



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1732

Date Filmed 4/12/85 Camera No. --- 1

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FEDERAL ELECTION COMMISSION

- Material relating to another political committee sent in by former treasurer
- All routing cards
- 12 Day Report and Comment Sheets
- 12 Day Pre-Brief and Comment Sheets
- Material relating to conciliation
- Letters (initialed copies)

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 2 U.S.C. § 437g (a) (4) (B) (i) | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed Marybeth Tamant
 date 3/22/85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1732
Conservative Party of Connecticut)
David J. Ordway, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 26, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1732:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed February 21, 1985.
2. Approve the letters attached to the General Counsel's Report signed February 21, 1985.
3. Close the file.

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

Attest:

2-26-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

2-21-85, 12:17
2-21-85, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 1, 1985

David J. Ordway, Treasurer
Conservative Party of Connecticut
24 Hoyt Street
Stamford, Connecticut 06905

Re: MUR 1732

Dear Mr. Ordway:

On February 26, 1985, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Please send a check for the civil penalty, made payable to the U.S. Treasurer, within 30 days. The file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Conservative Party of Connecticut)
David J. Ordway, as treasurer)

MUR 1732

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Conservative Party of Connecticut ("CPC") and David J. Ordway, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file reports and 2 U.S.C. § 441a(f) by accepting excessive contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent, CPC, is a political committee pursuant to 2 U.S.C. § 431(4)(A).

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GENERAL COUNSEL

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2. Respondent, David J. Ordway, became treasurer of CPC on October 4, 1984.
 3. CPC's 1983 Year End Report, which was due on January 31, 1984, was filed on July 30, 1984.
 4. CPC's 1984 April Quarterly Report, which was due on April 15, 1984, was filed on July 30, 1984.
 5. CPC's 1984 July Quarterly Report, which was due on July 15, 1984, was filed on July 30, 1984.
 6. CPC's 1984 October Quarterly Report, which was due on October 15, 1984, was filed on November 16, 1984.
 7. On September 9, 1982, Anne C. Seggerman contributed \$15,000 to CPC.
 8. On September 9, 1982, Harry G.A. Seggerman contributed \$10,000 to CPC.
 9. On November 4, 1983, CPC refunded \$5,000 to Anne C. Seggerman.
 10. On November 23, 1983, CPC refunded another \$5,000 to Anne C. Seggerman.
 11. On November 23, 1983, CPC refunded \$5,000 to Harry G.A. Seggerman.
- V. 1. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required in a non-election year to file, through their treasurers, a report, covering the period beginning July 1 and ending December 31, no later than January 31 of the

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following calendar year. Pursuant to 2 U.S.C.

§ 434(a)(4)(A)(i), all political committees other than authorized committees are required to file quarterly reports, in a calendar year in which a regularly scheduled general election is held, no later than the 15th day after the last day of each calendar year.

2. Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

VI. 1. By failing to timely file the 1983 Year End and 1984 April, July and October Quarterly Reports, Respondents violated 2 U.S.C. § 434(a)(4)(A).

2. By accepting excessive contributions from Anne C. Seggerman and Harry G.A. Seggerman, Respondents violated 2 U.S.C. § 441a(f).

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondents agree to continue to file reports pursuant to 2 U.S.C. § 434(a)(4) until the debt to Castellanos & Co. is extinguished or settled in accordance with the standards set forth at 11 C.F.R. § 114.10.

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

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

XII. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XIII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

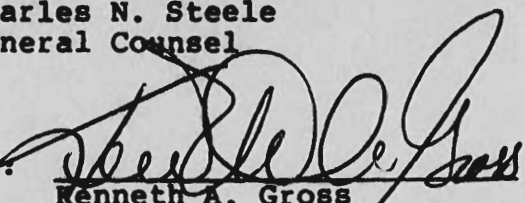
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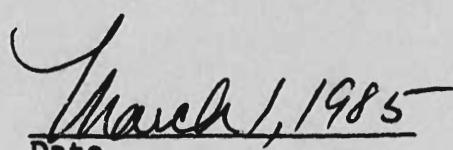
oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

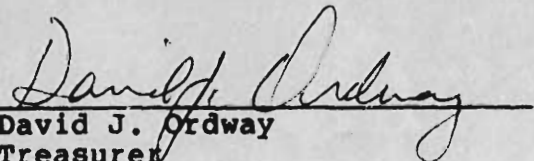
Charles N. Steele
General Counsel

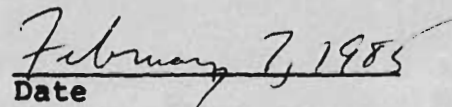
BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENTS:


David J. Ordway
Treasurer


Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 1, 1985

J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
Suite 1100
McLean, Virginia 22102

Re: MUR 1732
Anne C. Seggerman
Harry G.A. Seggerman
Castellanos & Co.

Dear Mr. Herge:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, which appears to read "Kenneth A. Gross", is written over the typed name.

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 10, 1985

J. Curtis Herge, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1732
Anne C. Seggerman
Harry G.A. Seggerman
Castellanos & Co.

Dear Mr. Herge:

On June 26, 1984, the Commission found reason to believe that your clients had violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission, on January 8, 1985, determined to take no further action and close its file as it pertains to your clients.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

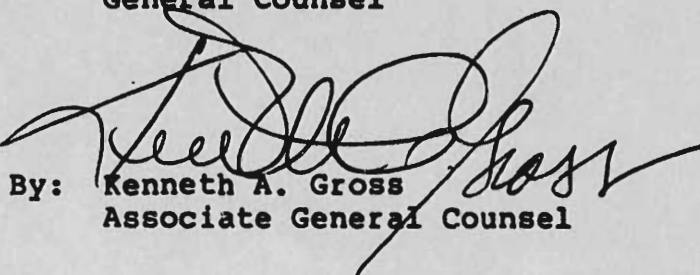
The Commission reminds your clients that the making of an excessive contribution is a violation of the Act and steps should be taken to insure that this activity does not occur in the future.

Letter to J. Curtis Herge
Page 2

If you have any questions, please direct them to Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Conservative Party of Connecticut)
and David J. Ordway, as)
treasurer) MUR 1732
Anne C. Seggerman)
Harry G.A. Seggerman)
Castellanos & Co.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of
January 8, 1985, do hereby certify that the Commission
decided by a vote of 4-1 to take the following actions
in MUR 1732:

1. Find reason to believe that David J.
Ordway, as treasurer, violated
2 U.S.C. §§ 434(a)(4)(A) and 441a(f).
2. Find reason to believe that the
Conservative Party of Connecticut
and David J. Ordway, as treasurer,
violated 2 U.S.C. § 434(a)(4)(A) by
failing to timely file the July and
October 1984 Quarterly Reports.
3. Take no further action against Anne
C. Seggerman, Harry G.A. Seggerman
and Castellanos & Co. and close the
file with respect to these respondents.

(continued)

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4. Take no further action against the Conservative Party of Connecticut in connection with a contribution from Castellanos & Co.
5. Enter into pre-probable cause conciliation with the Conservative Party of Connecticut and David J. Ordway, as treasurer.
6. Approve the proposed conciliation agreement attached to the General Counsel's report dated December 28, 1984.
7. Approve the letters attached to the General Counsel's report dated December 28, 1984.

Commissioners Elliott, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioner Reiche dissented; Commissioner Aikens did not cast a vote.

Attest:

1-9-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS JODY C. RANSOM *JCR*
DATE: JANUARY 3, 1985
SUBJECT: OBJECTION - MUR 1732 General Counsel's
Report signed December 28, 1984

The above-named document was circulated to the
Commission on Monday, December 31, 1984 at 11:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____ X _____

This matter will be placed on the Executive Session
agenda for Tuesday, January 8, 1985.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cx*
DATE: December 28, 1984
SUBJECT: MUR 1732 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Conservative Party of Connecticut and
David J. Ordway, as treasurer
Anne C. Seggerman
Harry G.A. Seggerman
Castellanos & Co.

MUR 1732

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FEDERAL ELECTION COMMISSION
SECRETARY

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was referred to the Office of the General Counsel by the Reports Analysis Division. On June 26, 1984, the Commission found reason to believe that the Conservative Party of Connecticut ("CPC") had violated 2 U.S.C. § 434(a)(4)(A) by failing to file the 1983 Year End and the 1984 April Quarterly Reports. 1/ (CPC had filed a Termination Report on July 18, 1983, however, it was not accepted because of an outstanding debt of \$5,259 owed to Castellanos & Co. 2/). In addition, the Commission found reason to believe that CPC had violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Anne C. Seggerman (\$15,000), Harry G.A. Seggerman (\$10,000) 3/ and

1/ Because Mr. Ordway did not become treasurer of CPC until October 1984 and since the former treasurer had resigned in March 1983, no findings were made against a treasurer.

2/ Castellanos & Co. is not incorporated and is a sole proprietorship.

3/ On September 9, 1982, Anne C. Seggerman contributed \$15,000 to CPC and Harry G.A. Seggerman contributed \$10,000. In October 1982, CPC was notified by a RAD analyst that the contributions were excessive. On November 4, 1982, \$5,000 was refunded to Mrs. Seggerman and on November 23, 1982, additional refunds of \$5,000 were made to both Mr. and Mrs. Seggerman.

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Castellanos & Co. (\$5,259) 4/ and that these contributors had violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions to CPC.

In response to the reason to believe findings, Mr. Ordway, who was sent the reason to believe notification on behalf of CPC, responded on July 30, 1984, by stating that all efforts to retire the debt owed to Castellanos & Co. have been fruitless. In addition, Mr. Ordway filed unsigned copies of a 1983 Year End Report, 1984 April Quarterly Report and 1984 July Quarterly Report explaining that the reports had been forwarded to the former treasurer for signature. (Signed copies were filed by Mr. Ordway on October 4, 1984). Mr. Ordway also stated that it was he who had solicited the contributions from the Seggermans based upon the belief that the maximum for contributions to a state party committee was \$15,000.

On August 2, 1984, counsel for the Seggermans responded by sending in affidavits from both Mr. and Mrs. Seggerman which stated that they had been advised by Mr. Ordway that an individual could contribute \$15,000 to a state party committee. See Attachment 2. On August 6, 1984, counsel for Castellanos & Co. responded by stating that his client had no intention of forgiving the debt or entering into a debt settlement agreement as Mr. Castellanos expects to be paid in full. Mr. Castellanos

4/ In August and September 1982, CPC was provided services (relating to TV time on behalf of Conservative Party candidate Lucien DeFazio) by Castellanos & Co. for a total cost of \$5,259. Since that time, no payments have been made by CPC to retire the debt.

claims to have discussed the problem with the former treasurer of CPC several times in addition to speaking to other political committees regarding the possibility of raising funds for CPC. According to Mr. Castellanos, CPC is incorporated, therefore, to sue CPC would be a futile act. See Attachment 3.

On October 30, 1984, a General Counsel's Brief was sent to Mr. Ordway to inform him of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe that CPC and Mr. Ordway, as treasurer, had violated the Act. On November 16, 1984, CPC filed its October 15, 1984, Quarterly Report. On November 19, 1984, Mr. Ordway responded to the brief by asking to enter into pre-probable cause conciliation

II. ANALYSIS

In the General Counsel's Brief, this Office recommended that the Commission find probable cause to believe that Mr. Ordway, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f) even though a reason to believe finding had not been made against him. This recommendation was based on the fact that Mr. Ordway is now treasurer of CPC and has had notice of the allegations and an opportunity to respond on behalf of CPC. In light of his conciliation request, it is the recommendation of this Office that the Commission find reason to believe that David J. Ordway, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f).

In addition, as both the July and October 1984 Quarterly Reports were filed late, this Office recommends that the Commission find reason to believe that CPC and David J. Ordway, as treasurer, violated 2 U.S.C. § 434(a)(4)(A). 5/

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With regard to the other respondents in this matter, this Office recommends that no further action be taken. This recommendation is based on the fact that both the Seggermans and Mr. Ordway have stated that it was Mr. Ordway who solicited and incorrectly advised the Seggermans regarding the contribution limitations. 6/ In addition, although it appears that Mr. Castellanos has not made any recent efforts to collect the debt and has allowed the debt to remain outstanding for over two years, he has made some attempts to collect payment from CPC and claims that he will be continuing to do so. As CPC is incorporated and has no assets, Mr. Castellanos' options are somewhat limited. Further, as it appears that Castellanos & Co. would be permitted to make a \$5,000 contribution to CPC, the amount in excess is only \$259. Therefore, this Office recommends that no further action be taken against the Seggermans, Castellanos & Co. and CPC concerning these transactions.

5/ On December 10, 1984, a staff member spoke to Mr. Ordway regarding these late reports. This Office indicated its intent to make reason to believe recommendations concerning his liability as treasurer and those reports. Mr. Ordway indicated that he wanted the pre-probable cause conciliation request to apply to these reports also.

6/ It is noted that the recommendation to take no further action against the Seggermans is not based on Mr. Ordway's request. This Office had made the determination to make such a recommendation before receiving the request.

In light of Mr. Ordway's request, the Office of the General Counsel recommends that the Commission enter into pre-probable cause conciliation with CPC and Mr. Ordway and approve the attached conciliation agreement.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

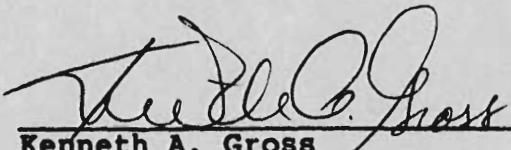
1. Find reason to believe that David J. Ordway, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f).
2. Find reason to believe that the Conservative Party of Connecticut and David J. Ordway, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file the July and October 1984 Quarterly Reports.
3. Take no further action against Anne C. Seggerman, Harry G.A. Seggerman and Castellanos & Co. and close the file with respect to those respondents.
4. Take no further action against the Conservative Party of Connecticut in connection with a contribution from Castellanos & Co.

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5. Enter into pre-probable cause conciliation with the Conservative Party of Connecticut and David J. Ordway, as treasurer.
6. Approve the proposed conciliation agreement.
7. Approve the attached letters.

Charles N. Steele
General Counsel

Dec 28, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response of Ordway
2. Response of Seggermans
3. Response of Castellanos & Co.
4. Request for pre-probable cause conciliation
5. Proposed conciliation agreement
6. Proposed letters

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84 JUL 30 P 1: 43

David J. Ordway
24 Hoyt Street
Stamford, Conn. 06905

July 27, 1984

Marybeth Tarrant
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1732
Conservative Party of Connecticut

Dear Ms. Tarrant:

Enclosed you find my affidavit respecting the above captioned matter.

You will also find copies of reports for filing with the F.E.C., which reports are awaiting Mr. Gunnison's signature pursuant to his responsibility as Treasurer.

As soon as I receive said originals executed by Mr. Gunnison, I shall send them to you forthwith.

I assume I shall be contacted soon.

Sincerely,

David J. Ordway

Enclosures
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Attachment 1

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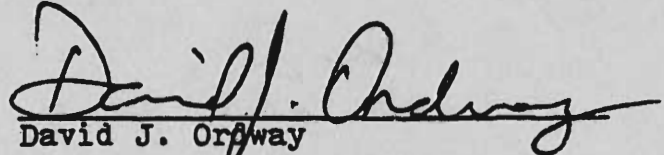
AFFIDAVIT

I, David J. Ordway, of 24 Hoyt Street, Stamford, Connecticut, being duly sworn do make affidavit and say:

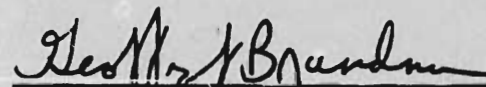
1. That I am 32 years of age and am a Commissioner of the Superior Court in the State of Connecticut and understand the nature and obligation of an oath;
2. That I was the Executive Director of the Conservative Party of Connecticut and served as it's operational officer and was primarily responsible for the day to day operations regarding political tactics, strategy, operations, and effecting same, but I was not directly responsible for filing reports with the F.E.C. or appropriate state agencies, nor was I responsible for bookkeeping or bank accounts with regard to the Conservative Party of Connecticut. Mr. Foster Gunnison was responsible for these matters, and maintains all of such documents and papers at his office.
3. That I moved from the Hartford area of Connecticut immediately subsequent to November, 1982, to Stamford, Connecticut, in order to begin the practice of law, and have been totally uninvolved in politics in any way since January, 1984, including the Conservative Party of Connecticut.
4. That I am of the understanding currently that Mr. Foster Gunnison has not filed any reports pursuant to his responsibility for one year.
5. That I solicited the excessive contributions from Mr. and Mrs. Seggerman based upon the sincere but mistaken belief that contributions to a State Party with a Federal candidates' bank account may be solicited from individuals up to a maximum of \$15,000.00 per person, and further, pursuant to said mistaken belief, said contributions were openly reported to the F.E.C. and were in no way concealed.
6. That upon notification by the F.E.C. of the error, refunds were promptly made to the Seggermans.
7. That immediately prior to the election in November, 1982, fundraising efforts were discussed at length for the purpose of determining how the debt may be paid off when the election was over. That volunteers hand addressed envelopes for the anticipated purpose of a direct mail solicitation to effect same. However, subsequent to the election, a determination was reached that the likely response to such a solicitation would not justify the cost of postage and printing the letters.

7. That immediately subsequent to the election I personally drove to Washington D.C. and met and talked with virtually every major national conservative leader or organization director respecting fundraising efforts to retire the debt and said efforts were absolutely fruitless.

Dated this 18th day of July, 1984.


David J. Ordway

Personally appeared, David J. Ordway, and acknowledged, this 18th day of July, 1984.


Commissioner of the Superior Court

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GCC #4240

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8800 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

August 1, 1984

GLENN J. SEDAM, JR.

J. CURTIS HERGE

ROBERT R. SPARKS, JR.

A. MARK CHRISTOPHER

CHRISTOPHER S. MOFFITT

PHILIP H. BANE

DONNA L. MILLER

OF COUNSEL

THOMAS J. FADOUL, JR.

TELEX: 710-831-0896

CABLE: SEDAMHERG

SEDAM, HERGE & REED

SUITE 1000

1250 EYE STREET, N.W.

WASHINGTON, D.C. 20005

(202) 898-0200

RESIDENT PARTNER: CHARLES D. REED

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

Re: MUR 1732

Dear Mr. Gross:

This letter is written on behalf of our clients, Apne C. Seggerman and Harry G.A. Seggerman, with reference to the letters from the Chairman of the Federal Election Commission to our clients, dated June 27, 1984, in which it was reported that the Commission had determined that there is reason to believe our clients may have violated the provisions of 2 U.S.C. 441a(a)(1)(C). Specifically, it appears that Mrs. Seggerman may have contributed the sum of \$15,000.00 to the Conservative Party of Connecticut on or about September 9, 1982; and, that Mr. Seggerman may have contributed the sum of \$10,000.00 to the Conservative Party of Connecticut on or about September 9, 1982. Pursuant to 2 U.S.C. 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees or to political committees established and maintained by a national political party, in any calendar year which, in the aggregate, exceed \$5,000.00. By letter dated July 11, 1984, we entered our appearance on behalf of our clients and requested an appropriate extension of time within which to respond to the findings.

Enclosed are two affidavits, one executed by Mr. Seggerman and the second executed by Mrs. Seggerman. In both cases, there is an admission that the alleged contributions were made, but it is noted that the contributions were solicited by the then Executive Director of the Conservative Party of

Attachment 2

(4)

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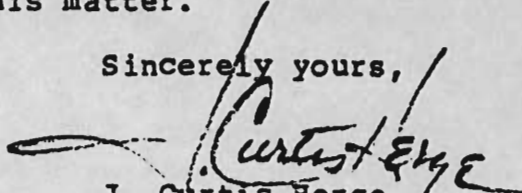
Kenneth A. Gross, Esq.
August 1, 1984
Page Two

Connecticut, who advised our clients that the maximum lawful amount an individual could contribute to the Federal account of a state party committee was \$15,000.00. Our clients acted in good faith in reliance upon that advice, not knowing, until two months later when the excessive amounts were refunded, that the advice they had been given was incorrect.

It appears that the error was called to the attention of the Conservative Party of Connecticut by an analyst in the Reports Analysis Division of the Federal Election Commission and that, as a result thereof, the Party promptly refunded the excess amounts to our clients.

Because our clients acted innocently and in good faith, upon reliance of the advice of representatives of the Conservative Party of Connecticut, and because the excess portion of the contributions were promptly refunded to our clients, equity and justice are not served by taking any further action against our clients in connection with this matter.

Sincerely yours,


J. Curtis Herge

Enclosures

85040520881

5

BEFORE THE
FEDERAL ELECTION COMMISSION

Affidavit of Harry G. A. Seggerman

MUR 1732

STATE OF CONNECTICUT
CITY OR COUNTY OF

)
) ss:

HARRY G.A. SEGGERMAN, being duly sworn, deposes and
says:

(1) That he resides at 5060 Congress Street,
Fairfield, Connecticut 06030; and, is the individual named as a
respondent in a matter pending before the Federal Election
Commission known as MUR 1732 regarding a contribution to the
Conservative Party of Connecticut in apparent violation of 2
U.S.C. 441a(a)(1)(C);

(2) That on or about September 9, 1982, he made a
contribution to the Conservative Party of Connecticut in the
amount of \$10,000.00;

(3) That he made the aforesaid contribution to
Conservative Party of Connecticut in response to a solicitation
by David J. Ordway, the then Executive Director of the
Conservative Party of Connecticut, who advised your deponent that
the maximum lawful amount an individual could contribute to the
Federal account of a state party committee was \$15,000.00;

(4) That, in November 1982, your deponent received a
refund of \$5,000.00 from the Conservative Party of Connecticut;
and, was advised, for the first time, that David J. Ordway had
been mistaken in his belief that the maximum lawful contribution
to Conservative Party of Connecticut was \$15,000.00; that his
error was called to the attention of the Conservative Party of
Connecticut by the Federal Election Commission; and, that the
refund was made to conform the contribution to the limitations in
2 U.S.C. 441a(1)(1)(C).

IN WITNESS WHEREOF, Harry G.A. Seggerman has executed
this affidavit this 24th day of July, 1984.

Harry G.A. Seggerman
Harry G.A. Seggerman

Sworn to before me this 24th day of July, 1984.

Marion J. Doherty
Notary Public

My commission expires:

MY COMMISSION EXPIRES MAR. 31, 1989

85040520883

BEFORE THE
FEDERAL ELECTION COMMISSION

Affidavit of Anne C. Seggerman

MUR 1732

STATE OF CONNECTICUT
CITY OR COUNTY OF

)
) ss:

ANNE C. SEGGERMAN, being duly sworn, deposes and says:

(1) That she resides at 5060 Congress Street, Fairfield, Connecticut 06030; and, is the individual named as a respondent in a matter pending before the Federal Election Commission known as MUR 1732 regarding a contribution to the Conservative Party of Connecticut in apparent violation of 2 U.S.C. 441a(a)(1)(C);

(2) That on or about September 9, 1982, she made two contributions to the Conservative Party of Connecticut which, in the aggregate, totaled \$15,000.00;

(3) That she made the aforesaid contributions to Conservative Party of Connecticut in response to a solicitation by David J. Ordway, the then Executive Director of the Conservative Party of Connecticut, who advised your deponent that the maximum lawful amount an individual could contribute to the Federal account of a state party committee was \$15,000.00;

(4) That, in November 1982, your deponent received a refund of \$10,000.00 from the Conservative Party of Connecticut; and, was advised, for the first time, that David J. Ordway had been mistaken in his belief that the maximum lawful contribution to Conservative Party of Connecticut was \$15,000.00; that his error was called to the attention of the Conservative Party of Connecticut by the Federal Election Commission; and, that the refunds were made to conform the contribution to the limitations in 2 U.S.C. 441a(1)(1)(C).

