



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1407

Date Filmed 7-24-82 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

12 DAY PRE-BRIEF

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

date

Virginia M. Little
6/21/82

FEC 9-21-77

62040333907



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 18, 1982

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

Dear Mr. Giorgio:

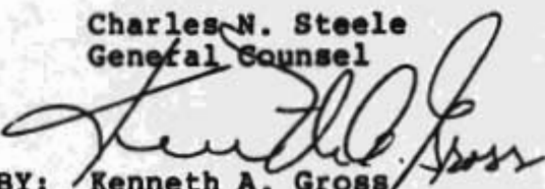
Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your Committee, the Federal Election Commission, on January 19, 1982, found reason to believe that the Committee to Elect Bob Gigante had violated 2 U.S.C. § 441a(f) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Commission has decided to take no further action and close its file in this matter. The file will be made part of the public record.

Should you have any questions, please call Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

82040333908



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Some
6/17/82

82040333909



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1982

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Mrs. Gigante:

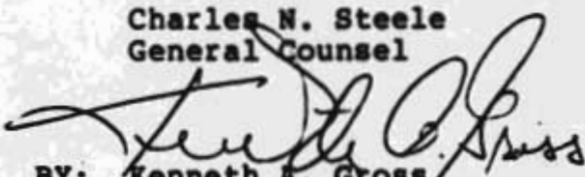
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Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

02040333910



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Mrs. Gigante:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on January 19, 1982, found reason to believe that you had violated 2 U.S.C. § 441a and instituted an investigation in this matter.

After considering all the evidence made available to the Commission, the Commission has decided to take no further action and close its file in this matter. The file will be made part of the public record.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Copy
6/17/82

6204033911



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1982

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

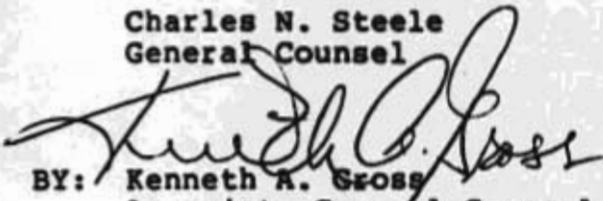
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Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

0204033912



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on January 19, 1982, found reason to believe that you had violated 2 U.S.C. § 441a and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Commission has decided to take no further action and close its file in this matter. The file will be made part of the public record.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SMC
6/17/82

02040333913

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee to Elect Bob Gigante
Barbara Gigante
Charles Lofino

MUR 1407

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 17, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1407:

1. Take no further action against Charles Lofino's violation of 2 U.S.C. § 441a.
2. Take no further action against Barbara Gigante's violation of 2 U.S.C. § 441a.
3. Take no further action against The Committee to Elect Bob Gigante's violation of 2 U.S.C. § 441a(f).
4. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively.

Attest:

6-17-82

Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

6-15-82, 9:21
6-15-82, 11:00

02040333914

32040333915

TO: Mr. Tolson
FROM: Mr. [illegible]
SUBJECT: [illegible]

Please have Mr. Tolson's General Counsel's Report distributed to the Committee on a 48 hour tally basis.
Thank you.

Attachment

cc: Callahan

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 JUN 15 A 9: 21

In the Matter of)
)
Committee to Elect) MUR 1407
Bob Gigante)
Barbara Gigante)
Charles Lofino)

GENERAL COUNSEL'S REPORT

BACKGROUND

This matter involves the acceptance of excessive loans from individuals by the Committee to Elect Bob Gigante ("the Committee"). Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution to \$11,000.

LEGAL ANALYSIS

On May 13, 1982, the respondents were sent the General Counsel's Brief recommending probable cause to believe that Charles Lofino and Barbara Gigante violated 2 U.S.C. § 441a and that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

On May 27, 1982, the treasurer of the Committee, Ralph Giorgio met with Office of General Counsel staff concerning our legal position in this matter. He submitted his position in a follow-up letter on June 1, 1982 (attached). During the meeting and stated in his letter, Mr. Giorgio expressed his belief that not all relevant facts in this matter were considered prior to our recommendation of probable cause to believe.

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Mr. Giorgio maintains that when he first learned of the possible § 441a violations on April 16, 1981 through a request for additional information (RFAI), he immediately phoned the Commission and spoke to Tom Scully in an attempt to rectify the situation. Mr. Giorgio has stated that he advised the Reports Analyst that he would repay the total amount of excessive contributions immediately "in order to prevent further Commission action" but asked if a systematic repayment schedule would be appropriate to minimize the financial hardship. He states that he was told to submit a letter stating his position which did on May 20, 1981.

Tom Scully's memo to the file in connection with the telephone call referred to by Mr. Giorgio states in part,

I told him to write a letter explaining his misunderstanding of the Act and to refund the contributions as soon as possible.

In his letter of May 20th, Mr. Giorgio states,

please be advised that as indicated in subsequent reports, these loans are being repaid on a systematic basis and are expected to be completely repaid in approximately 18 months.

RAD considered this letter to be an inadequate response and referred the matter to the Office of General Counsel.

This matter was given MUR status on December 15, 1981 and on January 21, 1982 the respondents were notified that the Commission had found reason to believe that § 441a violations had been committed.

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Mr. Giorgio's position is that he believed the Commission approved of his repayment proposal of May 20, 1981, because he did not receive a negative response from the Commission for eight months after he submitted his letter. Mr. Giorgio contends that an immediate repayment would have been made had he been advised to do so by the Commission. At this time, all outstanding loans have been repaid completely.

It appears that the violations at issue here could have been corrected and voluntary compliance achieved early in this matter had the respondents received a timely response to their letter of May 20, 1981. Additionally, since the loans have now been fully repaid, it is recommended that the Commission take no further action in this matter and close the file.

Recommendations

It is recommended that the Commission take no further action against:

1. Charles Lofino's violation of 2 U.S.C. § 441a;
2. Barbara Gigante's violation of 2 U.S.C. § 441a; and

02040333918

3. The Committee to Elect Bob Gigante's violation of 2 U.S.C. § 441a(f).
4. Close the file.

Charles N. Steele
General Counsel

Date

June 14, 1982

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Giorgio letter dated June 1, 1982 (2 pages)
Proposed Notification letters (3 pages)

02040333919

Callahan
63 EVA AVENUE
STATEN ISLAND, N. Y. 10306

June 1, 1982

Charles N. Steele, General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

RE: MUR 1407
COMMITTEE TO ELECT BOB GIGANTE
IDENTIFICATION: C00130351

Dear Mr Steele:

0 2 0 4 0 3 3
3 9 2 0
The purpose of this letter is to respond to your letter of May 13, 1982, and present a number of significant facts which, I believe, may not have been given adequate consideration in the course of your investigation. These facts were discussed at a meeting with Mr. Thomas Whitehead and Ms Suzanne Callahan, on May 27, 1982, in your offices in Washington, D.C. I trust, that after additional consideration of these facts, you will recommend to the Commission that no further action be taken in this matter.

