey MU 1353

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 FEE)

2. ARTICLE ADDRESSED TO:
Kwei Tak Yum

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
S90826

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Alice L

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

MAY 2P 1981 U.S.P.O. MT. CORONA, CALIF.

☆GPO : 1979-

P Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Kwei Tik Yum-Sum

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039310

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Irene Sun
48-11 91st Street
Elmhurst, New York 11372

Re: MUR 1353

Dear Irene Sun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039310

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Irene Sun

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304030310

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yang Kuo-Shio
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear Yang Kuo-Shio:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039307

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yang Kuo-Shio

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304093139

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yeung Shun-Fook
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

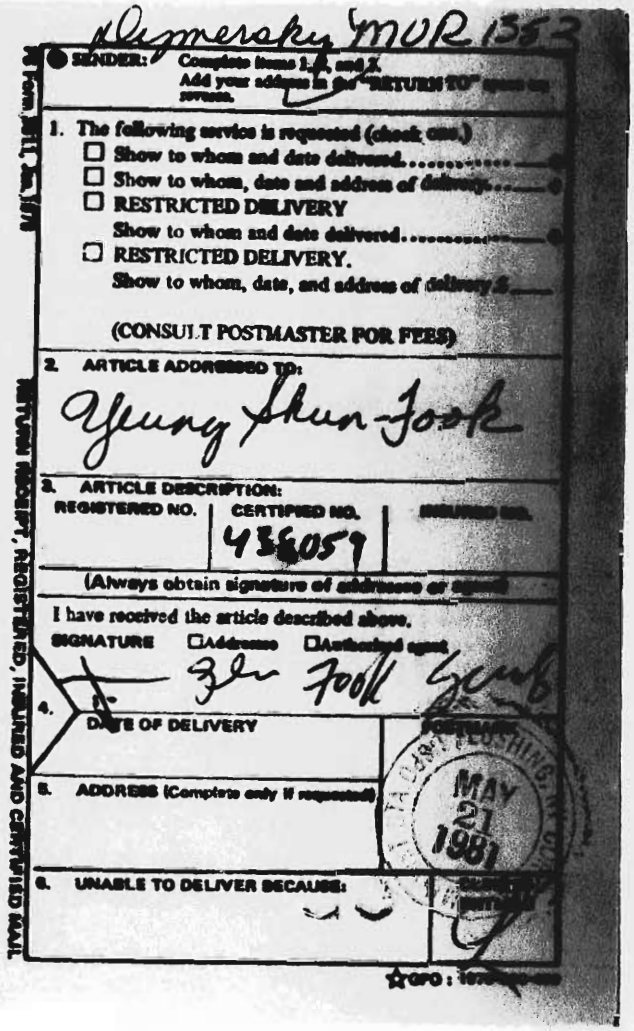
For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039311C



Dymersky MUR 1552

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:
Yeung Shun-Sook

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 436059 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Yeung Shun Sook

4. DATE OF DELIVERY
MAY 21 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yeung Shun-Fook

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039311

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K. G. Yeung
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear K. G. Yeung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304035118

Klymenko MUR 1353

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:
K. D. Yeung

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438058	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Glen Todd Yeung

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MAY 27 1981

☆GPO : 1975

PS Form 3811, Jan. 1979 REGISTERED, INSURED AND CERTIFIED MAIL

8304039311 3

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT K. G. Yeung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 5 9 3 1 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Choi Luen Cheing
64 Rutger Street
New York, New York 10002

Re: MUR 1353

Dear Choi Luen Cheing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039311

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Choi Luen Cheing

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039116

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ngan Chan
64 Rutger Street
New York, New York 10002

Re: MUR 1353

Dear Ngan Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

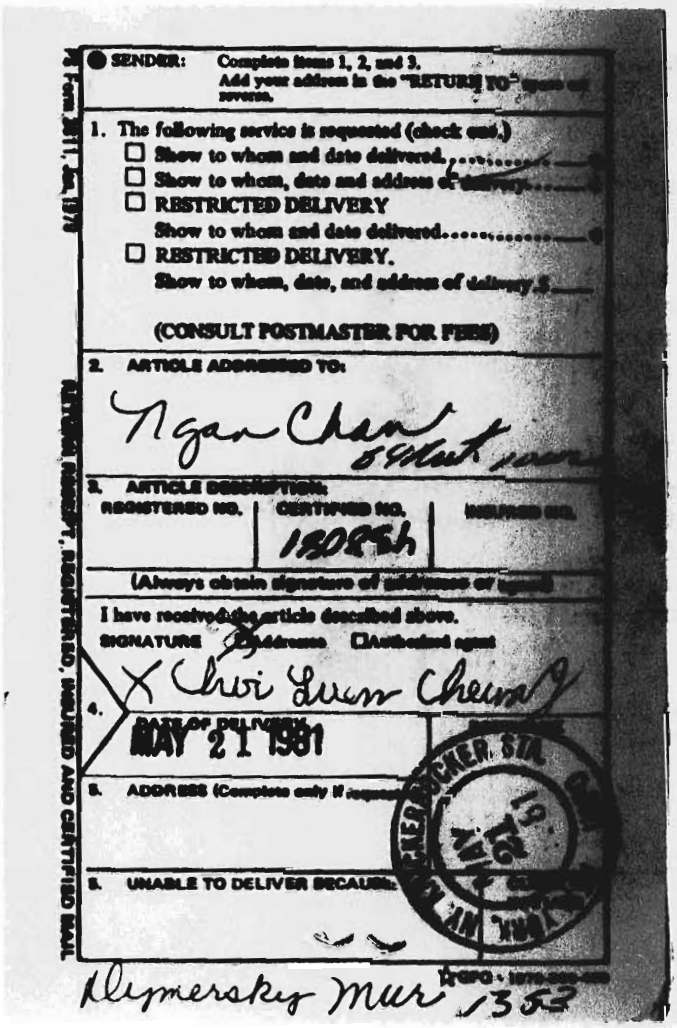
For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039311 E



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:
Ngan Chan
6 Hart

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 180258 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Lui Lueu Cheung

4. DATE OF DELIVERY
MAY 21 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

FORM 3811, Feb. 1974 DOMESTIC RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

NEW YORK BECKER STA

Klymersky Mur 1353

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Ngan Chan

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039315

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwan Ho
117 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Kwan Ho:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures.

8304059512

Klymenko MVR-1353

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:

Kwan Ho

3. ARTICLE DESCRIPTION:

REGISTERED NO. | CERTIFIED NO. 590854 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

Kwan Ho

4. DATE OF DELIVERY

NEW YORK MAY 20 1981

5. ADDRESS (Complete only if requested)

81 MAY 26 A 8:

6. UNABLE TO DELIVER BECAUSE:

MVR

☆GPO : 1979-289-288

PS Form 3811, Apr. 1979 DOMESTIC RETURN RECEIPT

P 830 403 931

Enclosure:
Summons
Complaint

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Kwan Ho

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 3 9 3 1 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ruby Chi
410 E. 6th Street
New York, New York 10009

Re: MUR 1353

Dear Ruby Chi:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304093112

Klymeshyn MVN 1353

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:

Ruby Chi

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	C60858	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

X Ruby Chi

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MAY 22 1981

POSTMARK

☆GPO: 1980-311-825

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

330403931 24

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Ruby Chi

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

So Hung Shum
117 Mott Street
New York, New York 10013

Re: MUR 1353

Dear So Hung Shum:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 3 9 3 1 2 5

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT So Hung Shum

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 0 3 1 2 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hing Lit Chau
92 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Hing Lit Chau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 5 9 3 1 2 3

DYMERSKY MUR # 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Hing Lit Chau
92 E Broadway
New York, New York 10006

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	425073	94

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

KNICKERBOCKER STATION MAIL

81 MAY 21 AM 8:38

RECEIVED

☆GPO: 1977-O-[illegible]

3304039312 9

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Hing Lit Chau

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 5 9 3 1 3 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chak Yum Chau
41-15A 75th Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Chak Yum Chau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 5 9 3 1 3 1

3304039313

DYMERSKY MUR # 1353

PS Form 3811, Jan. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
CHAK YUM CHAU

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	44083h	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4 chau chak yum

DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆GPO 1977 – 0 – 249-5

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chak Yum Chau

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 5 9 3 1 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Wai Kuen
66 Mulberry Street
New York, New York 10013

Re: MUR 1353

Dear Chan Wai Kuen:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304093134

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chan Wai Kuen

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 3 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Sui Wing
1259 57th Street
Brooklyn, New York 11219

Re: MUR 1353

Dear Chan Sui Wing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039316

3304039317

Numerous Mus #135

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
   Chair Sui Wong

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438026	

(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

☆GPO: 1977—O—240-865

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chan Sui Wing

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 3 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lam The Hoa
34 Hillside Avenue
New York, New York 10040

Re: MUR 1353

Dear Lam The Hoa:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039313

Nguyen ky MOR 1363

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
Lam The Hoa

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	280828	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
LH Lam the Hoa

4. DATE OF DELIVERY
Hell 5/20/81

POSTMARK
MAY 20 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO 1977—O—240-865

B30403931 C

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lam The Hoa

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304093141

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lam Chit Cheung
633 E. 16th Street
Brooklyn, New York 11218

Re: MUR 1353

Dear Lam Chit Cheung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039312

3304031343

Nemerskey #1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Lam Chit Cheung

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	E80824	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

X

4. DATE OF DELIVERY
5/23/81

POSTMARK
BROOKLYN NY
MAY 1981
3:2

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO 1977-0-249-865

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lam Chit Cheung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3040393114

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill S. Hui
749 57th Street
Brooklyn, New York 11220

Re: MUR 1353

Dear Bill S. Hui:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 6 9 3 1 4 3

Klymersky MOR 1353

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:
Bill S. Hui

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	20326	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

LH

DATE OF DELIVERY — POSTMARK

MAY 21 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆GPO: 1977 – 0 – 249-595

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3304039311 5

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Bill S. Hui

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 5 1 4 7

33040393118

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fung Sik Yec
245 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Fung Sik Yec:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

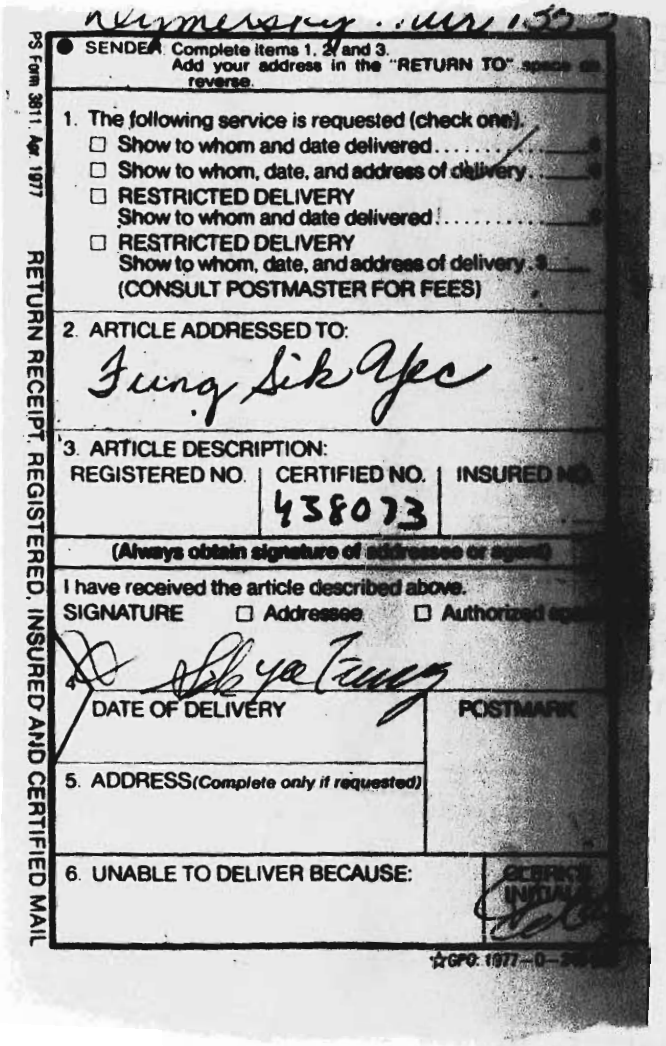
Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039319

3304039310



PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
Fung Sik Yee

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438073	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

X Sik ye Fung

DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977—O—

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Fung Sik Yec

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 5 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnson Chu
32 Monroe Street
New York, New York 10002

Re: MUR 1353

Dear Johnson Chu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039152

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Johnson Chu

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 5 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lee Yim Sun
32 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Lee Yim Sun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039315

Dymersky MVR 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Lu Yin Sun

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	830824	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. X Lu Yin Sun

DATE OF DELIVERY MAY 21 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

81 MAY 28 AM 10:10

U.S. POSTAL SERVICE OFFICIALS

☆GPO: 1977—(D—249,865

RECEIVED

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lee Yim Sun

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 3 6

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lee Yim Sun

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lee Cheung Kwir
375 Broome Street
New York, New York 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039156

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lee Cheung Kwir

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank Wang
96-10 41st Avenue
Corona, New York

Re: MUR 1353

Dear Frank Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039160

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Frank Wang

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lau Po Hing
9-11 Delancey Street
New York, New York 10002

Re: MUR 1353

Dear Lau Po Hing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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Dimensky MDR1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Lau Po Hing

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 938080 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Lau Po

4. DATE OF DELIVERY MAY 2, 1981 POSTMARK NEW YORK NY MAY 2 11 30 AM 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RECEIVED

☆GPO: 1977—O—249-865

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lau Po Hing

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304039315

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Law Yem Chou
19 Division Street
New York, New York 10002

Re: MUR 1353

Dear Law Yem Chou:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 3 9 3 1 6 6

Klymenko MUR 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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Add your address in the "RETURN TO" space on reverse.

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  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery ..... ¢
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Law Yem Chan

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	001254	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Law Yem Chan

4. DATE OF DELIVERY

POSTMARK
KNICKERBOCKER STATION
MAY 22 1981
USPO
NEW YORK

5. ADDRESS (Complete only if requested)

MAY 26 8 00 AM

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO 1977—O—249-865

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Law Yem Chou

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 5 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lucia Wang
96-10 41st Avenue
Corona, New York

Re: MUR 1353

Dear Lucia Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039168

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lucia Wang

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304039159

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

T.T. Wang
300 E. 75th Street
New York, New York 10021

Re: MUR 1353

Dear T.T. Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 5 0 4 0 3 9 3 1 7 0

3304059317 1

Democrats MUR 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
J. P. Wang

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	7408 54	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
George Wang

4. DATE OF DELIVERY 18 MAY 78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RECEIVED
81 MAY 22 AM 10

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT T.T. Wang

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 5 0 4 0 3 3 1 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwok Tung Tam
71-11 31st Street
Jackson Heights, New York

Re: MUR 1353

Dear Kwok Tung Tam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 3 9 5 1 7

3304039317 4

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:

KWOK TUNG TAM

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438095	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979

MUR 1353 - Dymnosky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Kwok Tung Tam

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 5 3 1 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shui Sum Leung
117 Mulberry Street, #2
New York, New York 10013

Re: MUR 1353

Dear Shui Sum Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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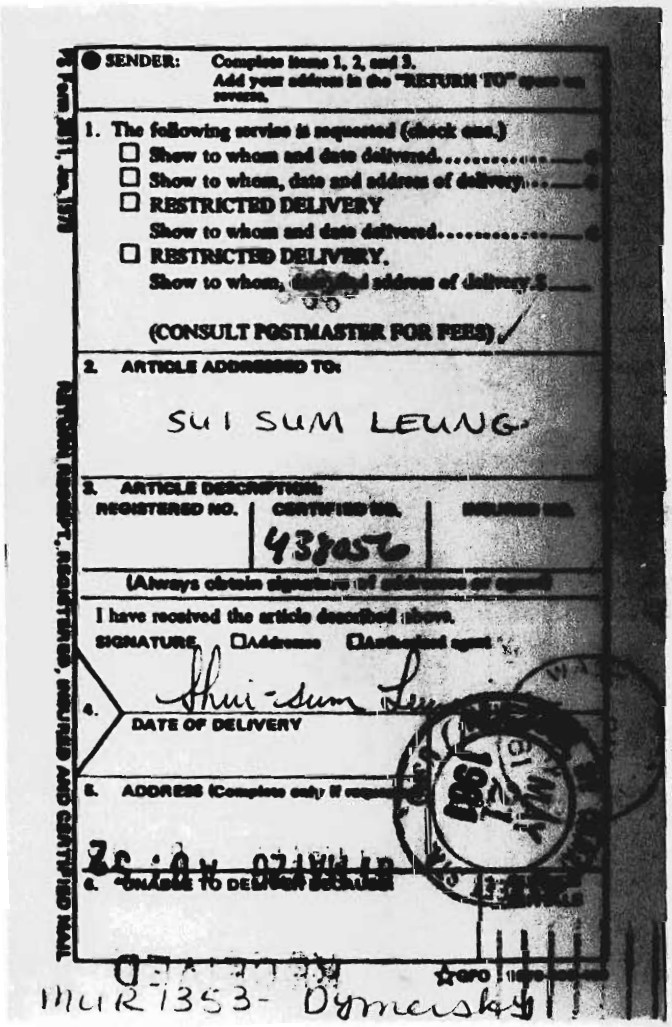
83040393177