IN WITNESS WHEREOF, Anne C. Seggerman has executed this
affidavit this 24th day of July, 1984.

Anne C. Seggerman
Anne C. Seggerman

Sworn to before me this 24th day of July, 1984.

Marilyn J. Delaney
Notary Public

My commission expires:

MY COMMISSION EXPIRES MAR. 31, 1999

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84 AUG 6 P 1:00

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8800 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

August 2, 1984

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
CHRISTOPHER S. MOFFITT
PHILIP H. BANE
DONNA L. MILLER

OF COUNSEL

THOMAS J. FADOUL, JR.

TELEX: 710-831-0896

CABLE: SEDAMHERG

SEDAM, HERGE & REED

SUITE 1000

1850 EYE STREET, N.W.

WASHINGTON, D.C. 20006

202 596-0800

RESIDENT PARTNER: CHARLES D. REED

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

Re: MUR 1732

Dear Mr. Gross:

This letter is written on behalf of our client, Alejandro Castellanos, with reference to the letter from the Chairman of the Federal Election Commission to our client, dated June 27, 1984, in which it was reported that the Commission had determined that there is reason to believe our client may have violated 2 U.S.C. 441a(a)(1)(C). Specifically, it is alleged that our client may have violated 2 U.S.C. 441a(a)(1)(C), by reason of the provisions of 11 CFR 100.7(a)(4), for having extended credit to the Conservative Party of Connecticut for a length of time beyond normal business or trade practice. By letter dated July 9, 1984, we entered our appearance on behalf of our client and requested an appropriate extension of time within which to respond to the findings.

Our client, Alejandro Castellanos, conducts business under the name, Castellanos & Co. Castellanos & Co. is a sole proprietorship. In 1982, Mr. Castellanos provided services to the Conservative Party of Connecticut. Copies of the invoices rendered by Mr. Castellanos to the Conservative Party of Connecticut, dated August 20, 1982 in the amount of \$737.14 and September 30, 1982 in the amount of \$4,551.47, are enclosed. The Conservative Party of Connecticut reports that \$5,259.00 remains as a debt and obligation due Castellanos & Co.

Attachment 3

(10)

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90:34 9 34

Kenneth A. Gross, Esq.
August 2, 1984
Page Two

It should be understood that Mr. Castellanos has no interest whatsoever in forgiving, forgoing and forgetting this debt. He will not entertain a suggestion that any portion or all of this debt be compromised.

Mr. Castellanos has discussed the subject of the debt on several occasions with Mr. Gunnison, the treasurer of the Conservative Party of Connecticut, and has sent him copies of his invoices. Mr. Castellanos is fully aware of the fact that the Conservative Party of Connecticut has no cash. Aside from being told that by Mr. Gunnison, it is a matter of public record. Mr. Castellanos is fully aware of the fact that the Conservative Party of Connecticut has incorporated in order to limit its liability. Aside from being told that by Mr. Gunnison, it is a matter of public record. Thus, Mr. Castellanos knew he would not be successful if he were to sue the Conservative Party of Connecticut. That would be a futile act and an expensive act. The statute of limitations has not tolled, because the Conservative Party of Connecticut has continued to affirm its obligation and there is no evidence that there is any dispute over the validity or over the amount of the obligation.

Mr. Castellanos also knows that the Executive Director of the Conservative Party of Connecticut, Mr. Ordway, has made numerous efforts to raise funds for the Party. Mr. Castellanos himself has had numerous discussions during the past two years with representatives of multicandidate political committees, to discuss the possibility of raising funds for the Conservative Party of Connecticut. In brief, Mr. Castellanos has made and will continue to make every reasonable effort to collect the funds due him.

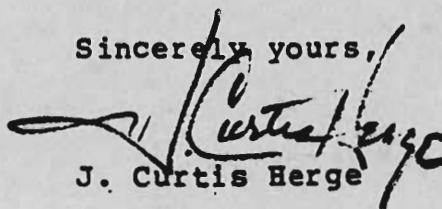
Mr. Castellanos, as a creditor of the Conservative Party of Connecticut, cannot be held responsible for the fact that Mr. Gunnison took it upon himself to stop filing reports with the Federal Election Commission. The law is clear that a political committee must continue to report if it has outstanding debts.

Mr. Castellanos, by counsel, asserts that he is not prepared to enter into a debt settlement agreement with the Conservative Party of Connecticut. If the Federal Election

Kenneth A. Gross, Esq.
August 2, 1984
Page Three

Commission were to force him to do so, that would amount to an unlawful taking of his property. To have this valid obligation termed a "contribution," because Mr. Castellanos has not sued a corporate creditor which has no assets, would be a gross injustice. The law does not require someone to act if that act would be futile. Mr. Castellanos expects payment in full and he and Mr. Ordway will continue to make all reasonable efforts to raise funds for the Conservative Party of Connecticut and to have the debt paid in full.

Sincerely yours,


J. Curtis Herge

Enclosures

85040520889

ALEJANDRO CASTELLANOS

I N V O I C E

Purchase Order -- VBL
Job Description -- Difazio TV
Invoice Date -- 09 30 82
Invoice Number -- 1034CC

Aug 6 13:06

The Conservative Party
of Connecticut

<u>QTY</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
1	TV Production :30 TV "Concern"	\$ 750.00
1	:30 TV "Vote for Weicker/ Moffet"	750.00
1	:30 TV "Real Choice"	750.00
1	:30 TV "Deserve a Choice"	750.00
4	Revised disclaimer, "Conservative Party of Conn."	633.12
1	round-trip airfare DCA-HRT-DCA	197.00
1	Hotel, Hartford	71.35
2	Taxi, air-htl-air	30.00
6	2" Quad dubs	450.00
3	3/4" Cassettes dubs	120.00
1	Shipping, Mt. Kisco	<u>50.00</u>
TOTAL INVOICE		\$4551.47

Payable to: Castellanos & Co.
Suite 103
2100 Paul Edwin Terrace
Falls Church, Va 22043

(703) 821 - 2496

85040520889

ALEJANDRO CASTELLANOS

I N V O I C E

Purchase Order -- VBL
Job Description -- Dubs, Revised Disc.
Job Number -- 1054, 1064
Invoice Date -- 08 20 82

The Conservative Party
of Connecticut

<u>QTY/DT</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	1054	
6	2" Quad dubs (4 spots)	\$ 480.00
2	3/4" cassettes	84.72
1	Shipping, Mt. Kisco	<u>65.12</u>
	Total	\$ 629.84
	1064	
1	3/4" Cassette	\$ 60.00
1	Shipping, Cable Net, Conn:	37.30
1	Same day serv:	<u>10.00</u>
	Total	\$ <u>107.30</u>
	TOTAL INVOICE	\$ 737.14

Payable to: Castellanos & Co.
Suite 103
2100 Paul Edwin Terrace
Falls Church, Va 22043

(703) 821 - 2496

85040520890

David J Ordway

Attorney at Law

24 Hoyt Street

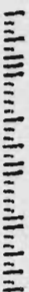
Stamford, Connecticut 06905



Vietnam Veterans Memorial - USA 20c

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

1 6 8 0 3 5 0 P O 5 8



84 NOV 19 9 42

David J. Ordway

Attorney at Law

24 Hoyt Street

Stamford, Connecticut 06905

(203) 967-4974

November 9, 1984

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

Re: Conservative Party of Connecticut

Dear Mr. Steele:

This letter is to express my desire to enter into negotiations toward reaching a conciliation agreement prior to a finding of probable cause that certain violations of the law occurred with respect to the above captioned matter.

Thankyou in advance for your cooperation in this matter.

Sincerely,

David J. Ordway

DJO:mlc

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ALL: 11:00

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David J. Ordway
Attorney at Law
24 Hoyt Street
Stamford, Connecticut 06905
(203) 967-4374

1732

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84 NOV 19 89:42

November 9, 1984

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

Re: Conservative Party of Connecticut

Dear Mr. Steele:

This letter is to express my desire to enter into negotiations toward reaching a conciliation agreement prior to a finding of probable cause that certain violations of the law occurred with respect to the above captioned matter.

Thankyou in advance for your cooperation in this matter.

Sincerely,

David J. Ordway

DJO:mlc

35040520893

34 NOV 19 11:41



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM TO: THE COMMISSION

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: OCTOBER 31, 1984

SUBJECT: MUR 1732 - General Counsel's Brief
signed October 30, 1984

The attached documents are circulated for your
information.

ATTACHMENTS:

1) Memo; 2) Brief; 3) Letter

85040520894



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CW*
DATE: October 30, 1984
SUBJECT: MUR 1732 - Memorandum and General Counsel's Brief

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information [X]
Sensitive [X]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

85040520895



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

84 OCT 30 P 1: 05

October 30, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1732

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 Respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on October 30, 1984. Following receipt of the Respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondents

85040320896

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Conservative Party of Connecticut) MUR 1732
David J. Ordway, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On June 26, 1984, the Federal Election Commission found reason to believe that the Conservative Party of Connecticut ("CPC") had violated 2 U.S.C. § 434(a)(4)(A) by failing to file a 1983 Year End Report and a 1984 April Quarterly Report and 2 U.S.C. § 441a(f) by accepting excessive contributions from Anne C. Seggerman and Harry G.A. Seggerman.

A. Failure to Timely File Reports

On July 18, 1983, CPC filed a Termination Report which was not considered to be valid as CPC had an outstanding debt of \$5,259 owed to a creditor, Castellanos & Co. On August 17, 1983, a Request for Additional Information ("RFAI") was sent by the Reports Analysis Division ("RAD") to CPC advising that the Termination Report could not be accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled.

On August 26, 1983, Foster Gunnison */ responded on CPC's behalf. He reiterated that he was no longer treasurer based upon

*/ On July 18, 1983, Mr. Gunnison notified RAD in a letter that he had resigned as treasurer of CPC effective March 28, 1983.

35040520897

his resignation in March of 1983. He also noted that ". . . there is no feasible manner in which this debt as listed on Schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign . . ." According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of senatorial candidate Lucian DiFazio.

CPC was again notified on an informational basis by RAD on September 23, 1983, that it could not terminate. The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984. Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28, 1984. A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway because the treasurer had resigned. The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984. He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt. In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled. On May 8, 1984, both Mr. Gunnison and Mr. Ordway were notified that CPC had failed to file the 1984 April Quarterly Report.

In response to the reason to believe findings, Mr. Ordway, who was sent the reason to believe notification on behalf of CPC, responded by stating that all efforts to retire the debt have been fruitless. See Attachment 1. In addition, Mr. Ordway filed, on July 30, 1984, unsigned copies of a 1983 Year End Report, 1984 April Quarterly Report and 1984 July Quarterly Report explaining that the reports had been forwarded to Mr. Gunnison for signature. All the reports showed no activity and disclosed the outstanding debt.

Subsequently, Mr. Gunnison telephoned the Office of the General Counsel to say that he was no longer treasurer of CPC and, therefore, would not sign the reports. On September 10, 1984, David Ordway telephoned this office and stated that he would file an amended statement of organization naming himself as treasurer. On October 4, 1984, such an amendment was filed (see Attachment 2) in addition to signed copies of the aforementioned reports.

B. Excessive Contributions

According to CPC's 1982 October Quarterly Report, on September 9, 1982, Anne C. Seggerman contributed \$15,000 to CPC and Harry G.A. Seggerman contributed \$10,000. Mr. Gunnison was first informed of these possible excessive contributions in October 1982, during a phone conversation with a RAD staff member. Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should be refunded to the contributors.

On November 2, 1982, Mr. Gunnison responded by stating that portions of the contributions had been "partially mis-applied" to CPC's federal account. To remedy the matter Mr. Gunnison stated that CPC had redesignated \$5,000 from each individual to CPC's state account and that an additional \$5,000 would be refunded to Anne Seggerman. However, according to CPC's 1982 30 Day Post General Election and Year End Reports, \$5,000 was refunded to Mrs. Seggerman on November 4, 1984, and on November 23, 1984, another \$5,000 was refunded to Mrs. Seggerman in addition to a \$5,000 refund to Mr. Seggerman.

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions. Mr. Gunnison's response, which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made.

On July 30, 1984, Mr. Ordway responded to the reason to believe findings by stating that he had solicited the contributions from the Seggermans based upon the belief that the maximum for contributions to a state party committee was \$15,000. See Attachment 1.

II. Legal Analysis

A. Failure to Timely File Reports

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required in a non-election year to file a report covering the period beginning July 1 and ending December 31 no later than January 31 of the following calendar year. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees are required to file quarterly reports, in a calendar year in which a regularly scheduled general election is held, no later than the 15th day after the last day of each calendar quarter. Under 2 U.S.C. § 433(d)(1), a political committee may terminate only when such a committee files a written statement that it will no longer receive any contributions or make any disbursements and that such committee has no outstanding debts or obligations. As CPC can not terminate due to existing debts, it is required to continue to file reports. CPC did not file a 1983 Year End Report, which was due on January 31, 1984, until July 30, 1984. In addition, CPC did not file a 1984 April Quarterly Report, which was due on April 15, 1984, until July 30, 1984.

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Based on the above, the Office of the General Counsel recommends that the Commission find probable cause to believe that CPC and David J. Ordway, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file reports. Although a reason to believe finding was not previously made against Mr. Ordway, this Office is recommending a finding of probable cause to believe against Mr. Ordway, as treasurer, because according to the latest Statement of Organization he is now treasurer of CPC and he has already been given notice of the allegations and has had an opportunity to resolve the apparent violations through conciliation. Although Mr. Ordway was not treasurer at the time the violations of the Act occurred, he is a proper respondent in this matter as the finding against Mr. Ordway is in his official capacity as treasurer, not as an individual.

B. Excessive Contributions

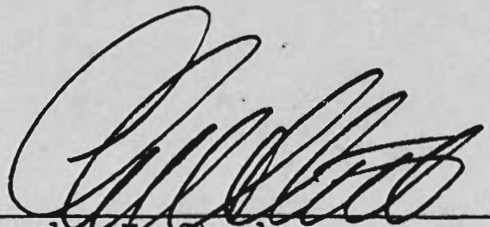
Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

As it is apparent that CPC accepted excessive contributions from Anne C. Seggerman and Harry G.A. Seggerman, the Office of the General Counsel recommends that the Commission find probable cause to believe that CPC and David J. Ordway, as treasurer, violated 2 U.S.C. § 441a(f). This office recommends this finding against Mr. Ordway based on the reasons stated earlier.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Conservative Party of Connecticut and David J. Ordway, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f).

30 October 1984
Date


Charles R. Steele
General Counsel

Attachments

1. Response filed by Mr. Ordway
2. Amended Statement of Organization

85040520903

84 JUL 30 P 1: 43

David J. Ordway
24 Hoyt Street
Stamford, Conn. 06905

July 27, 1984

Attachment 1

Marybeth Tarrant
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1732
Conservative Party of Connecticut

Dear Ms. Tarrant:

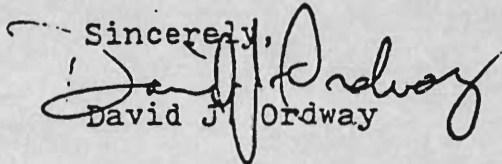
Enclosed you find my affidavit respecting the above captioned matter.

You will also find copies of reports for filing with the F.E.C., which reports are awaiting Mr. Gunnison's signature pursuant to his responsibility as Treasurer.

As soon as I receive said originals executed by Mr. Gunnison, I shall send them to you forthwith.

I assume I shall be contacted soon.

Sincerely,


David J. Ordway

Enclosures
DJ0:klh

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①

AFFIDAVIT

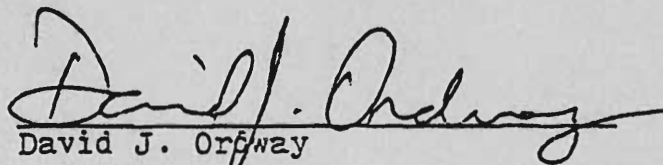
I, David J. Ordway, of 24 Hoyt Street, Stamford, Connecticut, being duly sworn do make affidavit and say:

1. That I am 32 years of age and am a Commissioner of the Superior Court in the State of Connecticut and understand the nature and obligation of an oath;
2. That I was the Executive Director of the Conservative Party of Connecticut and served as it's operational officer and was primarily responsible for the day to day operations regarding political tactics, strategy, operations, and effecting same, but I was not directly responsible for filing reports with the F.E.C. or appropriate state agencies, nor was I responsible for bookkeeping or bank accounts with regard to the Conservative Party of Connecticut. Mr. Foster Gunnison was responsible for these matters, and maintains all of such documents and papers at his office.
3. That I moved from the Hartford area of Connecticut immediately subsequent to November, 1982, to Stamford, Connecticut, in order to begin the practice of law, and have been totally uninvolved in politics in any way since January, 1984, including the Conservative Party of Connecticut.
4. That I am of the understanding currently that Mr. Foster Gunnison has not filed any reports pursuant to his responsibility for one year.
5. That I solicited the excessive contributions from Mr. and Mrs. Seggerman based upon the sincere but mistaken belief that contributions to a State Party with a Federal candidates' bank account may be solicited from individuals up to a maximum of \$15,000.00 per person, and further, pursuant to said mistaken belief, said contributions were openly reported to the F.E.C. and were in no way concealed.
6. That upon notification by the F.E.C. of the error, refunds were promptly made to the Seggermans.
7. That immediately prior to the election in November, 1982, fundraising efforts were discussed at length for the purpose of determining how the debt may be paid off when the election was over. That volunteers hand addressed envelopes for the anticipated purpose of a direct mail solicitation to effect same. However, subsequent to the election, a determination was reached that the likely response to such a solicitation would not justify the cost of postage and printing the letters.

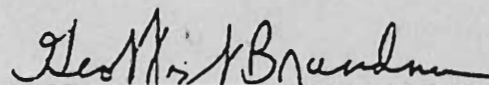
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7. That immediately subsequent to the election I personally drove to Washington D.C. and met and talked with virtually every major national conservative leader or organization director respecting fundraising efforts to retire the debt and said efforts were absolutely fruitless.

Dated this 18th day of July, 1984.


David J. Ordway

Personally appeared, David J. Ordway, and acknowledged, this 18th day of July, 1984.


Commissioner of the Superior Court

85040520906

David J. Ordway
Attorney at Law
24 Hoyt Street
Stamford, Connecticut 06905
(203) 967-4374

Received at the
F.E.C.
October 4, 1984

September 15, 1984

Marybeth Tarrant
Federal Election Commission
Washington, D.C.

Attachment 2

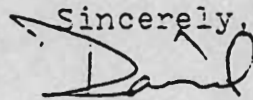
Re: MUR 1732
Conservative Party of Connecticut

Dear Ms. Tarrant:

Enclosed herein you will find new Statement of Organization, in which I name myself as Treasurer of the Conservative Party, and reports regarding same, which heretofore, were awaiting Mr. Gunnison's signature in the above referenced matter.

Thankyou in advance for your cooperation in this matter.

Sincerely,



David J. Ordway

DJO:mle
Enclosure

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7

STATEMENT OF ORGANIZATION

RECEIVED AT THE FEC

(See reverse side for instructions)

1. (a) Name of Committee (in full) ☒ Check if name or address is changed. CONSERVATIVE PARTY OF CONNECTICUT (CPAC-I)	2. Date 84 OCT 2 11:11
b. Address (Number and Street) C/O David J. Ordway, AHy. 24 Hoyt St.	3. FEC Identification Number C-00110754
c. City, State and ZIP Code Stamford, CT 06905	4. Is this an amended statement? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
-------------------	-----------------------------	---------------	----------------

- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
☒ (d) This committee is a political party committee of the Conservative Party.
 (National, State or subordinate) (Democratic, Republican, etc.)
☐ (e) This committee is a separate segregated fund.
☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
FOSTER GUNNISON JR	ONE GOLD ST #22-ABC	(203) 549-1281 VOLUNTARY ARCHIVIST

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
David J. Ordway, AHy	24 Hoyt St., Stamford, CT 06905	

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
None	

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

DAVID J. ORDWAY, AHy *X David J. Ordway* *X September 4, 1984*
 or Print Name of Treasurer SIGNATURE OF TREASURER Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this statement to the penalties of 2 U.S.C. § 437g.

For further information contact:

Federal Election Commission, Toll Free 800-424-6530, Local 202-623-4068

FEC FORM 1 (3/80)

(5)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 30, 1984

David J. Ordway, Treasurer
Conservative Party of Connecticut
24 Hoyt Street
Stamford, Connecticut 06905

Re: MUR 1732
Conservative Party of Connecticut
David J. Ordway, as treasurer

Dear Mr. Ordway:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 26, 1984, found reason to believe that the Conservative Party of Connecticut had violated 2 U.S.C. §§ 434(a)(4)(A) and 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 15 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 20 days.

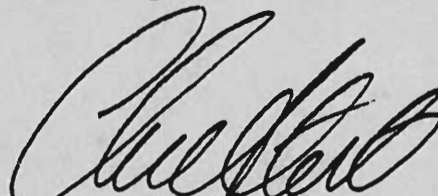
85040520909

Letter to David J. Ordway
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 Marybeth Tarrant, the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

85040520910

David J. Ordway
Attorney at Law
24 Hoyt Street
Stamford, Connecticut 06905
(203) 967-4374

Received at the
F.E.C.

October 4, 1984

6-CC#S1541

September 15, 1984

Marybeth Tarrant
Federal Election Commission
Washington, D.C.

Re: MUR 1732
Conservative Party of Connecticut

Dear Ms. Tarrant:

Enclosed herein you will find new Statement of Organization,
in which I name myself as Treasurer of the Conservative Party,
and reports regarding same, which heretofore, were awaiting
Mr. Gunnison's signature in the above referenced matter.

Thankyou in advance for your cooperation in this matter.

Sincerely,

David J. Ordway

DJO:mlc
Enclosure

8 5 4 0 4 3 3 2 6 29 41 91 3

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
SEP 15 1984
P 2:58

RECEIVED AT THE FEC

1. (a) Name of Committee (in Full) ☒ Check if name or address is changed. CONSERVATIVE PARTY OF CONNECTICUT (COPC-1)	2. Date 04 OCT 81
(b) Address (Number and Street) C/O David J. Ordway, A.Hy. 24 Hoyt St.	3. FEC Identification Number C-00160754
(c) City, State and ZIP Code Stamford, CT 06905	4. Is this an amended statement? ☒ YES ☐ NO

(1) (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 U (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

2) (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.