0 2 0 4 0 3 3
On May 20, 1981, I responded via letter to the Commission's concerns regarding the excessive contribution from Mr. Lofino, the candidate's father-in-law, and the loans from Mrs. Gigante, the candidate's wife, and Mr. Lofino. I advised the Commission that the excessive contribution was incorrectly reported, and should have been identified as a contribution from the Lofino family. Additionally, I requested Commission guidance regarding the method of loan repayment. In both my letter and discussions with Thomas Scully of the Reports Analysis Division, I indicated that while immediate repayment of both loans would represent hardship to the Candidate, this action would be taken, in order to prevent further Commission action. I also requested consideration for repayment on a systematic basis in order to relieve some of the financial burden from the Candidate. I did not receive guidance or information from the Commission for more than eight months until I received the letters from Mr. Frank P Reiche, dated January 21, 1982. Had we been advised that systematic repayment was unacceptable, the loans would have been repaid.

After receiving this letter, I contacted your office and provided more information regarding systematic repayment but, again offered to repay the loans completely, if necessary to prevent further Commission action. Again, no guidance was received.

We have, after receiving your most recent letter realized that no guidance will be forthcoming. In order to bring this matter to a close, the Candidate has repaid all outstanding loans completely.

June 1, 1982

Since this repayment has been made at significant hardship to the candidate, we look to you to view it as a sign of good faith and a sign of understanding.

The Candidate is not participating in elections this year, nor has he participated since the Primary activity in the spring and summer of 1980 for which the Committee was formed. Our hope is to resolve this matter without further penalty and terminate the Committee in July.

Your understanding is gratefully requested.

Very truly yours,



Ralph J. Giorgio, Treasurer
COMMITTEE TO ELECT BOB GIGANTE

RJG:aba

cc: Ms. Suzanne Callahan
Robert J Gigante

02040333921

2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

Dear Mr. Giorgio:

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Should you have any questions, please call Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Mrs. Gigante:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on January 19, 1982, found reason to believe that you had violated 2 U.S.C. § 441a and instituted an investigation in this matter.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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5

RECEIVED
604 7007
82 JUN 7 AM: 01

65 EVA AVENUE
STATEN ISLAND, N. Y. 10306

June 1, 1982

Charles N. Steele, General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

RE: MUR 1407
COMMITTEE TO ELECT BOB GIGANTE
IDENTIFICATION: C00150551

Dear Mr. Steele:

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The purpose of this letter is to respond to your letter of May 13, 1982, and present a number of significant facts which, I believe, may not have been given adequate consideration in the course of your investigation. These facts were discussed at a meeting with Mr. Thomas Whitehead and Ms. Suzanne Callahan, on May 27, 1982, in your offices in Washington, D.C. I trust, that after additional consideration of these facts, you will recommend to the Commission that no further action be taken in this matter.

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The Candidate is not participating in elections this year, nor has he participated since the Primary activity in the spring and summer of 1980 for which the Committee was formed. Our hope is to resolve this matter without further penalty and terminate the Committee in July.

Your understanding is gratefully requested.

Very truly yours,



Ralph J. Giorgio, Treasurer
COMMITTEE TO ELECT BOB GIGANTE

RJG:aba

cc: ~~Ms. Suzanne Callahan~~
Robert J Gigante

62040333926

62040330927

65 EVA AVENUE
STATEN ISLAND, N. Y. 10306



Ms. Suzanne Callahan
FEDERAL ELECTION COMMISSION
Office of the General Counsel
Washington, D. C. 20463

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Call 7083
82 JUN 7 AIO: 58

63 EVA AVENUE
STATEN ISLAND, N. Y. 10306

June 1, 1982

Charles N. Steele, General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

RE: MUR 1407
COMMITTEE TO ELECT BOB GIGANTE
IDENTIFICATION: C0015351

Dear Mr Steele:

The purpose of this letter is to respond to your letter of May 13, 1982, and present a number of significant facts which, I believe, may not have been given adequate consideration in the course of your investigation. These facts were discussed at a meeting with Mr. Thomas Whitehead and Ms Suzanne Callahan, on May 27, 1982, in your offices in Washington, D.C. I trust, that after additional consideration of these facts, you will recommend to the Commission that no further action be taken in this matter.

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Ralph J. Giorgio, Treasurer
COMMITTEE TO ELECT BOB GIGANTE

RJG:aba

cc: Ms. Suzanne Callahan
Robert J Gigante

62040333929

820403339

100 AVENUE
STATION 134 AND N. Y. 10506



82 JUN 7



Charles N. Steele, General Counsel
FEDERAL ELECTION COMMISSION
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MEMORANDUM TO:

J. Callahan

FROM:

Steve Barndollar
Docket Clerk

SUBJECT: Returned Letters

DATE:

5/20/82

The following letter MUR/1407 was returned. Please write a memo to the file and advise on what to do. If you wish to resend the letter, please have the envelope(s) and green card(s) made.

Thank you
SB

*Please re-send
envelope attached
Sme
5/20/82*

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

62040303

87

POSTAGE AND FEES PAID

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RETURNED
TO
SENDER

20 MAY 10:49

GENERAL

8 2 0 4 0 3 3 3 9 3 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use \$300

POSTAGE AND FEES PAID



Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306



No Address

JUN 20 1979

0204033



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 13, 1982

**Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306**

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After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

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 probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

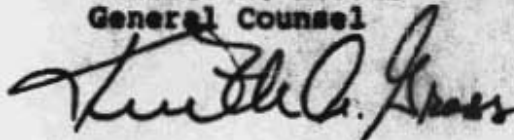
Letter to Ralph J. Giorgio
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

62040333936



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 13, 1982

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Mrs. Gigante:

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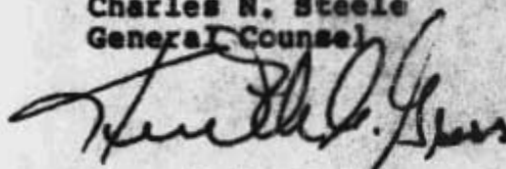
Letter to Barbara Gigante
Page 2

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Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

82040333938



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

May 13, 1982

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

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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 probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

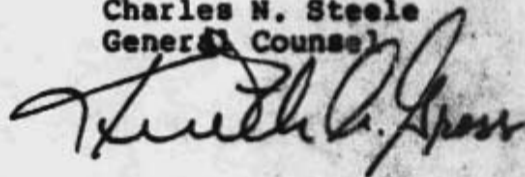
Letter to Charles J. Lofino
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

02040333940



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAY 13 AM 10

May 13, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

C. Steele

SUBJECT: MUR 1407

SENSITIVE

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 13, 1982. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief (one)
2. Letters to Respondents (three)
(10 total pages attached)

02040333941



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 13, 1982

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

Dear Mr. Giorgio:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your Committee, the Federal Election Commission, on January 19, 1982, found reason to believe that the Committee to Elect Bob Gigante had violated 2 U.S.C. § 441a(f) and instituted an investigation in 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 probable cause to believe that a violation has occurred.