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:

SUI SUM LEUNG

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	43405	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

Shui-sum Leung

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

PS Form 3811, July 1978 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 7353- Dymecki

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Shui Sum Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3040593176

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yet Sue Gee (Tom)
71-11 31st Street
Jackson Heights, New York

Re: MUR 1353

Dear Yet Sue Gee (Tom):

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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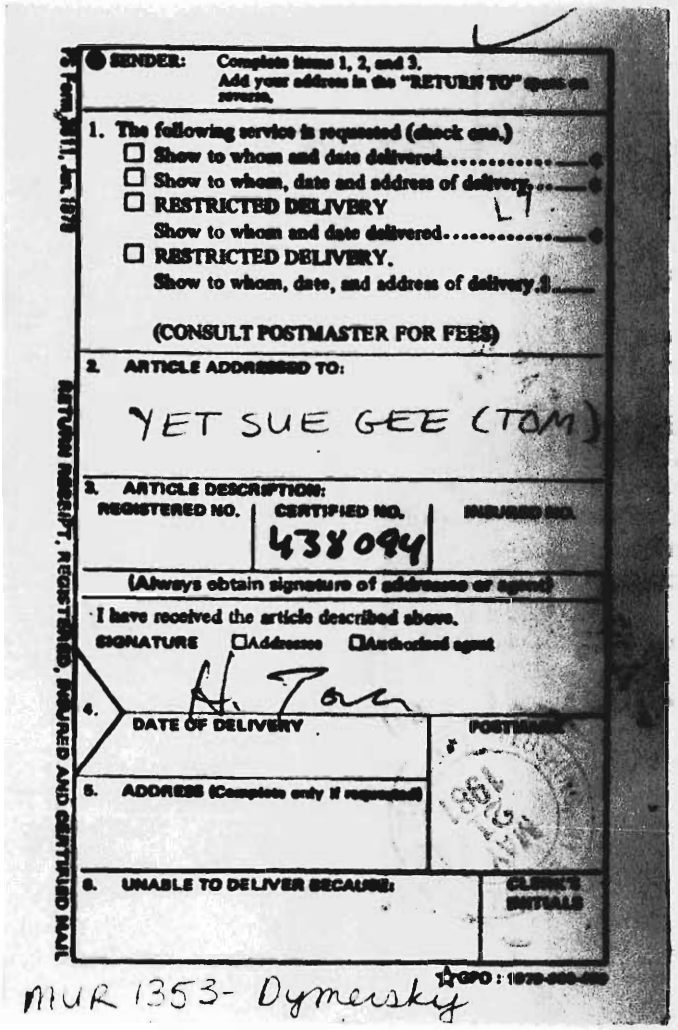
9304039310



PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED AND INSURED MAIL

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:

YET SUE GEE (TOM)

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438094	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

H. Tom

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO : 1979-

MUR 1353- Dymersky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yet Sue Gee (Tom)

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8040939

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tse Wai Chun
5 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Tse Wai Chun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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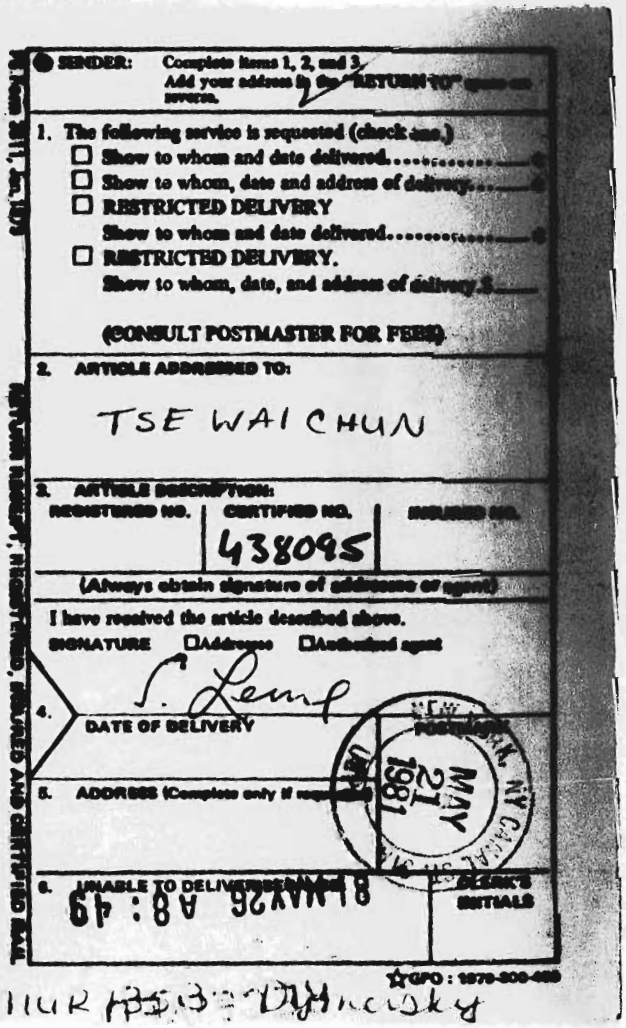
Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 0 3 9 3 1 3 3

8304039318 3



SENDER: Complete items 1, 2, and 3.
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- ☐ 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:

TSE WAI CHUN

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438095	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

T. Lemp

4. DATE OF DELIVERY

POSTMARK MAY 21 1981 NEW CASTLE, N.H.

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

81 MAY 26 A8:49

CLERK'S INITIALS

☆GPO : 1979-300-429

PS Form 3811, Jan. 1979 DOMESTIC RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR [illegible] Dymecky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Tse Wai Chun

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 1 3 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bob Leu
5 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Bob Leu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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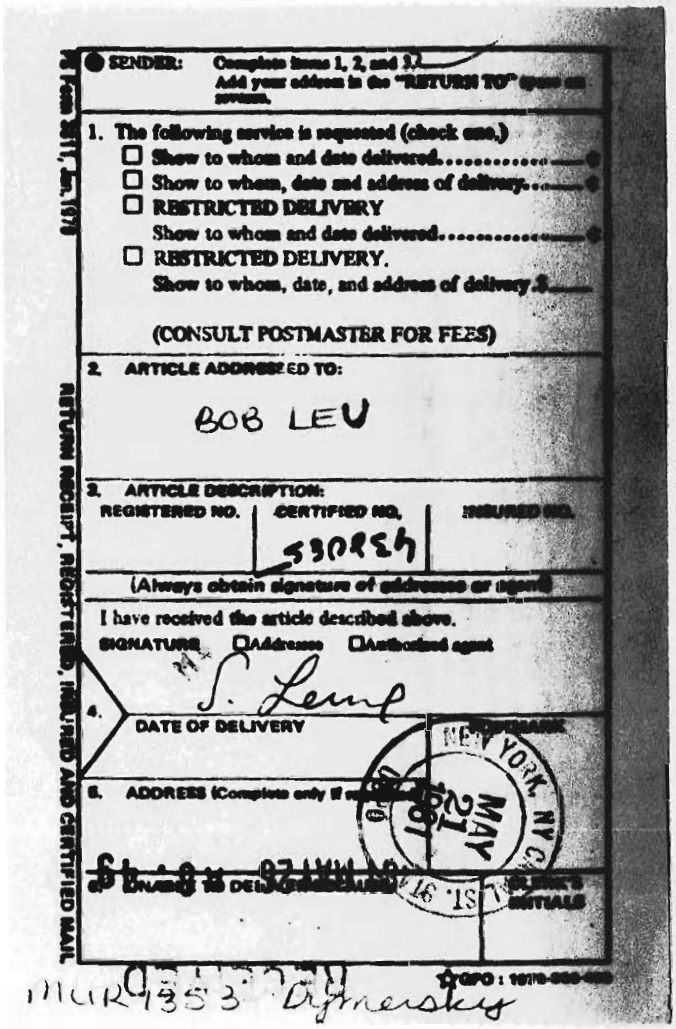

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

PS Form 3811, Jan. 1979

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
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- ☐ 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:

BOB LEU

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	590858	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

S. Leu

4. DATE OF DELIVERY

NEW YORK, NY MAY 21 10 PM '81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

GPO : 1979-

MCR 1353 Agnewsky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Bob Leu

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 5 9 5 1 3 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shui K. Lee
394 Chestnut
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039313 3

3304039319 39

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:

SHUI K. LEE

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438093	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY: MAY 22 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK: MAY 22 1981

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-

MUR 1353 - Dymerski

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Shui K. Lee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304029376

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Do Young Paik
1330-32nd Avenue
Flushing, New York 11363

Re: MUR 1353

Dear Do Young Paik:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 3 9 3 1 9 1

3 3 0 4 0 3 7 3 1 9 2

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:

DO YOUNG PARK

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438099	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

Park

4. DATE OF DELIVERY

MAY 26 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆GPO : 1976-260-847

PS Form 3811, Nov. 1979 DOMESTIC RETURN RECEIPT, INSURED AND CERTIFIED MAIL

MUR 1353 - Dymerskij

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Do Young Paik

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 2 9 5 1 9 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David D.H. Kim
38 W. 32nd Street
New York, New York 10001

Re: MUR 1353

Dear David D.H. Kim:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

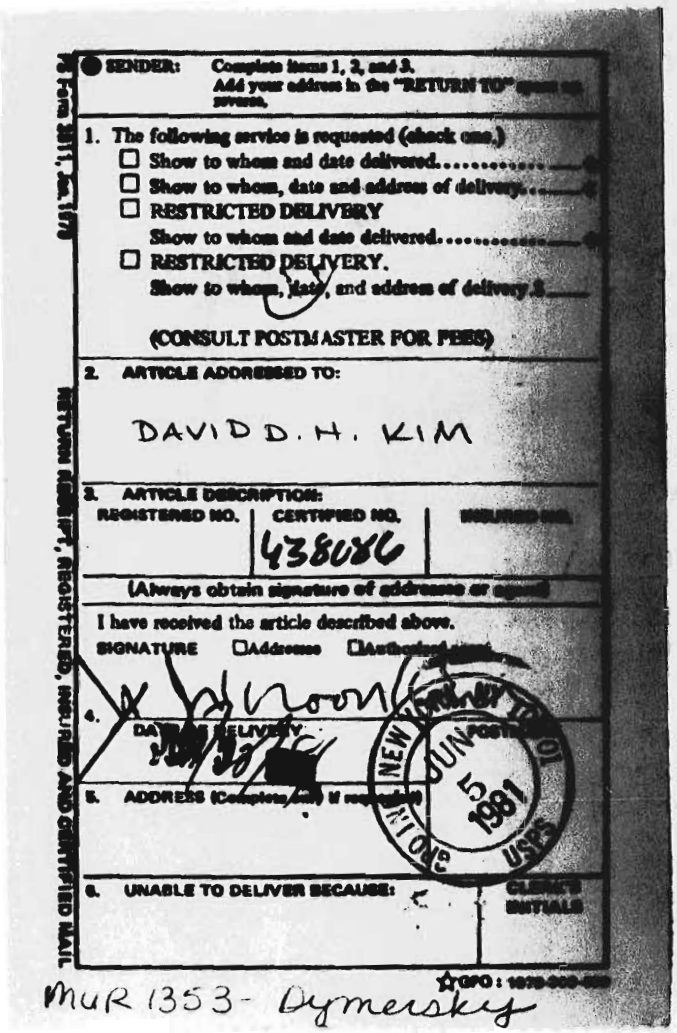
Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039319

3304059319725



PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:

DAVID D. H. KIM

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438086	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

X [signature]

4. DATE OF DELIVERY [illegible]

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

NEW YORK NY JUN 5 1981 U.S.P.S.

☆GPO : 1979-000-000

MUR 1353 - Dymerskys

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT David D.H. Kim

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 1 2 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Young Kim
38 W. 32nd Street
New York, New York 10001

Re: MUR 1353

Dear Young Kim:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3040393177

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Young Kim

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039138

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chun Sing Au
52 Bowery
New York, New York 10013

Re: MUR 1353

Dear Chun Sing Au:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039196

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chun Sing Au

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 2 0 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Koon Kau Hg
45 Newkirk Street
Jersey City, New Jersey 07306

Re: MUR 1353

Dear Koon Kau Hg:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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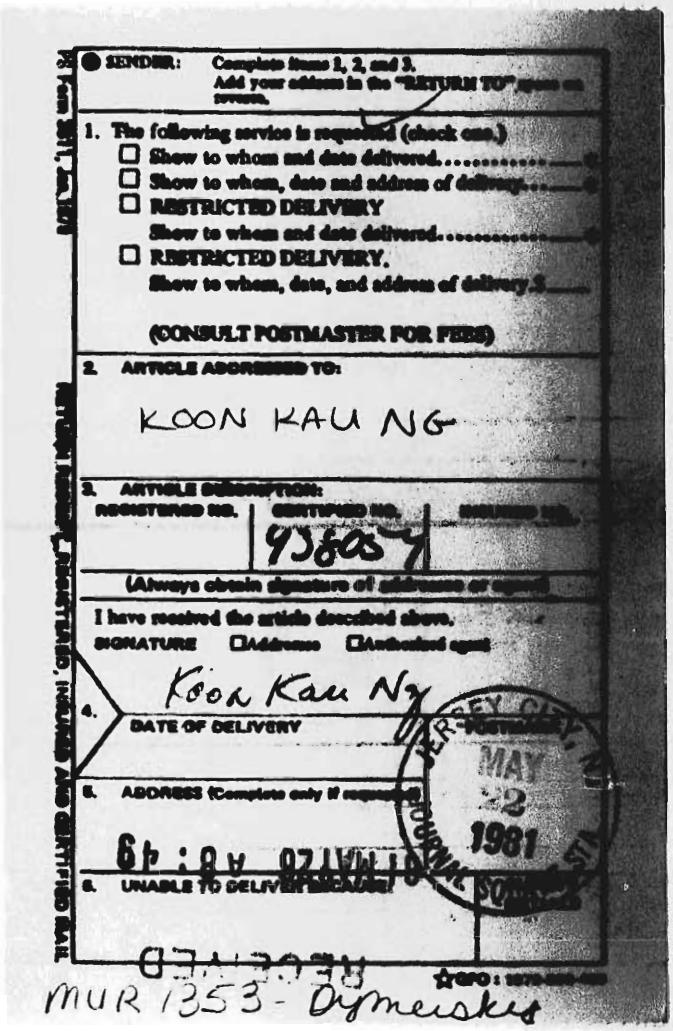
Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039301

3304039320 2



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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:
KOON KAU NG

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 935057 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Koon Kau Ng

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

JERSEY CITY, N.J. MAY 22 1981

MUR 1353 - Dymeiskes

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Koon Kau Hg

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8040393

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lui Hor Kuen
66 Bayard Street
New York, New York 10013

Re: MUR 1353

Dear Lui Hor Kuen:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039320

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lui Hor Kuen

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304093203

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Foo Louie
127 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Chung Foo Louie:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 0 7 3 2 0 6

8304039320 7

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:

CHUNG-FOO LOUIE

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	043085	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MAY 23 1981

☆GPO : 1979-289-848

STATEMENT OF SERVICE, RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1353 - Dymecsky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chung Foo Louie

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Jor Louie
30 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Chan Jor Louie:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039321 5

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- ☐ 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:

CHAN JOR LOUIE

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	890852	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

STAMP

MAY 20 1996 WASHINGTON DC

PS Form 3811, JUL. 1988 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1953 - Dymansky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chan Jor Louie

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 3 9 3 2 1 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lo Ting
3403 14th Avenue
New York, New York 10009

Re: MUR 1353

Dear Lo Ting:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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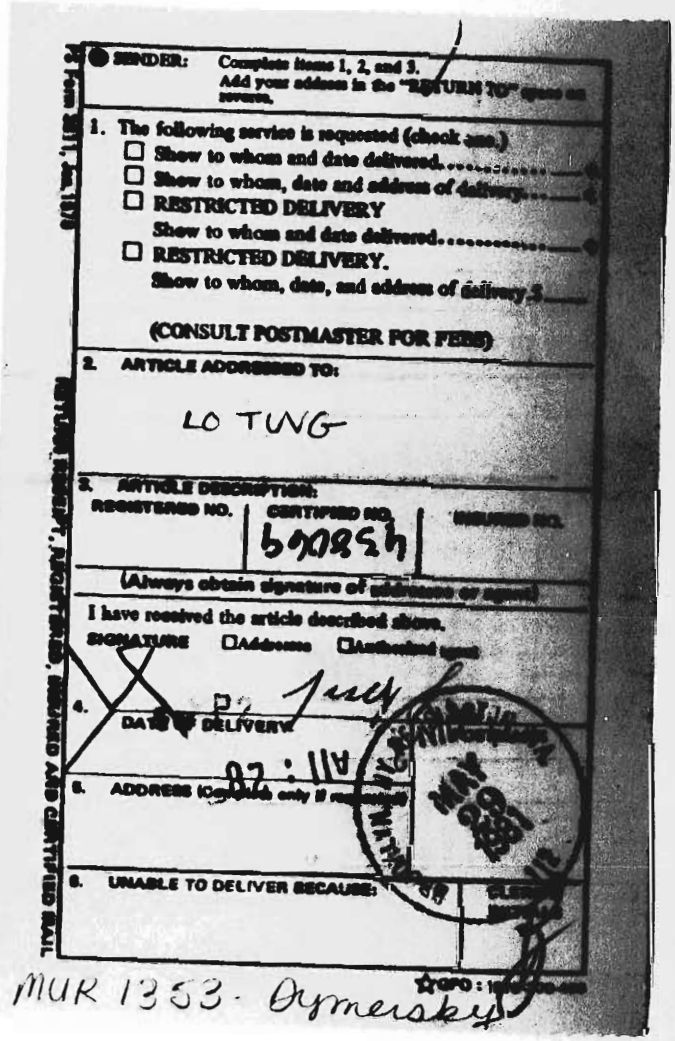