✓ (d) This committee is a political party committee of the Conservative Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

3 (f) The committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

If the registering political committee has identified a "connected organization" above, please indicate type of organization.

☒ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Canadian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Title or Position

FOSTER GUNNISON JR. ONE GOLD ST B22-ABC VOLUNTEER ARCHIVIST

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Title or Position

David S. Ordway, Apt 24 Hoyt St., Stamford, CT 06905

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Mailing Address and ZIP Code

None

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete

DAVID J. ORDWAY, AL
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

September 4, 1984
Date

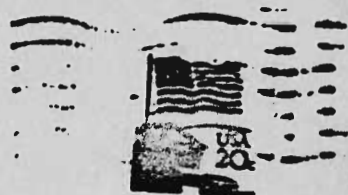
NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this statement to the penalties of 2 U.S.C. §437e.

For further information contact:

Federal Election Commission, Toll Free 800-424-9530, Local 202-623-4068

F. C. FORM 1 (3/80)

17 Ordway
Hardy at Low
Street
Connecticut 06903



Mary Beth Warrant
Federal Election Commission
Wash. D.C., 20463

850405316
R403316

84 OCT 4
ALL: 14

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

84 OCT 4 ALL: 25

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

CONSERVATIVE PARTY OF CONNECTICUT, INC.

Address (Number and Street)

One Gold Street, #22-BC

City, State and ZIP Code

Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00110754

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____
election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 4.00

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 5,259.00

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

FOSTER CLARKSON, JR. DAVID J. DROWAY

Type or Print Name of Treasurer

David J. Droway 9/15/84
SIGNATURE OF TREASURER

For further information contact:

Federal Election Commission

Toll Free 800-426-9530

Local 202-623-4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

850403302496

SCHEDULE D
(Revised 3/80)

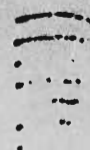
DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) CONSERVATIVE PARTY OF CONNECTICUT, INC.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

8524933824057

1. Outway
at Low
Street
Connected 0600



Mary Beth Tarrant
Federal Election Commission
Wash. D.C., 20463

84 OCT 4
ALL: 14

8 5 2 2 6 3 5 7 8 2 9 4 1 9 6 8

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

04 OCT 4 4:11 PM

(Summary Page)

ALIGN AREA	ALIGN AREA
------------	------------

1. Name of Committee (in Full)
CONSERVATIVE PARTY OF CONNECTICUT, INC.

Address (Number and Street)
One Gold Street, #22-BC

City, State and ZIP Code
Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00110754

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5. Covering Period 1/1/84 through 3/31/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	\$ 0
\$ 0	
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	
\$ 5,259.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4000

ROSTER GUNNISON, JR. *DAVID J. DROWNY*
Type or Print Name of Treasurer

David J. Drony 9/15/84
Signature of Treasurer

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 1437s

All previous versions of FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

8309483202951072

SCHEDULE D
(Revised 3/80)

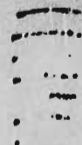
DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) CONSERVATIVE PARTY OF CONNECTICUT, INC.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

3599493362503

1 J. Anthony
Mary at Home
High Street
Cincinnati 67009



Mary Beth Tarrant
Federal Election Commission
Wash. D.C., 20463

84 OCT 4
ALL: 14

85894937825104

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

84 OCT 4 11:18

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

CONSERVATIVE PARTY OF
CONNECTICUT, INC.

Address (Number and Street)

One Gold Street, #22-BC

City, State and ZIP Code

Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00110754

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☒ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____

(Type of Statement)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 4/1/84 through 6/30/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 5,259.00

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 202-523-4088

FOSTER GUNNISON, JR. DAVID J. DROWAY

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

FEC FORM 3X (3/80)

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Debtor (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CONSERVATIVE PARTY OF CONNECTICUT, INC.				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

85040520921
84033162500

J. J. O'Rourke
Post Office
High Street
Connecticut 06003



Mary Beth Tarrant
Federal Election Commission
Wash. D.C., 20463

84 OCT 4

ALL: 14

85040520922
84033362501

RECEIVED AT THE FEC
GCC#4276
84 AUG 6 P 1:00

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

August 2, 1984

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
CHRISTOPHER S. MOFFITT
PHILIP H. BANE
DONNA L. MILLER

OF COUNSEL

THOMAS J. FADOUL, JR.

TELEX: 710-831-0896

CABLE: SEDAMHERG

SEDAM, HERGE & REED

SUITE 1000

1850 EYE STREET, N.W.

WASHINGTON, D.C. 20005

202 898-0800

RESIDENT PARTNER: CHARLES D. REED

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

Re: MUR 1732

Dear Mr. Gross:

This letter is written on behalf of our client, Alejandro Castellanos, with reference to the letter from the Chairman of the Federal Election Commission to our client, dated June 27, 1984, in which it was reported that the Commission had determined that there is reason to believe our client may have violated 2 U.S.C. 441a(a)(1)(C). Specifically, it is alleged that our client may have violated 2 U.S.C. 441a(a)(1)(C), by reason of the provisions of 11 CFR 100.7(a)(4), for having extended credit to the Conservative Party of Connecticut for a length of time beyond normal business or trade practice. By letter dated July 9, 1984, we entered our appearance on behalf of our client and requested an appropriate extension of time within which to respond to the findings.

Our client, Alejandro Castellanos, conducts business under the name, Castellanos & Co. Castellanos & Co. is a sole proprietorship. In 1982, Mr. Castellanos provided services to the Conservative Party of Connecticut. Copies of the invoices rendered by Mr. Castellanos to the Conservative Party of Connecticut, dated August 20, 1982 in the amount of \$737.14 and September 30, 1982 in the amount of \$4,551.47, are enclosed. The Conservative Party of Connecticut reports that \$5,259.00 remains as a debt and obligation due Castellanos & Co.

85040520925

AUG 6 P 3:06

Kenneth A. Gross, Esq.
August 2, 1984
Page Two

It should be understood that Mr. Castellanos has no interest whatsoever in forgiving, forgoing and forgetting this debt. He will not entertain a suggestion that any portion or all of this debt be compromised.

Mr. Castellanos has discussed the subject of the debt on several occasions with Mr. Gunnison, the treasurer of the Conservative Party of Connecticut, and has sent him copies of his invoices. Mr. Castellanos is fully aware of the fact that the Conservative Party of Connecticut has no cash. Aside from being told that by Mr. Gunnison, it is a matter of public record. Mr. Castellanos is fully aware of the fact that the Conservative Party of Connecticut has incorporated in order to limit its liability. Aside from being told that by Mr. Gunnison, it is a matter of public record. Thus, Mr. Castellanos knew he would not be successful if he were to sue the Conservative Party of Connecticut. That would be a futile act and an expensive act. The statute of limitations has not tolled, because the Conservative Party of Connecticut has continued to affirm its obligation and there is no evidence that there is any dispute over the validity or over the amount of the obligation.

Mr. Castellanos also knows that the Executive Director of the Conservative Party of Connecticut, Mr. Ordway, has made numerous efforts to raise funds for the Party. Mr. Castellanos himself has had numerous discussions during the past two years with representatives of multicandidate political committees, to discuss the possibility of raising funds for the Conservative Party of Connecticut. In brief, Mr. Castellanos has made and will continue to make every reasonable effort to collect the funds due him.

Mr. Castellanos, as a creditor of the Conservative Party of Connecticut, cannot be held responsible for the fact that Mr. Gunnison took it upon himself to stop filing reports with the Federal Election Commission. The law is clear that a political committee must continue to report if it has outstanding debts.

Mr. Castellanos, by counsel, asserts that he is not prepared to enter into a debt settlement agreement with the Conservative Party of Connecticut. If the Federal Election

85040520924

Kenneth A. Gross, Esq.
August 2, 1984
Page Three

Commission were to force him to do so, that would amount to an unlawful taking of his property. To have this valid obligation termed a "contribution," because Mr. Castellanos has not sued a corporate creditor which has no assets, would be a gross injustice. The law does not require someone to act if that act would be futile. Mr. Castellanos expects payment in full and he and Mr. Ordway will continue to make all reasonable efforts to raise funds for the Conservative Party of Connecticut and to have the debt paid in full.

Sincerely yours,



J. Curtis Herge

Enclosures

85040520925

ALEJANDRO CASTELLANOS

I N V O I C E

Purchase Order -- VBL
Job Description -- Difazio TV
Invoice Date -- 09 30 82
Invoice Number -- 1034CC

AUG 6 23:06

The Conservative Party
of Connecticut

<u>QTY</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
1	TV Production :30 TV "Concern"	\$ 750.00
1	:30 TV "Vote for Weicker/ Moffet"	750.00
1	:30 TV "Real Choice"	750.00
1	:30 TV "Deserve a Choice"	750.00
4	Revised disclaimer, "Conservative Party of Conn."	633.12
1	round-trip airfare DCA-HRT-DCA	197.00
1	Hotel, Hartford	71.35
2	Taxi, air-htl-air	30.00
6	2" Quad dubs	450.00
3	3/4" Cassettes dubs	120.00
1	Shipping, Mt. Kisco	<u>50.00</u>
	TOTAL INVOICE	\$4551.47

Payable to: Castellanos & Co.
Suite 103
2100 Paul Edwin Terrace
Falls Church, Va 22043

(703) 821 - 2496

85040520926

ALEJANDRO CASTELLANOS

I N V O I C E

Purchase Order -- VBL
Job Description -- Dubs, Revised Disc.
Job Number -- 1054, 1064
Invoice Date -- 08 20 82

The Conservative Party
of Connecticut

<u>QTY/DT</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	1054	
6	2" Quad dubs (4 spots)	\$ 480.00
2	3/4" cassettes	84.72
1	Shipping, Mt. Kisco	<u>65.12</u>
	Total	\$ 629.84
	1064	
1	3/4" Cassette	\$ 60.00
1	Shipping, Cable Net, Conn:	37.30
1	Same day serv:	<u>10.00</u>
	Total	\$ <u>107.30</u>
	TOTAL INVOICE	\$ 737.14

Payable to: Castellanos & Co.
Suite 103
2100 Paul Edwin Terrace
Falls Church, Va 22043

(703) 821 - 2496

85040520927

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102



84 AUG 6 P1:0

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

RECEIVED AT THE FEC

84 AUG 2 10:27

GCC #4240

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

August 1, 1984

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
CHRISTOPHER S. MOFFITT
PHILIP H. BANE
DONNA L. MILLER

OF COUNSEL

THOMAS J. FADOUL, JR.

TELEX: 710-831-0896

CABLE: SEDAMHERG

SEDAM, HERGE & REED

SUITE 1000

1850 EYE STREET, N.W.

WASHINGTON, D.C. 20005

GOB 808-0800

RESIDENT PARTNER: CHARLES D. REED

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

Re: MUR 1732

Dear Mr. Gross:

This letter is written on behalf of our clients, Anne C. Seggerman and Harry G.A. Seggerman, with reference to the letters from the Chairman of the Federal Election Commission to our clients, dated June 27, 1984, in which it was reported that the Commission had determined that there is reason to believe our clients may have violated the provisions of 2 U.S.C. 441a(a)(1)(C). Specifically, it appears that Mrs. Seggerman may have contributed the sum of \$15,000.00 to the Conservative Party of Connecticut on or about September 9, 1982; and, that Mr. Seggerman may have contributed the sum of \$10,000.00 to the Conservative Party of Connecticut on or about September 9, 1982. Pursuant to 2 U.S.C. 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees or to political committees established and maintained by a national political party, in any calendar year which, in the aggregate, exceed \$5,000.00. By letter dated July 11, 1984, we entered our appearance on behalf of our clients and requested an appropriate extension of time within which to respond to the findings.

Enclosed are two affidavits, one executed by Mr. Seggerman and the second executed by Mrs. Seggerman. In both cases, there is an admission that the alleged contributions were made, but it is noted that the contributions were solicited by the then Executive Director of the Conservative Party of

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AUG 2 1984

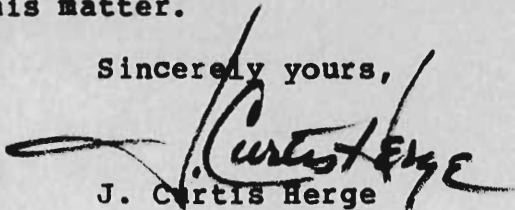
Kenneth A. Gross, Esq.
August 1, 1984
Page Two

Connecticut, who advised our clients that the maximum lawful amount an individual could contribute to the Federal account of a state party committee was \$15,000.00. Our clients acted in good faith in reliance upon that advice, not knowing, until two months later when the excessive amounts were refunded, that the advice they had been given was incorrect.

It appears that the error was called to the attention of the Conservative Party of Connecticut by an analyst in the Reports Analysis Division of the Federal Election Commission and that, as a result thereof, the Party promptly refunded the excess amounts to our clients.

Because our clients acted innocently and in good faith, upon reliance of the advice of representatives of the Conservative Party of Connecticut, and because the excess portion of the contributions were promptly refunded to our clients, equity and justice are not served by taking any further action against our clients in connection with this matter.

Sincerely yours,


J. Curtis Herge

Enclosures

35040520930

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IN WITNESS WHEREOF, Harry G.A. Seggerman has executed
this affidavit this 24th day of July, 1984.

Harry G.A. Seggerman
Harry G.A. Seggerman

Sworn to before me this 24th day of July, 1984.

Marilyn J. Delaney
Notary Public

My commission expires:

MY COMMISSION EXPIRES MAR. 31, 1989

8 5 0 4 0 5 2 0 9 3 4

IN WITNESS WHEREOF, Anne C. Seggerman has executed this
affidavit this 24th day of July, 1984.

Anne C. Seggerman
Anne C. Seggerman

Sworn to before me this 24th day of July, 1984.

Marilyn J. Delaney
Notary Public

My commission expires:

MY COMMISSION EXPIRES MAR. 31, 1989

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SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

NOV 2 9 8:17



84 AUG 2 A 8:27

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant

84 JUL 30 P 1: 00

RECEIVED
GENERAL COUNSEL14 JUL David J. Ordway
24 Hoyt Street
Stamford, Conn. 06905

July 27, 1984

Marybeth Tarrant
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1732
Conservative Party of Connecticut

Dear Ms. Tarrant:

Enclosed you find my affidavit respecting the above captioned matter.

You will also find copies of reports for filing with the F.E.C., which reports are awaiting Mr. Gunnison's signature pursuant to his responsibility as Treasurer.

As soon as I receive said originals executed by Mr. Gunnison, I shall send them to you forthwith.

I assume I shall be contacted soon.

Sincerely,

David J. Ordway

Enclosures
DJO:klh

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AFFIDAVIT

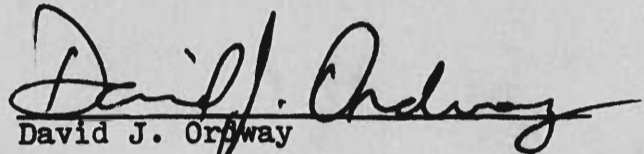
I, David J. Ordway, of 24 Hoyt Street, Stamford, Connecticut, being duly sworn do make affidavit and say:

1. That I am 32 years of age and am a Commissioner of the Superior Court in the State of Connecticut and understand the nature and obligation of an oath;
2. That I was the Executive Director of the Conservative Party of Connecticut and served as it's operational officer and was primarily responsible for the day to day operations regarding political tactics, strategy, operations, and effecting same, but I was not directly responsible for filing reports with the F.E.C. or appropriate state agencies, nor was I responsible for bookkeeping or bank accounts with regard to the Conservative Party of Connecticut. Mr. Foster Gunnison was responsible for these matters, and maintains all of such documents and papers at his office.
3. That I moved from the Hartford area of Connecticut immediately subsequent to November, 1982, to Stamford, Connecticut, in order to begin the practice of law, and have been totally uninvolved in politics in any way since January, 1984, including the Conservative Party of Connecticut.
4. That I am of the understanding currently that Mr. Foster Gunnison has not filed any reports pursuant to his responsibility for one year.
5. That I solicited the excessive contributions from Mr. and Mrs. Seggerman based upon the sincere but mistaken belief that contributions to a State Party with a Federal candidates' bank account may be solicited from individuals up to a maximum of \$15,000.00 per person, and further, pursuant to said mistaken belief, said contributions were openly reported to the F.E.C. and were in no way concealed.
6. That upon notification by the F.E.C. of the error, refunds were promptly made to the Seggermans.
7. That immediately prior to the election in November, 1982, fundraising efforts were discussed at length for the purpose of determining how the debt may be paid off when the election was over. That volunteers hand addressed envelopes for the anticipated purpose of a direct mail solicitation to effect same. However, subsequent to the election, a determination was reached that the likely response to such a solicitation would not justify the cost of postage and printing the letters.

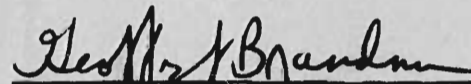
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7. That immediately subsequent to the election I personally drove to Washington D.C. and met and talked with virtually every major national conservative leader or organization director respecting fundraising efforts to retire the debt and said efforts were absolutely fruitless.

Dated this 18th day of July, 1984.


David J. Ordway

Personally appeared, David J. Ordway, and acknowledged, this 18th day of July, 1984.


Commissioner of the Superior Court

85040520938

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

84 JUL 30 P 1: 43

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

CONSERVATIVE PARTY OF CONNECTICUT, INC.

Address (Number and Street)

One Gold Street, #22-BC

City, State and ZIP Code

Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00110754

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on hand January 1, 19 83

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 4.00

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 5,259.00

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

FOSTER GUNNISON, JR.

Type or Print Name of Treasurer

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

SCHEDULE D
(Revised 3/90)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) CONSERVATIVE PARTY OF CONNECTICUT, INC.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

85040520940

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

CONSERVATIVE PARTY OF CONNECTICUT, INC.

Address (Number and Street)

One Gold Street, #22-BC

City, State and ZIP Code

Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00110754

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5. Covering Period 1/1/84 through 3/31/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(e) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 0	\$ 0
\$ 0	
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	
\$ 5,259.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

FOSTER GUNNISON, JR.

Type or Print Name of Treasurer

For further information contact:

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4068

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used.

FEC FORM 3X (3/80)

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) CONSERVATIVE PARTY OF CONNECTICUT, INC.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

85040520942

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

CONSERVATIVE PARTY OF
CONNECTICUT, INC.

Address (Number and Street)

One Gold Street, #22-BC

City, State and ZIP Code

Hartford, Connecticut 06103

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00110754

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☒ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 4/1/84 through 6/30/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 0

\$ 5,259.00

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

FOSTER GUNNISON, JR.

Type or Print Name of Treasurer

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 202-523-4068

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CONSERVATIVE PARTY OF CONNECTICUT, INC.				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Company River Place South, #1106 1011 Arlington Boulevard Arlington, Virginia 22209	5,259.00	0	0	5,259.00
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				5,259.00
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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850405
D. J. Ordway
Attorney at Law
24 1/2 Street
Stamford, Connecticut 06905

Marybeth Tarrant
Federal Election Commission
Washington D.C. 20463





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

J. Curtis Herge, Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1732
Anne C. Seggerman
Harry G.A. Seggerman
Castellanos & Company

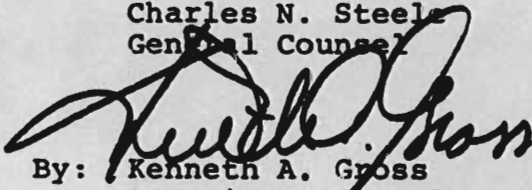
Dear Mr. Herge:

This is in reference to your letters dated July 9 and July 11, 1984, requesting extensions until July 27, 1984, to respond to the Commission's notices that it has reason to believe your clients have violated the Act. After considering the circumstances presented in your letters, the Office of the General Counsel has determined to grant you your requested extensions. Accordingly, your responses will be due on or before July 27, 1984.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

85040520946



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 18, 1984

David J. Ordway, Executive Director
Conservative Party of Connecticut
24 Hoyt Street
Stamford, Connecticut 06905

RE: MUR 1732
Conservative Party
of Connecticut

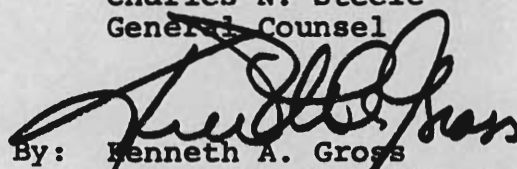
Dear Mr. Ordway:

This is in reference to your letter dated July 10, 1984, requesting an extension of three weeks to respond to the Commission's notice that it has reason to believe your committee has violated the Act. After considering the circumstances presented in your letter, the Office of the General Counsel has granted you your requested extension. Accordingly, your response will be due on or before August 6, 1984.

If you have any questions, please call Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

85040520947

6CC 40V6

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

McLEAN, VIRGINIA 22102

(703) 821-1000

July 9, 1984

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUL 16 10:32

84 JUL 16 P 4: 16

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
CHRISTOPHER S. MOFFITT
PHILIP H. BANE
DONNA L. MILLER

OF COUNSEL
THOMAS J. FADOUL, JR.

TELEX: 710-831-0886
CABLE: SEDAMHERG
SEDAM, HERGE & REED
SUITE 1000
1850 EYE STREET, N.W.
WASHINGTON, D.C. 20006
(202) 898-0800
RESIDENT PARTNER: CHARLES D. REED

The Honorable Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant
Office of General Counsel

Re: MUR 1732

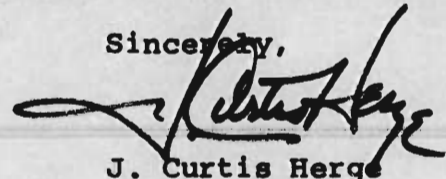
Dear Madam Chairman:

We are writing on behalf of our client, Castellanos & Company, in acknowledgment of the receipt of your letter of June 27, 1984, relative to the above-captioned matter.

Enclosed, for your records, is a copy of a Statement of Designation of Counsel, appointing the undersigned as counsel to Castellanos & Company in connection with this matter.

In order for us to respond to the allegations contained in your letter, we respectfully requested an extension until July 27, 1984, within which to reply. It will be necessary to gather and analyze the facts relevant to this matter from individuals presently located, to the best of our knowledge, in Connecticut and North Carolina and we presently have no knowledge as to the location of the relevant files.