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 probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

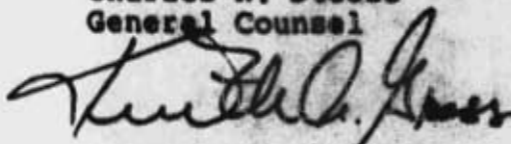
Letter to Ralph J. Giorgio
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

62040333943



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 13, 1982

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on January 19, 1982, found reason to believe that you had violated 2 U.S.C. § 441a and instituted an investigation in 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 probable cause to believe that a violation has occurred.

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 probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

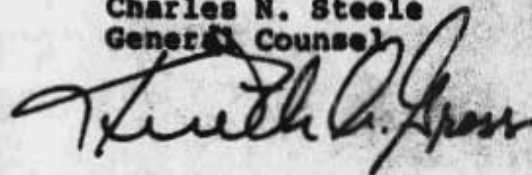
Letter to Charles J. Lofino
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Susanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

62040333945



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 13, 1982

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Mrs. Gigante:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on January 19, 1982, found reason to believe that you had violated 2 U.S.C. § 441a and instituted an investigation in 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 probable cause to believe that a violation has occurred.

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 probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

0204033946

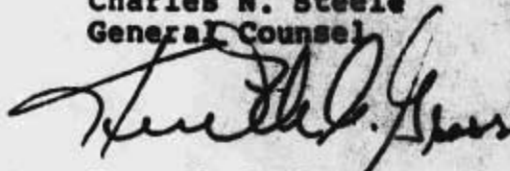
Letter to Barbara Gigante
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

02040333947

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Committee to Elect) MUR 1407.
Bob Gigante)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter involves the acceptance of excessive loans from individuals by the Committee to Elect Bob Gigante ("the Committee"). Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution to \$11,000.

II. Legal Analysis

As set forth in 2 U.S.C. § 431(8)(A), the term "contribution" includes

(i) any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office; (emphasis added).

Because each of the contributions exceeded \$1,000, the contribution limitations of 2 U.S.C. § 441a have been violated.

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

①

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②

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A response was filed by Ralph Giorgio, treasurer of the Committee, on February 5, 1982. He reiterated his previous position stating that the excessive loans were accepted because the individuals involved did not realize they were contributions. He said he was under the impression from speaking to a RAD analyst that "complete repayment of these loans on a systematic, expeditious basis, would be acceptable and lead to no further action" The \$10,000 in funds loaned to the Committee by Mrs. Gigante was secured by her from her bank using her assets as collateral. Her husband then signed a promissory note to her guaranteeing repayment of the loan as well as the interest charged by the bank. The \$10,000 loan from Charles J. Lofino, the candidate's father-in-law, was a loan from his personal funds to the candidate at a rate of 2% above prime. Both of the subject loans constitute violations of 2 U.S.C. § 441a.

The treasurer has stated that the candidate, under direction of the Commission, will take a second mortgage on his home to make immediate repayment of the subject loans but that it would be preferable to make systematic payments.

The respondents have provided a proposed payment schedule which provides for total repayment of the excessive loans by the fourth quarter of 1982.

While the Office of General Counsel recommends approval of the repayment proposal, violations have nevertheless been committed and it is therefore recommended that the Commission proceed to probable cause.

(3)

III. Recommendations

It is recommended that the Commission find probable cause to believe that:

1. Charles Lofino violated 2 U.S.C. § 441a.
2. Barbara Gigante violated 2 U.S.C. § 441a.
3. The Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

May 12, 1982
Date

Charles N. Steele by KSC
Charles N. Steele
General Counsel

82 MAR 15 AIO:

63 EVA AVENUE
STATEN ISLAND, N. Y. 10306

March 11, 1982

Frank P Reiche
Chairman of the Federal Election Committee
Washington, D. C. 20463

RE: MUR 1407
COMMITTEE TO ELECT BOB GIGANTE
IDENTIFICATION NO: C00130351

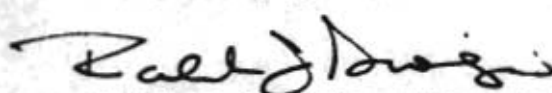
Dear Mr. Reiche:

With my letter of February 5, 1982, I detailed the history of events leading up to issuance of MUR 1407. Recently, I was contacted by Suzanne Callahan of your office requesting additional information specific to repayment of the outstanding loans. The following is a schedule of repayment:

1982 Period	Loans Outstanding At Beginning of Period	Repayment	Loans Outstanding At End of Period
1st Quarter	\$15,500	1,000	14,500
2nd Quarter	14,500	1,000	13,500
3rd Quarter	13,500	3,500	10,000
4th Quarter	10,000	10,000	0

I trust this repayment schedule is acceptable to you.

Very truly yours,


Ralph J Giorgio, Treasurer
Committee To Elect Bob Gigante

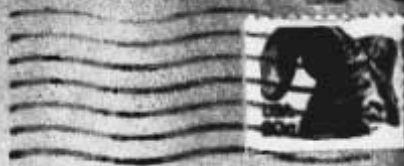
RJG:rba

cc: Robert Gigante

02040333952

COPIES 7340
32 MAR 15 P 1:19
RECEIVED
GENERAL COUNSEL

82040333938



Frank P Reiche
Chairman of the Federal Election Committee
Washington, D. C. 20463

02 MAR 1982 4:19

RECEIVED

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 FEB 10 P2: 17

63 EVA AVENUE
STATEN ISLAND, N. Y. 10306

February 5, 1982

Frank P Reiche
Chairman of the Federal Election Committee
Washington, D. C. 20463

RE: NUR 1407
COMMITTEE TO ELECT BOB GIGANTE
IDENTIFICATION NO: C00130351

82 FEB 10 P5: 10

GENERAL COUNSEL

Dear Mr. Reiche

The purpose of this letter is to respond to your letters of January 22, 1982, wherein you advised me, Barbara Gigante, Charles J Lofino and, by copy, the Candidate, Robert Gigante of the investigation being conducted by your office of possible violation of the Federal Election Campaign Act.