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

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:

LO TUNG

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 590852 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY 1 SEP

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MUR 1353 - Dymerskys

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Lo Ting

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 5 9 3 2 1 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wing Kwong Leung
127 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Wing Kwong Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

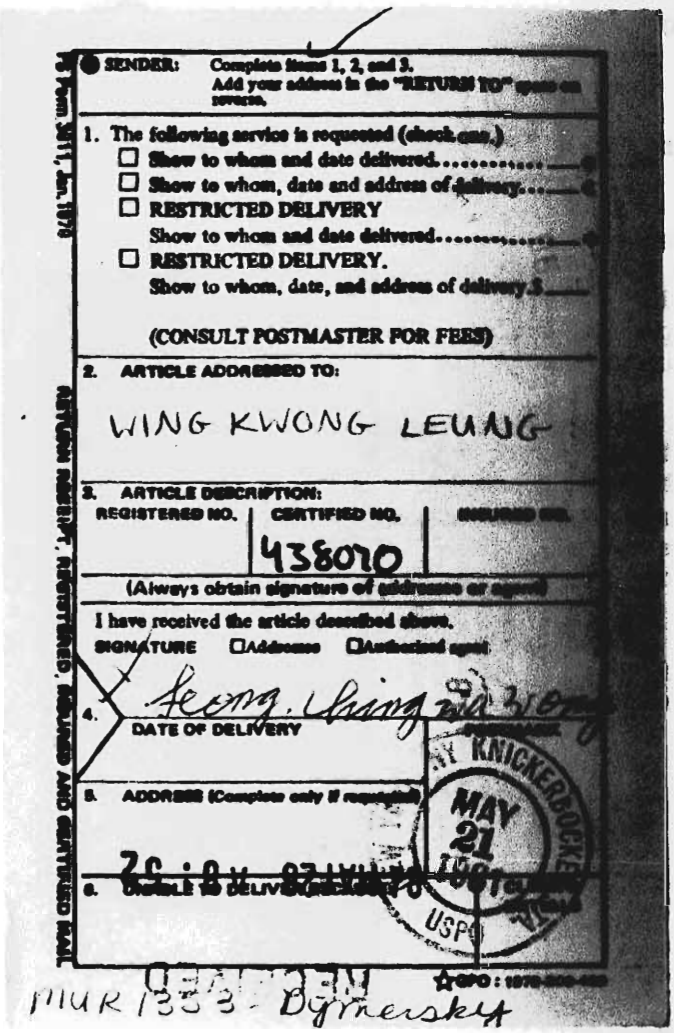
Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039321

B30403932164



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- ☐ 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:

WING KWONG LEUNG

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438070	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

Leung. Wing

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MAY 21 1987

PS Form 3811, Jan. 1979

GPO: 1979-

MUR 1353 - Byrnes ltr

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Wing Kwong Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304059321 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chi Ping Leung
92 Madison Street
New York, New York 10002

Re: MUR 1353

Dear Chi Ping Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039321 8

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chi Ping Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernakella Hu
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Bernakella Hu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039220

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Bernakella Hu

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joyce Hu
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Joyce Hu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3 3 0 4 0 3 9 2 2 2

8304039521 3

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 L7
  Show to whom and date delivered.....¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

JOYCE HU

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438051	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

Hu

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

PS Form 3811, July 1983 — REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-847

MUR 1353 - Dymovsky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Joyce Hu

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304049321

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sin Joung Ha
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Sin Joung Ha:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

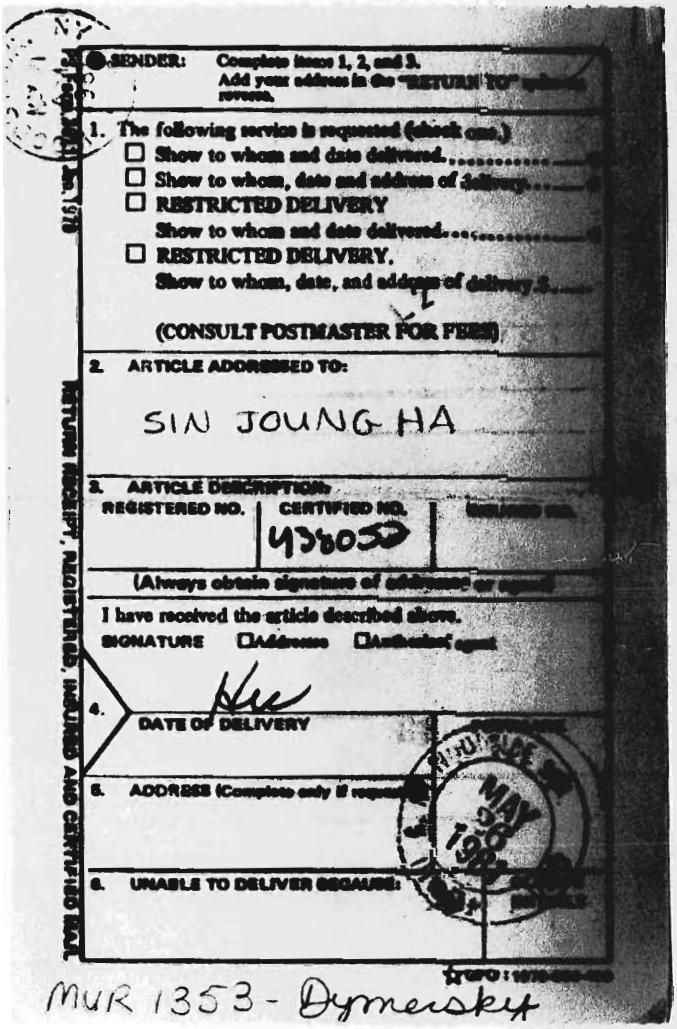
For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3304039321216



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:

SIN JOUNG HA

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 43803 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MAY 1980

MUR 1353 - Dymerskyt

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Sin Joung Ha

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304093217

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mieh Ho
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Mieh Ho:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039328

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Mieh Ho

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039329

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ming Wha Woo
20 Confucius Plaza
New York, New York 10002

Re: MUR 1353

Dear Ming Wha Woo:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039250

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Ming Wha Woo

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039231

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terrin Hwang
3345 90th Street
Jackson Heights, New York

Re: MUR 1353

Dear Terrin Hwang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

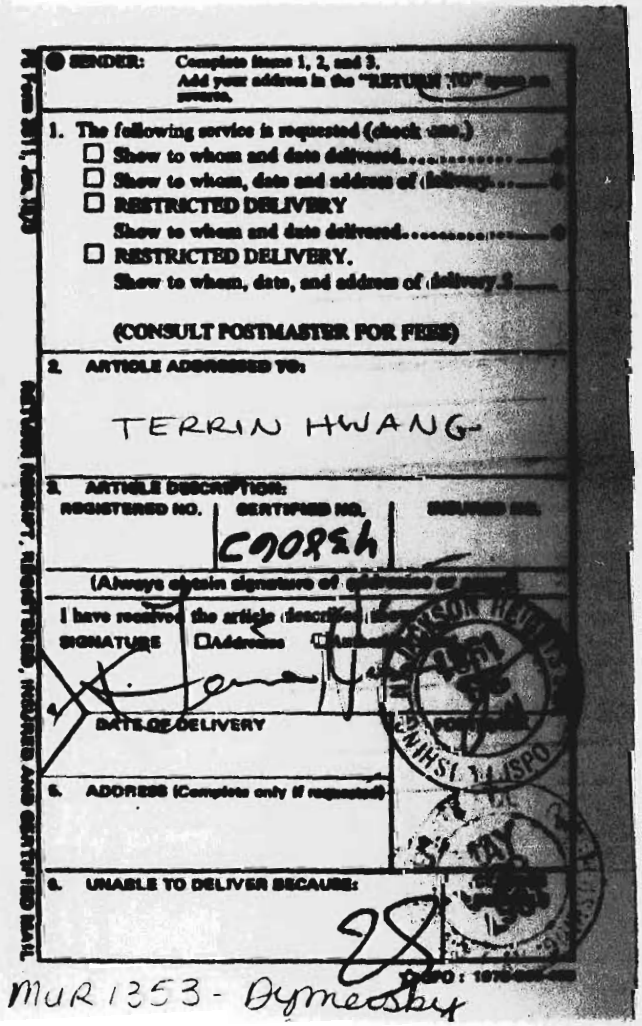
For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039325



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:

TERRIN HWANG-

3. ARTICLE DESCRIPTION:

REGISTERED NO. | CERTIFIED NO. | INSURED NO.

C90858

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐Addressee ☐Agent

DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

28

MUR 1353 - Dymeosby

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Terrin Hwang

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 3 0 4 0 3 9 3 2 1 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ja Fak Wei
2081 2nd Avenue
New York, New York 10029

Re: MUR 1353

Dear Ja Fak Wei:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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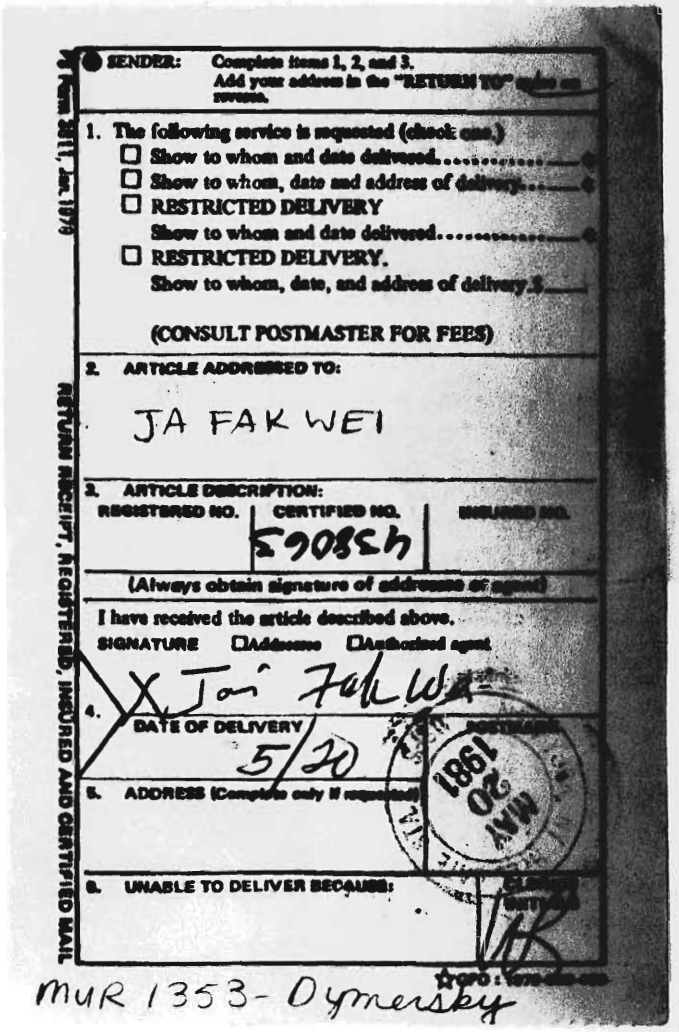
8304039324



SENDER: Complete items 1, 2, and 3.
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- ☐ 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:

JA FAK WEI

3. ARTICLE DESCRIPTION:

REGISTERED NO. | CERTIFIED NO. 590852 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

X Jai Fak Wei

4. DATE OF DELIVERY 5/20

POSTMARK MAY 20 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO: 1979-311-865

MUR 1353- Oymensky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Ja Fak Wei

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8504039237

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tao T. Wei
2081 2nd Avenue
New York, New York 10029

Re: MUR 1353

Dear Tao T. Wei:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

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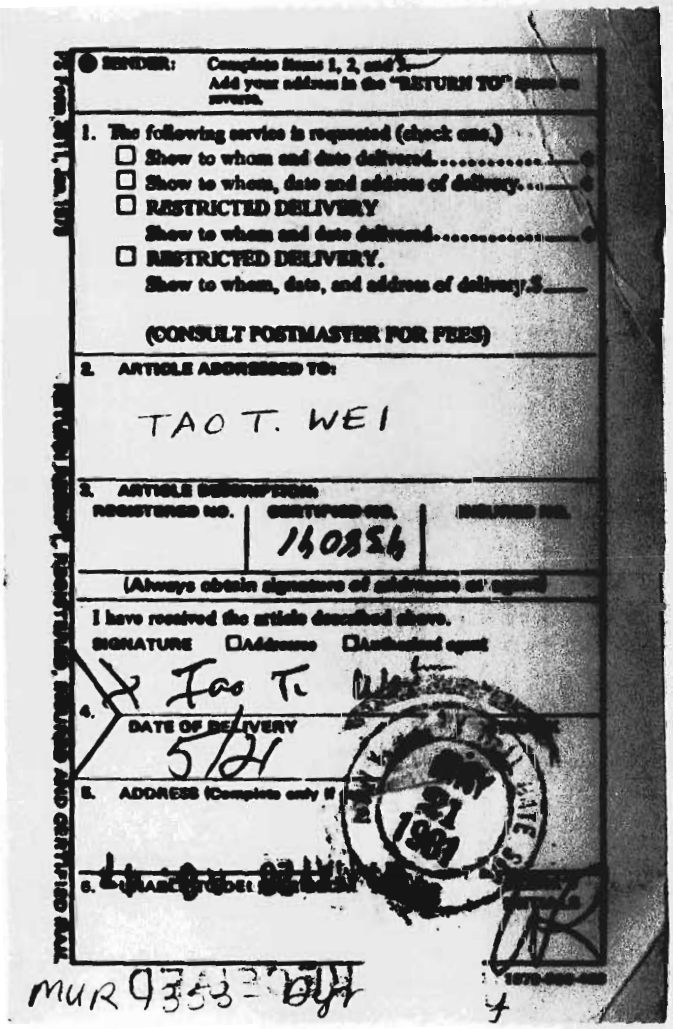

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- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

TAO T. WEI

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
1408546

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. Tao Ti Wei

DATE OF DELIVERY
5/24

5. ADDRESS (Complete only if

6. MARK

MUR 9353

PS Form 3811, December 1994 DOMESTIC RETURN RECEIPT

4

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Tao T. Wei

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 3 0 4 0 0 3 2 1 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Hop Ping
54 Rutgers Street
New York, New York 10002

Re: MUR 1353

Dear Chung Hop Ping:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039241

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chung Hop Ping

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3 5 0 4 0 3 9 3 2 4 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Suey Jin Chih Leung
7 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304032413

P 630403932 14

PS Form 3811, Dec. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:

SUEY JIN CHIH LEUNG

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438043	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESSEE'S ADDRESS (ONLY IF REQUESTED)

6. UNABLE TO DELIVER BECAUSE:

U.S.P.O. MAY 20 1981 N.Y.