Sincerely,



J. Curtis Herge

Enclosure

85040520948

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1732

NAME OF COUNSEL: J. Curtis Herge, Esquire

ADDRESS: Sedam & Herge, P.C.
8300 Greensboro Drive, Suite 1100
McLean, Virginia 22102

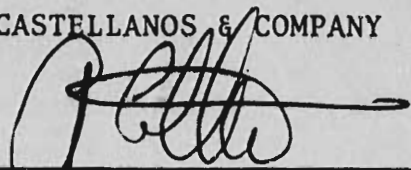
TELEPHONE: (703) 821-1000

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

CASTELLANOS & COMPANY

7-5-81
Date

BY:


Signature President

RESPONDENT'S NAME: Castellanos & Company
ADDRESS: River Place South, #1106
Arlington, Virginia 22209

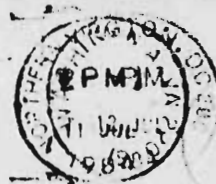
HOME PHONE: _____

BUSINESS PHONE: _____

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SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102



The Honorable Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant
Office of General Counsel

6CC4048

ED
RI
OF
COMMISS

THE
SECRETARY
David J. Ordway
24 Hoyt Street
Stamford, Conn. 06905
July 10, 1984

JUL 16 P4:842 JUL 11 11:17
Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Chairman:

This letter is to request a continuance of three weeks to respond to your letter of June 27, 1984 and accompanying General Counsels Factual and Legal Analysis, which I received on July 5, 1984. The reason for the request for continuance is that all records of reports, bookkeeping, etc. are with Mr. Gunnison who resides in Hartford and it will take time to arrange to meet with him, collect such documents, and respond more completely and forthrightly.

Since I have no records in Stamford, and since I have been totally involved with this organization or politics in general since January of 1984, I will need this to prepare an adequate response.

Thanking you in advance for your cooperation in this matter.

Sincerely

David J. Ordway
David J. Ordway

DJO/krc

85040520951

85040520952

David J. Ordway
24 Hoyt Street
Stamford, CT 06905

Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463



04 JUL 1984



Call 4023

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

July 11, 1984

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT E. SPARKS, JR.
A. MARK CHRISTOPHER
CHRISTOPHER S. MOFFITT
PHILIP H. BANE
DONNA L. MILLER
OF COUNSEL
THOMAS J. FADOUL, JR.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUL 12 P 1:26

TELEX: 710-831-0886

CABLE: SEDAMHERG

SEDAM, HERGE & REED
SUITE 1000

1850 EYE STREET, N.W.
WASHINGTON, D.C. 20006

(202) 898-0200

RESIDENT PARTNER: CHARLES D. REED

The Honorable Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant
Office of General Counsel

Re: MUR 1732

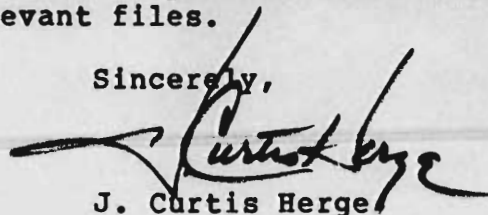
Dear Madam Chairman:

We are writing on behalf of our clients, Anne C. Seggerman and Harry G.A. Seggerman, in acknowledgment of the receipt of your letters of June 27, 1984, relative to the above-captioned matter.

Enclosed, for your records, are two Statements of Designation of Counsel, appointing the undersigned as counsel to Mr. and Mrs. Seggerman in connection with this matter.

In order for us to respond to the allegations contained in your letter, we respectfully requested an extension until July 27, 1984, within which to reply. It will be necessary to gather and analyze the facts relevant to this matter from individuals presently located, to the best of our knowledge, in Connecticut and North Carolina and we presently have no knowledge as to the location of the relevant files.

Sincerely,



J. Curtis Herge

Enclosure

3
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4
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9
5
3

84 JUL 12 P 1:50

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1732

NAME OF COUNSEL: J. Curtis Herge

ADDRESS: Sedam & Herge, P.C.

8300 Greensboro Drive, Suite 1100

McLean, Virginia 22102

TELEPHONE: (703) 821-1000

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

July 10, 1984
Date

Harry G.A. Seggerman
Signature

RESPONDENT'S NAME: Harry G.A. Seggerman

ADDRESS: 5060 Congress Street

Fairfield, Connecticut 06030

HOME PHONE: _____

BUSINESS PHONE: _____

14 JUL 12 P 1:50

85040520954

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1732

NAME OF COUNSEL: J. Curtis Herge

ADDRESS: Sedam & Herge, P.C.

8300 Greensboro Drive, Suite 1100

McLean, Virginia 22102

TELEPHONE: (703) 821-1000

JUL 12 P 1:50

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

July 10, 1984
Date

Anne C. Seggerman
Signature

RESPONDENT'S NAME: Anne C. Seggerman

ADDRESS: 5060 Congress Street

Fairfield, Connecticut 06030

HOME PHONE: _____

BUSINESS PHONE: _____

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SEDAM & HERGE

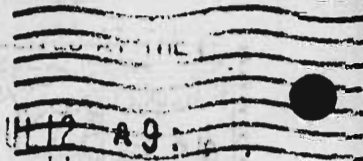
PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102



The Honorable Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Marybeth Tarrant
Office of General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 27 P 4: 00

June 27, 1984

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel
SUBJECT: RAD Referral 84L-14

On June 26, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84L-14 should now become MUR 1732.

Attachment
Copy of Certification

85040520957



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

27 June 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: MARYBETH TARRANT

THROUGH: JOHN C. SURINA
STAFF DIRECTOR *[Signature]*

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL UPDATE ON THE CONSERVATIVE PARTY OF CONNECTICUT

The following information is being presented to update the April 26, 1984 referral (84L-14) of the Conservative Party of Connecticut ("CPC").

CPC has failed to file the 1984 April Quarterly Report.*/
Prior Notice was mailed to CPC on March 22, 1984 informing CPC that the April Quarterly Report was due on April 15, 1984 (Attachment 1). A Non-Filer Notice was sent on May 8, 1984 (Attachment 2).

CPC's treasurer of record, Foster Gunnison, contacted the analyst by phone on May 31, 1984 (Attachment 3). Mr. Gunnison stated that he had been notified by the post office that CPC had received a certified letter from the Federal Election Commission. He said that he did not intend to accept the letter, as he had resigned as treasurer in 1983.

In a letter received by the Commission on June 4, 1984, Mr. Gunnison reiterated that he would not accept the FEC Non-Filer Notice (Attachment 4). He also included a photocopy of the certification card that demonstrated that the Notice had been refused.

* / CPC filed an invalid Termination Report that disclosed \$5,259 in outstanding debts.

35040520958

As of this date, the 1984 April Quarterly Report has not been received. The question of whether or not this committee should receive a Chronic Late Filer Warning Notice is being discussed with your office.

If you have any questions, please contact Pam Brown on 523-4048.

Attachments

85040520959



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1984

APRIL REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by April 15, 1984. (See below)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through March 31, 1984. Political committees which have not previously filed a financial disclosure report covering any period in 1984 should report all financial activity from the later of January 1, 1984, or date of registration,* through March 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than April 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by April 20, 1984, and disclose all financial activity of their committee from March 1 through March 31, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed in 1984, and prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b) Activity which occurred prior to 1984 should be reported separately.

A R E M I N D E R

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election, which have not previously been reported, must file a pre-election report.

**FOR INFORMATION CALL: Office of Public Communications
800/424-9530 or 202/523-4068**

85040520961



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1984

Foster Gunnison, Treasurer
Conservative Party of
Connecticut, Inc.
One Gold Street #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Gunnison:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

cc: David Ordway
Executive Director
24 Hoyt Street
Stamford, CT 06905

85040520962

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: CONSERVATIVE PARTY OF CONNECTICUT Attachment 3

COMMITTEE CONTACT: Foster Gunnison

DATE: 5/31/84

ANALYST: Brown

SUBJECT: Non-Filer letter 01 '84

Mr. Gunnison called to tell me that he had been notified by the post office that there was a certified letter for him as treasurer of the Conservative Party of Connecticut. He stated that he called OGC to ask if this letter were from them. The Counsel's office told him that they had not sent him anything. He told me that since he had resigned, he was not going to pick up the letter as he did not want to be involved any more than what he was.

I told Mr. Gunnison that he would probably continue to receive non-filer letters as the committee had not filed a valid termination report; and that since we had no record of any successor, that he would still be listed as treasurer on our records. I told him that I could not give him any other advice.

85040520963

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 2000
ONE SOLO STREET, HARTFORD, CONN. 06183

PHONE 527-4200 AREA 0000 220

RECEIVED AT THE FEC

84 JUN 4 10:52

Attachment 4

FOSTER GUNNISON JR., M.A., PH.D.
ADMINISTRATOR

Ms. Pamela Brown
Office of John D. Gibson
(Asst. Staff Director)
Reports Analysis Division
Federal Elections Commission
1325 K Street NW
Washington, DC 20463

ASSISTANT
FRANKLIN E. KARNET, M.A., PH.D.
BARBARA S. BITTINGER
AUSTIN WARD, LL.B., M.A., PH.D.
JAMES L. NEPHER, JR.
STEPHEN DONALDSON

May 31, 1984

Copy to: Ms. Lois Lerner
General Counsel Div., FEC

IN RE: FEC Registered Committees:
#C00160754 Conservative Party Of
Connecticut.
#C00160804 Lucian DiFazio For U.S.
Senate Committee

Dear Ms. Brown:

This letter is to confirm my phone calls to you and to Ms. Lerner of earlier today concerning a certified letter currently being held for me at the Hartford Post Office office which I suspect as being a communication to me from the FEC concerning the status of reporting in regards to the above captioned registered committees.

And to restate my wish not to accept such communications on the grounds that I do not wish to knowingly risk the status of my March 28, 1983 resignation from both committees as treasurer by signing documents or receipts for delivery thereof addressed to me as treasurer of either of these organizations.

I wish also to reiterate that this act of refusal on my part represents no sign of disrespect on my part towards the FEC or its procedures, nor any wilful failure to cooperate with the FEC in its resolution of the problems reflected in the cases of these two organizations.

As I have stated previously I am trying to do what I can, in my capacity as a resigned treasurer of both organizations, to aid the FEC in its resolution of these problems and the organizations subtending them.

These statements apply to the current piece of certified mail in question and to any future pieces of this kind, and I trust you will understand to spirit in which they are offered.

And again I wish to reiterate that the problems presented by these two organizations are the consequences of circumstances and actions over which I had neither control nor, for the most part, knowledge in my former capacity as treasurer of both.

Very cordially,

Foster Gunnison Jr.

Filed by mail 5/31/84

84500349 519884

[illegible]

CENTRAL STATION
80 STATE STREET
HARTFORD, CT.

[illegible]

0
FESTER GUNNISON, JR.
OFFICE OF SOCIAL ETHICS
ALL PLAZA NORTH TOWER SUITES 2206
145 STREET, HARTFORD, CONN. 06103



8 4 0 3 3 1 6 1
Mrs Pamela Brown
c/o Althe & J.D. Gibson
Repts Analysis Division
Federal Election Commission
1325 K St NW
Washington DC 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Conservative Party of Connecticut) RAD Referral #84L-14
Anne C. Seggerman)
Harry G.A. Seggerman)
Castellanos & Company)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 26, 1984, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #84L-14:

1. Open a MUR.
2. Find reason to believe that the Conservative Party of Connecticut violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f).
3. Find reason to believe that Anne C. Seggerman violated 2 U.S.C. § 441a(a)(1)(C).
4. Find reason to believe that Harry G.A. Seggerman violated 2 U.S.C. § 441a(a)(1)(C).
5. Find reason to believe that Castellanos and Co. violated 2 U.S.C. § 441a(a)(1)(C).
6. Approve the letters attached to the First General Counsel's Report signed June 21, 1984.

Commissioners Aikens, Elliott, McDonald, Harris and Reiche voted affirmatively in this matter; Commissioner McGarry did not cast a vote.

Attest:

6-26-84
Date

Marjorie W. Emmons

for Marjorie W. Emmons
Secretary of the Commission

35040520967



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 27, 1984

President
Castellanos & Company
River Place South, #1106
Arlington, VA 22209

RE: MUR 1732

Dear Sir or Madam:

On June 26, 1984, the Federal Election Commission determined that there is reason to believe your company violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your company. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

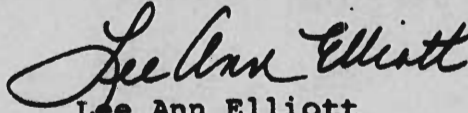
In the absence of any additional information which demonstrates that no further action should be taken against your company, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

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

85040520969

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1732

RESPONDENT Castellanos & Company

SUMMARY OF ALLEGATIONS

It is alleged that the Castellanos & Co. made an excessive contribution to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On its 1982 Year End Report, CPC reported an outstanding debt of \$5,259 owed to Castellanos & Co. According to Mr. Gunnison, treasurer of CPC, the debt was incurred by David Ordway, the Executive Director, without his (Gunnison's) knowledge and that the amount was to cover television ads in connection with the 1982 DiFazio for U.S. Senate campaign.

On July 18, 1983, CPC filed a Termination Report which still disclosed the outstanding debt of \$5,259 owed to Castellanos & Co. On August 17, 1983, the Reports Analysis Division ("RAD") notified CPC that its Termination Report could not be accepted because of its outstanding debt.

On August 26, 1983, Mr. Gunnison responded on CPC's behalf. He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that "... there is no feasible manner in which this debt as listed on Schedule D

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of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign" According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." Both Mr. Gunnison and Mr. Ordway were informed by RAD on several occasions that CPC is required to continue to file reports until the debt is extinguished or settled. Judging from conversations with both men, no attempts will be made by CPC to pay off the debt and that no attempts by Castellanos & Co. have been made to collect it. As of this date, CPC has not filed any additional reports and a debt settlement statement has not been filed.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

Pursuant to 11 C.F.R. § 100.7(a)(4), the extension of credit by any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a commercially reasonable attempt to collect the debt. A debt owed by a political committee which is forgiven or settled for less

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than the amount owed is a contribution unless such debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10. Under 11 C.F.R. § 114.10(c), a settlement will be considered commercially reasonable if --

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. § 451 or paragraph (a) of this section.
- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the settlement is subject to Commission review.

As there is no indication that the Castellanos & Co. has made an attempt to collect the debt owed by CPC, it appears that the Castellanos & Co. has made a contribution in excess of \$5,000 to CPC. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Castellanos & Co. violated 2 U.S.C. § 441a(a)(1)(C).

85040520972



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1984

Conservative Party of Connecticut
c/o David Ordway, Executive Director
24 Hoyt Street
Stamford, CT 06905

RE: MUR 1732

Dear Mr. Ordway:

On June 26, 1984, the Federal Election Commission determined that there is reason to believe your committee violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

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 so desired. See 11 C.F.R. § 111.18(d).

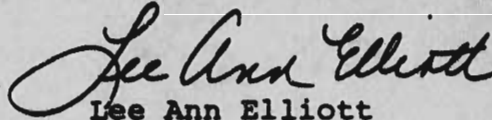
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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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 Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

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

85040520974

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1732

RESPONDENT Conservative Party of Connecticut

SUMMARY OF ALLEGATIONS

It is alleged that the Conservative Party of Connecticut ("CPC")^{1/} has failed to file a 1983 Year End Report and a 1984 April Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A) and has accepted excessive contributions in violation of 2 U.S.C. § 441a(f).

FACTUAL BASIS AND LEGAL ANALYSIS

A. Failure to File Reports

CPC filed a Termination Report on July 18, 1983, which was not considered to be valid, as CPC had an outstanding debt of \$5,259 owed to a creditor, Castellanos & Co.^{2/} On August 17, 1983, a Request for Additional Information ("RFAI") was sent by RAD to CPC advising that the Termination Report could not be

^{1/} The last treasurer of record was Foster Gunnison, One Gold Street, Suite 22BC, Hartford, CT 06103. Mr. Gunnison notified RAD in a letter received on July 18, 1983, that he had resigned as treasurer effective March 28, 1983. In that letter, he also supplied the address of the executive director.

^{2/} CPC's total activity amounted to \$43,056 in receipts and \$43,055 in disbursements.

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accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled.

On August 26, 1983, Mr. Gunnison responded on CPC's behalf. He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that ". . . there is no feasible manner in which this debt as listed on Schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign" According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of senatorial candidate Lucian DiFazio.^{3/}

CPC was again notified on an informational basis by RAD on September 23, 1983, that it could not terminate. The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984. Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28,

^{3/} Lucian DiFazio was the Conservative Party candidate for the U.S. Senate in the 1982 Connecticut general election. Mr. DiFazio lost that election receiving 3% of the vote. It should be noted that Mr. Gunnison was the treasurer of the Lucien DiFazio for U.S. Senate Committee, Inc. and that CPC only supported one federal candidate, which was Mr. DiFazio, by making \$22,000 in coordinated expenditures and a \$702 in-kind contribution.

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1984. A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway since the treasurer had resigned. The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984. He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt. In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled.

On May 8, 1984, both Mr. Gunnison and Mr. Ordway were notified that CPC had failed to file the 1984 April Quarterly Report. As of this date, CPC has not filed a 1983 Year End Report and a 1984 April Quarterly Report, nor has a debt settlement been submitted.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required in a non-election year to file a report covering the period beginning July 1 and ending December 31 no later than January 31 of the following calendar year. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required to file quarterly reports, in a calendar year in which a regularly scheduled general election

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is held, no later than the 15th day after the last day of each calendar quarter. Under 2 U.S.C. § 433(d)(1), a political committee may terminate only when such a committee files a written statement that it will no longer receive any contributions or make any disbursements and that such committee has no outstanding debts or obligations. As CPC could not terminate due to existing debts, it was required to continue to file reports. Therefore, it is recommended that the Commission find reason to believe that CPC violated 2 U.S.C. § 434(a)(4)(A).

B. Excessive Contributions

The 1982 October Quarterly Report filed by CPC disclosed contributions from two (2) individuals on September 9, 1982, totalling \$25,000 resulting in apparent excessive contributions of \$15,000.

Mr. Gunnison was first informed of these possible excessive contributions in October, 1982, during a phone conversation with a RAD staff member concerning Mr. Gunnison's failure to use FEC forms for his reports.^{4/} Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should either be refunded to the contributors

^{4/} Although the summary page and detailed summary page were used, the rest of the pages of the reports were filed on ledger paper and were very difficult to understand.

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or transferred to a non-Federal account with the contributors' approval.

On November 2, 1982, several items of correspondence were received from CPC. According to the letters, Mrs. Anne C. Seggerman had contributed \$15,000 (in two (2) checks) to CPC, \$10,000 in excess of the limitation, and Mr. Harry G.A. Seggerman had contributed \$10,000 (in one (1) check) to CPC, \$5,000 in excess of limitation. According to CPC, portions of the contribution checks had been "partially mis-applied" to the Federal Account. To remedy the matter, CPC stated that it redesignated \$5,000 received from each individual to CPC's State Account. The additional \$5,000 excessive contribution received from Mrs. Seggerman was disclosed on Schedule D "as an account payable and will be refunded to Mrs. Seggerman as soon as funds were available"

CPC's 1982 30 Day Post-General Report, received on December 6, 1982, disclosed two (2) \$5,000 refunds to Mrs. Seggerman on November 4 and 23, 1982 and a \$5,000 refund to Mr. Seggerman on November 23, 1982. The refunds made on November 23, 1982 were repeated on the 1982 Year End Report.

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions. Mr. Gunnison's response which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made.

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With regard to the \$5,259 debt owed to Castellanos & Co.,^{5/} it is not clear exactly when the debt was incurred. The debt first appeared on CPC's 1982 Year End Report. According to Mr. Gunnison, the \$5,259 was for television ads in connection with the DiFazio for U.S. Senate campaign and was a coordinated expenditure. Mr. Gunnison has stated that it was Mr. Ordway who incurred the debt without his (Gunnison's) knowledge and that the debt remains "... unpayable and unconvertible." It appears, judging from conversations with Ordway and Gunnison, that no attempts will be made to pay off the debt and that Castellanos & Co. has not made any attempts to collect it.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

Pursuant to 11 C.F.R. § 100.7(a)(4), the extension of credit by any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a

^{5/} According to the corporate division of the Virginia Secretary of State's office, Castellanos & Co. is not incorporated.

commercially reasonable attempt to collect the debt. A debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless such debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10. Under 11 C.F.R. § 114.10(c), a settlement will be considered commercially reasonable if --

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. § 451 or paragraph (a) of this section.
- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the settlement is subject to Commission review.

As there is no indication that the Castellanos & Co. has made an attempt to collect the debt owed by CPC, it appears that an excessive contribution has been made. In light of the foregoing, the Office of the General Counsel recommends that the

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Commission find reason to believe that CPC violated 2 U.S.C.
§ 441a(f) by accepting excessive contributions from Anne C.
Seggerman, Harry G.A. Seggerman, and Castellanos & Co.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 27, 1984

Anne C. Seggerman
5060 Congress Street
Fairfield, CT 06030

RE: MUR 1732

Dear Mrs. Seggerman:

On June 26, 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

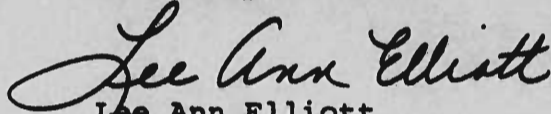
In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

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

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1732

RESPONDENT Anne C. Seggerman

SUMMARY OF ALLEGATIONS

It is alleged that Anne C. Seggerman made excessive contributions to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On September 9, 1982, Anne Seggerman made two contributions to CPC totalling \$15,000. These contributions were disclosed on the 1982 October Quarterly Report filed by CPC. CPC's treasurer, Foster Gunnison, Jr., was informed of the excessive contributions through a telephone conversation with a Reports Analysis Division analyst in October, 1982. CPC's 1982 30 Day Post-General Election Report disclosed two \$5,000 refunds to Anne Seggerman on November 4 and 23, 1982.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. In light of the fact that Anne Seggerman made \$15,000 in contributions in 1982 to CPC, the Office of the General Counsel recommends that the Commission find reason to believe that the Respondent violated 2 U.S.C. § 441a(a)(1)(C).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1984

Harry G.A. Seggerman
5060 Congress Street
Fairfield, CT 06030

RE: MUR 1732

Dear Mr. Seggerman:

On June 26, 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

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 so desired. See 11 C.F.R. § 111.18(d).

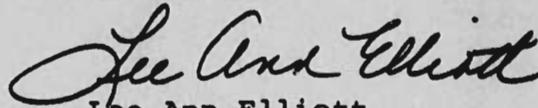
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

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

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1732

RESPONDENT Harry G.A. Seggerman

SUMMARY OF ALLEGATIONS

It is alleged that Harry G.A. Seggerman made an excessive contribution to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On September 9, 1982, Harry G.A. Seggerman made a \$10,000 contribution to CPC. The contribution was disclosed on the 1982 October Quarterly Report filed by CPC. CPC's treasurer, Foster Gunnison, Jr., was informed of the excessive contribution through a telephone conversation with a Reports Analysis Division analyst in October, 1982. CPC's 1982 30 Day Post-General Election Report disclosed a \$5,000 refund to Harry G.A. Seggerman on November 23, 1982.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. In light of the fact that Harry G.A. Seggerman made a \$10,000 contribution in 1982 to CPC, the Office of the General Counsel recommends that the Commission find reason to believe that the Respondent violated 2 U.S.C. § 441a(a)(1)(C).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CJ*
DATE: June 22, 1984
SUBJECT: RAD Referral 84L-14: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 22 A10: 46

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 6/22/84 - 10:45 RAD REFERRAL # 84L-14 STAFF MEMBER(S)

M. Tarrant

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS NAMES: Conservative Party of Connecticut
Anne C. Seggerman, Harry G.A. Seggerman,
Castellanos & Company

RELEVANT STATUTE: 2 U.S.C. §§ 434(a)(4)(A), 441a(a)(1)(C),
441a(f)

INTERNAL REPORTS CHECKED: Reports filed by Respondent committee

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD").