Prior to forwarding this response, I contacted Suzanne Callahan of your office. I told her that when I had first been made aware of the concern by your office in April and May of 1981, I spoke with Thomas Scully of the Reports Analysis Division. During these discussions, I was led to believe the following:

- a) Contrary to my understanding your office considered these loans as contributions.
- b) Since there clearly was no intent on the part of either the Committee, the Candidate or the Contributors to purposely violate the Law, complete repayment of these loans on a systematic, expeditious basis, would be acceptable and lead to no further action by the Federal Election Commission.

I told Suzanne Callahan that on the basis of this discussion, I responded to the initial concerns with my letter to the Commission of May 20, 1981. Further, I advised, that had I known that this response might not have been totally acceptable to the Commission, the Candidate would have at that time, through liquidation of his personal assets, repaid the loans completely.

6204033954

Frank P Reiche

(2)

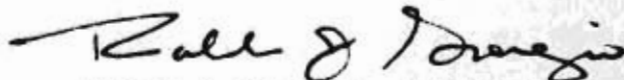
February 5, 1982

More than six months have passed since our initial correspondence in this matter. Based upon the above, I had assumed that the matter was closed. The Committee, the Candidate, the Contributors and I would like to resolve this matter as soon as possible. To this end I look to you for direction and understanding.

As the Treasurer of the Committee, I naively accepted these loans, not aware that they were considered contributions and exceeded the limits set forth in 2 U.S.C. 441a.. At your direction, the Candidate will, through a second mortgage on his house or similar means repay these loans immediately. Or, if acceptable to you, the Candidate will continue systematic, expeditious repayment as described in my May 20, 1981 letter.

I trust that with your direction and understanding, and our response, we will resolve this matter in a manner which recognizes our intent to comply fully with the Act regardless of hardship, and lead to no further action by the Commission.

Very truly yours,



Ralph J Giorgio, Treasurer
Committee To Elect Bob Gigante

RJG:rba

cc: Robert Gigante
Barbara Gigante
Charles J Lofino

0204033957

663 EVA AVENUE
STATEN ISLAND, NEW YORK 10306



FRANK R. REICHE
CHAIRMAN OF THE FEDERAL ELECTION COMMITTEE
WASHINGTON, D. C. 20463

82 FEB 18 P12:19

62040333956

2/4/82

To File

This letter was returned. The address has been verified as correct so the letter is being sent to the treasurer's home address taken from the committee's statement of organization.

Ralph Giorgio
63 Eva Avenue
Staten Island, NY 10306

62040333957

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

Suzanne Callahan
OGC

2040333
b7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Committee to Elect Bob Gigante)

Charles J. Lofino)

Barbara Gigante)

MUR 1407

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 19, 1982, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1407:

1. Find Reason to Believe that Charles J. Lofino violated 2 U.S.C. § 441a.
2. Find Reason to Believe that Barbara Gigante violated 2 U.S.C. § 441a.
3. Find Reason to Believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).
4. Send the Reason to Believe notifications as submitted with the First General Counsel's Report dated January 15, 1982.

(Continued)

82040333959

MUR 1407

First General Counsel's Report

Dated January 15, 1982

5. Send the notification letters as submitted with the First General Counsel's Report dated January 15, 1982.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

1-20-82

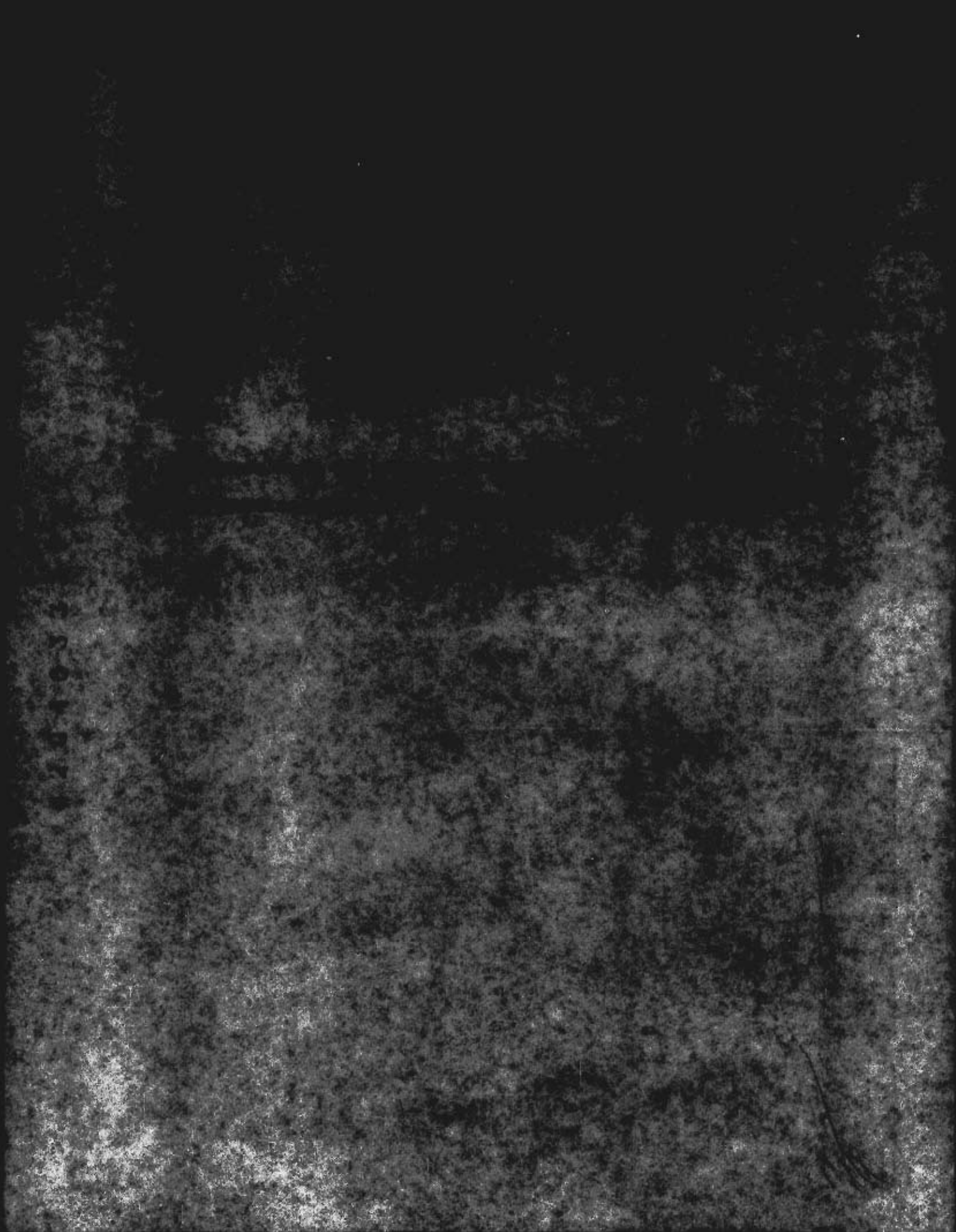
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