GPO:

MUR 1353 - Dymally

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Suey Jin Chih Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

0 5 0 4 0 6 3 2 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yin Young Leung
7 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Yin Young Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039321 7

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
YIN YOUNG LEUNG

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 438044 | INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Mrs Leung

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

FIRST ST. STA. 1981

GPO : 1979-

NR 1353 - Dymecky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yin Young Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8 5 0 4 0 3 9 3 2 4 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wah Chan
101 Park Street, #3
New York, New York 10013

Re: MUR 1353

Dear Wah Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

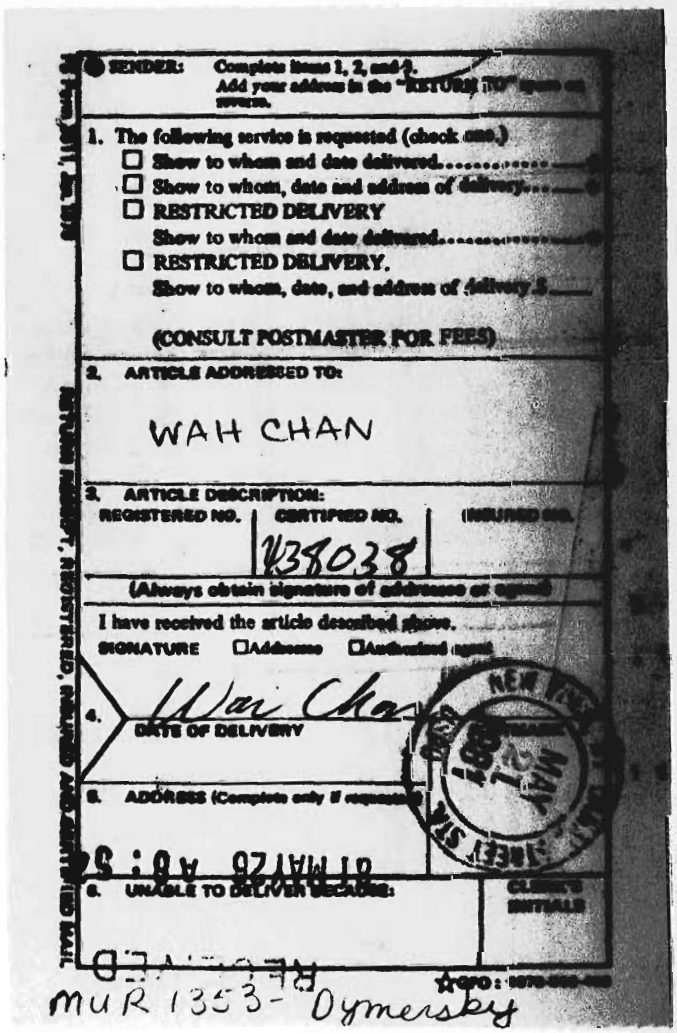
For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039320



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.)
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- ☐ 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:

WAH CHAN

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P38038	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Wai Cha
DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

01 MAY 28 A8:3

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RECEIVED

GPO: 1979-288-848

MUR 1353- Oymersky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Wah Chan

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304032021

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yeun May Leung
145 E. 27th Street
New York, New York 10016

Re: MUR 1353

Dear Yeun May Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039323

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yeun May Leung

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304093233

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Lau
80 Beekman Street
New York, New York 10038

Re: MUR 1353

Dear George Lau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039325 4

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT George Lau

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039325

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yew Leung Wong
40-33 Warren Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Yew Leung Wong:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

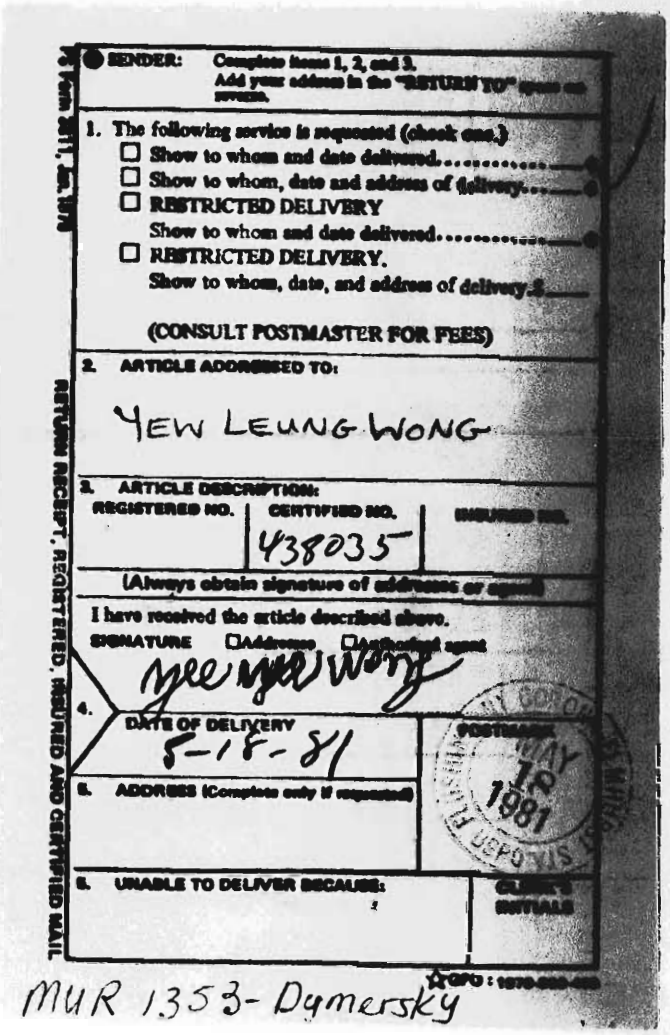
John Warren McGarry

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

3040393236

3304039325?



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:
YEW LEUNG WONG

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 438035 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Yew Leung Wong

4. DATE OF DELIVERY 5-18-81

POSTMARK MAY 18 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 1353- Dymersky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Yew Leung Wong

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Soo Ling Wong
40-33 Warren Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Soo Ling Wong:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8 3 0 4 0 3 9 3 2 3 5

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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:

SOO LING WONG

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	Y38 034	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent

4. DATE OF DELIVERY 5-18-81

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

MAY 18 19

PS Form 3811, Dec. 1979 ... RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO: 1979 O-303-865

MUR 1353 - Dymersky

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Soo Ling Wong

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039321

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwok Hung Chan
66 Bayard Street
New York, New York 10013

Re: MUR 1353

Dear Kwok Hung Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039325 2

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Kwok Hung Chan

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039326

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Sing Au
856 Carrol Street
Brooklyn, New York 11215

Re: MUR 1353

Dear Chung Sing Au:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039326

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chung Sing Au

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304039265

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chiu Tak Foon
32 Monroe Street
New York, New York 10002

Re: MUR 1353

Dear Chiu Tak Foon:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039325 6

DYMERSKY MUR # 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Chiu Tak Foon
32 Monroe Street
New York, New York 10002

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	439031	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

X Tak Foon Chiu

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆GPO: 1977—O—248-865

8304039326?

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Chiu Tak Foon

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cheung Yeun Ting
75 Baxter Street
New York, New York 10013

Re: MUR 1353

Dear Cheung Yeun Ting:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

8304039269

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Cheung Yeun Ting

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

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The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

8304093270

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cheng Wai Ming
57 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Cheng Wai Ming:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

John Warren McGarry
Chairman

Enclosures
Summary of Possible Violations
Procedures

DYMERSKY MUR 1353

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
Cheng Wai Ming
57 E Broadway
New York, New York 10006

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438015	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆GPO 197[illegible]-D-[illegible]

81 MAY 26 A8:41

RECEIVED

83040393273

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE May 14, 1981

MUR NO. 1353

STAFF MEMBER(S) & TEL. NO.

Michael Dymersky

(202) 523-4039

RESPONDENT Cheng Wai Ming

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

Respondent appears to have violated 2 U.S.C. § 441f by allowing respondent's name to be used to effect a contribution to the Carter/ Mondale Presidential Committee ("the Committee").

FACTUAL AND LEGAL ANALYSIS

The Committee's Matching Fund Submission #17 disclosed that respondent made a contribution to the Committee by a signed money order purchased from the Manhattan Savings Bank, New York, New York.

Respondent's money order was accompanied by a large number of other money orders in Submission #17 all payable to the Committee, and purchased from the Manhattan Savings Bank. These money orders were purchased variously on February 28, and February 29, 1980, and were numbered in three series of exact or near sequence. The handwriting on the payee line of each of the money orders was identical, and the remitter's signature appeared to be written by one of three different people in each instance.

Section 441f of the Act prohibits, among other things, any person from making a contribution in the name of another person or knowingly permitting his or her name to be used by another in making a contribution. Thus, for example, accepting money from another person to pay for a money order so that the accepting person appears to make the contribution is prohibited. Similarly, knowingly allowing one's name to be written on a money order paid for by someone else and thereby making it appear that the person named on the money order made a contribution (when in fact this person did not), is prohibited as well.

The evidence strongly suggests that respondent knowingly permitted respondent's name to be used by another person to make a contribution to the Committee.

Recommendation

Find reason to believe that respondent violated 2 U.S.C. § 441f.

3304093275

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. S. Lee Kling
Treasurer
Carter/Mondale Presidential
Committee, Inc.
2000 L Street, Northwest
Washington, D. C. 20036

Re: MUR 1353

Dear Mr. Kling:

On , 1981, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting contributions made in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten (10) days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

5/13

8304039327 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwok Tung Tam
71-11 31st Street
Jackson Heights, New York

Re: MUR 1353

Dear Kwok Tung Tam:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

YP 5/13

3304033276

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shui Sum Leung
117 Mulberry Street, #2
New York, New York 10013

Re: MUR 1353

Dear Shui Sum Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MUD 5/13

8304039277

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yet Sue Gee (Tom)
71-11 31st Street
Jackson Heights, New York

Re: MUR 1353

Dear Yet Sue Gee (Tom):

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MP 5/13

8304039327 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tse Wai Chun
5 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Tse Wai Chun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

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8304039327 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bob Leu
5 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Bob Leu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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5/13

3304039320

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Shui K. Lee
394 Chestnut
Kearny, New Jersey 07032

Re: MUR 1353

Dear Shui K. Lee:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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5/13

8304039321

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Do Young Paik
1330-32nd Avenue
Flushing, New York 11363

Re: MUR 1353

Dear Do Young Paik:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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8304039323

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David D.H. Kim
38 W. 32nd Street
New York, New York 10001

Re: MUR 1353

Dear David D.H. Kim:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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8304039323

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Young Kim
38 W. 32nd Street
New York, New York 10001

Re: MUR 1353

Dear Young Kim:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MP 5/13

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chun Sing Au
52 Bowery
New York, New York 10013

Re: MUR 1353

Dear Chun Sing Au:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MO 5/13

8304059328 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Koon Kau Hg
45 Newkirk Street
Jersey City, New Jersey 07306

Re: MUR 1353

Dear Koon Kau Hg:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

5/13

3040393284

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lui Hor Kuen
66 Bayard Street
New York, New York 10013

Re: MUR 1353

Dear Lui Hor Kuen:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

5/13

8304093937

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Foo Louie
127 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Chung Foo Louie:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

VLD 5/13

3040393283

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Jor Louie
30 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Chan Jor Louie:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MUR 5/13

3304039236

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lo Ting
3403 14th Avenue
New York, New York 10009

Re: MUR 1353

Dear Lo Ting:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Enclosures
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wing Kwong Leung
127 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Wing Kwong Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 5/13

8304039291

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chi Ping Leung
92 Madison Street
New York, New York 10002

Re: MUR 1353

Dear Chi Ping Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MSP 5/13

8304039292

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernakella Hu
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Bernakella Hu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joyce Hu
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Joyce Hu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MD 5/13

8304039294

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sin Joung Ha
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Sin Joung Ha:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Enclosures
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MP 5/13

8304039295

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mieh Ho
34-44 59th Street
Woodstock, New York

Re: MUR 1353

Dear Mieh Ho:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

5/13

8304039296

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ming Wha Woo
20 Confucius Plaza
New York, New York 10002

Re: MUR 1353

Dear Ming Wha Woo:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

MMP 5/13

8304039297

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terrin Hwang
3345 90th Street
Jackson Heights, New York

Re: MUR 1353

Dear Terrin Hwang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

WD 5/13

8304039298

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ja Fak Wei
2081 2nd Avenue
New York, New York 10029

Re: MUR 1353

Dear Ja Fak Wei:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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7/13

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tao T. Wei
2081 2nd Avenue
New York, New York 10029

Re: MUR 1353

Dear Tao T. Wei:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

MAD 5/13

8304039330C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Hop Ping
54 Rutgers Street
New York, New York 10002

Re: MUR 1353

Dear Chung Hop Ping:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

DMD 5/13

3040393301

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Suey Jin Chih Leung
7 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Suey Jin Chih Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 9/13

3304039330

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yin Young Leung
7 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Yin Young Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 5/13

3304059330

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wah Chan
101 Park Street, #3
New York, New York 10013

Re: MUR 1353

Dear Wah Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

5/13

3304093304

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yeun May Leung
145 E. 27th Street
New York, New York 10016

Re: MUR 1353

Dear Yeun May Leung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

8304039305

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Lau
80 Beekman Street
New York, New York 10038

Re: MUR 1353

Dear George Lau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

5/13

8304039306

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yew Leung Wong
40-33 Warren Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Yew Leung Wong:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MAP 9/13

3304039307

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Soo Ling Wong
40-33 Warren Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Soo Ling Wong:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Enclosures
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MD 5/13

8304039306

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwok Hung Chan
66 Bayard Street
New York, New York 10013

Re: MUR 1353

Dear Kwok Hung Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MP 5/13

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chung Sing Au
856 Carrol Street
Brooklyn, New York 11215

Re: MUR 1353

Dear Chung Sing Au:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

AMP 9/13

8304039316

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chiu Tak Foon
32 Monroe Street
New York, New York 10002

Re: MUR 1353

Dear Chiu Tak Foon:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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9/13

8304039311

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cheung Yeun Ting
75 Baxter Street
New York, New York 10013

Re: MUR 1353

Dear Cheung Yeun Ting:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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9/13

8304039312

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cheng Wai Ming
57 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Cheng Wai Ming:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
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MD 5/13

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hing Lit Chau
92 E. Broadway
New York, New York 10006

Re: MUR 1353

Dear Hing Lit Chau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

8/13

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chak Yum Chau
41-15A 75th Street
Elmhurst, New York 11373

Re: MUR 1353

Dear Chak Yum Chau:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MUR 5/13

3040393115

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Wai Kuen
66 Mulberry Street
New York, New York 10013

Re: MUR 1353

Dear Chan Wai Kuen:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

5/13

3040393316

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chan Sui Wing
1259 57th Street
Brooklyn, New York 11219

Re: MUR 1353

Dear Chan Sui Wing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MDS/13

8304039317

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lam The Hoa
34 Hillside Avenue
New York, New York 10040

Re: MUR 1353

Dear Lam The Hoa:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

6/13

8304039316

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lam Chit Cheung
633 E. 16th Street
Brooklyn, New York 11218

Re: MUR 1353

Dear Lam Chit Cheung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

MD 5/13

8304039315

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill S. Hui
749 57th Street
Brooklyn, New York 11220

Re: MUR 1353

Dear Bill S. Hui:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

8304039320

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fung Sik Yec
245 Elizabeth Street
New York, New York 10013

Re: MUR 1353

Dear Fung Sik Yec:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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07/13

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Johnson Chu
32 Monroe Street
New York, New York 10002

Re: MUR 1353

Dear Johnson Chu:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

8/13

3040393322

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lee Yim Sun
32 Henry Street
New York, New York 10002

Re: MUR 1353

Dear Lee Yim Sun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

10/13

8304039325

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lee Cheung Kwir
375 Broome Street
New York, New York 10013

Re: MUR 1353

Dear Lee Cheung Kwir:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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8/13

3304039324

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank Wang
96-10 41st Avenue
Corona, New York

Re: MUR 1353

Dear Frank Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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5/13

8304039325

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lau Po Hing
9-11 Delancey Street
New York, New York 10002

Re: MUR 1353

Dear Lau Po Hing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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Procedures

MD 5/13

8304039326

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Law Yem Chou
19 Division Street
New York, New York 10002

Re: MUR 1353

Dear Law Yem Chou:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Enclosures
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MD 8/13

8304039327

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lucia Wang
96-10 41st Avenue
Corona, New York

Re: MUR 1353

Dear Lucia Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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5/13

8304039326

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

T.T. Wang
300 E. 75th Street
New York, New York 10021

Re: MUR 1353

Dear T.T. Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MD 8/13

8304039326

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. T.T. Wang
300 E. 75th Street
New York, New York 10021

Re: MUR 1353

Dear Mrs. T.T. Wang:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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ODO 5/13

8304039333

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sim Fuey Chow
830 Avenue H
Brooklyn, New York 11233

Re: MUR 1353

Dear Sim Fuey Chow:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MD 5/13

8304039331

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwei Tik Yum-Sum
48-11 91st Street
Elmhurst, New York 11372

Re: MUR 1353

Dear Kwei Tik Yum-Sum:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MD 5/13

8304039333

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Irene Sun
48-11 91st Street
Elmhurst, New York 11372

Re: MUR 1353

Dear Irene Sun:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
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MD 5/13

3304039333

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yang Kuo-Shio
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear Yang Kuo-Shio:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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 legal counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of your lawyer, and a statement authorizing your lawyer to receive any notifications and other communications from the Commission.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 5/13

3304039334

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Yeung Shun-Fook
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear Yeung Shun-Fook:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 5/13

8304039335

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K. G. Yeung
94-36 Alstyne Avenue
Elmhurst, New York 11373

Re: MUR 1353

Dear K. G. Yeung:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

3040393336

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Choi Luen Cheing
64 Rutger Street
New York, New York 10002

Re: MUR 1353

Dear Choi Luen Cheing:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

MD 07/13

8304039337

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ngan Chan
64 Rutger Street
New York, New York 10002

Re: MUR 1353

Dear Ngan Chan:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

5/13

8304039336

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kwan Ho
117 Mott Street
New York, New York 10013

Re: MUR 1353

Dear Kwan Ho:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

Enclosures
Summary of Possible Violations
Procedures

8304039335

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ruby Chi
410 E. 6th Street
New York, New York 10009

Re: MUR 1353

Dear Ruby Chi:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

8304093340

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

So Hung Shum
117 Mott Street
New York, New York 10013

Re: MUR 1353

Dear So Hung Shum:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures
Summary of Possible Violations
Procedures

9/13

8304039341

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hong Chi
410 E. 6th Street
New York, New York 10009

Re: MUR 1353

Dear Hong Chi:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities, has found reason to believe that you have violated § 441f of Title 2, United States Code, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") (2 U.S.C. § 431 et seq.). A summary of the possible violation is enclosed.