SUMMARY OF ALLEGATIONS

It is alleged that the Conservative Party of Connecticut, Inc. ("CPC")^{1/} has failed to file a 1983 Year End Report and a 1984 April Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A). It is further alleged that Anne C. Seggerman,

^{1/} The last treasurer of record was Foster Gunnison, One Gold Street, Suite 22BC, Hartford, CT 06103. Mr. Gunnison notified RAD in a letter received on July 18, 1983, that he had resigned as treasurer effective March 28, 1983. In that letter, he also supplied the address of the executive director.

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Harry G.A. Seggerman and Castellanos & Co. made excessive contributions to CPC in violation of 2 U.S.C. § 441a(a)(1)(C) and that CPC accepted these contributions in violation of 2 U.S.C. § 441a(f).

FACTUAL BASIS AND LEGAL ANALYSIS

A. Failure to File Reports

CPC filed a Termination Report on July 18, 1983, which was not considered to be valid, as CPC had an outstanding debt of \$5,259 owed to a creditor, Castellanos & Co.^{2/} On August 17, 1983, a Request for Additional Information ("RFAI") was sent by RAD to CPC advising that the Termination Report could not be accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled.

On August 26, 1983, Mr. Gunnison responded on CPC's behalf. He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that "... there is no feasible manner in which this debt as listed on Schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising

^{2/} CPC's total activity amounted to \$43,056 in receipts and \$43,055 in disbursements.

campaign" According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of senatorial candidate Lucian DiFazio.^{3/}

CPC was again notified on an informational basis by RAD on September 23, 1983, that it could not terminate. The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984. Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28, 1984, to Mr. Gunnison. A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway since the treasurer had resigned. The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984. He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

^{3/} Lucian DiFazio was the Conservative Party candidate for the U.S. Senate in the 1982 Connecticut general election. Mr. DiFazio lost that election receiving 3% of the vote. It should be noted that Mr. Gunnison was the treasurer of the Lucien DiFazio for U.S. Senate Committee, Inc. and that CPC only supported one federal candidate, which was Mr. DiFazio, by making \$22,000 in coordinated expenditures and a \$702 in-kind contribution.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt. In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled.

On May 8, 1984, both Mr. Gunnison and Mr. Ordway were notified that CPC had failed to file the 1984 April Quarterly Report. As of this date, CPC has not filed a 1983 Year End Report and a 1984 April Quarterly Report, nor has a debt settlement been submitted.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required in a non-election year to file a report covering the period beginning July 1 and ending December 31 no later than January 31 of the following calendar year. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required to file quarterly reports, in a calendar year in which a regularly scheduled general election is held, no later than the 15th day after the last day of each calendar quarter. Under 2 U.S.C. § 433(d)(1), a political committee may terminate only when such a committee files a written statement that it will no longer receive any contributions or make any disbursements and that such committee has no outstanding debts or obligations. As CPC could not terminate due to existing debts, it was required to continue to

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file reports. Therefore, it is recommended that the Commission find reason to believe that CPC violated 2 U.S.C. § 434(a)(4)(A).

B. Excessive Contributions

The 1982 October Quarterly Report filed by CPC disclosed contributions from two (2) individuals on September 9, 1982, totalling \$25,000 resulting in apparent excessive contributions of \$15,000.

Mr. Gunnison was first informed of these possible excessive contributions in October, 1982, during a phone conversation with a RAD staff member concerning Mr. Gunnison's failure to use FEC forms for his reports.^{4/} Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should either be refunded to the contributors or transferred to a non-Federal account with the contributors' approval.

On November 2, 1982, several items of correspondence were received from CPC. According to the letters, Mrs. Anne C. Seggerman had contributed \$15,000 (in two (2) checks) to CPC, \$10,000 in excess of the limitation, and Mr. Harry G.A. Seggerman had contributed \$10,000 (in one (1) check) to CPC, \$5,000 in excess of limitation. According to CPC, portions of

^{4/} Although the summary page and detailed summary page were used, the rest of the pages of the reports were filed on ledger paper and were very difficult to understand.

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the contribution checks had been "partially mis-applied" to the Federal Account. To remedy the matter, CPC stated that it redesignated \$5,000 received from each individual to CPC's State Account. The additional \$5,000 excessive contribution received from Mrs. Seggerman was disclosed on Schedule D "as an account payable and will be refunded to Mrs. Seggerman as soon as funds were available"

CPC's 1982 30 Day Post-General Report, received on December 6, 1982, disclosed two (2) \$5,000 refunds to Mrs. Seggerman on November 4 and 23, 1982 and a \$5,000 refund to Mr. Seggerman on November 23, 1982. The refunds made on November 23, 1982 were repeated on the 1982 Year End Report.

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions. Mr. Gunnison's response which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made.

With regard to the \$5,259 debt owed to Castellanos & Co.,^{5/} it is not clear exactly when the debt was incurred. The debt first appeared on CPC's 1982 Year End Report. According to Mr. Gunnison, the \$5,259 was for television ads in connection with the DiFazio for U.S. Senate campaign and was a coordinated expenditure. Mr. Gunnison has stated that it was Mr. Ordway who

^{5/} According to the corporate division of the Virginia Secretary of State's office, Castellanos & Co. is not incorporated.

incurred the debt without his (Gunnison's) knowledge and that the debt remains ". . . unpayable and unconvertible." It appears, judging from conversations with Ordway and Gunnison, that no attempts will be made to pay off the debt and that Castellanos & Co. has not made any attempts to collect it.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

Pursuant to 11 C.F.R. § 100.7(a)(4), the extension of credit by any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a commercially reasonable attempt to collect the debt. A debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless such debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10. Under 11 C.F.R. § 114.10(c), a settlement will be considered commercially reasonable if --

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. § 451 or paragraph (a) of this section.

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- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the settlement is subject to Commission review.

As there is no indication that Castellanos & Co. has made an attempt to collect the debt owed by CPC, it appears that an excessive contribution has been made. In light of the fact that Anne C. Seggerman, Harry G.A. Seggerman and Castellanos & Co. all contributed in excess of \$5,000 in 1982 to CPC, the Office of the General Counsel recommends that the Commission find reason to believe that all three violated 2 U.S.C. § 441a(a)(1)(C). It is further recommended that the Commission find reason to believe that CPC violated 2 U.S.C. § 441a(f) by accepting these excessive contributions.

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RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Conservative Party of Connecticut violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f).
3. Find reason to believe that Anne C. Seggerman violated 2 U.S.C. § 441a(a)(1)(C).
4. Find reason to believe that Harry G.A. Seggerman violated 2 U.S.C. § 441a(a)(1)(C).
5. Find reason to believe that Castellanos & Co. violated 2 U.S.C. § 441a(a)(1)(C).
6. Approve the attached letters.

Charles N. Steele
General Counsel

June 21, 1974
Date

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

Attachments

1. RAD Referral
2. Proposed Letters
3. General Counsel's Factual and Legal Analysis

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 April 1984

ANALYST: Pamela Brown

I. COMMITTEE: Conservative Party of Connecticut, Inc.
C00160754
David J. Ordway, Executive Director^{1/}
70 Standish Road, Apt. 2
Stamford, CT 06902

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(iv)
2 U.S.C. 441a(f)

III. BACKGROUND:

A. Non-Filing of 1983 Year End Report
2 U.S.C. 434(a)(4)(A)(iv)

The Conservative Party of Connecticut, Inc. ("CPC") filed a Termination Report on July 18, 1983 which was not considered to be valid, as CPC had an outstanding debt of \$5,259 owed to a creditor (Attachment 2). On August 17, 1983, a Request for Additional Information ("RFAI") was sent to CPC advising that the Termination Report could not be accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled (Attachment 3).^{2/}

On August 26, 1983, Mr. Gunnison responded on CPC's behalf (Attachment 4). He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that "...there is no feasible manner in which this debt as listed on Schedule D of the

^{1/} The treasurer of record is Foster Gunnison, One Gold Street, Suite 22BC, Hartford, CT 06103. Mr. Gunnison notified RAD in a letter received on July 18, 1983 that he had resigned as treasurer effective March 28, 1983. In that letter, he also supplied the address of the executive director.

^{2/} A Second Notice was incorrectly sent September 8, 1983. CPC responded to the Second Notice on September 15, 1983 by providing a copy of the August 26, 1983 response.

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termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign...." According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of Mr. Lucian DiFazio (Mr. DiFazio was the Conservative Party candidate for U.S. Senate in the 1982 Connecticut general election).

CPC was again notified on an informational basis by the Reports Analysis Division ("RAD") on September 23, 1983, that it could not terminate (Attachment 5). The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984 (Attachment 6). Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28, 1984 (Attachment 7). A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway since the treasurer had resigned (Attachment 8). The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984 (Attachment 9). He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt (Attachment 10). In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled.

As of this date, CPC has not filed a Year End Report, nor has a debt settlement statement been submitted.

B. Receipt of Excessive Contributions from Individuals -
2 U.S.C. 441a(f)

The 1982 October Quarterly Report filed by CPC disclosed contributions from two (2) individuals on September 9, 1982 totalling \$25,000 resulting in apparent excessive contributions of \$15,000 (Attachment 11). On October 20, 1982, the RAD analyst contacted CPC's treasurer

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regarding the use of non-FEC Forms (Attachment 12). Mr. Gunnison subsequently phoned and requested to speak with the Chief of the Party/Non-Party Branch (Attachment 13). During the discussion, the Chief of the Party/Non-Party Branch pointed out that it appeared as though excessive contributions had been received. Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should either be refunded to the contributors or transferred to a non-Federal account with the contributors' approval.

On November 2, 1982, several items of correspondence were received from CPC (Attachment 14). According to the letters, Mrs. Anne C. Seggerman had contributed \$15,000 (in two (2) checks) to CPC, \$10,000 in excess of the limitations, and Mr. Harry G.A. Seggerman had contributed \$10,000 (in one (1) check) to CPC, \$5,000 in excess of the limitations. Portions of the contribution checks had been "partially mis-applied" to the Federal Account. To remedy the matter, CPC stated that it redesignated \$5,000 received from each individual to CPC's State Account. The additional \$5,000 excessive contribution received from Mrs. Seggerman was disclosed on Schedule D "as an account payable and will be refunded to Mrs. Seggerman as soon as funds were available..."

Additional correspondence was received on November 8, 1982 (Attachment 15). Mr. Gunnison reiterated that CPC had received \$15,000 in excess of the limitations; however, it was not clear how much, if any, of the excessive contributions had been transferred to the non-Federal account or considered to be an account payable.^{3/}

CPC's 1982 30 Day Post-General Report, received on December 6, 1982, disclosed two (2) \$5,000 refunds to Mrs. Seggerman on November 4 and 23, 1982 and a \$5,000 refund to Mr. Seggerman on November 23, 1982 (Attachment 16). The refunds made on November 23, 1982 were repeated on the 1982 Year End Report (Attachment 17).

3/ Although the response received on November 2nd indicated that \$10,000 had been redesignated to CPC's State Account, the response received on November 8th appeared to indicate that CPC was waiting for letters from the contributors approving the transfer to CPC's State Account.

CONSERVATIVE PARTY OF CONNECTICUT, INC.
REPORTS ANALYSIS OGC REFERRAL
PAGE 4

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions (Attachment 18). Mr. Gunnison's response which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made (Attachment 19).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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COMMITTEE	DOCUMENT	PARTY RELATED		TYPE OF FILER	# OF	MICROFILM
		RECEIPTS	DISBURSEMENTS			
				COVERAGE DATES	PAGES	LOCATION

CONSERVATIVE PARTY OF CONNECTICUT INC				PARTY NON-QUALIFIED		ID #C00160734
1982 REQUEST FOR ADDITIONAL INFORMATION						1 82FEC/244/5032
STATEMENT OF ORGANIZATION				23AUG82		2 82FEC/241/1691
REQUEST FOR ADDITIONAL INFORMATION 2ND						2 82FEC/252/4007
OCTOBER QUARTERLY		27,746	23,685	1JUL82 -30SEP82		13 82FEC/246/1965
OCTOBER QUARTERLY - AMENDMENT		-	-	1JUL82 -30SEP82		1 82FEC/259/1282
OCTOBER QUARTERLY - AMENDMENT		-	-	1JUL82 -30SEP82		7 82FEC/253/4088
OCTOBER QUARTERLY - AMENDMENT		-	-	1JUL82 -30SEP82		2 83FEC/260/4260
OCTOBER QUARTERLY - AMENDMENT		-	-	1JUL82 -30SEP82		5 83FEC/274/7005
REQUEST FOR ADDITIONAL INFORMATION				1JUL82 -30SEP82		2 83FEC/274/7005
PRE-GENERAL		1,000	900	1OCT82 -13OCT82		13 82FEC/253/0
PRE-GENERAL - AMENDMENT		-	-	1OCT82 -13OCT82		11 82FEC/253/11
PRE-GENERAL - AMENDMENT		-	-	1OCT82 -13OCT82		1 82FEC/253/4357
POST-GENERAL		304	6,301	14OCT82 -22NOV82		12 83FEC/260/4262
POST-GENERAL - AMENDMENT		-	-	14OCT82 -22NOV82		1 83FEC/274/3126
REQUEST FOR ADDITIONAL INFORMATION				14OCT82 -22NOV82		1 83FEC/274/0313
YEAR-END		14,006	12,165	23NOV82 -31DEC82		11 83FEC/262/4555
YEAR-END - AMENDMENT		-	-	23NOV82 -31DEC82		1 83FEC/274/3127
REQUEST FOR ADDITIONAL INFORMATION				23NOV82 -31DEC82		1 83FEC/274/0311
TOTAL		43,056	0 43,051	0		87 TOTAL PAGES

All reports have received basic review.

Ending cash-on-hand as of December 31, 1982:

\$ 4

Outstanding debts owed to the committee as of December 31, 1982:

\$ 0

Outstanding debts owed by the committee as of December 31, 1982: \$5,259

COMMITTEE	DOCUMENT	PARTY-RELATED				TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		8	5	0	4			
		0	5	2	1			
		0	0	0	4			
		RECEIPTS		DISBURSEMENTS				
CONSERVATIVE PARTY OF CONNECTICUT INC						PARTY NON-QUALIFIED		ID #C00160754
1983 NOTICE OF FAILURE TO FILE						1JUL83 -31DEC83	1	84FEC/297/3897
TERMINATION REPORT		0			4	1JAN83 -30JUN83	7	83FEC/276/3085
TERMINATION REPORT - AMENDMENT		-			-	1JAN83 -30JUN83	3	83FEC/282/1979
TERMINATION REPORT - AMENDMENT		-			-	1JAN83 -30JUN83	4	83FEC/283/0077
REQUEST FOR ADDITIONAL INFORMATION						1JAN83 -30JUN83	1	83FEC/281/3487
REQUEST FOR ADDITIONAL INFORMATION 2ND						1JAN83 -30JUN83	2	83FEC/282/3994
1ST LETTER INFORMATIONAL NOTICE						1JAN83 -30JUN83	1	83FEC/283/4583
TOTAL		0	0	4	0		19	TOTAL PAGE

All reports have received basic review.

Ending cash-on-hand as of June 30, 1983: \$ 0

Outstanding debts owed to the committee as of June 30, 1983: \$ 0

Outstanding debts owed by the committee as of June 30, 1983: \$5,259

85040521005

Documentation Regarding the Non-Filing
of the 1983 Year End Report

(Attachments 2 through 10)

STATE OF RECEIPTS AND DISBURSEMENTS
For an Authorized Committee

ATTACHMENT 2
(Page 1 of 2)

Filed by Mail on July 14, 1983 (Summary Page)

CPOC-1

CLOSING 6-30-83

C00160754 830614
FOSTER GUNNISON
CONSERVATIVE PARTY OF CONNECTICUT INC
ONE GOLD ST #22-BC
HARTFORD CT 06103

2. FEC Identification Number

C00160754

3. Is this Report an Amendment?

☐ YES ☒ NO

Previously reported.

REPORT

☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☒ Termination Report **TERMINATION**

This report contains activity for - ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period 1-1-83 Through 6-30-83

6. Net Contributions (other than loans):

(a) Total Contributions (other than loans) (from Line 11e)

(b) Total Contribution Refunds (from Line 20d)

(c) Net Contributions (other than loans) (Subtract Line 8b from 6a)

7. Net Operating Expenditures:

(a) Total Operating Expenditures (from Line 17)

(b) Total Offsets to Operating Expenditures (from Line 14)

(c) Net Operating Expenditures (Subtract Line 7b from 7a)

8. Cash on Hand at Close of Reporting Period (from Line 27) BANK ACCT CLOSED

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$ 0 \$ 0

\$ \$

\$ 0 \$ 0

\$ 4 \$ 4

\$ \$

\$ 4 \$ 4

\$ 0

\$ 5,259

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4088

FOSTER GUNNISON JR. (RESIGNED)

Type of Report Name of Signatory

Foster Gunnison Jr. (Resigned)

7-14-83

SIGNATURE OF FINANCIAL MANAGER, RESIGNED AS OF
JULY 28, 1983 Per letter to FEC dated August 1, 1983

NOTE: Submission of false information, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

FEC FORM 3 (7-83)

8

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 2 (Page 2 of 2)
LINE NUMBER 16
(Use separate schedules for each numbered line)

CLOSING 1-30-83

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance or Claim at End of This Period
CONSERVATIVE PARTY OF CALIF - ECTILET				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Co. River Plaza South, #1106 1011 Arlington Blvd. Arlington, Va. 22209	5,259	0	0	5,259
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1. SHORT-TERM: This Period (This Page optional)				5,259
2. TOTAL: This Period (last page this line only)				5,259
3. TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4. Attach 2 and 3 and carry forward to appropriate line of Summary Page (last page only)				

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85040521007
03031753001



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

RG-2

17 August 1983

Foster Gunnison, Treasurer
Conservative Party of Connecticut,
Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: Termination Report (1/1/83-6/30/83)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your Termination Report cannot be accepted because it discloses outstanding debts and obligations. You must continue to file reports of receipts and disbursements until such debts and obligations are extinguished or settled. (11 C.F.R. 104.11)

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the purpose of each debt. (11 CFR 104.11)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith

Alva Smith
Reports Analyst
Reports Analysis Division

RECEIVED AT THE FEC

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITE 800C
ONE GOLD STREET, HARTFORD, CONNECTICUT 06103

83 AUG 22 AM 1:47

PHONE 857-0000 AREA CODE 203

FOSTER CLARKSON JR., M.A., PH.D.
ADMINISTRATOR

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington DC 20463

ADMINISTRATIVE
FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA B. ETTENES
AUSTIN WIDE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN SCHNEIDERSON

Aug. 20, 1983

Dear Ms. Smith:

I received today your letter of Aug. 17th requesting additional information relating to the Termination Report of the organization Conservative Party of Connecticut, Inc. (JC00160754) and I will respond herewith as best I can.

The first of your two inquiries relates to the matter of outstanding debts and obligations of the committee. Again, I must reiterate that I am no longer the treasurer of this organization, having resigned per advisory letter to Ms. Susan Kaitenbaugh of earlier this year. The termination report which is the subject of your inquiry was filed by me on an unofficial basis as former treasurer merely to furnish the FEC with closing transactions during the early part of this year following the filing of the year end report for 1982. And also to provide the FEC with a reaffirmation of the single debt outstanding against the organization.

In my opinion there is no feasible manner in which this debt as listed on schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign to enable this and to appoint a new treasurer to resume reporting until this is accomplished. There is no longer a bank account, nor any funds or assets belonging to the organization.

The debt in question was racked up against the committee by the Executive Director without my knowledge, presumably in anticipation that there would be funds available to pay it (and in fact at one point there were such funds collected by the Executive Director excepting that they constituted illegal excess contributions and had to be refunded, leaving the committee essentially without funds.)

The Executive Director subsequently moved his office from Hartford suburban area to Stamford Conn., where he entered another field of endeavor, the practice of law, and that left the committee without fundraising resources and no hope of resolving outstanding debt. It was in consequence of this situation that I resigned.

You may, if you wish, however, establish contact with the executive Director concerning the matter of resolving the debt and arranging continued reporting during the time it takes to accomplish this. And I give you his address as follows:

Mr. David J. Ordway
Executive Director of CPOC
c/o 70 Standish Rd., Apt. #2
Stamford, CT 06902

8503405219999

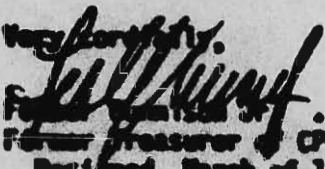
11

And his phone number is as follows:

Stanford CT. (203) 327-4376 (phone at 70 Standish Rd.)
I note there is also a number listed in Stanford under David
Ordway at 329-1975 and that may be a business number of his.

With respect to the second item of inquiry of your letter, it was my
error that I inadvertently omitted the purpose of the debt for the single
creditor shown in the schedule D reporting, Castellanos & Co. I am told that
this was for a series of TV productions having to do with the U.S. Senatorial
campaign (of 1962 general elections) of Lucian DiFazio, running as a conser-
vative party candidate from Connecticut. My apologies for this omission.

If there is any additional information that you are in need of concerning
the status or activities of this (now defunct) organization I will try to help
you in whatever way I can but with the understanding that I am no longer a part
of this organization nor have any official capacity in it.

Very respectfully,

Former Treasurer of CPDC
Resigned, March of 1963

6 5 0 3 4 2 0 5 2 2 1 1 0 0 9 1 0 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RG-5

September 23, 1983

David J. Ordway, Executive Director
Conservative Party of Connecticut, Inc.
70 Standish Road
Apt. #2
Stanford, CT 06902

Identification Number: C00160754

Reference: Termination Amendment Report (1/1/83-6/30/83)

Dear Mr. Ordway:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee cannot terminate its reporting requirements because of outstanding debts. To properly terminate your reporting obligation, you must either liquidate the debt(s) or provide the Commission with a statement of debt settlement. (11 CFR 102.3, 104.11, and 114.10) A statement of debt settlement must include the following information:

- The initial terms of credit,
- The steps taken by the committee to pay the debt and the steps taken by the creditor to obtain payment of the debt, and
- The terms of the agreement to settle the debt.

-Please note, according to 11 CFR 102.7, every political committee shall have a treasurer. No contribution or expenditure shall be accepted or made on behalf of a political committee at a time when there is a vacancy in the office of the treasurer.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

John G. Smith

Alva Smith
Reports Analyst
Reports Analysis Division

13



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Furthermore, failure to file in a timely fashion is a serious violation and an offending committee is subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted and committees filing such documents will be required to refile.