1-15-82, 11:53
1-15-82, 2:00

02040333960



SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr *EG*
SUBJECT: MUR 1407

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

02040333962

82 JAN 15 11:59

RECEIVED
FEB 1 1982

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 1-15-82

MUR # 1407
STAFF MEMBER(S)
Suzanne Callahan

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Committee to Elect Bob Gigante
Charles J. Lofino
Barbara Gigante

RELEVANT STATUTE: 2 U.S.C. § 441a

INTERNAL REPORTS CHECKED: Committee to Elect Bob Gigante

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On December 15, 1981, the Commission determined that the Reports Analysis Division's ("RAD") referral to the Office of General Counsel (OGC) concerning the Committee to Elect Bob Gigante ("the Committee") should be given MUR status.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution to \$11,000.

82 JAN 15 ALL: 53

COMMISSION SECRETARY

02040333963

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

On May 20, 1981, the respondent Committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500.

Based on the above facts and analyses, the Office of General Counsel recommends that the Commission find reason to believe that Mrs. Gigante and Mr. Lofino violated 2 U.S.C. § 441a by making contributions of \$9,000 and \$11,000, respectively, to the Committee. Conversely, it is recommended that the Commission find reason to believe the Committee violated 2 U.S.C. § 441a(f) by accepting \$20,000 in excessive contributions.

Recommendations

1. Find reason to believe that Charles J. Lofino violated 2 U.S.C. § 441a.
2. Find reason to believe that Barbara Gigante violated 2 U.S.C. § 441a.
3. Find reason to believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).
4. Send attached reason to believe notifications.
5. Send attached notification letters.

Charles N. Steele
General Counsel

Date

Jan. 16, 1982

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

RAD referral (11 pages)
Proposed reason to believe notifications (6 pages)
Proposed notification letters (6 pages)
(23 total pages attached)

62040333965

REPORTS ANALYSIS REFERRAL SHEET

dw KAC

DATE JUNE 30, 1981

ANALYST Susan Weber for Theresa Kell

TO: OGC

TEAM CHIEF Peter Kell, Jr.

THROUGH: STAFF DIRECTOR RE

COMPLIANCE REVIEW PS/ EG

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS gd

CANDIDATE/COMMITTEE:

Committee to Elect Bob Gigante

TREASURER:

Ralph Giorgio

ADDRESS:

2288 Hylan Boulevard

Staten Island, New York 10306

AFFILIATE(S):

N/A

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Receipt of excessive contributions
from an individual

2 U.S.C. 441a

DATE INITIATED:

4/16/81

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 7/28/80

TO 10/10/80

TOTAL RECEIPTS \$ 29093

TOTAL EXPENDITURES \$ 29378

CASH ON HAND \$ 29.99

DEBTS \$ 20,000

HISTORY:

RESULTS OF REVIEW:

RFAI sent for the 12P report- 4/16/81

RFAI sent for the Q3 report- 4/16/81

2nd Notice sent for above reports- 5/8/81

Inadequate Response received for above reports- 5/26/81

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon dated- 5/14/81

ATTACHMENT

3
4
5

ATTACHMENT

7

ATTACHMENT

6

REASON(S) FOR REFERRAL:

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Although the committee responded on 5/26/81 stating that an amendment would be filed to correct the excessive contribution reported on the October Quarterly Report, no such amendment has been recieved.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

1

NOI 1730 I
W 11 1021.3 KM

12 Plans report

Page 1 of 1
 LHA Number 12
 Use separate schedule
 for each numbered item

COMMITTED TO ELECT BOB GIGANTE				
A Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Committed Payments To Date	Balance Outstanding at Close of This Period
Charles J. Lafino 3245 E. Patterson Road DAYTON, Ohio 45430		10,000.00	0.00	10,000.00
Election ☒ Primary ☐ General ☐ Other (specify)		Terms Date Incurred 7/23/80 Date Due 7/23/81 Interest Rate 2 Year 0% Secured		
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
ROBERT GIGANTE		NONE		
5 Dulenere Road		Occupation		
Staten Island, N.Y. 10304		LAWYER		
		Amount Guaranteed Outstanding		
		10,000.00		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
		0		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
		0		
B Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Committed Payments To Date	Balance Outstanding at Close of This Period
BARBARA GIGANTE 5 Dulenere Road Staten Island, N.Y. 10305		10,000.00	0.00	10,000.00
Election ☒ Primary ☐ General ☐ Other (specify)		Terms Date Incurred 8/21/80 Date Due 8/21/81 Interest Rate 11% Secured		
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
ROBERT GIGANTE		NONE		
5 Dulenere Road		Occupation		
Staten Island, N.Y. 10305		LAWYER		
		Amount Guaranteed Outstanding		
		2,500.00		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
		0		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding		
		0		
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				20,000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

(3)

28846610000

B report

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

Name of Committee (in Full)

COMMITTEE TO ELECT BOB GIGANTE

A. Full Name, Mailing Address and ZIP Code

 Charles J. Lafino
 3245 E. Patterson Road
 Dayton, Ohio 45420

Name of Employer

NONE

Date (month,
day, year)

9/10/89

Amount of Each
Receipt This Period

2,000.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

CONTRACTOR

Aggregate Year-to-Date—\$ 2,000.00

B. Full Name, Mailing Address and ZIP Code

 Gilbert Marr
 75 Signal Hill Road
 S.I., N.Y. 10301

Name of Employer

NONE

Date (month,
day, year)

8/27/80

Amount of Each
Receipt This Period

750.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

ENGINEER

Aggregate Year-to-Date—\$ 750.00

C. Full Name, Mailing Address and ZIP Code

 Margaret Marr
 75 Signal Hill Road
 S.I., N.Y. 10301

Name of Employer

NONE

Date (month,
day, year)

8/27/80

Amount of Each
Receipt This Period

750.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

HOUSEWIFE

Aggregate Year-to-Date—\$ 750.00

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Receipt For:

☐ Primary☐ General☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Receipt For:

☐ Primary☐ General☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Receipt For:

☐ Primary☐ General☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Receipt For:

☐ Primary☐ General☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$

SUBTOTAL of Receipts This Page (optional)

3500.00

TOTAL This Period (last page this line number only)

3500.00

4

0 2 0 0 0 1 3 9 6 9 1 5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

April 16, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: 12 Day Pre Primary Report (7/28/80-8/22/80)

Dear Mr. Giorgio:

This letter is prompted by the Commission's preliminary review of your 12 Day Pre-Primary Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multicandidate committee, from making contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donors the amounts in excess of \$1,000. (Any refund itemized on Schedule B should be reported on Line 20a of the Detailed Summary Page of your next report.)