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Sincerely,

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8304039341

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1353
Carter/Mondale Presidential Committee, Inc.	)	
	)	

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on May 5, 1981, do hereby certify that the Commission took the following actions in MUR 1353:

1. Decided in a vote of 5-1 to FIND REASON TO BELIEVE that the Carter/Mondale Presidential Committee, Inc., violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

   Commissioners Aikens, Harris, McGarry, Reiche, and Thomson voted affirmatively for this action. Commissioner Tiernan dissented.

2. Decided in a vote of 6-0 to FIND REASON TO BELIEVE that the 73 contributors listed in attachments to the First General Counsel's Report dated April 29, 1981, violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(ii) by knowingly permitting their names to be used to effect contributions in the name of another person.

   Commissioners Aikens, Harris, McGarry, Reiche, Thomson, and Tiernan voted affirmatively for this action.

Attest:

5-6-81
Date

Lena L. Stafford
Recording Secretary

2 3 0 4 0 3 9 3 3 4 3

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4-29-81

MUR # 1353
STAFF MEMBER(S)
Michael Dymersky

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Carter/Mondale Presidential Committee, Inc.

RELEVANT STATUTE: 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b)(1)(iii)

INTERNAL REPORTS CHECKED: Matching Fund Submissions

FEDERAL AGENCIES CHECKED:

8 APR 29 P4:09

8304039334

SUMMARY OF ALLEGATIONS

This matter was generated as the result of information compiled by the Audit Division during its review of Matching Fund Submissions received from the Carter/Mondale Presidential Committee, Inc. ("the Committee"). In its referral, the Audit Division raised questions concerning the validity/matchability of seventy-three money orders contained in matching fund submissions #17 and #13. (See attached memoranda to Charles N. Steele, dated August 12, 1980, and December 1, 1980, with accompanying attachments).

FACTUAL AND LEGAL ANALYSIS

All of the money orders involved in the referral were issued by the Manhattan Savings Bank. Seven (7) of these money orders were dated February 28, 1980, and the rest February 29, 1980; those with the earlier date were in the amounts of $100, $400 and $500, while all of those dated February 29, 1980, were in the amount of $100. The money orders were numbered in three series of exact or near sequence as follows: 106522-106524, 106526-106527, 106530-106533, 106535-106537, 106540, 106543, 592615, 592617, 592619, 592622-592634, 592639-592650, 592652-592654, 592657-592664, 592666-592670, 592673-592676, 592678-592680, 592682, 591754-591755, 591757, 591764-591765.

Twenty-five of the persons whose names appeared as remitters are waiters or cooks at the Silver Palace Restaurant in New York City where the Committee apparently held a fund-raiser on February 21, 1980. Five of the alleged remitters are employed

elsewhere while no occupation or principal place of business was provided for the remaining 35 individuals involved. (The names of five (5) persons appear on more than one money order.) All of the money orders were matched with public funds up to the $250 limit per person.

It is recognized by this Office that handwriting similarities and differences can be determined authoritatively only by experts within the field of handwriting analysis. However, it appears that the handwriting used in inserting the payee's name on each of the money orders is that of the same person. This handwriting appears to differ from that of all signatures on the remitter's signature lines. It also seems that the handwriting on the remitter's signature lines falls into two or three groupings of striking similarities, making it appear likely that one, two or three persons wrote in all of the names of the contributors. (See attached copies of money orders numbered 106522, 106530, 592627, 592628, 592630, 592623, 592624, 592625 and 592626 as examples.) In the four instances in which the Committee obtained confirmation from the contributors, the signatures on the confirmations are strikingly different from those on the relevant remitter's signature lines. 1/ (See attached copies of money orders numbered 591755, 591764, 592636 and 592635 and accompanying confirmations.) On two of the money orders, the name on the remitter line appears to be the same but the handwriting differs. (See attached copies of money orders numbered 592643 and 592644.)

2 U.S.C. §441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contriubtion, and no person shall knowingly accept a contribution made by one person in the name of another person. (Emphasis added).

In the present situation, the apparent similarities in the handwriting on the money orders' remitters' signature lines, the consecutive numbering of the instruments, (most of which are in the same amount), the common place of employment of almost 1/3 of the alleged contributors, and the apparent differences between certain money order signatures and corresponding verification signatures raise serious questions as to the source of the contributions.

1/ Despite the fact that the signature on the remitter's signature line may not be that of the remitter, the money order is still negotiable. Therefore, a money order so signed would be a valid instrument for purposes other than matching, no matter who supplied the signature.

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From this evidence, the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

As to the ostensible contributors involved, the General Counsel recommends that the Commission defer taking action until a response from the Committee is received

RECOMMENDATION

1) Find reason to believe that the Carter/Mondale Presidential Committee, Inc., violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

2) Send the attached notification letter and General Counsel's Legal and Factual Analysis.

Attachments

1) Analysis of Submission 17 for Carter/Mondale Presidential Committee, Inc. dated August 12, 1980. (14 pages)

2) Money orders (19 pages)

3) Notification Letter and General Counsel's Legal and Factual Analysis (5 pages)

8304039346

Attachment 1

A-81-4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

B.L.

THROUGH: WILLIAM P. LOUGHREY
ACTING STAFF DIRECTOR

FROM: BOB COSTA RC FOR RJC 8/12/80

SUBJECT: ANALYSIS OF SUBMISSION 17 FOR CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.

8304039317

During the review of Submission 17 of the Carter/Mondale Presidential Committee, Inc., a similarity between six (6) money orders included in the sample was noted. The six (6) money orders were drawn on the Manhattan Savings Bank on February 29, 1980 in the amount of one hundred dollars each. 1/ The serial numbers in the six (6) money orders were from two (2) numerical series (106522, 106531, 106543 & 592622, 592624, 592643), and four (4) of the money orders listed the contributors' place of employment as the Silver Palace Restaurant in New York City.

Further review of copies of written instruments submitted from New York and New Jersey revealed 64 additional Manhattan Savings Bank money orders which were generally sequentially ordered and apparently from individuals of oriental descent (see Attachment I). Sixty (60) of these money orders were for the amount of one hundred dollars ($100.00) and dated February 29, 1980. 1/

For twenty five (25) of the one hundred dollar money orders (including the 6 sample items) the contributors' occupation and principal place of business on the attached contributor card was shown as a waiter or cook employed by the Silver Palace Restaurant. In addition, three (3) money orders were attributed to a businessman working for the Young Jin Trading Company. No occupation or principal place of business was given for the remaining $100 money orders.

1/ Both the amount and date on the money orders are machine encoded which indicates that the money orders were all purchased on the same date.

A review of prior submissions for money orders from these sequential series identified an additional three (3) money orders dated February 28, 1980.* These money orders were from contributors of apparent "oriental descent", but differed in amount, and/or place of employment. (see Attachment II).

Further, a review of the Committee's disclosure reports around the time of the contributions indicated that a fundraising event took place at the Silver Palace Restaurant in New York City on approximately March 3, 1980.

One additional aspect relating to these money orders should be noted. In several instances the handwriting on the "Remitter's Signature" line of the money order differs from the handwriting on the line "(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)" located on the attached contribution verification form (see Attachment III and IV). Also, it appears that the same handwriting exists on all the money orders for the payee line "Carter/Mondale Presidential Committee." The money orders submitted for matching are available for your review and are located in the Audit Division's Matching Fund files.

This matter is being referred to your office for review with the Audit staff recommendation that the Office of General Counsel send positive confirmation letters to each of these contributors to gain assurance as to the validity/matchability of these contributions.

If you have any questions regarding the above information, please do not hesitate to contact Ray Lisi or Glen Buco on extension 3-4155.

Attachments as stated

* See footnote 1/

8304039346

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Chan Kwok Hung	Waiter/Silver Palace Restaurant	106522	02/29/80	$ 100.00
Au C. Sing	Waiter/Silver Palace Restaurant	106523	02/29/80	100.00
Chiu Tak Foon	Waiter/Silver Palace Restaurant	106524	02/29/80	100.00
Cheung Yuen Ting	Waiter/Silver Palace Restaurant	106526	02/29/80	100.00
Cheng Wai Ming	Waiter/Silver Palace Restaurant	106527	02/29/80	100.00
Chau Hing Lit	Waiter/Silver Palace Restaurant	106530	02/29/80	100.00
Chau Chak Yum	Waiter/Silver Palace Restaurant	106531	02/29/80	100.00
Chan Wai Kuen	Waiter/Silver Palace Restaurant	106532	02/29/80	100.00
Chan Sui Wing	Waiter/Silver Palace Restaurant	106533	02/29/80	100.00
Lam The Hoa	Waiter/Silver Palace Restaurant	106535	02/29/80	100.00
Lam Chit Cheung	Waiter/Silver Palace Restaurant	106536	02/29/80	100.00
Bill S. Hui	Waiter/Silver Palace Restaurant	106537	02/29/80	100.00
Fung Sik Yec	Waiter/Silver Palace Restaurant	106540	02/29/80	100.00
Johnson Chu	Waiter/Silver Palace Restaurant	106543	02/29/80	100.00
Lee Yim Sun	Waiter/Silver Palace Restaurant	592615	02/29/80	100.00
Lee Cheung Kwei	Waiter/Silver Palace Restaurant	592617	02/29/80	100.00
Lau Yem Chou	Waiter/Silver Palace Restaurant	592619	02/29/80	100.00
Lau P. Hing	Waiter/Silver Palace Restaurant	592622	02/29/80	100.00
Frank Wang	None Listed	592623	02/29/80	100.00
Lucia Wang	" "	592624	02/29/80	100.00
T. T. Wang	" "	592625	02/29/80	100.00
T. T. Wang	" "	592626	02/29/80	100.00
Sim F. Chow	" "	592627	02/29/80	100.00
Kwei T. Yu-Sum	" "	592628	02/29/80	100.00
Irene Sun	" "	592629	02/29/80	100.00
Yang Kuo-Shio	" "	592630	02/29/80	100.00

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Page 3 of 14

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Yeung Shun-Fook	None Listed	592631	02/29/80	$ 100.00
K. G. Yeung	" "	592632	02/29/80	100.00
Ngan Chan	" "	592633	02/29/80	100.00
Choi Cheing	" "	592634	02/29/80	100.00
Kwan Ho	" "	592639	02/29/80	100.00
Ruby Chi	" "	592640	02/29/80	100.00
So Hung Shum	" "	592641	02/29/80	100.00
Hong Chi	" "	592642	02/29/80	100.00
George Lau	" "	592643	02/29/80	100.00
George Lau	" "	592644	02/29/80	100.00
Yew Leung Wong	" "	592645	02/29/80	100.00
Soo Ling Wong	" "	592646	02/29/80	100.00
Wah Chan	" "	592647	02/29/80	100.00
Yuen May Leung	" "	592648	02/29/80	100.00
Yin Young Leung	" "	592649	02/29/80	100.00
Suey Jin Chih Leung	" "	592650	02/29/80	100.00
Chung Hop Ping	" "	592652	02/29/80	100.00
Tao T. Wei	" "	592653	02/29/80	100.00
Ja F. Wei	" "	592654	02/29/80	100.00
Terrin Hwang	" "	592657	02/29/80	100.00
Ming Wha Woo	" "	592658	02/29/80	100.00
Mieh Hu	" "	592659	02/29/80	100.00
Sin Joung Ha	" "	592660	02/29/80	100.00
Joyce Hu	" "	592661	02/29/80	100.00
Bernakella Hu	" "	592662	02/29/80	100.00
Leung C. Ping	Cook/Silver Palace Restaurant	592663	02/29/80	100.00
Leung W. Kwong	Cook/Silver Palace Restaurant	592664	02/29/80	100.00
Lo Ting	Cook/Silver Palace Restaurant	592666	02/29/80	100.00
Louie C. Jor	Cook/Silver Palace Restaurant	592667	02/29/80	100.00
Louie C. Foo	Cook/Silver Palace Restaurant	592668	02/29/80	100.00

3040393

Page 4 of 4

Attachment I

CART 17

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Lui H. Kuen	Cook/Silver Palace Restaurant	592669	02/29/80	$ 100.00
Na Koon Kau	Cook/Silver Palace Restaurant	592670	02/29/80	100.00
Chun S. Au	None Listed	592673	02/29/80	100.00
Young Kim	None Listed	592674	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592675	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592676	02/29/80	100.00
Do Young Paik	None Listed	592678	02/29/80	100.00
Do Young Paik	None Listed	592679	02/29/80	100.00
David D. H. Kim	Businessman/Young Jin Trading Co.	592680	02/29/80	100.00
Do Young Paik	None Listed	592682	02/29/80	100.00
Shui K. Lee	Owner liquor store/Sun Wai Liquor Store	591754	02/28/80	500.00
Shui K. Lee	Owner/liquor store/Sun Wai Liquor Store	591755	02/28/80	500.00
Leung Shui Sum	Businessman/None listed	591757	02/28/80	500.00
Bob Leu	Businesswoman/None Listed	591765	02/28/80	400.00
			Total	$8,500.00

Page 5 of 14

Attachment II

CART 13

MANHATTAN SAVINGS BANK MONEY ORDERS

Contributor Name	Occupation/PPB	Money Order #	Date	Amount
Tse W. Chun	Businessman/Dinlay Co.	591764	02/28/80	$400.00
Yet Suey Gee (Tom)	Factory worker/Easeley Sport Short Co.	592636	02/28/80	100.00
Kwok Tung Tam	Restaurant Mgr./Chinese Republic Restaurant	592635	02/28/80	100.00

30403933

Page 1 of 14

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS NO. 000210

VINGS BANK MONEY ORDER

DATE FEB2860 PAY $ $400.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

THE ER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Tse Yan Chun

REMITTER'S SIGNATURE

5 Mott St. NY N.Y. 10013

ADDRESS

BANKS TRUST COMPANY
NEW YORK, N. Y.

⑆026007943⑆ 0024 0710

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
PRINCIPLE ACCOUNT 20

DATE 2/28/80

03-7

25 400

Attachment III

P8/82

⑆021000153⑆ 42-350

Page 7 of 14

FOR: CONTRIBUTION TO SSF FEC ID# C00083006

NAME: CHUN, TSE YAN

5 Mott Street

NY NY NY 10013

CITY STATE ZIP

OCCUPATION: Saleswoman

EMPLOYER:

CITY STATE ZIP

AMOUNT: 400.00

TYP

M

3 0 4 0 3 9 3 3 3 6

Sub B

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592635

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwok Tung Tam

REMITTER'S SIGNATURE

71-11 31 St NY

ADDRESS Jackson Heights

SAVINGS BANKS TRUST COMPANY

NEW YORK, N. Y.

⑈03592635⑈ ⑆026007948⑆ 0024⑉0710⑈

BATCH: 031880007 TC: 02 SC: EC: F1104

MR. MRS. MS. OTHER: NAME: Tung Tam, Kwok

ADDRESS: 71-11 31th St.

Jackson Heights, N.Y.

CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP

4 F

1 PC

3040393336

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM.. IN

PRINCIPLE ACCOUNT 20

The Riggs Bank of Washington

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH

CASH

25 3,000 0

⑆054000072⑆ 1⑈0593 29 4⑈

$ 3,000

Page 8 of 11

Page 220

Attachment IV

pg 1 of 2

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE THAT YOUR CONTRIBUTION WILL QUALIFY FOR FEDERAL MATCHING FUNDS WE

00000000000027171310 032180027 L 02 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. TSE W CHUN

5 MOTT ST

NY NY 10013

( )- -

BUSINESSMAN

PLACE OF BUSINESS?

NY NY 10013

AMOUNT OF CONTRIBUTION $ 400.00

102	TITLE	NAME (LAST, FIRST, MI) TSE WAI CHUN
104	ADDRESS	394 [illegible]
105	ADDRESS	
106	CITY	STATE ZIP N.J. 07032
116	TEL #	[illegible] 4175
103	OCCUPATION	Businesswoman
111	COMPANY NAME	DIN LAY CO.
112	CITY	STATE ZIP N.Y. 10013
131	CATEGORY	CONTRIBUTION # CLAA

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

[signature]

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

05228075

Pg 29

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000026019610 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

~~MR. KWOK TUNG~~

71-11 31TH ST

JACKSON HEIGHTS NY

( )- -

OCCUPATION?

PLACE OF BUSINESS?