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 1984.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications
202/523-4068 or 800/424-9530



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 28 1984 RQ-7

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: 1983 Year End Report (7/1/83-12/31/83)

Dear Mr. Gunnison:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040521014

PS Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse. (CONSULT POSTMASTER FOR FEES)	
1. The following service is requested (check one). ☐ Show to whom and date delivered ☒ Show to whom, date, and address of delivery	
2. ☐ RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)	
TOTAL \$	
3. ARTICLE ADDRESSED TO: David Ordway Conservative Party of Connecticut 70 Standish Rd., #2	
4. TYPE OF SERVICE: CT 06902 ☒ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COO ☐ EXPRESS MAIL	ARTICLE NUMBER R020993001 7-2
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent 5. <i>David P. Ordway</i>	
6. DATE OF DELIVERY	POSTMARK May 10 1984 U.S. PO
6. ADDRESSEE'S ADDRESS (Only if requested)	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1982-379-600

16

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Conservative Party of CT
PCC-Lucien DiFazio

COMMITTEE CONTACT: Foster Gunnison (ex-Treasurer)

DATE: 3/6/84

ANALYST: Brown

SUBJECT: YE Non-Filing

Mr. Gunnison called in response to 2 nonfiler letters he received:
1) one for the Conservative Party of Connecticut (which had terminated with debts outstanding); and 2) one for the PCC of Lucien DiFazio.
Mr Gunnison said that he had resigned as treasurer of both committees. In addition, he stated that both committees were defunct. He mentioned that he had spoken to several people at the Commission, and suggested that we try to reach the executive director of both committees, David Ordway. His last known address was c/o his mother at 70 Standish Street, Stamford, CT . Mr Gunnison stated that Mr Ordway had moved twice since that address, but that he would probably receive mail delivered there. Mr. Ordway has, according to Mr. Gunnison, set up a law practice in the Stamford area.

85040521015

MEMORANDUM TO THE FILES: TELECON

COMMITTEE NAME: Conservative Party of Connecticut

COMMITTEE CONTACT: David Ordway, Exec. Director

DATE: 3/21/84

ANALYST: P. Brown

SUBJECT: Non-filing & inadequate termination report

I contacted Mr. Ordway to follow-up our letter concerning the committee's non-filing of the 1983 Year-end Report. I explained to Mr. Ordway that the termination report was not considered adequate, since the committee had debts and had failed to satisfy them. I explained that the Act precluded a committee from terminating with debts, and provided a vehicle for the debt settlement procedure. I suggested that he file the YE report and attempt to contact the creditor to attempt to start the debt settlement procedure. I also advised him that the committee had to continue to file reports until the settlement was approved by the Commission. I stated that I would send him the Directive so that he would know how to proceed.

Mr. Ordway said that the committee was defunct and that he was no longer associated with it. I told him that the treasurer, Mr. Gunnison had stated that he (Ordway) was in charge, and that Gunnison had resigned. Mr. Ordway asked how long would the paperwork continue. I told him that the requirements I discussed were required by the Act, and that I could not provide him with any shortcuts.

24 Hoyt Street
Stamford, CT 06905
(203) 967-4374

85040521016

18

85040521017

Documentation Regarding the Receipt of
Excessive Contributions

(Attachments 11 through 19)

[illegible]

MEMORANDUM: FOR FILES

RE: TELECON (initiated by analyst)

FROM: Foster Gunnison

DATE: October 20, 1982

NAME OF COMMITTEE OR CANDIDATE: CONSERVATIVE PARTY OF CONNECTICUT INC.

SUBJECT: Reporting on Form 3X and other reporting problems

I explained to Mr. Gunnison that his reports must be submitted on Form 3X. I stated that the Summary and Detailed Summary Pages were enclosed, however, the receipt and disbursement schedules for Form 3X were not. Mr. Gunnison explained that he spoke with someone at the FEC and was told that it would be okay to use his forms. He also stated that other committees submit reports on forms convenient for their use. I stated that other committees most likely submit their reports on approved computer generated schedules. The only form of reporting would be on FEC Form 3X.

He was not satisfied with my advise. He asked to speak with my supervisor. I told him that Mr. Filler was currently available but could be reached later that day.

85040521019

October 1982

MEMORANDUM TO THE FILE

FROM : MICHAEL B. FILLER
SUBJECT : DISCLOSURE AND COMPLIANCE PROBLEMS
COMMITTEE : CONSERVATIVE PARTY OF CONNECTICUT

Foster Gunnison, Treasurer of the Conservative Party, called about submitting disclosure information on non-FEC Forms. I informed him that the Commission's regulations required prior approval before such schedules could be used. In addition, I mentioned that the ledger format made it difficult to determine what was being reported. Mr. Gunnison stated that he would work on revising the format and submit his proposed schedules by the end of the year.

During our conversation, I also pointed out that the committee had apparently received excessive contributions. I informed him of the statutory limitations, of which he was not aware, and suggested that the amounts in excess either be refunded to the contributors, or transferred to a non-Federal account with the consent of the contributors. Mr. Gunnison stated that he would take the necessary steps to be in compliance.

85040521020

RECEIVED... FEC

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 220C
ONE GOLD STREET, HARTFORD, CONN. 06103
PHONE 527-4220 AREA CODE 203

82 NOV 2 09:43

FOSTER BARNHORN, JR., M.A., PH.D.

Mr. Michael Filler
Chief of Party/Non-Party Section
RADS Division
Federal Elections Commission
1325 "K" St. NW
Washington, DC 20463

ADVICE
FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA B. SITTING
AUSTIN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

Oct. 31, 1982

Dear Mr. Filler:

This repair job on our reports and finances has taken a lot longer than I could have imagined. I have been working almost solidly for 48 hours on it. It is now a day later than I had anticipated so I am mailing this by special delivery hoping to save you a day or so.

It has been exhausting work and I hope I don't get hit with something like this again at least on this scale. I will have a talk with my boss about it and the general manner of operations as well.

The figures are all interlocked and breaking them apart and segregating them has involved endless entries.

But I think the job is pretty much done. And it appears that we have been able to clear up just about all the violations excepting a remaining \$5,000 in excess contribution by Mrs. Seggerman. My boss has a fundraiser in the mail now (by coincidence - he had planned it for this time) and I would guess that that will enable this refund to take place within reasonable time. We will of course keep you advised of any change in the situation.

Surprisingly enough, the state appeared to have no objection to the use of state committee funds for helping federal candidates. Without limitation in fact. I would not have counted on that. But it enabled us to shift \$10,000 of the contribution overage to our state account, leaving only the aforementioned \$5,000 to be dealt with. All other items have been cleared out as per copy enclosed of my letter to NCPAC and the vendors, and the letter of amendment which I am herewith leaving in your care.

If anything more needs to be done you can let me know. Otherwise my next contact with you (other than for occasional information) will probably be related to the final refunding of the \$5,000. But in any event I plan to be in touch with you late Nov. or sometime in early Dec. with regards to ideas and samples I have in mind that will make our reports more convenient to FEC applications as well as to our own operations. While still maintaining the key features we need here in order to make this thing viable without computer help. I want to struggle through on the current basis until year's end and be able to start out fresh next year with an improved format. This has all been new to me anyway and I've needed the past two years of experience to gain some familiarity with the structure of campaign financing and regulations (obviously with some ways yet to go.)

850405310213

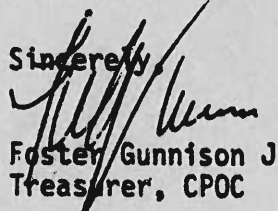
Filler/FEC/10-31-82/Page 2

I do appreciate your kind help in all of this. And that of Mr. Ed Ryan's as well. I have been impressed with your manuals, once I got a chance to glance through them.

I do have one suggestion to make. Something that threw me off the track here in one of these foul-ups. Your Schedule #21 is officially titled "Contributions to Federal Candidates and Other Political Committees." I took this to mean political committees other than our own, i.e. any committees other than our own - and thus wound up entering contributions to our state candidates here instead of Schedule #27. Had it said "...to Federal Candidates and other Federal Political Committees" I would have checked first to find out where to put state stuff which would have led me to Schedule 27. Just an ambiguity of wording.

I'll take leave of you now to get this into the Sunday mail -(only one pickup) and you can get hold of me if things still aren't right or if you need any other information or have an other cautionary advice to offer.

Sincerely,


Foster Gunnison Jr.
Treasurer, CPOC

85040521022

(24)

INSTITUTE OF SOCIAL ETHICS
RUSHNELL PLAZA NORTH TOWER SUITES 228C
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 527-4890 AREA CODE 203

FOSTER GUNNISON JR., M.A., PH.M.
ADMINISTRATOR

Office of Public Records
The Federal Elections Commission
1325 "K" St. NW
Washington DC 20463

ASSOCIATES
FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA B. GITTINGS
AUSTEN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

Oct. 30, 1982

IN RE: The Conservative Party of Connecticut, Inc. (CPOC-1)

FEC Committee i.d. No. C-00160754

Subject: Letter of Amendment to the following reports:

- a. The Report of 9-30-82 closing, due 10-15-82
- b. The Report of 10-13-82 closing, due 10-21-82

Dear Sirs:

We wish to take this opportunity to offer in amendment to the above listed reports filed on behalf of the above captioned organization the following revised data and correcting entries.

1. Applicable to both reports. In schedule A1a, Itemized Individual Donations Exceeding \$200, contributions shown as items #001 and #002 totalling \$15,000 from Anne C. Seggerman of 5060 Congress St, Fairfield CT 06430, received in two checks on September 9th, were partially mis-applied to the Federal Account of this organization resulting in a technical exceedment of the \$5,000 per individual limit by \$10,000. Of this excess, one half or \$5,000 has been re-designated to the Connecticut State account (CPOC-2) of this organization, leaving an excess of \$5,000 still remaining in the Federal Account. This remaining excess has now been entered into Schedule D as item #001, as an account payable and will be refunded to Mrs. Seggerman as soon as funds are available to enable this final clearing transaction.
2. Applicable to both reports. Again in schedule A1a, a contribution shown as item #003 in amount of \$10,000 by Mr. Harry G. Seggerman of same address, and in one check of same date was received by us also on same date and, similarly, was partially mis-applied to the Federal Account (CPOC-1) of this organization. In like manner to the above, one half of this amount or \$5,000 has been redesignated to the Connecticut State account of the organization, thus clearing the violation of contribution limits incurred by the initial transaction.
3. Applicable to both reports. In schedule 21, Contributions To Federal Candidates and Other Political Committees, and acting as an offset to the above redesignation of contributions from Federal to State account, the first item listed (as #001) in amount of \$20,000 paid to Murphy Powers Media Inc. of Mt. Kisco, NY for a program of advertising in support of the Connecticut State candidate for U.S. Senate, Mr. Lucien P. DiFazio, has been reduced in

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the Federal Account to one half or \$10,000, and the balance of \$10,000 has been redesignated and transferred to the State account, thus compensating for the aforedecared transfer of contributions.

4. Applicable to both reports. In scedule A11c, Itemized Donations Received From other Political Organizations. The first two listed items (#001-#002) represented contributions by the Organizaton NCPAC (National Conservative Political Action Committee) of Arlingto, VA. to our organization in amounts of \$1225.33 and \$671.49 respectively. These contributions were, however, received and accepted by us in the form of refunds due NCPAC by two temporary help companies for in-kind payments made to them by NCPAC in support of a candidate of our party here in Connecticut. Because these contributions, in the nature of diverted refunds, were received by us in the form of corporate checks issued by commercial companies our acceptance of them put us in violation of the Federal Election laws prohibiting the acceptatnce of such payments. Both of these contributions have now been refunded by our organization to the respective temporary help companies and the integrity of our organization has been restored in these reagrs.

The above described contributions were received on September 8th and 13th respectively. A similar third such contribution in the amount of \$302.20 was received from another temporary help company on October 22nd after the closing dates, and hence not applicable to, the listed reports. This contribution has also been refunded and will stand cleared as of the next report filed.

5. Applicable to both reports. In schedule 21, Contributions to Federal Candidates and Other Political Committees. and due to ambiguity in the official schedule description, three in-kind class expenditures by the organization NCPAC on behalf of three CPOC candidates running for state offices (items #005-006-007 in the schedule) were logged in error instead of in schedule 27 Other Expenditures as they ought to have been. These three items totalling \$2,107.50 have now been deducted from Schedule 21 and re-entered in Schedule 27, as items #004-005-006.
6. Applicable to both reports. Referring back to item #3 of page #1 of this letter of amendment, Scedule 21. item #001 and the remaining balance in the Federal Account of \$10,000 in advertising paid to Murphy Powers Media on behalf of the DiFazio for U.S. Senate campaign it was intended that this be in the class of a coordinated expenditure and therefore ought to have been enetred in schedule "F" for line item #23. This remaining balnce of \$10,000 has now been eliminated entirely from Schedule 21 and transferred to schedule 23F as the first (and thus far only) entry in that schedule.
7. Applicable to both reports. In schedule ~~21~~ #21, of the 9/30 closing report, items ~~004~~ (in amount of \$702.50) and #005-006-007 Totaling ~~0000~~ \$2,107.50 and since transferred to schedule 27) are incorrectly entered under the date of 9/28 instead of the correct date of 10/02. This would have the effect of reducing schedule 21 for the 9/30 closing report by \$2,810.00 and increasing the 10/13 closing period by same amount, or, under the amended reclassification of three of the four items to Scedule 27, would have the effect of reducing Schedule 21 by \$2,810.00 for the 9/30 closing period and by \$2,107.50 for the 10/13 closing period (with item #004 redated to that period and items #005-006-007 transfered out completely for both periods). Additionally, it would have the effect of increasing schedule 27 by \$2,107.50 for the 10/13 closing period under the combined practice of redating and transferring in.

The net affect of these transactions in sum for all affected accounts would

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yield the following balances per reporting period:

	SEPTEMBER 30 CLOSING		OCTOBER 13 CLOSING	
	Period	Annum	Period	Annum
Schedule 11a (Indiv. Don.)	15,850	15,850	1,000	16,850
Schedule 11c (Pol Org Dons)	Unchanged until refunds were made in a later period.			
Schedule 19 (oper. exp.)	Unchanged including transfers in and out and adjustments made as of each reporting date.			
Schedule 21 (Dons to Fed Cands)	298	298	702	1,000
Schedule 23F (Coord. Exp.)	10,000	10,000	0	10,000
XXXXXXXXXXXXXXXXXXXX	XXXXX	XXXXX	XXXXX	XXXXX
Schedule 27 (other Exp.)	200	200	2,007	2,207
Schedule A11a (Large Dons)	23,500	23,500	1,000	24,500
Schedule A11c (Pol Org Dons)	Same as Schedule 11c above			
Schedule D (Accts Payable)	5,000	5,000	0	5,000
Line 6c Receipts	17,746	17,746	unchanged	18,747
Line 7 Disbursements	(13,686)	(13,686)	(unchanged)	(14,587)
Cash On Hand, Closing	4,060	4,060	4,160 (unch)	4,160

Enclosed is a copy of the new schedule #23F and the new Schedule D.

Respectfully Submitted,

Foster Gunnison Jr.
Foster Gunnison Jr.

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(h))

(To be used only by Political Committees in the General Election)

APPROVED 10-29-82

AMENDED 11/27/82 FOR THE PERIOD 10-1-82

Name of Political Committee (in Full)

2005-1 Conservative Party of Connecticut

Has candidate received coordinated expenditures from a political party, committee, or
YES NO
agent, including committee.

Name and ZIP Code of Subordinate Committee

DPF-1 D. Fazio For Senate Committee

At Foster Farmham Jr., D.S.

644 St. #22-84

and CT 06102

Name and ZIP Code

23E, 1km DC1-002

Madison Ave

Met 1164-572

NY

Name and ZIP Code of Candidate Supported,
State, District & Office Sought

Lucier, P.D. Tazilo
(For) U.S. Senate

Purpose of Expenditure

To purchase a
program of
Medical Admin.
via Capital
Medical broker

Date (month
day, year)

9/18/82 10,000

Aggregate General Election Expenditure
for this Candidate \$ 10,000

Name, mailing address and ZIP Code
of Each Entry

Name of Federal Candidate Supported,
State, District & Office Sought

Purpose of Expenditure

Date (month
day, year)

Amount

Aggregate General Election Expenditure
for this Candidate \$

Name, mailing address and ZIP Code
of Each Entry

Name of Federal Candidate Supported,
State, District & Office Sought

Purpose of Expenditure

Date (month
day, year)

Amount

Aggregate General Election Expenditure
for this Candidate \$

Name, mailing address and ZIP Code
of Each Entry

Name of Federal Candidate Supported,
State, District & Office Sought

Purpose of Expenditure

Date (month
day, year)

Amount

Aggregate General Election Expenditure
for this Candidate \$

SUBTOTAL of Expenditures (If Page optional)

10,000

TOTAL This Period (add up this line number only)

10,000

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FORM
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 MOE FORM
 MODEL
 81-0207-51
 GENERAL
 FEDERAL
 (FRONT)

8
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FOSTER GUNNISON, JR.
BUSHNELL PLAZA NORTH TOWER SUITES 2200
ONE GOLD STREET, HARTFORD, CONN. 06103
(203) 847-1281

REC
A10: 22

Mr. Michael Filler
Chief of Party/Non-Party Section
Federal Elections Commission
1325 "K" St. NW
Washington DC 20463

Nov. 3, 1982

Dear Mr. Filler:

Enclosed please find a second Letter of Amendment to the previous letter and the earlier reports, disclosing transactions as discussed over the phone at the beginning of this week.

Please advise if anything remaining still causes you concern or does not appear right. Or I may phone down to you in a few days to determine that this communication has been duly received and to check on any further items you may have in mind.

I have just learned that our organization director, Mr. David J. Ordway, is intending to move from his present nearby home and office in Rocky Hill to his former home and family base in Stamford, Conn. down at the bottom of the state, approximately Dec. 15.

Just what effect this may have on the continued operation of the various PACS and committees, including the ones involved in the present correspondence, remains to be seen. As mentioned to you earlier all of the fundraising for all of the organizations is wholly contingent on his functioning in these regards.

Alternatively, there conceivably could be a question of my own continued involvement as Treasurer for these organizations if operations are relocated to Stamford as well in such degree that my end of things can not be effectively maintained from such a distance.

I will try to keep you advised on this as well.

Sincerely,
Foster Gunnison Jr.

(31)

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 228C
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 527-4880 AREA CODE 203

82 NOV 8 AIO: 22

FOSTER GUNNISON JR., M.A., PH.M.
ADMINISTRATOR

Office Of Public Records
The Federal Elections Commission
1325 "K" St. NW
Washington DC20463

ASSOCIATES
FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA S. GITTINGS
AUSTEN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

IN RE: The Conservative Party of Connecticut, Inc. (CPOC-1)
FEC Committee i.d. No. C-00160754

Nov. 3, 1982

Subject: Letter of Re-Amendment to the following reports:

C-00160754

- a. The Report of 9-30-82 closing, due 10-15-82
- b. The report of 10-13-82 closing, due 10-21-82

And of Amendment to the following Letter of Amendment:

- a. Letter of Amendment dated Oct. 30, 1982

Dear Sirs:

We wish to take this opportunity to offer for public record the following list of transactions executed in respect to the above captioned organization and having the effect of amending and re-amending the above listed reports and letters:

These transactions were based on the following information received since the aforementioned reports and letters were filed.

- a. Information received from the State of Connecticut SEC indicating that the state accounting unit of a combined state/federal state central party committee could make expenditures without limit on behalf of a candidate for federal office supported by the federal accounting unit of said combined committee was discovered to be in error insofar as the state of Connecticut has no jurisdiction over regulations pertaining to the supporting of federal candidates, that the federal FEC has primacy over the state in any conflict of regulations relating to federal candidates, and that federal FEC regulations do not permit the support of federal candidates by state accounting units.
- b. That federally regulated state central committees of a political party are limited in the amount of annual contributions they may make, either in cash or in kind, to a committee-supported candidate for federal office to an amount not exceeding \$1,000 in the case of a non-qualifying federal committee (as is the case with the subject organization) or \$5,000 if qualifying in terms of number of contributors, number of donees, and other status determining criteria.

Because of these conditions, and in order to maintain the books of subject organization in conformance with FEC requirements, the following transactions have been effected.

a. Restoration of Contributions:

\$10,000 in contributions, \$5,000 each from Anne C. and Harry G.A. Seggerman of Greenwich, CT, originally booked into the CPOC-1 federal accounting unit of subject organization, and since transferred to the CPOC-2 state accounting unit of subject organization, have been reversed in the books of CPOC-2 and restored to their 11a account in the books of CPOC-1.

b. Restoration of Expenditures:

In tandem with the foregoing transaction, \$10,000 in expenditures formed ads in support of the DiFazio for Senate (U.S.) campaign, made to Murphy Powers Media Inc., of Mt. Kisco, N.Y., originally booked into schedule 21 of the books of CPOC-1, and since transferred to the CPOC-2 account, have been restored to the books of CPOC-1, this time under the schedule 23F account for coordinated expenditures, not subject to the lower limitations of class 21 candidate expenditures, and thus raising the current total in this 23F account to the original \$20,000 expended to Murphy Powers Media.

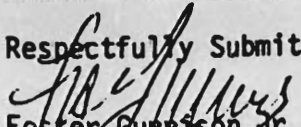
c. Refund of Contributions:

Under part "a" above, restoration of the Seggerman Contributions to the CPOC-1 account resulted in the restoration also of \$10,000 in excess allowable contributions per annum from these sources, which, added to the \$5,000 in excess remaining on the CPOC-1 books after transfer of contribution portions to CPOC-2, yielded a total of \$15,000 in excess contributions now on the CPOC-1 books.

It is understood that to resolve this violation of FEC regulations pertaining to annual individual contribution limits, \$15,000 in new money (i.e. contributions) must be now raised from alternative sources and then: either \$10,000 must be refunded to Anne C. Seggerman and \$5,000 to Harry G.A. Seggerman, or \$5,000 must be refunded to Anne C. Seggerman and \$5,000 for each party must be transferred to the state CPOC-2 account as originally-intended state account donations, providing that letters of intent and approval to this effect are forthcoming from the Seggermans covering the amounts specified.

In the meantime, and pending resolution of the outstanding violation, \$5,000 in excess contributions has been entered in the Schedule D portion of the books of CPOC-1 under the account of Ann C. Seggerman as refundable to her, and, combined with the existing \$5,000 in that account, remanded from previous transactions, makes for a new total of \$10,000 refundable to her in Schedule D. Similarly, \$5,000 in excess contributions has been entered in Schedule D under the account of Harry G.A. Seggerman, as refundable to him, and, with no remainder in that account, making the total of that account \$5,000 present balance.

This completes the correcting entries to date in the books of both accounting units of CPOC, and the organization awaits activity that will generate sufficient new income to enable refund of the contributions excess (or combination refund and transfer to CPOC-2 as outlined above.)

Respectfully Submitted,

 Foster Gunnison Jr.
 Treasurer, CPOC (1 & 2)

92Z 601 DAY POST-GENERAL
REPRRT

SCHEDULE B

ITEMIZED DISBURSEMENTS

Line 1-1000
This schedule (page 1) for each
category of the Detailed
Summary Page

1982 YEAR-END REPORT

Any information copied from such Reports and 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 solicit contributions from such contributors.