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515, within fifteen (15) days of the date of this letter. If you need assistance, please

6204033970

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Ralph J. Giorgio
Committee to Elect Bob Gigante

2

feel free to contact me on our toll free number, (800) 424-9530. My
local number is (202) 523-4172.

Sincerely,

Tom Scully

Thomas Scully
Reports Analyst
Reports Analysis Division

02040333971

6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

April 16, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: October 15 Quarterly Report (8/23/80-10/10/80)

Dear Mr. Giorgio:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. (Any refund itemized on Schedule B should be reported on Line 20a of the Detailed Summary Page of your next report.)

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515, within fifteen (15) days of the date of this letter. If you need assistance, please

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Ralph J. Giorgio
Committee to Elect Bob Gigante

2

feel free to contact me on our toll free number, (800) 424-9530. My
local number is (202) 523-4172.

Sincerely,

Tom Scully

Thomas Scully
Reports Analyst
Reports Analysis Division

02040333973

8



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 8, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: 12 Day Pre-Primary Report (07/28/80 - 08/22/80) and October
15th Quarterly Report (08/23/80 - 10/10/80)

Dear Mr. Giorgio:

This letter is to inform you that as of this date, the Commission has not received your response to our requests for additional information, dated April 16, 1981. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Thomas Scully on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson

John D. Gibson
Acting Assist. Staff Director
Reports Analysis Division

Enclosure

9

02040333974



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

TELEPHONE

FROM Ralph Giorgio to Tom Scully

DATE 5/14/81

COMMITTEE Committee to Elect Bob Gigante

Mr. Giorgio called about the two RFAI's sent to him for the Q3 and 12P reports. He asked why the loans were excessive, why they were contributions, and said that they were only loans from family members.

I explained that a loan is considered a contribution, and that an individual is limited to \$1000 an election. I explained why the loan and contribution from Charles Lofino and the loan from Barbara Gigante were excessive. I told him to write a letter explaining his misunderstanding of the Act and to refund the contributions as soon as possible. He said that he would do so.

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10

GIGANTE DEMOCRAT FOR CONGRESS

COMMITTEE TO ELECT BOB GIGANTE

SUITE 1B

2268 Hylan Boulevard

STATEN ISLAND, N.Y. 10306

MAY 21 1981
REGULAR MAIL

May 20, 1981

Mr. Thomas Scully
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

Identification No:

Committee To Elect Bob Gigante
C00130351

References: Thomas Scully Letters Dated 4/16/81
Concerning the 12 Day Pre Primary Report
and the October 15 Quarterly Report

Dear Mr. Scully

This letter will serve to confirm our recent discussion concerning
the subject References:

12 Day Pre Primary Report

You advised me that the loans provided to the candidate by Mr. Lofino and
Mrs. Gigante were in excess of \$1000.00. The Committee was not aware that
loans are considered contributions, and, as such are limited to \$1000.00.
Please be advised that as indicated in subsequent reports, these loans are
being repaid on a systematic basis and are expected to be completely repaid
in approximately 18 months.

October 15 Quarterly Report

You advised me that the contribution made by Mr. Lofino exceeded the \$1000.00
limitation for contributions. Please be advised that the contribution should
have been reported as from the Lofino family and, to my understanding would
not have then exceeded the limitation of personal contributions. I intend
to ammend this Report to reflect this clarification.

If I can be of further assistance, please contact me.

Very truly yours,

Ralph J Giorgio
Treasurer

bc: Robert Gigante

Paid for by the Committee to Elect Bob Gigante

PSS
Cw/s

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Committee to Elect
Bob Gigante

STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution to \$11,000.

The Committee was sent two requests for additional information (RAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

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12

On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find reason to believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

13

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Barbara Gigante

STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 323-4057

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution of \$11,000.

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

14

On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

02040333980 The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that Barbara Gigante violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Barbara Gigante violated 2 U.S.C. § 441a.

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Charles J. Lofino

STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution of \$11,000.

The Committee was sent two requests for additional information (RAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

16

On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

8204033982 The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that Charles J. Lofino violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Charles J. Lofino violated 2 U.S.C. § 441a.

17



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: NUR 1407

Dear Mr. Giorgio:

On January , 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. 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 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).

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.

18

Letter to Ralph J. Giorgio
Page 2

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 Susanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

62040333984

19



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Ms. Gigante:

On January , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

20

Letter to Barbara Gigante
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

02040333986

21



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

On January , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

22

Letter to Charles J. Lofino
Page 2

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 Susanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

02040333988

23



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1982

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

On January 19, 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

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Letter to Charles J. Lofino
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

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

cc: Robert Gigante

02040333990

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Charles J. Lofino

**STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057**

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution of \$11,000.

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

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On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that Charles J. Lofino violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Charles J. Lofino violated 2 U.S.C. § 441a.

8.2040333992



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1982

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Ms. Gigante:

On January 19, 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

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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.

0204033993

Letter to Barbara Gigante
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

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

cc: Robert Gigante

62040333994

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Barbara Gigante

**STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057**

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution of \$11,000.

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

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The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that Barbara Gigante violated 2 U.S.C. § 441a.

RECOMMENDATION

1. Find reason to believe that Barbara Gigante violated 2 U.S.C. § 441a.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 21, 1982

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

Dear Mr. Giorgio:

On January 19, 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. 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 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).

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.

0'2040333997

Letter to Ralph J. Giorgio
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

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

cc: Robert Gigante

6'2040333998

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1407

RESPONDENT Committee to Elect
Bob Gigante

STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

Based on a review of the reports filed by the Committee to Elect Bob Gigante ("the Committee"), the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel ("OGC") alleging that Charles J. Lofino, Barbara Gigante and the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

This matter involves the acceptance of excessive loans from individuals by the Committee. Specifically, the Committee accepted a \$10,000 loan from Charles J. Lofino and a \$10,000 loan from Barbara Gigante, both of which are \$9,000 in excess of the limitations of 2 U.S.C. § 441a. Additionally, Mr. Lofino made an outright contribution of \$2,000 bringing his total excessive contribution to \$11,000.

The Committee was sent two requests for additional information (RFAI) on April 16, 1981, in connection with apparent violations reported on the 12 day pre-primary and October Quarterly Reports. No response was received so RAD sent the respondent second notices on May 8, 1981.