AMOUNT OF CONTRIBUTION $ 100.00

	TITLE	NAME (LAST, FIRST, MI)
102	~~Mr.~~	101 Tom, KWOK TUNG
	ADDRESS	
104	71-11 31 AVENUE	
	ADDRESS	
105		
	CITY	STATE ZIP
106	JACKSON HEIGHTS	NY 11370
	TEL #	
116	(212) 457-1327	
	OCCUPATION	
103	RESTAURANT MANAGER	
	COMPANY NAME	
111	CHINESE REPUBLIC RESTAURANT	
	CITY	STATE ZIP
112	NEW YORK	NY 10036
	CATEGORY	CONTRIBUTION #
131		1

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Kwok Tung Tom *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

05220776

A-869

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 1, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER, III
STAFF DIRECTOR

FROM: ROBERT J. COSTA

SUBJECT: A. UPDATE OF ANALYSIS OF CARTER/MONDALE SUBMISSION 17

A. In reference to the Submission 17 matter previously referred to your office on August 12, 1980, attached please find copies of the check and check request relating to the fundraising event held at the Silver Palace Restaurant, (Attachments I and II). Please note that the check request provides information concerning the expected number of participants, and the charge per person to the Committee.

8304039337

Page 11 of 14

8304039333

Attachments as stated

COMMITTEE, INC.
OPERATING ACCOUNT

The National BANK OF WASHINGTON Washington, D.C.

March 3 19 80

15-7/540 20

PAY [illegible] $ 5,600.00

TO THE ORDER OF

Silver Palace Restaurant
52 Bowery
New York, NY

NON NEGOTIABLE

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
3-3-80	Meetings - Food (Fundraising) FL04, 2-21, NYC	$5,600.00

V2-1

0 3 9 3 3 3 5 3 0 4 8

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
OPERATING ACCOUNT

Cost Estimate Attached ____ Other Form Attached ____

Proposal Attached ____ Agreement/Contract Attached ____

Receipts Attached ____

(Do Not Write Below This Line - For Approval Purposes Only)

[signature] Date ____ Amount ____
Cost Center Director

[signature] Date 3-3-80 C/C ____
Treasurer/Controller

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.

EXPENDITURE/CHECK REQUEST

TO: Evan Dobelle, Cost Center Director DATE 2/27/80

FROM: Sandy Oreste

SUBJECT: Request for Expenditure Approval/Check Request
(Give Complete Details of Request)

FL04

Silver Palace Restaurant — need by Feb. 29, 1980
Name to be Used on Check

52 Bowery
Address

New York New York
Address

PURPOSE OF EXPENDITURE: DETAILED PARTICULARS

Cost of food, etc. for Fundraiser Feb. 21 $5,600.00
$8 per person X 700 people
(includes guest, press, silent service)

DOCUMENTATION:

Purchase Order Attached	____	Invoice Attached	____
Cost Estimate Attached	____	Order Form Attached	____
Proposal Attached	____	Agreement/Contract Attached	____
		Receipts Attached	____

(Do Not Write Below This Line - For Approval Purposes Only)

Cost Center Director — Date ____ Amount ____

Treasurer/Controller — Date 3-3-80 C/C ____

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

Page 14 of 14

Attachment 2

DEPOSIT TICKET

ER-MONDALE PRESIDENTIAL COMM., INC.
CIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 032180 19
025

24 2,520 —

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-794
260
No. CS106522
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Chan Kwok Hung
REMITTER'S SIGNATURE

66 Bayard St.
ADDRESS NY NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈ 6106522 ⑈ ⑆026007948⑆ 00241 0710 ⑈

BATCH: 032180025 TC: 02 SC: FC: F604

MR. MRS. MS. OTHER: NAME: Chan Kwok H.

ADDRESS: 66 BAYARD ST

CITY New York NY, STATE N.Y. ZIP

OCCUPATION: waiter F M

NAME OF COMPANY: SILVER PALACE RESTAURANT

CITY New York NY, STATE NY. ZIP

TEL. # ( ) AMOUNT $ 100.00

4 TYP
1 F
4 PC

⑆063 29 4⑈

C.Y.H

Rec 1 2 19

$ 2,520 —

This deposit is accepted subject to verification and to our rules and regulations

6

830403933 62

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. CS106530

SAVINGS BANK MONEY ORDER

FEB2980 $100.00
DATE PAY $
NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Chan Hing Lit
REMITTER'S SIGNATURE

92 East Broadway
ADDRESS
NY NY

NGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑆106530⑈ ⑆026007948⑆ 0024⑉0710⑈

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 032180
025

LIST CHECKS SINGLY OR

CASH
24 2,520

⑆054000072⑆ 1⑈063 29 4⑈

$ 2,520

This deposit is accepted subject to verification and to our rules and regulations

Page 2 of 19

BATCH: 032180025 TC: 02 SC: FC: FL04

OFFICE: NAME: ~~Chan, Hing Lit~~ CHAU, HING L

ADDRESS: ~~92 East Broadway~~ 92 EAST BROADWAY

NY NY
CITY STATE ZIP

OCCUPATION: ~~Waiter~~ EM
SILVER PALACE RESTAURANT

NAME OF COMPANY: ~~Silver Palace Restaurant~~

~~50 Bowery~~ New York ~~NY~~ NY.
CITY STATE ZIP

REG. # AMOUNT: ~~100.00~~ 100.00

4 TYP
1
6 PC

CY-H

13

8 3 0 4 0 3 9 3 3 6 3

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794 / 260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592627

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Sim Fuey Chow
REMITTER'S SIGNATURE

830 Ave H
ADDRESS
Bklyn NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈0359262 7⑈ ⑆026007948⑆ 0024 5⑈0710⑈

BATCH: 03188867 TC: 42 SC: EC: 5161

MR.
OTHER: NAME: Fuey Chow, Sim

ADDRESS: 830 Avenue H.

Brooklyn, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL. # ( ) AMOUNT $ 100.00

4 TYP
1 F
L PC

s/n 00107

R 6337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19__

007

LIST CHECKS SINGLY

CASH

25 3,000 00

Rec 3/19

⑆054000072⑆ 1⑈063 29 4⑈

$ 3,000 0

24

B'30403933364

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592628

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwei Tik Yu Sum
REMITTER'S SIGNATURE

48-11 91st St.
ADDRESS

Elmhurst ny

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈03592628⑈ ⑆026007948⑆ 0024⑈0710⑈

BATCH: 03188001 TC: 42 SC: EC: E1014

MR.
MRS.
MS.
OTHER:

NAME: Yu Sum, Kwei Tik

ADDRESS: 48-11 91th St.

Elmhurst, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP
1 P
1 PC

S/N 60187

0337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH

CASH

25 3,000 00

⑆054000721⑆ 1⑈0063 29 4⑈

$ 3,000 00

Pay 4 2.9

24

B 3 0 4 0 3 9 3 3 3 5

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592630

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Yang Kuo-Shiu
REMITTER'S SIGNATURE

94-36 Alstyne Ave
ADDRESS Elmhurst, NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈0359263O⑈ ⑆026007948⑆ 0024⑉0760⑈

BATCH: 031880007 TC: 02 SC: EC: FL04

MR. MRS. MS. OTHER: NAME: Kuo-Shiu, Yang

ADDRESS: 94-36 Alstyne Ave

Elmhurst, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP

4

4 PC

S/N 60197

6337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC.
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY

CASH

25 3,000 00

Rec 5/19

⑆0540007⑆ ⑈ 0363 29 4⑈

INW

$ 3,000

8 3 0 4 0 3 9 3 3 6 6

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

1-794 / 260

No. C592623

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

Frank Wang
REMITTER'S SIGNATURE

96-10 41st Ave Corona NY
ADDRESS

⑈035926 23⑈ ⑆026007948⑆ 0024 1⑈0710⑈

BATCH: 031880467 TC: 12 SC: EC: Feb 14

MR.
MRS.
MS.
OTHER:

NAME: WANG, FRANK

ADDRESS: 9610 41th Ave.

Corona, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

AMOUNT $ 100.00

4 TYP
1 F
1 PC

s/n 60107

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC

PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR AT

CASH

ITEMS

15 3,000 00

⑆054000072⑆ 1⑈063 29 4⑈

$ 3,000 00

This deposit is accepted subject to verification

20

8 3 0 4 0 3 9 3 3 6 7

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592624

SAVINGS BANK MONEY ORDER

FEB2980 $100.00

DATE PAY $

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Lucia Wang

REMITTER'S SIGNATURE

96-10 41st Ave Corona NY

ADDRESS

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈035926 24⑈ ⑆026007948⑆ 0024 1⑈0710⑈

BATCH: 03188005 TC: 03 SC: EC: Feb04

MR.
MRS.
MS.
OTHER:

NAME: Wang, Lucia

ADDRESS: 96-10 41st Ave.

Corona, NY,
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP
1 F
1 PC

B/N 60167

B — 6337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., IN
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR

CASH

25 3,000 0

⑆054000021⑆ 1⑈063 29 4⑈

$ 3,000 0

Rec'd 3/19

21

8 3 0 4 0 3 9 3 3 6 8

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
1-784/260
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS No. C592625

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

T. T. Wang
REMITTER'S SIGNATURE

300 E. 75 St. NYC
ADDRESS

AVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈0359262 5⑈ ⑆026007948⑆ 0024 ⑈0710⑈

BATCH: 03188007 TC: 02 SC: EC: F1014

ER: NAME: Wang, T.T.

DDRESS: 300 East 75th St.

New York, N.Y.
CITY STATE ZIP

CUPATION:

AME OF COMPANY:

CITY STATE ZIP

AMOUNT 100.00

TYP
F
PC

S/N 60187
0337
DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY OR ATTACH

CASH 25 3,000 : 0

⑆054000021⑆ 1-063 29 4⑈

$ 3,000

This deposit is accepted subject to collection

22

8 3 0 4 0 3 9 3 3 6 9

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

1-794
260

No. C592626

SAVINGS BANK MONEY ORDER

FEB2980 $100.00
DATE PAY $

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

T. T. Wang
REMITTER'S SIGNATURE

300 E. 75th St
ADDRESS
NYC

⑈035926 26⑈ ⑆026007948⑆ 0024 0710⑈

BATCH: 03180007 TC: 03 SC: EC: FL04

MR.
MRS.
MS.
OTHER: NAME: WANG, T.T.

ADDRESS: 300 East 75th St.

New York, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( ) AMOUNT $ 100.00

4 TYP
L F
L PC

B/N 60167

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY OR ATTACH

CASH
CHECKS
25 3,000 00

⑆026007948⑆ 0035 926 26⑈

Rec'd 3/19

$ 3,000 00

This deposit is accepted subject to applicable

8 3 0 4 0 3 9 3 3 7 0

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794
260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. 0591755

SAVINGS BANK MONEY ORDER

DATE FEB2880 PAY $ $500.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

LEE SHUI KUEN

REMITTER'S SIGNATURE

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

SS#058-46-5943

394 Chestnut St. Kearny, N.J. 07032

ADDRESS

"03591755" :026007948: 0024 "0710"

:021400045: 4 "063 29 4"

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., IN
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 042480 003 19-

20

6,555.02

BATCH: 0424800003 TC: 22 SC: FC: FL04

MRS.
MS.
OTHER: NAME: Lee, Shui K.

ADDRESS: 394 Chestnut St.

Kearny, NJ. 07032
CITY STATE ZIP

OCCUPATION: ~~Owner, Liquor Store~~ J6

NAME OF COMPANY: 17 E. Broadway

NY, NY.
CITY STATE ZIP

TEL. # ( )

AMOUNT $ ~~1000.00~~ 1,000.00

4 TYP
1 F
M PC

$ 6.555.02

This deposit is accepted subject to verification and to our rules and regulations

Rec'd 7/1

CAR[illegible]R/MONDALE PRESIDENTIAL CA[illegible]AIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000031469560 042480003 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. LEE S KUEN

394 CHESTNUT ST

KEARNY NJ 07032

( )- -

OWNER

17 E BROADWAY

NY NY

AMOUNT OF CONTRIBUTION $ 1,000.00

	TITLE	NAME (LAST,FIRST,MI)
102		011 LEE SHUI KUEN
104	ADDRESS 394 CHESTNUT ST.	
105	ADDRESS	
106	CITY KEARNY	STATE N.J. ZIP 07032
115	TEL #	
103	OCCUPATION MANAGER	
111	COMPANY NAME SUN WAI LIQUOR STORE	
112	CITY N.Y.	STATE N.Y. ZIP 10002
131	CATEGORY	CONTRIBUTION #

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

[signature]*

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

8304039371

062580751

Page 11 of 19

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS NO. 4691764

Sub 13

INGS BANK MONEY ORDER 830403937 2

DATE FEB2880 PAY $ $400.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

THE ER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Tse Wai Chun

REMITTER'S SIGNATURE

5 Mott St. N.Y. N.Y. 10013

ADDRESS

BANKS TRUST COMPANY
NEW YORK, N. Y.

764" :026007946: 00246 0760"

TCO: 03211202211 TC12 SC: EC: F1Q4

:0: NAME: CHUN, TSE WAI W

ESS: 5 Mott Stre

NY New York, NY 10013

CITY STATE ZIP

PATION: Businessman

E OF COMPANY:

CITY STATE ZIP

AMOUNT $400.00

TYP

QM

D POST [illegible]

CARTER-MONDALE RESIDENTIAL [illegible], INC

PRINCIPLE ACCOUNT 20

DATE 03/21/80

027

25 9,330 —

:0560002: 8"03E 24 1"

Page 12 of 19

S 9,330 —

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE THAT YOUR CONTRIBUTION WILL QUALIFY FOR FEDERAL MATCHING FUNDS WE

00000000000027171310 032180027 L 02 ADDITIONS/CORRECTIONS (PLEASE PRINT)

MR. TSE W CHUN

5 MOTT ST

NY NY 10013

( )- -

BUSINESSMAN

PLACE OF BUSINESS?

NY NY 10013

AMOUNT OF CONTRIBUTION $ 400.00

102	TITLE 101	NAME (LAST, FIRST, MI) TSE WAI CHUN
104	ADDRESS	394 Bleecker St. Apt. 4
105	ADDRESS	
106	CITY	STATE ZIP N.J. 07032
116	TEL #	9934175
103	OCCUPATION	Businessman
111	COMPANY NAME	DINLAY CO.
112	CITY	STATE ZIP N.Y. 10013
131	CATEGORY	CONTRIBUTION # 400

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

8304039

052280775

Page 13 of 19

Sub 13

DEPOSIT TICKET
CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19
007
LIST CHECKS SINGLY OR

CASH

25	3,000

THE MANHATTAN SAVINGS BANK
NEW YORK, NEW YORK
THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS
No. C592636

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Senator Mondale Presidential Committee
REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Yet Suey Gee
REMITTER'S SIGNATURE

71-11 31st Ave
ADDRESS Jackson Heights NY

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈0359263⑈ ⑆026007948⑆ 0024⑈0710⑈

⑆054000721⑆ 063 29 45

BATCH: 031818 0002 TC: 02 SC: EC: Feb 04

MR.
MRS.
MS.
OTHER: NAME: Suey Gee, Yet

ADDRESS: 71-11 31th Ave.
Jackson Heights, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

ZIP

4 TYP
L
L PG

Fee 11 [illegible]

$ 3,000

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000026019280 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

02|03

MRS YET SUEY GEE TOM

71-11 31TH AVE

JACKSON HEIGHTS NY

( )- -

OCCUPATION?

PLACE OF BUSINESS?

AMOUNT OF CONTRIBUTION $ 100.00

	TITLE	NAME (LAST, FIRST, MI)
102	~~MRS.~~	101 TOM, YET SUEY GEE

	ADDRESS
104	71 11 31 AVE.

	ADDRESS
105	

	CITY	STATE	ZIP
106	JACKSON HTS.	N.Y.	11370

	TEL #
116	(212) 457-1327

	OCCUPATION
103	FACTORY WORKER

	COMPANY NAME
111	EASLEY SPORTSHORT CO.

	CITY	STATE	ZIP
112	NEW YORK	N.Y.	11370

	CATEGORY	CONTRIBUTION #
131		

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Yet Suey Gee Tom

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

052280776

8 3 0 4 0 3 9 3 3 7 Sub 13

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

1-794 / 260

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592635

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

Kwok Tung Tam

REMITTER'S SIGNATURE

71-11 31st Ave

ADDRESS Jackson Heights ny

SAVINGS BANKS TRUST COMPANY

NEW YORK, N. Y.

⑈03592635⑈ ⑆026007948⑆ 0024 4⑈0710⑈

BATCH: 03188007 TC: 02 SC: EC: F1804

MR. MRS. MS. OTHER: NAME: Tung Tam, Kwok

ADDRESS: 71-11 31th St.

Jackson Heights, N.Y.

CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

4 TYP

4 F

1 PC

S/N 60187

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM. - IN

PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR ATTACH

CASH

CHECKS

25 3,000

⑆054000072⑆ 1⑈063 29 4⑈

Page 16 of 190

$ 3,000 00

72-1

CARTER/MONDALE PRESIDENTIAL CAMPAIGN

CONTRIBUTION VERIFICATION

IN ORDER TO COMPLY WITH THE FEDERAL ELECTION COMMISSION RULES AND ENSURE

00000000000026019610 031880007 L 01 ADDITIONS/CORRECTIONS (PLEASE PRINT)

~~MR. KWOK TUNG~~

~~71-11 31TH ST~~

JACKSON HEIGHTS NY

( )- -

	TITLE	NAME (LAST, FIRST, MI)
102	~~MR.~~	101 Tom, KWOK TUNG
	ADDRESS	
104	71-11 31 AVENUE	
	ADDRESS	
105		
	CITY	STATE ZIP
106	JACKSON HEIGHTS	NY 11372
	TEL #	
116	(212) 457-1327	

OCCUPATION?