Name of Committee On Page

CPOC-C Conservative Party of Connecticut

A. Full Name, Mailing Address and ZIP Code Ann C. Saggaman 5010 Congress St. Fairfield CT 06430	Purpose of Disbursement Adm'l. Assist. Cont'd	Date (month, day, year) 11/13/82	Amount of Each Disbursement This Period \$5,000
B. Full Name, Mailing Address and ZIP Code Harry G. Saggaman 5010 Congress St. Fairfield CT 06430	Purpose of Disbursement Adm'l. Assist. Cont'd	Date (month, day, year) 11/13/82	Amount of Each Disbursement This Period \$5,000
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$14,000

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

22 June 1983

RQ-2

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: October Quarterly Report (7/1/82-9/30/82)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or an individual in excess of \$5,000 per calendar year. (2 U.S.C. 441a(f))

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt action in refunding the contribution(s) will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

(36)

23 JUN 23 PK: 21

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington, DC 20463

June 24, 1983

Dear Ms. Smith:

I received today from you, three letters of inquiry dated June 22 of this year, and designated RQ-2, having to do with 1982 reports filed for the organization CPOC Conservative Party of Connecticut, i.d. #C00160754.

Please be advised that I am no longer treasurer of this organization. I sent in my letters of resignation both to this organization and to the FEC (by way of Ms. Susan Kaltenbaugh) earlier this year.

I will, however, try to furnish you with the information that you are requesting and to help you in whatever way I can in regards to matters relating to your analytic work with respect to this organization.

The first of your three letters inquires as to a negative ending cash balance of \$1,837 showing at the close of the period ending 11/22/82 and whether this was a consequence of overdraw, mathematical error, or incurrence of debt. Please be advised that this was an overdraw. And that it resulted from one of several refund checks - issued prematurely at the request of the executive director - to pay back the excess of allowable contributions that are the subject matter of your second letter. The check in question was eventually cleared enabling that portion of the total refund of excess contributions.

The second of your three letters inquires as to the excess contributions. Actually there were two of these. Both from the same family. Husband and wife. The executive director, temporarily confusing allowable limits at the state level with those permissible at the federal level, accepted contributions totalling \$25,000 from this particular family - \$15,000 from one and \$10,000 from the other of husband and wife - resulting in excess donations of \$10,000 and \$5,000 respectively. It was during discussions on other matters with the officers of the Federal Elections Commission around about October of last year that that these excess contributions came to light and a program was undertaken to get them refunded. These repayments and resolutions of the corresponding debts of the organization which they represented were reported both verbally week by week to your chief investigating officer and in writing in the succession of reports (BX) covering the periods during which the refunds were made and the Schedule D debt accounts reduced as declared in the supplementary schedules.

The third of your letters, I am not quite sure what the problem is here. Your query related to outstanding debt together with attendant descriptive information, having to do with the final year end report of 12/31. As of that date only one outstanding debt remained - the others, all relating to the excess contributions having been progressively extinguished and reported.

With regard to this remaining debt, the schedule D report insofar as I can see offers the detail you are seeking with the exception that I apparently did indeed omit the purpose of the debt, and may I offer that information to you herewith. The \$5,259.00 owing to Castellanos & Co. of Arlington, VA was, I was informed, for TV Productions in connection with the DiFazio for US senate Campaign of that year and was incurred, I am advised, as a coordinated expenditure with the DiFazio campaign. This debt remains outstanding and to the best of my knowledge - unpayable and unconvertible.

Alva Smith/FEC/RADS 6/24/83

Now, a few remarks relating to these organizations in general - the DiFazio Committee and the Conservative Party organization (which was the subject of your inquiries.)

Both organizations ended up in a mess. DiFazio worse than the Party. I was dependent on the executive director of the organization for his knowledge of the rules relating to fundraising and expenditures. Much of what went on in both organizations I learned of only after the fact. Other matters I learned of only accidentally during discussions with officers of FEC. It was a result of this plus the apparent hopelessness of ever resolving some of the outstanding issues including overwhelming debt ~~tax~~ particularly in view of the departure of the executive director upon whom all fundraising was dependent that I resigned from both units.

A third unit I was able to save through action on my part, though the problems here were far more manageable.

At this moment I am in communication with Susan Kaltenbaugh of the legal staff of FEC in trying to help her to wrap up the Di Fazio committee as best as possible under the circumstances. And I am in communication with Mr. Ryan with the regards to the CPOC Party organization (subject of your letters) to help him likewise with that organization, and am waiting now to hear back from him, probably by phone, as he makes further checks on his own.

In all of this and from the beginning I have done whatever I could do to maintain a complete and proper set of records on all of the organizations and in all aspects of the financial operations.

However, as said, I was dependent all the way through on the organization's executive director for his knowledge of campaign financing. Nearly everything came to me after the fact - contributions, bills, and so on. Additionally I had no way of knowing what the fund raising capacity was going to be to pay incurred debt. There was an air of excess optimism from the very beginning. But until the end when bills appeared out of nowhere and income plummeted, and major and crucial contributions were turned over to me that subsequently turned out to be unlawful that I began to realize the organizations were in serious financial difficulty. Then with the departure of the executive director I was left holding the bag on all of this. It was then that I resigned.

I will still do what I can to help the FEC in making resolution of any outstanding information needed, such as the subject matters of your three letters, but quite frankly I am beginning to feel a bit put upon from all sides. I intend to furnish Ms. Kaltenbaugh with an up to date Schedule D type listing of all of the outstanding debt on the DiFazio Committee - as best as I can determine it, no way to know if I have it all since I can only report what was reported to me by the executive director plus whatever confirming copies of invoices I was able to round up on my own following these reports. And, as said, I am waiting to hear from Mr. Ryan in regards to his needs.

Likewise with you, whatever additional information you need I will try to get for you. But I am hoping that someone down at FEC will sympathize with my situation in this.

As to the future I don't know quite what to expect or do. I had wanted to help out with these political action groups up here in Connecticut. It seemed a good way to be able to participate at a grass roots level in political activity using whatever skills I could bring to bear, having mostly to do with bookkeeping. But somehow one gets a feeling he's stepped into a hornets nest.

I still have one remaining organization, a standard PAC, which is now clear with boards on all counts as best as I can tell. It too is abandoned at the leadership

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level, and wont be useable until new leadership picks up on it if indeed any comes along to do so. I thought I would keep it on the books here and down with you folks at FEC and see what happens. But now, while I kind of hate to see it go - it was the first of its kind I had association with (and I guess kind of threw me off the track with what was to come - I never had any trouble with it of the kind that caused me woe with the candidate and party groups - I am wonder if that is a wise thing to do.

That I will have to decide. I may close it down with my June report to Ms. Kaltenbaugh. And whether to ever take up again with any of these groups in the future I dont know. There is much that lies beyond the control of a treasurer. The racking up of debt is one. The resolution of debt is another. The acceptance of contributions seemingly is controllable - but it gets so complicated that one can never be sure of where he stands unless he is something of an expert on campaign financing law which I am certainly not - more or less learning as I go along, but with much frustration along the way.

At any rate, thats not your worry. As said, let me know if you need additional information. You can also check if you want with the stuff I send to Ms. Kaltenbaugh (DiFazio Committee) after the June reporting period and with Mr. Ryan for whatever I send him according to his wishes. I wont be submitting regular reports for either of those two organizations given my resignation. ~~BMX~~ They are all closed out anyway including the bank accounts. But I will give whatever informal information I can as an aid to FEC's needs.

Sincerely,

Foster Gunnison Jr.
Foster Gunnison Jr.

Former Treasurer of

DFS DiFazio for US Senate
CPOC Conservative Party
of Connecticut.

And currently still Treasurer of
CPAC - Conn Pol. Act. Comm.

85040521037



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 2

Conservative Party of Connecticut
c/o David Ordway, Executive Director
24 Hoyt Street
Stamford, CT 06905

RE: MUR

Dear Mr. Ordway:

On June , 1984, the Federal Election Commission determined that there is reason to believe your committee violated 2 U.S.C. §§ 434(a)(4)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

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 so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

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

85040521039



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Anne C. Seggerman
5060 Congress Street
Fairfield, CT 06030

RE: MUR

Dear Mrs. Seggerman:

On June , 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

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 so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

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

85040521041



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Harry G.A. Seggerman
5060 Congress Street
Fairfield, CT 06030

RE: MUR

Dear Mr. Seggerman:

On June , 1984, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

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 so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

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

85040521043

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

President
Castellanos & Company
River Place South, #1106
Arlington, VA 22209

RE: MUR

Dear Sir or Madam:

On June , 1984, the Federal Election Commission determined that there is reason to believe your company violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your company. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your company, 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 so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

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

85040521045

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT Conservative Party of ConnecticutSUMMARY OF ALLEGATIONS

It is alleged that the Conservative Party of Connecticut ("CPC")^{1/} has failed to file a 1983 Year End Report and a 1984 April Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A) and has accepted excessive contributions in violation of 2 U.S.C. § 441a(f).

FACTUAL BASIS AND LEGAL ANALYSIS

A. Failure to File Reports

CPC filed a Termination Report on July 18, 1983, which was not considered to be valid, as CPC had an outstanding debt of \$5,259 owed to a creditor, Castellanos & Co.^{2/} On August 17, 1983, a Request for Additional Information ("RAFI") was sent by RAD to CPC advising that the Termination Report could not be

^{1/} The last treasurer of record was Foster Gunnison, One Gold Street, Suite 22BC, Hartford, CT 06103. Mr. Gunnison notified RAD in a letter received on July 18, 1983, that he had resigned as treasurer effective March 28, 1983. In that letter, he also supplied the address of the executive director.

^{2/} CPC's total activity amounted to \$43,056 in receipts and \$43,055 in disbursements.

accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled.

On August 26, 1983, Mr. Gunnison responded on CPC's behalf. He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that ". . . there is no feasible manner in which this debt as listed on Schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign" According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of senatorial candidate Lucian DiFazio.^{3/}

CPC was again notified on an informational basis by RAD on September 23, 1983, that it could not terminate. The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984. Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28,

^{3/} Lucian DiFazio was the Conservative Party candidate for the U.S. Senate in the 1982 Connecticut general election. Mr. DiFazio lost that election receiving 3% of the vote. It should be noted that Mr. Gunnison was the treasurer of the Lucien DiFazio for U.S. Senate Committee, Inc. and that CPC only supported one federal candidate, which was Mr. DiFazio, by making \$22,000 in coordinated expenditures and a \$702 in-kind contribution.

1984. A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway since the treasurer had resigned. The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984. He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt. In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled.

On May 8, 1984, both Mr. Gunnison and Mr. Ordway were notified that CPC had failed to file the 1984 April Quarterly Report. As of this date, CPC has not filed a 1983 Year End Report and a 1984 April Quarterly Report, nor has a debt settlement been submitted.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required in a non-election year to file a report covering the period beginning July 1 and ending December 31 no later than January 31 of the following calendar year. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees are required to file quarterly reports, in a calendar year in which a regularly scheduled general election

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is held, no later than the 15th day after the last day of each calendar quarter. Under 2 U.S.C. § 433(d)(1), a political committee may terminate only when such a committee files a written statement that it will no longer receive any contributions or make any disbursements and that such committee has no outstanding debts or obligations. As CPC could not terminate due to existing debts, it was required to continue to file reports. Therefore, it is recommended that the Commission find reason to believe that CPC violated 2 U.S.C. § 434(a)(4)(A).

B. Excessive Contributions

The 1982 October Quarterly Report filed by CPC disclosed contributions from two (2) individuals on September 9, 1982, totalling \$25,000 resulting in apparent excessive contributions of \$15,000.

Mr. Gunnison was first informed of these possible excessive contributions in October, 1982, during a phone conversation with a RAD staff member concerning Mr. Gunnison's failure to use FEC forms for his reports.^{4/} Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should either be refunded to the contributors

^{4/} Although the summary page and detailed summary page were used, the rest of the pages of the reports were filed on ledger paper and were very difficult to understand.

or transferred to a non-Federal account with the contributors' approval.

On November 2, 1982, several items of correspondence were received from CPC. According to the letters, Mrs. Anne C. Seggerman had contributed \$15,000 (in two (2) checks) to CPC, \$10,000 in excess of the limitation, and Mr. Harry G.A. Seggerman had contributed \$10,000 (in one (1) check) to CPC, \$5,000 in excess of limitation. According to CPC, portions of the contribution checks had been "partially mis-applied" to the Federal Account. To remedy the matter, CPC stated that it redesignated \$5,000 received from each individual to CPC's State Account. The additional \$5,000 excessive contribution received from Mrs. Seggerman was disclosed on Schedule D "as an account payable and will be refunded to Mrs. Seggerman as soon as funds were available"

CPC's 1982 30 Day Post-General Report, received on December 6, 1982, disclosed two (2) \$5,000 refunds to Mrs. Seggerman on November 4 and 23, 1982 and a \$5,000 refund to Mr. Seggerman on November 23, 1982. The refunds made on November 23, 1982 were repeated on the 1982 Year End Report.

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions. Mr. Gunnison's response which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made.

With regard to the \$5,259 debt owed to Castellanos & Co.,^{5/} it is not clear exactly when the debt was incurred. The debt first appeared on CPC's 1982 Year End Report. According to Mr. Gunnison, the \$5,259 was for television ads in connection with the DiFazio for U.S. Senate campaign and was a coordinated expenditure. Mr. Gunnison has stated that it was Mr. Ordway who incurred the debt without his (Gunnison's) knowledge and that the debt remains ". . . unpayable and unconvertible." It appears, judging from conversations with Ordway and Gunnison, that no attempts will be made to pay off the debt and that Castellanos & Co. has not made any attempts to collect it.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

Pursuant to 11 C.F.R. § 100.7(a)(4), the extension of credit by any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a

^{5/} According to the corporate division of the Virginia Secretary of State's office, Castellanos & Co. is not incorporated.

commercially reasonable attempt to collect the debt. A debt owed by a political committee which is forgiven or settled for less than the amount owed is a contribution unless such debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10. Under 11 C.F.R. § 114.10(c), a settlement will be considered commercially reasonable if --

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. § 451 or paragraph (a) of this section.
- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the settlement is subject to Commission review.

As there is no indication that the Castellanos & Co. has made an attempt to collect the debt owed by CPC, it appears that an excessive contribution has been made. In light of the foregoing, the Office of the General Counsel recommends that the

Commission find reason to believe that CPC violated 2 U.S.C.
§ 441a(f) by accepting excessive contributions from Anne C.
Seggerman, Harry G.A. Seggerman, and Castellanos & Co.

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT Anne C. Seggerman

SUMMARY OF ALLEGATIONS

It is alleged that Anne C. Seggerman made excessive contributions to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On September 9, 1982, Anne Seggerman made two contributions to CPC totalling \$15,000. These contributions were disclosed on the 1982 October Quarterly Report filed by CPC. CPC's treasurer, Foster Gunnison, Jr., was informed of the excessive contributions through a telephone conversation with a Reports Analysis Division analyst in October, 1982. CPC's 1982 30 Day Post-General Election Report disclosed two \$5,000 refunds to Anne Seggerman on November 4 and 23, 1982.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. In light of the fact that Anne Seggerman made \$15,000 in contributions in 1982 to CPC, the Office of the General Counsel recommends that the Commission find reason to believe that the Respondent violated 2 U.S.C. § 441a(a)(1)(C).

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT Harry G.A. Seggerman

SUMMARY OF ALLEGATIONS

It is alleged that Harry G.A. Seggerman made an excessive contribution to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On September 9, 1982, Harry G.A. Seggerman made a \$10,000 contribution to CPC. The contribution was disclosed on the 1982 October Quarterly Report filed by CPC. CPC's treasurer, Foster Gunnison, Jr., was informed of the excessive contribution through a telephone conversation with a Reports Analysis Division analyst in October, 1982. CPC's 1982 30 Day Post-General Election Report disclosed a \$5,000 refund to Harry G.A. Seggerman on November 23, 1982.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. In light of the fact that Harry G.A. Seggerman made a \$10,000 contribution in 1982 to CPC, the Office of the General Counsel recommends that the Commission find reason to believe that the Respondent violated 2 U.S.C. § 441a(a)(1)(C).

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT Castellanos & Company

SUMMARY OF ALLEGATIONS

It is alleged that the Castellanos & Co. made an excessive contribution to the Conservative Party of Connecticut ("CPC") in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL BASIS AND LEGAL ANALYSIS

On its 1982 Year End Report, CPC reported an outstanding debt of \$5,259 owed to Castellanos & Co. According to Mr. Gunnison, treasurer of CPC, the debt was incurred by David Ordway, the Executive Director, without his (Gunnison's) knowledge and that the amount was to cover television ads in connection with the 1982 DiFazio for U.S. Senate campaign.

On July 18, 1983, CPC filed a Termination Report which still disclosed the outstanding debt of \$5,259 owed to Castellanos & Co. On August 17, 1983, the Reports Analysis Division ("RAD") notified CPC that its Termination Report could not be accepted because of its outstanding debt.

On August 26, 1983, Mr. Gunnison responded on CPC's behalf. He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that "... there is no feasible manner in which this debt as listed on Schedule D

of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign" According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." Both Mr. Gunnison and Mr. Ordway were informed by RAD on several occasions that CPC is required to continue to file reports until the debt is extinguished or settled. Judging from conversations with both men, no attempts will be made by CPC to pay off the debt and that no attempts by Castellanos & Co. have been made to collect it. As of this date, CPC has not filed any additional reports and a debt settlement statement has not been filed.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), a person is prohibited from making contributions to a political committee, other than authorized committees and national party committees, in any calendar year which, in the aggregate, exceed \$5,000. Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. Under 2 U.S.C. § 441a(f), a political committee is prohibited from knowingly accepting excessive contributions.

Pursuant to 11 C.F.R. § 100.7(a)(4), the extension of credit by any person for a length of time beyond normal business or trade practice is a contribution, unless the creditor has made a commercially reasonable attempt to collect the debt. A debt owed by a political committee which is forgiven or settled for less

than the amount owed is a contribution unless such debt is settled in accordance with the standards set forth at 11 C.F.R. § 114.10. Under 11 C.F.R. § 114.10(c), a settlement will be considered commercially reasonable if --

- (1) The initial extension of credit was made in accordance with regulations issued pursuant to 2 U.S.C. § 451 or paragraph (a) of this section.
- (2) The candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
- (3) The corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances.

The corporation and/or the debtor must file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt, and remedies pursued by the creditor. This statement must be filed prior to the termination of the reporting status of the debtor and the settlement is subject to Commission review.

As there is no indication that the Castellanos & Co. has made an attempt to collect the debt owed by CPC, it appears that the Castellanos & Co. has made a contribution in excess of \$5,000 to CPC. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Castellanos & Co. violated 2 U.S.C. § 441a(a)(1)(C).

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INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 229C
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 527-4880 AREA CODE 203: 59

RECEIVED AT THE FEC

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copy
Ms. Lois Lerner

Tenant

FOSTER GUNNISON JR., M.A., PH.D.
ADMINISTRATOR

Ms. Pamela Brown
Office of John D. Gibson
(Asst. Staff Director)
Reports Analysis Division
Federal Elections Commission
1325 K Street NW
Washington, DC 20463

ASSOCIATES

FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA B. GITTINGS
AUSTEN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

May 31, 1984

✓ Copy to: Ms. Lois Lerner
General Counsel Div., FEC

IN RE: FEC Registered Committees:
#C00160754 Conservative Party Of
Connecticut.
#C00160804 Lucian DiFazio For U.S.
Senate Committee

Dear Ms. Brown:

This letter is to confirm my phone calls to you and to Ms. Lerner of earlier today concerning a certified letter currently being held for me at the Hartford Post Office office which I suspect as being a communication to me from the FEC concerning the status of reporting in regards to the above captioned registered committees.

And to restate my wish not to accept such communications on the grounds that I do not wish to knowingly risk the status of my March 28, 1983 resignation from both committees as treasurer by signing documents or receipts for delivery thereof addressed to me as treasurer of either of these organizations.

I wish also to reiterate that this act of refusal on my part represents no sign of disrespect on my part towards the FEC or its procedures, nor any wilful failure to cooperate with the FEC in its resolution of the problems reflected in the cases of these two organizations.

As I have stated previously I am trying to do what I can, in my capacity as a resigned treasurer of both organizations, to aid the FEC in its resolution of these problems and the organizations subtending them.

These statements apply to the current piece of certified mail in question and to any future pieces of this kind, and I trust you will understand to spirit in which they are offered.

And again I wish to reiterate that the problems presented by these two organizations are the consequences of circumstances and actions over which I had neither control nor, for the most part, knowledge in my former capacity as treasurer of both.

Very cordially,

Foster Gunnison Jr.
Foster Gunnison Jr.

Filed by mail 5/31/84

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ARTICLE NO. *P 100-952-219*

IMPORTANT: Present this form to obtain your mail. ID required. Signature may be required.

You may notify your carrier or Post Office for redelivery or pick up your mail after *10* at (Date) *3-31-74* MAIL IN AT *▶*

☒ REGISTERED	☐ NUMBERED INSURED	☐ CUSTOM (Only Number)	☒ LETTER	☐ FLAT
☒ CERTIFIED	☐ COO	☐ EXPRESS MAIL	☐ POSTAGE DUE	☐ PARCEL
☐ International mail subject to storage charges after (Date)				
☐ SPECIAL DELIVERY	For special deliveries Article	☐ PLACED UNDER YOUR DOOR	☐ RESTRICTED DELIVERY	
☐ If not picked up at Post Office before carrier begins his next regular trip he will deliver it to you.		☐ PLACED IN YOUR LETTER BOX	ZIP OF ORIGIN	

CUSTOMER (Please describe any visible damage)

CLAIM CHECK NO. *▶* **215853** AMOUNT DUE

ADDRESSEE NAME (Print) *Frank Thompson*

ADDRESS *1 Gold St 2280*

DELIVERED BY AND DATE *Refused by Addressee 3/31/74*

PS Form 3849-A Oct. 1980 DELIVERY NOTICE OR RECEIPT

CENTRAL STATION
80 STATE STREET
HARTFORD CT

(filed by mail to Central Station 3/31/74)

Ref. (cf letter to Post 3/31/74)

8504052106
FOSTER GUNNISON, JR.
INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 228C
ONE GOLD STREET, HARTFORD, CONN. 06103



Ms. Lois Lerner
General Counsel D.V.
Federal Election Commission
1325 "K" Street NW
Washington, DC 20463

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 22BC
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 527-4890 AREA CODE 203

RECEIVED AT THE FEC
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FOSTER GUNNISON JR., M.A., PH.D.
ADMINISTRATOR

Ms. Lois Lerner
General Counsel Division
Federal Elections Commission
1325 K Street NW
Washington DC 20463

ASSOCIATES
FRANKLIN E. KAMENY, M.A., PH.D.
BARBARA B. GITTINGS
AUSTEN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

May 11, 1984

Dear Ms. Lerner:

Per phone call of earlier today. I am enclosing as requested all of the relevant materials that I can find relating to my termination of service with the two committees involved, including my letters of resignation both to our executive Director Mr. Ordway and to the FEC via Susan Kaltenbaugh, plus the termination reports I made out for the period after I had resigned in order to help the FEC by bringing them fully up to date on all remaining transactions up to and including final close-out of bank accounts.