0.2040333999

On May 20, 1981, the respondent committee advised the Commission, via letter, that it was not aware that the loans from Mrs. Gigante and Mr. Lofino were considered contributions. The treasurer indicated that the loans were being systematically repaid and expected the loans to be completely repaid within 18 months. The treasurer also stated that the \$2,000 outright contribution from Mr. Lofino should be attributed to the Lofino family.

The semi-annual report filed by the Committee on July 21, 1981, indicates that no portion of Mr. Lofino's loan has been repaid; however, the Committee does report a \$3,500 cumulative payment to date to Mrs. Gigante. Thus, the excessive portion of Mrs. Gigante's loan outstanding at this time is \$5,500. Therefore, the General Counsel recommends that the Commission find reason to believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find reason to believe that the Committee to Elect Bob Gigante violated 2 U.S.C. § 441a(f).

0'2040334000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Charles J. Lofino
3425 East Patterson Road
Dayton, Ohio 45430

RE: MUR 1407

Dear Mr. Lofino:

On January , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

02040334001

Letter to Charles J. Lofino
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Smc
1/20/82

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

02040334002



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Barbara Gigante
Five Dalemere Road
Staten Island, New York 10305

RE: MUR 1407

Dear Ms. Gigante:

On January , 1982, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. 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.

Letter to Barbara Gigante
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Smc
1/20/82

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

02040334004



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, New York 10306

RE: MUR 1407

Dear Mr. Giorgio:

On January , 1982, the Federal Election Commission determined that there is reason to believe that your committee violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. 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 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).

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.

02040334003

Letter to Ralph J. Giorgio
Page 2

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 Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

*Done
11/20/82*

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Robert Gigante

02040334006

MUR 1407

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Elect Bob Gigante)

81L-30

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission's Executive Session on December 15, 1981, do hereby certify that the Commission decided by a vote of 6-0 to authorize the Office of General Counsel to open a MUR in the above-captioned matter.

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

Attest:

12/23/81

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

62040334007

REPORTS ANALYSIS REFERRAL SHEET

DATE JUNE 30, 1981 ANALYST Susan Weber for Theresa Keefer
TO: OGC TEAM CHIEF Peter Kell, Jr.
THROUGH: STAFF DIRECTOR PS COMPLIANCE REVIEW EG
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS gd

CANDIDATE/COMMITTEE: Committee to Elect Bob Gigante
TREASURER: Ralph Giorgio
ADDRESS: 2288 Hylan Boulevard
Staten Island, New York 10306

MUR 1407

AFFILIATE(S): N/A

ALLEGATION(S): CITE: ATTACHMENT(S)

Receipt of excessive contributions
from an individual

2 U.S.C. 441a

2

DATE INITIATED:
4/16/81

MANNER IN WHICH REVIEW WAS INITIATED:

- ☒ Normal Review ☐ Other:
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 7/28/80 TO 10/10/80

TOTAL RECEIPTS \$ 29093 TOTAL EXPENDITURES \$ 29378

CASH ON HAND \$ 29.99 DEBTS \$ 20,000

HISTORY:

RESULTS OF REVIEW:

RFAI sent for the 12P report- 4/16/81
RFAI sent for the Q3 report- 4/16/81
2nd Notice sent for above reports- 5/8/81

ATTACHMENT

3
4
5

Inadequate Response received for above reports- 5/26/81

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

7

Telecon dated- 5/14/81

6

REASON(S) FOR REFERRAL:

ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

ATTACHMENT

Although the committee responded on 5/26/81 stating that an amendment would be filed to correct the excessive contribution reported on the October Quarterly Report, no such amendment has been recieved.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

TTY NO FORM

INVT

ENTER 78 FOR 77-78 OR 80 FOR 79-80 ELECTION CYCLE.80

TYPE REPORT RUN OR HELP FOR ASSIST. C

ENTER COMMITTEE ID: C00130351

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)

DATE 12/11/81
PAGE 1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COMMITTEE TO ELECT BOB GIGANTE						HOUSE		ID #C00130351
	1980 STATEMENT OF ORGANIZATION					25.JUN80	1	HOUSE/178/3967
	*PRE-PRIMARY	20,750		13,486		20.JUL80 - 22AUG80	7	HOUSE/184/0016
	JPRE-PRIMARY - AMENDMENT	-		-		28.JUL80 - 22AUG80	1	HOUSE/201/3391
	REQUEST FOR ADDITIONAL INFORMATION					28.JUL80 - 22AUG80	3	HOUSE/194/2295
	REQUEST FOR ADDITIONAL INFORMATION 2ND					28.JUL80 - 22AUG80	7	HOUSE/195/2973
	MID-YEAR REPORT	7,066		6,750		3MAY80 - 27.JUL80	4	HOUSE/182/3846
	OCTOBER QUARTERLY		8,343			23AUG80 - 10OCT80	9	HOUSE/186/2010
	OCTOBER QUARTERLY - AMENDMENT		-			- 23AUG80 - 10OCT80	1	HOUSE/194/3914
	REQUEST FOR ADDITIONAL INFORMATION					23AUG80 - 10OCT80	3	HOUSE/194/2299
	REQUEST FOR ADDITIONAL INFORMATION 2ND					23AUG80 - 10OCT80	1	HOUSE/195/3859
	YEAR-END	4,476		4,432		16OCT80 - 31JAN81	6	HOUSE/199/0922
	TOTAL	32,292	8,343	24,668	15,892		43	TOTAL PAGES

600733070

12 Pages report

1. For Name, Mailing Address and ZIP Code of Loan Source
 2. For Name, Mailing Address and ZIP Code of Borrower
 3. For Name, Mailing Address and ZIP Code of Guarantor

2

COMMITTEE TO ELECT BOB GIGANTE			
1. For Name, Mailing Address and ZIP Code of Loan Source Charles J. Lafino 3245 E. Patterson Road DAYTON, Ohio 45430		Original Amount of Loan 10,000.00	Balance Outstanding at Close of This Period 10,000.00
Election Primary ☒ General ☐ Other (specify):		Term: Date Incurred 7/13/80 Date Due 7/13/81 Interest Rate 3 % ☒ Secured ☐ Unsecured	
List All Endorsers or Guarantors (if any) as Item A			
1. Full Name, Mailing Address and ZIP Code ROBERT GIGANTE 5 Dulerere Road Staten Island, N.Y. 10304		Name of Employer NONE Occupation LAWYER Amount Guaranteed Outstanding 10,000.00	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding	
B. Full Name, Mailing Address and ZIP Code of Loan Source BARBARA GIGANTE 5 Dulerere Road Staten Island, N.Y. 10305		Original Amount of Loan 10,000.00	Balance Outstanding at Close of This Period 10,000.00
Election Primary ☒ General ☐ Other (specify):		Term: Date Incurred 8/11/80 Date Due 8/11/81 Interest Rate 11 1/2 % ☒ Secured ☐ Unsecured	
List All Endorsers or Guarantors (if any) as Item B			
1. Full Name, Mailing Address and ZIP Code ROBERT GIGANTE 5 Dulerere Road Staten Island, N.Y. 10305		Name of Employer NONE Occupation LAWYER Amount Guaranteed Outstanding 10,000.00	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			20,000.00
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