PLACE OF BUSINESS?

	OCCUPATION	
103	RESTAURANT MANAGER	
	COMPANY NAME	
111	CHINESE REPUBLIC RESTAURANT	
	CITY	STATE ZIP
112	NEW YORK	NY 10036
	CATEGORY	CONTRIBUTION #
131		

AMOUNT OF CONTRIBUTION $ 100.00

8304039377

THE CONTRIBUTION SET FORTH ABOVE:

A. REPRESENTS MY PERSONAL FUNDS, THE GIVING OF WHICH REPRESENTS NO VIOLATION OF ANY TRUST OR ESCROW AGREEMENT; AND

B. HAS NOT BEEN DRAWN ON AN ACCOUNT MAINTAINED BY AN INCORPORATED ENTITY.

Kwok Tung Tom *

(*MUST BE PERSONALLY SIGNED BY THE CONTRIBUTOR)

052280776

Page 17 of 19

8 3 0 4 0 3 9 3 3 7 8

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

No. C592643

1-794/260

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

George Law

REMITTER'S SIGNATURE

80 Beekman St NYC

ADDRESS

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈03592643⑈ ⑆026007948⑆ 0024⑉0710⑈

BATCH: 031980100107 TC: 02 SC: EC: 6164

MR. MRS. CR: NAME: LAW, George

ADDRESS: 80 Beekman St.

New York, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

TEL # ( )

AMOUNT $ 100.00

TYP

F

PC

S/N 60187

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY

CASH	
25	3,000

⑆026007948⑆ 0359 29 4⑈

Rec'd 3/18/80

$ 3,000 00

36

8 3 0 4 0 3 9 3 3 7 9

THE MANHATTAN SAVINGS BANK

NEW YORK, NEW YORK

THIS MONEY ORDER MUST BE PRESENTED WITHIN 90 DAYS

1-784
260

No. C592644

SAVINGS BANK MONEY ORDER

DATE FEB2980 PAY $ $100.00

NOT GOOD FOR AMOUNTS OVER FIVE HUNDRED DOLLARS ($500.)

PAY TO THE ORDER OF Carter/Mondale Presidential Committee

REMITTER MUST INSERT PAYEE'S NAME ON ABOVE LINE

71

George Law
REMITTER'S SIGNATURE

80 Beekman St
ADDRESS

NYC

SAVINGS BANKS TRUST COMPANY
NEW YORK, N. Y.

⑈03592644⑈ ⑆026007948⑆ 0024⑉0710⑈

BATCH: 03180001 TC: 12 SC: EC: FEB14

MR.
MRS.
MS.
OTHER: NAME: LAW, George

ADDRESS: 80 Beekman St.

New York, N.Y.
CITY STATE ZIP

OCCUPATION:

NAME OF COMPANY:

CITY STATE ZIP

4 TYP
1 F
1 PC

44103

s/n 60107

8337

DEPOSIT TICKET

CARTER-MONDALE PRESIDENTIAL COMM., INC
PRINCIPLE ACCOUNT 20

The National BANK OF WASHINGTON Washington, D.C.

DATE 031880 19

007

LIST CHECKS SINGLY OR

CASH

25 3,000 00

⑆054000072⑆ 093 29 4⑈

Pay 13 2/19

$ 3,000

Attachment 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. S. Lee Kling
Treasurer
Carter/Mondale Presidential
Committee, Inc.
2000 L Street, Northwest
Washington, D. C. 20036

Re: MUR 1353

Dear Mr. Kling:

On , 1981, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. §441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting contributions made in the names of other persons. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten (10) days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

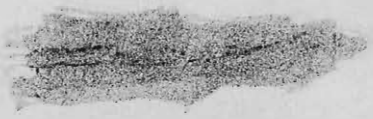
8304039390

Page 1 of 75

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Michael Dymersky, the staff member assigned to this matter, at 202-523-4039.

Sincerely,



Enclosures

General Counsel's Factual and Legal Analysis
Procedures

8304059331

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____ MUR 1353

STAFF MEMBER(S) & TEL. NO. Michael Dymersky 202-523-4039

RESPONDENT Carter/Mondale Presidential Committee, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

8304039308

SUMMARY OF ALLEGATIONS

This matter was generated as the result of information compiled by the Audit Division during its review of Matching Fund Submissions received from the Carter/Mondale Presidential Committee, Inc. ("the Committee"). In its referral, the Audit Division raised questions concerning the validity/matchability of seventy-three money orders contained in matching fund submissions #17 and #13. (See attached memoranda to Charles N. Steele, dated August 12, 1980, and December 1, 1980, with accompanying attachments).

FACTUAL AND LEGAL ANALYSIS

All of the money orders involved in the referral were issued by the Manhattan Savings Bank. Seven (7) of these money orders were dated February 28, 1980, and the rest February 29, 1980; those with the earlier date were in the amounts of $100, $400 and $500, while all of those dated February 29, 1980, were in the amount of $100. The money orders were numbered in three series of exact or near sequence as follows: 106522-106524, 106526-106527, 106530-106533, 106535-106537, 106540, 106543, 592615, 592617, 592619, 592622-592634, 592639-592650, 592652-592654, 592657-592664, 592666-592670, 592673-592676, 592678-592680, 592682, 591754-591755, 591757, 591764-591765.

Twenty-five of the persons whose names appeared as remitters are waiters or cooks at the Silver Palace Restaurant in New York City where the Committee apparently held a fund-raiser on February 21, 1980. Five of the alleged remitters are employed

elsewhere while no occupation or principal place of business was provided for the remaining 35 individuals involved. (The names of five (5) persons appear on more than one money order.) All of the money orders were matched with public funds up to the $250 limit per person.

It is recognized by this Office that handwriting similarities and differences can be determined authoritatively only by experts within the field of handwriting analysis. However, it appears that the handwriting used in inserting the payee's name on each of the money orders is that of the same person. This handwriting appears to differ from that of all signatures on the remitter's signature lines. It also seems that the handwriting on the remitter's signature lines falls into two or three groupings of striking similarities, making it appear likely that one, two or three persons wrote in all of the names of the contributors. (See attached copies of money orders numbered 106522, 106530, 592627, 592628, 592630, 592623, 592624, 592625 and 592626 as examples.) In the four instances in which the committee obtained confirmation from the contributors, the signatures on the confirmations are strikingly different from those on the relevant remitter's signature lines. 1/ (See attached copies of money orders numbered 591755, 591764, 592636 and 592635 and accompanying confirmations.) On two of the money orders, the name on the remitter line appears to be the same but the handwriting differs. (See attached copies of money orders numbered 592643 and 592644.)

2 U.S.C. §441f states:

> No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. (Emphasis added).

In the present situation, the apparent similarities in the handwriting on the money orders' remitters' signature lines, the consecutive numbering of the instruments, (most of which are in the same amount), the common place of employment of almost 1/3 of the alleged contributions, and the apparent differences between certain money order signatures and corresponding verification signatures raise serious questions as to the source of the contributions.

1/ Despite the fact that the signature on the remitter's signature line may not be that of the remitter, the money order is still negotiable. Therefore, a money order so signed would be a valid instrument for purposes other than matching, no matter who supplied the signature.

8304039393

From this evidence, the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

As to the ostensible contributors involved, the General Counsel recommends that the Commission defer taking action until a response from the Committee is received.

RECOMMENDATION

1) Find reason to believe that the Carter/Mondale Presidential Committee, Inc., violated 2 U.S.C. §441f and 11 C.F.R. §110.4(b)(1)(iii) by knowingly accepting contributions made in the names of other persons.

2) Send the attached notification letter and General Counsel's Legal and Factual Analysis.

Attachments

1) Analysis of Submission 17 for Carter/Mondale Presidential Committee, Inc. dated August 12, 1980.

2) Money orders

3) Notification Letter and General Counsel's Legal and Factual Analysis

8304039334

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1353

8304039338 5

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE PUBLIC FILE OF CLOSED MUR 1353.

33040413727

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 14, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: MURs 1284, 1353, 1361 and 1389

Attached for the Commission's review is a memorandum from the Audit Division concerning its review of Rafshoon media expenditures for the Carter/Mondale Presidential Committee, Inc. ("CMPC") and the Carter-Mondale Reelection Committee, Inc. ("CMRC") as provided for in the conciliation agreement. The Audit Division's review of the media documentation did not disclose any problems concerning documentation or allocation.

Additionally, on June 20, 1983, an amended 1980 August monthly report was filed by CMPC disclosing previously undisclosed and understated debts and on May 11, 1983, a check was received from CMPC for repayment of $7,310.35 in matching funds.

CMPC and CMRC have complied with all requirements of the agreement entered into with the Commission on February 4, 1983.

ATTACHMENT:
Audit Memorandum

8304041372 8

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

OGC Docket #2

-2-

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

83 JUL 1 P 2: 16

July 1, 1983

SENSITIVE

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON /s/
ACTING STAFF DIRECTOR

FROM: BOB COSTA

SUBJECT: REVIEW OF CARTER/MONDALE MEDIA EXPENDITURES
MURS 1361 AND 1389

As provided in the conciliation agreement, the Audit staff reviewed Rafshoon Communication's documentation supporting media placement and allocation and found no problems concerning documentation or allocation. A brief summary of the test procedures and results for both the primary and general campaign are presented below:

1) Carter/Mondale Presidential Committee, Inc. ("CMPC")

For the primary campaign, two (2) separate tests were conducted; a 100% review of all media activity related to Iowa, Maine and New Hampshire, and a sample of all activity not related to those states. The Audit staff reviewed the printouts previously provided, the printouts used by Rafshoon Communications to prepare invoices for CMPC, Rafshoon Communications check copies, contracts, spot schedules, and any related riders (refunds, time changes, etc.).

All items tested were adequately documented. In regards to the allocation of media placement, we would like to note that the methods of allocation differed slightly from those previously communicated to us by the committee. For television, Rafshoon Communications used ADI (area of dominant influence) as a base, and then adjusted the percentages somewhat depending upon the content of the ad. For radio, household viewing estimates (similar to ADI) adjusted by ad content were used if available, and if not, the station's signal strength and frequency, direction of broadcast, antenna height, geographical location, as well as ad content were considered in the allocation. Newspaper ads were allocated based on the newspapers circulation.

(1)

83041372 9

In order to determine whether the specific media buys were allocated on a resonable basis, we met with the media buyer responsible for the allocations, and traced selected buys through the allocation process. We found that the methods used resulted in a more realistic allocation than some others we have encountered and generally required a larger allocation to Iowa, Maine and New Hampshire than would be required under ADI.

2) Carter/Mondale Re-Election Committee, Inc. (CMRC)

A sample was conducted of all Rafshoon Communications' media expenditures (including production) related to the general election. The Audit staff reviewed Rafshoon Communications' check copies, station contracts, spot schedules, affidavits, and related riders (refunds, rate changes, etc.). All test items were adequately documented.

If you have any questions concerning the above matter, please contact Glen Buco or Ray Lisi at 523-4155.

8304041373C

83040413731

83 JUN 20 AM 10:58
GCC#350

STEIN & HURON
1819 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON *
EILEEN M. STEIN

*ADMITTED IN D. C. ONLY

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

June 16, 1983

Marsha Gentner, Esquire
Federal Election Commission
Washington, DC 20463

83 JUN 21 PM 12:11

re: MURs 1284, 1353, 1361, 1389

Dear Marsha:

Enclosed for filing is the original of the Carter/Mondale Presidential Committee's amended report for August 1980, signed by S. Lee Kling, the Committee's treasurer. I understand that the Commission's auditors have completed their field work in Atlanta concerning Rafshoon Communications. With the filing of the enclosed report, then, the Carter/Mondale Committees have complied with all requirements of the conciliation agreement that resolved the captioned MURs.

Sincerely,

Douglas B. Huron

Enclosure

FEC Form 3P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES
By a Candidate or Authorized Committee of a Candidate Seeking Nomination or Election to the Office of President or Vice President of the United States

FEC
83 JUN 20 AM 10: 30

NOTE: *This report is to be used by a candidate or authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.*

1 (a) NAME OF CANDIDATE OR COMMITTEE IN FULL ☐ Check if name or address is changed
CARTER/MONDALE PRESIDENTIAL COMM., INC

2 IDENTIFICATION NUMBER
C00108407

(b) ADDRESS (Number and Street)
P.O. Box 832

3 Is this report of receipts and expenditures for:
☒ PRIMARY
☐ GENERAL

(c) CITY, STATE AND ZIP CODE
McLEAN, VA 22101

4 TYPE OF REPORT (Check appropriate box and complete, if applicable)
(a) ☒ Amendment for July 31, 1980 (which report)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (state month)
(g) ☐ Termination Report
(h) ☐ Tenth day report preceding _____ Election on _____ in the State of _____
(i) ☐ Thirtieth day report following ___ Election on _____ in the State of _____

CANDIDATE OR COMMITTEE SUMMARY OF RECEIPTS AND EXPENDITURES

5 COVERING PERIOD: FROM July 1, 1980 THROUGH July 31, 1980

Section A – Cash Balance Summary	Column A This Period	Column B Calendar Year-to-Date
6 Cash on Hand January 1, 19___		$ 897,360.24
7 Cash on Hand at Beginning of Reporting Period	$325,937.64	
8 Total Receipts (from Line 23)	$934,955.72	$12,833,195.32
(a) Subtotal (Add Lines 7 and 8)	$1,260,924.36	$13,730,555.56
9 Total Expenditures (from Line 28)	$ 830,341.42	$13,299,970.62
10 Cash on Hand at Close of Reporting Period (Subtract Line 9 from Line 8a)	$ 430,582.94	$ 430,584.94
11 Contributed Items on Hand to be Liquidated (Attach Itemized List) ... $ _____		
DEBTS AND OBLIGATIONS		
12 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C-P)	$ 187,921.81	
13 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C-P)	$1,211,322.76	
Section B – Summary of Expenditures Subject to Limitation		
14 Expenditure Total (Add Lines 24c and 26b)	$ 496,836.82	$10,928,972.08
15 Refunds and Rebates (from Line 21c)	$ 62,256.31	$ 613,969.96
(a) Expenditures Subject to Limitation (Subtract Line 15 from Line 14)	$ 434,580.51	$ 10,315,002.12
(b) Expenditures from Prior Years Subject to Limitation		$ 2,884,095.02
(c) Total Expenditures Subject to Limitation (Add Lines 15a and 15b)		$13,199,097.14

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

S. Lee Kling
(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

6/14/83
(Date)

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g, §441j; and 26 U.S.C. §9012, §9042.

For further information Contact:
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
or Call 800/424-9530

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Approved by GAO, B-187620 (R0571), Expires 82-2-28

83040413737

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES

(Page 2, FEC Form 3P)

Name of Candidate or Committee	REPORT COVERING THE PERIOD: FROM: 7/1/80 TO: 7/31/80	
RECEIPTS	**COLUMN A This Period**	**COLUMN B Calendar Year-to-Date**
16 FEDERAL FUNDS (Itemize on Schedule A-P)	$ 576,250.70	$ 4,747,876.18
17 Contributions from Individuals (Including contributions in-kind):		
(a) Itemized (use Schedule A-P)	$ 197,495.00	
(b) Unitemized	$ 88,219.84	
(c) Sales and Collections Included Above: List by Event on Memo Schedule D-P ($ _____)		
(d) Subtotal of Contributions from Individuals (including contributions in-kind)	$ 285,714.84	$ 7,176,801.56
18 Transfers In from Political Committees (including contributions in-kind):		
(a) From Affiliated/Authorized Committee (Itemize on Schedule A-P Regardless of Amount)	$	
(b) From Other Committees (Itemize on Schedule A-P Regardless of Amount)	$ 9,383.05	
(c) Subtotal of Transfers In from Political Committees (including contributions in-kind)	$ 9,383.05	$ 254,209.56
19 Other Income:		
(a) Itemized (use Schedule A-P)	$ 937.88	
(b) Unitemized	$	
(c) Subtotal of Other Income	$ 937.88	$ 32,871.45
20 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A-P)	$	
(b) Unitemized	$	
(c) Subtotal of Loans and Loan Repayments Received	$	$ N/A
21 Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A-P)	$ 62,256.31	
(b) Unitemized	$	
(c) Subtotal of Refunds, Rebates, Returns of Deposits	$ 62,256.31	$ 613,464.96
22 Refunds and Rebates Relating to Exempt Fundraising, Legal and Accounting Fees:		
(a) Itemized (use Schedule A-P)	$ 445.44	
(b) Unitemized	$	
(c) Subtotal	$ 445.44	$ 7,446.57
23 TOTAL RECEIPTS	$ 730,988.72	$ 12,533,195.32
EXPENDITURES		
24 Operating Expenditures:		
(a) Itemized (use Schedule B-P)	$ 483,139.04	
(b) Unitemized	$ 13,697.78	
(c) Subtotal of Operating Expenditures	$ 496,836.82	$ 10,938,972.09
25 Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B-P)	$ 307,810.73	
(b) Unitemized	$ 413.88	
(c) Subtotal of Exempt Fundraising, Legal and Accounting Expenditures	$ 308,224.61	$ 2,298,369.55
26 Transfers Out:		
(a) To Affiliated Committees (Itemize on Schedule B-P Regardless of Amount)	$ 19,474.99	
(b) To Other Committees (Itemize on Schedule B-P Regardless of Amount)	$	
(c) Subtotal of Transfers Out	$ 19,474.99	$ 19,474.99
27 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B-P)	$ 5805.00	
(b) Unitemized	$	
(c) Subtotal of Loans, Loan Repayments, and Contribution Refunds	$ 5805.00	$ 53,214.00
28 TOTAL EXPENDITURES	$ 830,341.42	$ 13,311,970.62
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
29 TOTAL RECEIPTS (from Line 23)	$ 934,988.72	
30 TRANSFERS IN (from Line 18a)	$ 0	
31 NET RECEIPTS (Subtract Line 30 from Line 29)	$ 934,988.72	
32 TOTAL EXPENDITURES (from Line 28)	$ 830,341.42	
33 TRANSFERS OUT (from Line 26a)	$ 19,474.99	
34 NET EXPENDITURES (Subtract Line 33 from Line 32)	$ 810,866.43	

Approved by GAO, B-187620 (RO571), Expires 82-2-28

330413732

Carter/Mondale Presidential Committee, Inc.