020413940702

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

Name of Committee (in Full)

COMMITTEE TO ELECT BOB GIGANTE

A. Full Name, Mailing Address and ZIP Code

Charles J. Lofino
3245 E. Patterson Road
Dayton, Ohio 45420

Name of Employer

NONEDate (month,
day, year)**9/10/80**Amount of Each
Receipt This Period**2,000.00**

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

CONTRACTORAggregate Year-to-Date—\$ **2,000.00**

B. Full Name, Mailing Address and ZIP Code

Gilbert Marr
75 Signal Hill Road
S.I., N.Y. 10301

Name of Employer

NONEDate (month,
day, year)**8/27/80**Amount of Each
Receipt This Period**750.00**

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

ENGINEERAggregate Year-to-Date—\$ **750.00**

C. Full Name, Mailing Address and ZIP Code

Margaret Marr
75 Signal Hill Road
S.I., N.Y. 10301

Name of Employer

NONEDate (month,
day, year)**8/27/80**Amount of Each
Receipt This Period**750.00**

Receipt For:

☒ Primary☐ General☐ Other (specify):

Occupation

HOUSEWIFEAggregate Year-to-Date—\$ **750.00**

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date—\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date—\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date—\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date—\$

SUBTOTAL of Receipts This Page (optional)

3500.00

TOTAL This Period (last page this line number only)

3500.00

0 2 3 4 5 6 7 8 9 10 11 12



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

April 16, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: 12 Day Pre Primary Report (7/28/80-8/22/80)

Dear Mr. Giorgio:

This letter is prompted by the Commission's preliminary review of your 12 Day Pre-Primary Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multicandidate committee, from making contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donors the amounts in excess of \$1,000. (Any refund itemized on Schedule B should be reported on Line 20a of the Detailed Summary Page of your next report.)

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515, within fifteen (15) days of the date of this letter. If you need assistance, please

02040334012

3

Ralph J. Giorgio
Committee to Elect Bob Gigante

2

feel free to contact me on our toll free number, (800) 424-9530. My
local number is (202) 523-4172.

Sincerely,

Tom Scully

Thomas Scully
Reports Analyst
Reports Analysis Division

62040334013



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

4

April 16, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: October 15 Quarterly Report (8/23/80-10/10/80)

Dear Mr. Giorgio:

This letter is prompted by the Commission's preliminary review of your October Quarterly Report. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. (Any refund itemized on Schedule B should be reported on Line 20a of the Detailed Summary Page of your next report.)

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission.

An amendment to your original report correcting the above problems should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515, within fifteen (15) days of the date of this letter. If you need assistance, please

02040334014

Ralph J. Giorgio
Committee to Elect Bob Gigante

2

feel free to contact me on our toll free number, (800) 424-9530. My
local number is (202) 523-4172.

Sincerely,

Tom Scully

Thomas Scully
Reports Analyst
Reports Analysis Division

82040334015



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

5

May 8, 1981

Ralph J. Giorgio, Treasurer
Committee to Elect Bob Gigante
2288 Hylan Boulevard
Staten Island, NY 10306

Identification No: C00130351

Reference: 12 Day Pre-Primary Report (07/28/80 - 08/22/80) and October
15th Quarterly Report (08/23/80 - 10/10/80)

Dear Mr. Giorgio:

This letter is to inform you that as of this date, the Commission has not received your response to our requests for additional information, dated April 16, 1981. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Thomas Scully on our toll-free number (800)424-9530 or our local number (202)523-4172.

Sincerely,

John D. Gibson

John D. Gibson
Acting Assist. Staff Director
Reports Analysis Division

Enclosure

02040334016



FEDERAL ELECTION COMMISSION

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

TELECON

FROM Ralph Giorgio to Tom Scully

DATE 5/14/81

COMMITTEE Committee to Elect Bob Gigante

Mr. Giorgio called about the two REAI's sent to him for the Q3 and 12P reports. He asked why the loans were excessive, why they were contributions, and said that they were only loans from family members.

I explained that a loan is considered a contribution, and that an individual is limited to \$1000 an election. I explained why the loan and contribution from Charles Lofino and the loan from Barbara Gigante were excessive. I told him to write a letter explaining his misunderstanding of the Act and to refund the contributions as soon as possible. He said that he would do so.

62040334017



**BOB
GIGANTE**
**DEMOCRAT FOR
CONGRESS**

**COMMITTEE TO ELECT
BOB GIGANTE**

81 MAY 26 4 3: 14

7

SUITE 1B

2286 HYLAN BOULEVARD

STATEN ISLAND, N.Y. 10308

MAY 21 1981
REGULAR MAIL

May 20, 1981

Mr. Thomas Scully
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

U.S. MAIL
FIRST CLASS
STATEN ISLAND, N.Y.

MAY 27 PM 12:40

Identification No:

Committee To Elect Bob Gigante
C00130351

References: Thomas Scully Letters Dated 4/16/81
Concerning the 12 Day Pre Primary Report
and the October 15 Quarterly Report

3-A-1-P
7/2/81 - 8/2/81

Dear Mr. Scully

This letter will serve to confirm our recent discussion concerning
the subject References:

12 Day Pre Primary Report

You advised me that the loans provided to the candidate by Mr. Lofino and
Mrs. Gigante were in excess of \$1000.00. The Committee was not aware that
loans are considered contributions, and, as such are limited to \$1000.00.
Please be advised that as indicated in subsequent reports, these loans are
being repaid on a systematic basis and are expected to be completely repaid
in approximately 18 months.

October 15 Quarterly Report

You advised me that the contribution made by Mr. Lofino exceeded the \$1000.00
limitation for contributions. Please be advised that the contribution should
have been reported as from the Lofino family and, to my understanding would
not have then exceeded the limitation of personal contributions. I intend
to ammend this Report to reflect this clarification.

If I can be of further assistance, please contact me.

Very truly yours,

Ralph J. Giorgio

Ralph J Giorgio
Treasurer

bc: Robert Gigante

Paid for by the Committee to Elect Bob Gigante

PSB
CW/5



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1407

Date Filmed 7-24-82 Camera No. --- 2

Cameraman bpc