NOCO/LIABILITIES

Summary of Debts Mis-stated in CP for 7/31/80

	Invoice Date	Vendor Total	Stated on CP	Difference
Disclosure Violations at 7/31/80 Summarized from NOCO WP				
White House	7/31/80	$ 59,907.72	$16,975.13	$ 42,932.59
Altair International	7/14/80	538.00		
	7/08/80	2,147.00	380.00	2,305.00
Aable Rents & Sales	5/28/80	981.15	141.84	839.31
Automated Datatron	7/17/80	7,653.97	6,700.88	953.09
Avis	5/18/80	838.55		
	2/28/80	359.93		1,198.48
Baltimore Hilton	5/11/80	570.05		
	5/11/80	360.34		
	4/29/80	73.29		1,003.68
Bristol, George L.	6/02/80	9,249.66	8,041.41	1,208.25
CDSI, June Services		12,028.28	11,120.75	907.53
July Services		43,309.88		43,309.88
Caesars' Palace	12/02 to 6/11	25,481.78	24,887.19	594.59
Charter One, Ltd.	4/25/80	2,092.50		2,092.50
Cleveland Plaza	5/02/80	12,021.04		12,021.04
Committee for Tape of AMPI	5/02/80	988.07		988.07
Custom Print, Inc.	7/31/80	921.90		
	7/31/80	131.25		1,053.15
Flight Charter Corp.	3/25/80	8,041.27		8,041.27
Forest Printing Co.	3/17/80	950.00		950.00
George & Yvonne Gekas	4/80	1,431.50		1,431.50

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Carter/Mondale Presidential Committee, Inc.

MOCO/LIABILITIES

	Invoice Date	Vendor Total	Stated on CP	Difference
Hertz Corp.	2/02/80	$ 23.44		
	2/22/80	268.15		
	2/28/80	578.14		
	6/06/80	363.55		$ 1,233.28
Knudson, Robert L.	7/31/80	1,455.00		
	7/24/80	801.65		2,256.65
Lanierland Music Park	7/17/80	1,994.22		1,994.22
Marcus Group Inc.	5/31/80	800.00		800.00
Moynahan, Barrette & Assoc.	6/02/80	658.70		658.70
NY Telephone	5/12/80	821.91		821.91
North American Systems	6/12/80	3,494.72		
	6/05/80	2,646.05		
	5/15/80	96.00		6,236.77
Overland Express	2/01/80	643.50		643.50
Ramada Inn	3/18/80	139.46		139.46
	3/15/80	500.00		500.00
St. Francis	3/31/80	2,720.93		2,720.93
Warren, J.N.	6/24/80	3,715.00		3,715.00
Dept.of Transportation	4/30/80	1,728.26		1,728.26
Landrieu, Moon	5/28/80	973.50		973.50
Rogers & Wells	3/19/80	15,000.00	$ 7,091.93	7,908.07
ARA Food Services Co.	5/28/80	1,000.00		1,000.00
Weddington, Sarah	5/28/80	505.85		505.85
Total		$231,005.16	$75,339.13	$155,666.03

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6cc#315
83 JUN 10 AM 8:20

STEIN & HURON
1819 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

(202) 797-3680

DOUGLAS B. HURON†
EILEEN M. STEIN
CHRISTINE L. OWENS†
†NOT ADMITTED IN MARYLAND

MARYLAND OFFICE
7504 SYBROOK LANE
CHEVY CHASE, MD. 20815
(301) 657-9220

June 8, 1983

Marsha G. Gentner, Esquire
Federal Election Commission
Washington, DC 20463

re: MURs 1284, 1353, 1361, 1389

Dear Marsha:

Enclosed is a copy of the amended August 1980 report for the Carter/Mondale Presidential Committee, Inc., which our Committee is required to file under the conciliation agreement that resolved the captioned MURs. I will forward the original to you as soon as it has been signed by the Committee's treasurer.

Sincerely,

Douglas B. Huron

Enclosure

83 JUN 10 P4:58

33040137736

FEC Form 3P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES
By a Candidate or Authorized Committee of a Candidate Seeking Nomination or Election to the Office of President or Vice President of the United States

83 JUN 10 A8:

NOTE: *This report is to be used by a candidate or authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.*

1 (a) NAME OF CANDIDATE OR COMMITTEE IN FULL ☐ Check if name or address is changed
CARTER/MONDALE PRESIDENTIAL COMM., INC

(b) ADDRESS (Number and Street)
P.O. Box 832

(c) CITY, STATE AND ZIP CODE
MCLEAN, VA 22101

2 IDENTIFICATION NUMBER
C00108407

3 Is this report of receipts and expenditures for:
☒ PRIMARY
☐ GENERAL

4 TYPE OF REPORT (Check appropriate box and complete, if applicable)
(a) ☒ Amendment for July 31, 1980 (which report)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (state month)
(g) ☐ Termination Report
(h) ☐ Tenth day report preceding _____ Election on _____ in the State of _____
(i) ☐ Thirtieth day report following ___ Election on _____ in the State of _____

CANDIDATE OR COMMITTEE SUMMARY OF RECEIPTS AND EXPENDITURES

5 COVERING PERIOD: FROM July 1, 1980 THROUGH July 31, 1980

Section A – Cash Balance Summary	Column A This Period	Column B Calendar Year-to-Date
6 Cash on Hand January 1, 19___		$ 897,360.24
7 Cash on Hand at Beginning of Reporting Period	$325,937.64	
8 Total Receipts (from Line 23)	$934,958.72	$12,833,195.32
(a) Subtotal (Add Lines 7 and 8)	$1,260,896.36	$13,730,555.56
9 Total Expenditures (from Line 28)	$ 830,341.42	$13,299,970.62
10 Cash on Hand at Close of Reporting Period (Subtract Line 9 from Line 8a)	$ 430,554.94	$ 430,554.94
11 Contributed Items on Hand to be Liquidated (Attach Itemized List) ... $_____		
DEBTS AND OBLIGATIONS		
12 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C-P)	$ 127,921.81	
13 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C-P)	$1,211,322.76	
Section B – Summary of Expenditures Subject to Limitation		
14 Expenditure Total (Add Lines 24c and 26b)	$ 496,836.82	$10,928,972.08
15 Refunds and Rebates (from Line 21c)	$ 62,256.31	$ 613,969.96
(a) Expenditures Subject to Limitation (Subtract Line 15 from Line 14)	$ 434,580.51	$ 10,315,002.12
(b) Expenditures from Prior Years Subject to Limitation		$ 2,984,095.02
(c) Total Expenditures Subject to Limitation (Add Lines 15a and 15b)		$13,199,097.14

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (Date)

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g, §441j; and 26 U.S.C. §9012, §9042.

For further information Contact:
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
or Call 800/424-9530

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAIL SUMMARY OF RECEIPTS AND EXPENDITURES

(Page 2, FEC Form 3P)

Name of Candidate or Committee	REPORT COVERING THE PERIOD: FROM: 7/1/88 TO: 7/31/90	
RECEIPTS	**COLUMN A This Period**	**COLUMN B Calendar Year-to-Date**
16 FEDERAL FUNDS (Itemize on Schedule A-P)	$ 576,250.70	$ 4,741,856.18
17 Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A-P)	$ 197,495.00	
(b) Unitemized	$ 88,219.84	
(c) Sales and Collections Included Above: List by Event on Memo Schedule D-P ($ _____)		
(d) Subtotal of Contributions from Individuals (including contributions in-kind)	$ 285,714.84	$ 7,176,801.56
18 Transfers In from Political Committees (including contributions in-kind):		
(a) From Affiliated/Authorized Committee (Itemize on Schedule A-P Regardless of Amount)	$	
(b) From Other Committees (Itemize on Schedule A-P Regardless of Amount)	$ 4,383.05	
(c) Subtotal of Transfers In from Political Committees (including contributions in-kind)	$ 4,383.05	$ 254,204.56
19 Other Income:		
(a) Itemized (use Schedule A-P)	$ 431.88	
(b) Unitemized	$	
(c) Subtotal of Other Income	$ 431.88	$ 32,811.43
20 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A-P)	$	
(b) Unitemized	$	
(c) Subtotal of Loans and Loan Repayments Received	$	$ N/A
21 Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A-P)	$ [illegible]	
(b) Unitemized	$	
(c) Subtotal of Refunds, Rebates, Returns of Deposits	$ [illegible]	$ 613,464.46
22 Refunds and Rebates Relating to Exempt Fundraising, Legal and Accounting Fees:		
(a) Itemized (use Schedule A-P)	$ 445.44	
(b) Unitemized	$	
(c) Subtotal	$ 445.44	$ 7,446.51
23 TOTAL RECEIPTS	$ [illegible]	$ [illegible]
EXPENDITURES		
24 Operating Expenditures:		
(a) Itemized (use Schedule B-P)	$ 453,139.04	
(b) Unitemized	$ 13,691.18	
(c) Subtotal of Operating Expenditures	$ 466,830.82	$ 12,013,477.05
25 Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B-P)	$ 307,810.73	
(b) Unitemized	$ 413.88	
(c) Subtotal of Exempt Fundraising, Legal and Accounting Expenditures	$ 308,224.61	$ 1,292,359.55
26 Transfers Out:		
(a) To Affiliated Committees (Itemize on Schedule B-P Regardless of Amount)	$ 19,474.99	
(b) To Other Committees (Itemize on Schedule B-P Regardless of Amount)	$	
(c) Subtotal of Transfers Out	$ 19,474.99	$ 19,474.99
27 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B-P)	$ 5805.00	
(b) Unitemized	$	
(c) Subtotal of Loans, Loan Repayments, and Contribution Refunds	$ 5805.00	$ 53,214.00
28 TOTAL EXPENDITURES	$ 830,341.42	$ 13,377,926.71
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
29 TOTAL RECEIPTS (from Line 23)	$ 934,958.12	
30 TRANSFERS IN (from Line 18a)	$ 0	
31 NET RECEIPTS (Subtract Line 30 from Line 29)	$ 934,958.12	
32 TOTAL EXPENDITURES (from Line 28)	$ 830,341.42	
33 TRANSFERS OUT (from Line 26a)	$ 19,474.99	
34 NET EXPENDITURES (Subtract Line 33 from Line 32)	$ 810,866.43	

Approved by GAO, B-197630 (R0571) Expires 82-2-28

8304137

Carter/Mondale Presidential Committee, Inc.

NOCO/LIABILITIES

Summary of Debts Mis-stated
in CP for 7/31/80

	Invoice Date	Vendor Total	Stated on CP	Difference
Disclosure Violations at 7/31/80 Summarized from NOCO WP				
White House	7/31/80	$ 59,907.72	$16,975.13	$ 42,932.59
Altair International	7/14/80	538.00		
	7/08/80	2,147.00	380.00	2,305.00
Aable Rents & Sales	5/28/80	981.15	141.84	839.31
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	2/28/80	359.93		1,198.48
Baltimore Hilton	5/11/80	570.05		
	5/11/80	360.34		
	4/29/80	73.29		1,003.68
Bristol, George L.	6/02/80	9,249.66	8,041.41	1,208.25
CDSI, June Services		12,028.28	11,120.75	907.53
July Services		43,309.88		43,309.88
Caesars' Palace	12/02 to 6/11	25,481.78	24,887.19	594.59
Charter One, Ltd.	4/25/80	2,092.50		2,092.50
Cleveland Plaza	5/02/80	12,021.04		12,021.04
Committee for Tape of AMPI	5/02/80	988.07		988.07
Custom Print, Inc.	7/31/80	921.90		
	7/31/80	131.25		1,053.15
Flight Charter Corp.	3/25/80	8,041.27		8,041.27
Forest Printing Co.	3/17/80	950.00		950.00
George & Yvonne Gekas	4/80	1,431.50		1,431.50

8304137

Carter/Mondale Presidential Committee, Inc.

NOCO/LIABILITIES

	Invoice Date	Vendor Total	Stated on CP	Difference
Hertz Corp.	2/02/80	$ 23.44		
	2/22/80	268.15		
	2/28/80	578.14		
	6/06/80	363.55		$ 1,233.28
Knudson, Robert L.	7/31/80	1,455.00		
	7/24/80	801.65		2,256.65
Lanierland Music Park	7/17/80	1,994.22		1,994.22
Marcus Group Inc.	5/31/80	800.00		800.00
Moynahan, Barrette & Assoc.	6/02/80	658.70		658.70
NY Telephone	5/12/80	821.91		821.91
North American Systems	6/12/80	3,494.72		
	6/05/80	2,646.05		
	5/15/80	96.00		6,236.77
Overland Express	2/01/80	643.50		643.50
Ramada Inn	3/18/80	139.46		139.46
	3/15/80	500.00		500.00
St. Francis	3/31/80	2,720.93		2,720.93
Warren, J.N.	6/24/80	3,715.00		3,715.00
Dept.of Transportation	4/30/80	1,728.26		1,728.26
Landrieu, Moon	5/28/80	973.50		973.50
Rogers & Wells	3/19/80	15,000.00	$ 7,091.93	7,908.07
ARA Food Services Co.	5/28/80	1,000.00		1,000.00
Weddington, Sarah	5/28/80	505.85		505.85
Total		$231,005.16	$75,339.13	$155,666.03

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STEIN & HURON
1819 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009
(202) 797-3680

DOUGLAS B. HURON†
EILEEN M. STEIN
CHRISTINE L. OWENS†
†NOT ADMITTED IN MARYLAND

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20815
(301) 657-9220

83 JUN 8 P3:07

June 6, 1983

Marsha G. Gentner, Esquire
Federal Election Commission
Washington, DC 20463

Dear Marsha:

Enclosed is the agreement we have discussed, which I have signed on behalf of the Carter/Mondale committees.

Thank you for your cooperation.

Sincerely,

Douglas B. Huron

Enclosure

8304041374 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AGREEMENT BETWEEN CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC. AND THE CARTER-MONDALE REELECTION COMMITTEE, INC., AND THE FEDERAL ELECTION COMMISSION

In order to avoid litigation over the question of compliance of the Carter/Mondale Presidential Committee, Inc. ("CMPC") and the Carter-Mondale Reelection Committee, Inc. ("CMRC") with the terms of the conciliation agreement entered into by CMPC, CMRC and the Federal Election Commission ("FEC") to resolve MURs 1284, 1353, 1361, and 1389, the CMPC, CMRC, and the FEC, as evidenced by the signatures, below, of their respective counsel, enter into the following agreement:

1) CMRC and CMPC agree to comply, in a timely manner, with all remaining requirements as stated in the conciliation agreement, a copy of which is affixed hereto, as each such obligation becomes due;

2) CMRC and CMPC agree that the three year period of 26 U.S.C. § 9038(c), within which a notification by the FEC of a repayment under 26 U.S.C. § 9038(b) must be made, is extended for an additional ninety (90) days. CMRC and CMPC hereby expressly waive any defense based on 26 U.S.C. § 9038(c) to the extent the FEC notifies CMRC and CMPC of a repayment determination under 26 U.S.C. § 9038(b) no more than three (3) years plus

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ninety (90) days after the date of the end of the 1980 primary matching period. (See 26 U.S.C. § 9031(6) for the definition of "matching payment period".)

3) All parties agree that they will use their best efforts to facilitate an expeditious completion of the audit process pertaining to CMRC and CMPC. The field work associated with such audit to commence on June 6, 1983.

The above constitutes the complete agreement between the parties. With the exception of the attached conciliation agreement, to the extent any prior and/or oral agreements have been made by and between the parties with respect to these matters they are hereby nullified unless contained in this agreement.

Douglas B. Huron
Counsel
Carter/Mondale Presidential Committee, Inc.
Carter-Mondale Reelection Committee, Inc.

6/6/83
Date

Charles N. Steele
General Counsel
Federal Election Commission

9 June 1983
Date

8304041374 5

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1353.

83040413744