The two organizations involved here are the Conservative Party of Connecticut (CPOC-1) (your serial # C00160754) and the Lucian DiFazio for U.S. Senate Committee (DFS-1) (your serial #C00160804.) The former was a Political Party class committee, and the latter was a Candidate committee. Please not that we have not as yet received our May 8th warning letter from the FEC for the DiFazio committee, only for the Conservative Party Committee - but the DiFazio warning letter will be coming along in here shortly I am sure as they usually follow closely together. So I am sending you materials on both of these committees.

Although I have tried to separate the materials in two packs, one for each committee, there was so much combined correspondence on both committees that you probably had best review them together as though it were all one job.

I am hoping this thing can be resolved as it is driving me up the wall. As I pointed out to Mr. Ryan and to Ms. Kaltenbaugh, there is nothing to prevent the executive director of any PAC from racking up debt unbeknownst to a treasurer and then leaving him stuck to face the music. Even had I known it is quite probable that it would not have alarmed me since the money had been rolling in quite well until it suddenly tapered off, plus all kinds of promises of large donations and help that had been made to the executive director never materialized so that he was kind of left hanging too.

Its kind of a tragedy because it means the little guy trying to participate in political activity with a small committee, inexperienced, and struggling to keep abreast of the regulations and reporting (both quite complicated) doesn't stand much chance of keeping out of trouble. I get an impression that only the larger, professional PACS with full access to lawyers and accountants can engage in this sort of thing with any degree of safety. I somehow feel that was not what was really intended in the beginning.

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Anyway, whatever you can do to help me get the situation resolved with these two committees will be greatly appreciated.

Sincerely,
Foster Gunnison Jr.
Foster Gunnison Jr.

85040521063

Mr. David J. Ordway, Chairman
Conservative Party of Conn.
DiFazio for US Senate Committee
70 Standish St. Apt. #2
Stamford, CT 06902

March 28, 1983

Dear Mr. Ordway:

Per priop notice, this is to advise that the undersigned has, as of this date, resigned as treasurer and all other ministrations and capacities from the following organizations:

CPOC - The Conservative Party of Connecticut (FEC Reg # C-00160754)
a political party committee.

DFS - The Lucien DiFazio for U.S. Senate Committee (FEC Reg. #C-06-0992363)
a political candidatte committee.

Cordially,

Foster Gunnison Jr.
One Gold St. #22-BC
Hartford, CT 06103

85040521064

The Federal Elections Commission
Attn: Ms. Susan Kaltenbaugh, RADS Div.
1325 K St. NW
Washington DC 20463

March 28, 1983

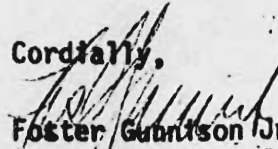
Dear Sirs:

This is to advise that the undersigned has, as of this date, resigned as treasurer and all other ministrations and capacities from the following organizations:

CPOC - The Conservative Party of Connecticut (FEC Reg. # C-0016074)
a political party committee.

DFS - The Lucien DiFazio for U.S. Senate Committee (FEC Reg. #C-06-0992363) a political candidate committee.

Cordially,


Foster Garrison Jr.
One Gold Street #22-BC
Hartford, CT 06103

85040521065

REPORT OF RECEIPTS AND DISBURSEMENTS
For an Authorized Committee

Filed by Mail on July 14, 1983 (Summary Page)

CPDC-1
CLOSING 6-30-83

C00160754 830614
FOSTER GUNNISON
CONSERVATIVE PARTY OF CONNECTI
CUT INC
ONE GOOD ST #22-BC
HARTFORD CT 06103

2. FEC Identification Number

C00160754

3. Is this Report an Amendment?

☐ YES ☒ NO

usually reported.

PORT

☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ In the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☒ Termination Report *TERMINATION*

This report contains activity for - ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period *1-1-83* Through *6-30-83*

6. Net Contributions (other than loans):

(a) Total Contributions (other than loans) (from Line 11e)

(b) Total Contribution Refunds (from Line 20d)

(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)

7. Net Operating Expenditures:

(a) Total Operating Expenditures (from Line 17)

(b) Total Offsets to Operating Expenditures (from Line 14)

(c) Net Operating Expenditures (Subtract Line 7b from 7a)

8. Cash on Hand at Close of Reporting Period (from Line 27) *BANK ACCT CLOSED*

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$	0	\$	0
\$		\$	
\$	0	\$	0
\$	4	\$	4
\$		\$	
\$	4	\$	4
\$	0		
\$	5,259		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

FOSTER GUNNISON JR. (RESIGNED)
Type or Print Name of Signatory

Foster Gunnison Jr. (Resigned)

SIGNATURE OF Former TREASURER, RESIGNED AS OF
MARCH 28, 1983 Per letter to FEC of Susan Kallenberg

7-14-83
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (3/80)

85040521066

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

CPDC-1

CLOSING 6-30-83

Name of Committee (in Full)

CONSUMERS PARTY OF CONN.

Report Covering the Period:

From: **1-1-83**

To: **6-30-83**

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees **0**
(Memo Entry Unitemized \$.....)

(b) Political Party Committees **0**

(c) Other Political Committees **0**

(d) The Candidate **0**

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d) **0**

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES. 0

13. LOANS:

(a) Made or Guaranteed by the Candidate **0**

(b) All Other Loans **0**

(c) TOTAL LOANS (add 13a and 13b) **0**

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) 0

15. OTHER RECEIPTS (Dividends, Interest, etc.) 0

16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15). 0

II. DISBURSEMENTS

17. OPERATING EXPENDITURES 4

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES. 4

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate **0**

(b) Of All Other Loans **0**

(c) TOTAL LOAN REPAYMENTS (add 19a and 19b). **0**

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees **0**

(b) Political Party Committees **0**

(c) Other Political Committees **0**

(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c) **0**

21. OTHER DISBURSEMENTS. 0

22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21). 4

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD \$ 4

24. TOTAL RECEIPTS THIS PERIOD (From Line 16) \$ 0

25. SUBTOTAL (Add Line 23 and Line 24). \$ 4

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) \$ (4)

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$ 0

BANK ACCT CLOSED

7
6
0
2
5
4
0
5
8

SCHEDULE B

ITEMIZED DISBURSEMENT

Page 1 of 1 for
 LINE NUMBER 29
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

CPOC-1

Closing 6-30-83

Any information copied from such Reports and 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 solicit contributions from such committee.

Name of Committee (in Full)

CONSERVATIVE PARTY OF CONNECTICUT CPOC-1

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
United Multiservice Co. Ltd. One Gold St Hartford CT 06103	Xerox + postage Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	3-28-83 in CK 1034	4-
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			4-
TOTAL This Period (last page this line number only)			4-

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 70
(Use separate schedules
for each numbered line)

CP6C-1
C105146 6-30-83

Name of Committee (in Full) CONSERVATIVE PARTY OF CONN - ELECT	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Co. River Place South, #1106 1011 Arlington Blvd. Arlington, Va. 22209	5,259	0	0	5,259
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington, DC 20463

June 24, 1983

Dear Ms. Smith:

I received today from you, three letters of inquiry dated June 22 of this year, and designated RQ-2, having to do with 1982 reports filed for the organization CPOC Conservative Party of Connecticut, I.d. #C00160754.

Please be advised that I am no longer treasurer of this organization. I sent in my letters of resignation both to this organization and to the FEC (by way of Ms. Susan Kaltenbaugh) earlier this year.

I will, however, try to furnish you with the information that you are requesting and to help you in whatever way I can in regards to matters relating to your analytic work with respect to this organization.

The first of your three letters inquires as to a negative ending cash balance of \$1,837 showing at the close of the period ending 11/22/82 and whether this was a consequence of overdraw, mathematical error, or incurrence of debt. Please be advised that this was an overdraw. And that it resulted from one of several refund checks - issued prematurely at the request of the executive director - to pay back the excess of allowable contributions that are the subject matter of your second letter. The check in question was eventually cleared enabling that portion of the total refund of excess contributions.

The second of your three letters inquires as to the excess contributions. Actually there were two of these. Both from the same family. Husband and wife. The executive director, temporarily confusing allowable limits at the state level with those permissible at the federal level, accepted contributions totalling \$25,000 from this particular family - \$15,000 from one and \$10,000 from the other of husband and wife - resulting in excess donations of \$10,000 and \$5,000 respectively. It was during discussions on other matters with the officers of the Federal Elections Commission around about October of last year that that these excess contributions came to light and a program was undertaken to get them refunded. These repayments and resolutions of the corresponding debts of the organization which they represented were reported both verbally week by week to your chief investigating officer and in writing in the succession of reports (EX) covering the periods during which the refunds were made and the Schedule D debt accounts reduced as declared in the supplementary schedules.

The third of your letters, I am not quite sure what the problem is here. Your query related to outstanding debt together with attendant descriptive information, having to do with the final year end report of 12/31. As of that date only one outstanding debt remained - the others, all relating to the excess contributions having been progressively extinguished and reported.

With regard to this remaining debt, the schedule D report insofar as I can see offers the detail you are seeking with the exception that I apparently did indeed omit the purpose of the debt, and may I offer that information to you herewith. The \$5,259.00 owing to Castellanos & Co. of Arlington, VA was, I was informed, for TV Productions in connection with the DiFazio for US senate Campaign of that year and was incurred. I am advised, as a coordinated expenditure with the DiFazio campaign. This debt remains outstanding and to the best of my knowledge - unpayable and unconvertible.

85040521070

Now, a few remarks relating to these organizations in general - the DiFazio Committee and the Conservative Party organization (which was the subject of your inquiries.)

Both organizations ended up in a mess. DiFazio worse than the Party. I was dependent on the executive director of the organization for his knowledge of the rules relating to fundraising and expenditures. Much of what went on in both organizations I learned of only after the fact. Other matters I learned of only accidentally during discussions with officers of FEC. It was a result of this plus the apparent hopelessness of ever resolving some of the outstanding issues including overwhelming debt and particularly in view of the departure of the executive director upon whom all fundraising was dependent that I resigned from both units.

A third unit I was able to save through action on my part, though the problems here were far more manageable.

At this moment I am in communication with Susan Kaltenbaugh of the legal staff of FEC in trying to help her to wrap up the Di Fazio committee as best as possible under the circumstances. And I am in communication with Mr. Ryan with regards to the CPOC Party organization (subject of your letters) to help him likewise with that organization, and am waiting now to hear back from him, probably by phone, as he makes further checks on his own.

In all of this and from the beginning I have done whatever I could do to maintain a complete and proper set of records on all of the organizations and in all aspects of the financial operations.

However, as said, I was dependent all the way through on the organization's executive director for his knowledge of campaign financing. Nearly everything came to me after the fact - contributions, bills, and so on. Additionally I had no way of knowing what the fund raising capacity was going to be to pay incurred debt. There was an air of excess optimism from the very beginning. But until the end when bills appeared out of nowhere and income plummeted, and major and crucial contributions were turned over to me that subsequently turned out to be unlawful that I began to realize the organizations were in serious financial difficulty. Then with the departure of the executive director I was left holding the bag on all of this. It was then that I resigned.

I will still do what I can to help the FEC in making resolution of any outstanding information needed, such as the subject matters of your three letters, but quite frankly I am beginning to feel a bit put upon from all sides. I intend to furnish Ms. Kaltenbaugh with an up to date Schedule D type listing of all of the outstanding debt on the DiFazio Committee - as best as I can determine it, no way to know if I have it all since I can only report what was reported to me by the executive director plus whatever confirming copies of invoices I was able to round up on my own following these reports. And, as said, I am waiting to hear from Mr. Ryan in regards to his needs.

Likewise with you, whatever additional information you need I will try to get for you. But I am hoping that someone down at FEC will sympathize with my situation in this.

As to the future I don't know quite what to expect or do. I had wanted to help out with these political action groups up here in Connecticut. It seemed a good way to be able to participate at a grass roots level in political activity using whatever skills I could bring to bear, having mostly to do with bookkeeping. But somehow one gets a feeling he's stepped into a hornets nest.

I still have one remaining organization, a standard PAC, which is now clear with boards on all counts as best as I can tell. It too is abandoned at the leadership

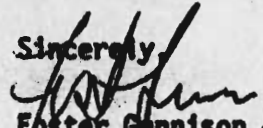
85040521071

level, and wont be useable until new leadership picks up on it if indeed any comes along to do so. I thought I would keep it on the books here and down with you folks at FEC and see what happens. But now, while I kind of hate to see it go - it was the first of its kind I had association with (and I guess kind of threw me off the track with what was to come - I never had any trouble with it of the kind that caused me woe with the candidate and party groups - I am wonder if that is a wise thing to do.

That I will have to decide. I may close it down with my June report to Ms. Kaltenbaugh. And whether to ever take up again with any of these groups in the future I dont know. There is much that lies beyond the control of a treasurer. The racking up of debt is one. The resolution of debt is another. The acceptance of contributions seemingly is controllable - but it gets so complicated that one can never be sure of where he stands unless he is something of an expert on campaign financing law which I am certainly not - more or less learning as I go along, but with much frustration along the way.

At any rate, thats not your worry. As said, let me know if you need additional information. You can also check if you want with the stuff I send to Ms. Kaltenbaugh (DiFazio Committee) after the June reporting period and with Mr. Ryan for whatever I send him according to his wishes. I wont be submitting regular reports for either of those two organizations given my resignation. ~~RM~~ They are all closed out anyway including the bank accounts. But I will give whatever informal information I can as an aid to FEC's needs.

Sincerely,


Foster Gannison Jr.

Former Treasurer of

DFS DiFazio for US Senate
CPOC Conservative Party
of Connecticut.

And currently still Treasurer of
CPAC - Conn Pol. Act. Comm.

85040521072



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

22 June 1983

RQ-2

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: Year End Report (11/23/82-12/31/82)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include purpose of each debt. (11 CFR 104.11)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

85040521073



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

22 June 1983

RQ-2

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You have reported a negative ending cash balance of \$1,837. This suggests that you have either overdrawn your account, made a mathematical error, or incurred a debt. If there is a debt or obligation, please show a zero balance on Line 8 of the Summary Page and reflect the amount and the nature of the debt on Schedule D, Line 10. (2 U.S.C. 434(b)(8))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

85040521074



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

22 June 1983

RQ-2

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: October Quarterly Report (7/1/82-9/30/82)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or an individual in excess of \$5,000 per calendar year. (2 U.S.C. 441a(f))

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt action in refunding the contribution(s) will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

85040521075

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington DC 20463

Aug. 20, 1983

Dear Ms. Smith:

I received today your letter of Aug. 17th requesting additional information relating to the Termination Report of the organization Conservative Party of Connecticut, Inc. (#C00160754) and I will respond herewith as best I can.

The first of your two inquiries relates to the matter of outstanding debts and obligations of the committee. Again, I must reiterate that I am no longer the treasurer of this organization, having resigned per advisory letter to Ms. Susan Kaltenbaugh of earlier this year. The termination report which is the subject of your inquiry was filed by me on an unofficial basis as former treasurer merely to furnish the FEC with closing transactions during the early part of this year following the filing of the year end report for 1982. And also to provide the FEC with a reaffirmation of the single debt outstanding against the organization.

In my opinion there is no feasible manner in which this debt as listed on schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign to enable this and to appoint a new treasurer to resume reporting until this is accomplished. There is no longer a bank account, nor any funds or assets belonging to the organization.

The debt in question was racked up against the committee by the Executive Director without my knowledge, presumably in anticipation that there would be funds available to pay it (and in fact at one point there were such funds collected by the Executive Director excepting that they constituted illegal excess contributions and had to be refunded, leaving the committee essentially without funds.)

The Executive Director subsequently moved his office from Hartford suburban area to Stamford Conn., where he entered another field of endeavor, the practice of law, and that left the committee without fundraising resources and no hope of resolving outstanding debt. It was in consequence of this situation that I resigned.

You may, if you wish, however, establish contact with the executive Director concerning the matter of resolving the debt and arranging continued reporting during the time it takes to accomplish this. And I give you his address as follows:

Mr. David J. Ordway
Executive Director of CPOC
c/o 70 Standish Rd., Apt. #2
Stamford, CT 06902

65040521076

And his phone number is as follows:

Stamford CT. (203) 327-4376 (phone at 70 Standish Rd.)
I note there is also a number listed in Stamford under David
Ordway at 329-1975 and that may be a business number of his.

With respect to the second item of inquiry of your letter, it was my error that I inadvertently omitted the purpose of the debt for the single creditor shown in the schedule D reporting, Castellanos & Co. I am told that this was for a series of TV productions having to do with the U.S. Senatorial campaign (of 1982 general elections) of Lucian DiFazio, running as a conservative party candidate from Connecticut. My apologies for this omission.

If there is any additional information that you are in need of concerning the status or activities of this (now defunct) organization I will try to help you in whatever way I can but with the understanding that I am no longer a part of this organization nor have any official capacity in it.

Very cordially,

Foster Gunnison Jr.
Foster Gunnison Jr.
Former Treasurer of CPOC
Resigned, March of 1983

85040521077



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

17 August 1983

Foster Gunnison, Treasurer
Conservative Party of Connecticut,
Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: Termination Report (1/1/83-6/30/83)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your Termination Report cannot be accepted because it discloses outstanding debts and obligations. You must continue to file reports of receipts and disbursements until such debts and obligations are extinguished or settled. (11 C.F.R. 104.11)

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the purpose of each debt. (11 CFR 104.11)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

85040521073

85040521079

Mr. John D. Gibson
Assistant Staff Director
RADS Division
Federal Elections Commission
Washington, DC 20463

RE: CPOC-1 CONSERVATIVE PARTY OF CONNECTICUT (FEC #C0016074)

Sept. 12, 1983

Dear Mr. Gibson:

I am in receipt of your letter of Sept. 8th advising that the FEC had as yet received no response from the above captioned organization relating to your request of August 17th for more information in connection with Termination Report for the period 1/1/83-6/30/83.

Please be advised that I am no longer treasurer of this organization, having resigned in March of this year per advises sent to the chairman/executive director of the organization and to Ms. Susan Kaltenbaugh of the FEC.

I did however file termination reports with the FEC, as former treasurer, in order to aid the FEC in updating its records. I inadvertantly left out one item of information relating to the purpose of a listed expenditure/debt and this was the subject of Ms. Alva Smith's August 17th inquiry.

Please be advised that I did indeed respond promptly to Ms. Smith's inquiry with a three page letter dated August 20th of this year, in which I fully answered her inquiry and provided other information as well.

That letter has apparently gotten mislaid somewhere down at the FEC. Therefore I am enclosing a copy of it herewith.

Again, please understand that I am no longer treasurer of this organization nor associated with it in any capacity. Further information concerning it can be had by contacting the chairman/executive director at the address indicated my Aug. 20th letter to Ms. Smith.

If I can be of any additional help to you I will try to do what I can upon advise.

Cordially,

Foster Gunnison Jr.
Foster Gunnison Jr.

Former Treasurer of CPOC-1.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

September 8, 1983

Foster Gunnison, Treasurer
Conservative Party of Connecticut,
Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: Termination Report (1/1/83-6/30/83)

Dear Mr. Gunnison:

This letter is to inform you that as of September 7, 1983, the Commission has not received your response to our request for additional information, dated August 17, 1983. That notice 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). A copy 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 Alva Smith on our toll-free number (800) 424-9530 or our local number (202) 357-0026.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

85040521080



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 28 1984 RQ-7

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: 1983 Year End Report (7/1/83-12/31/83)

Dear Mr. Gunnison:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

*phoned Gibson 5:35 pm
3/1/84 he will take
int. it*

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1984

Foster Gunnison, Treasurer
Conservative Party of
Connecticut, Inc.
One Gold Street #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Gunnison:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

5-11-84 Received this notice
4:20pm Called Pam Brown of RAOS
referred to Mary Beth Terrant
of General Counsel.
4:35pm Called Mary Beth Terrant
- Not in - but will get a call-back
4:45pm got call from Ms. Lois Lerner
of General Counsel - please send
all materials incl. resignation letter.

cc: David Ordway
Executive Director
24 Hoyt Street
Stamford, CT 06905

85040521092

Mr. David J. Ordway, Chairman
Conservative Party of Conn.
DiFazio for US Senate Committee
70 Standish St. Apt. #2
Stamford, CT 06902

March 28, 1983

Dear Mr. Ordway:

Per priop notice, this is to advise that the undersigned has, as of this date, resigned as treasurer and all other ministrations and capacities from the following organizations:

CPOC - The Conservative Party of Connecticut (FEC Reg # C-00160754)
a political party committee.

DFS - The Lucien DiFazio for U.S. Senate Committee (FEC Reg. #C-06-0992363)
a political candidatte committee.

Cordially,

Foster Gunnison Jr.
Foster Gunnison Jr.
One Gold St. #22-BC
Hartford, CT 06103

85040521083

Frank

One Gold Pl. #2285, 0-4985, 0-4985, 0-4985
Hartford, D.C. 206103



[MAY] 18 1984 -PM

MAY

WASHINGTON DC 200

Mo Jois Jernar
General Counsel Division
Federal Elections Commission
1325 K Street N.W.
Washington DC 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

26 April 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE CONSERVATIVE PARTY OF CONNECTICUT

This is a referral of the Conservative Party of Connecticut, Inc. ("CPC"). The CPC failed to file the 1983 Year End Report within thirty (30) calendar days from the date of the Non-Filer Notice. Additionally, CPC is being referred for accepting and refunding excessive contributions from individuals during the 1981-82 election cycle. According to the RAD Review and Referral Procedures (Standards 3 and 5), further examination is required by your office.

CPC's reporting history indicates a lack of understanding regarding the provisions of the Act. Repeated attempts to explain the requirements to CPC by RAD have not facilitated voluntary compliance.

If you have any questions, please contact Pamela Brown at 523-4048.

Attachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 April 1984

ANALYST: Pamela Brown

I. COMMITTEE: Conservative Party of Connecticut, Inc.
C00160754
David J. Ordway, Executive Director^{1/}
70 Standish Road, Apt. 2
Stamford, CT 06902

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(iv)
2 U.S.C. 441a(f)

III. BACKGROUND:

A. Non-Filing of 1983 Year End Report
2 U.S.C. 434(a)(4)(A)(iv)

The Conservative Party of Connecticut, Inc. ("CPC") filed a Termination Report on July 18, 1983 which was not considered to be valid, as CPC had an outstanding debt of \$5,259 owed to a creditor (Attachment 2). On August 17, 1983, a Request for Additional Information ("RFAI") was sent to CPC advising that the Termination Report could not be accepted because CPC still had an outstanding debt. The RFAI also notified CPC of its obligation to continue to file reports until the debt was repaid or settled (Attachment 3).^{2/}

On August 26, 1983, Mr. Gunnison responded on CPC's behalf (Attachment 4). He reiterated that he was no longer treasurer based upon his resignation in March of 1983. He also noted that "...there is no feasible manner in which this debt as listed on Schedule D of the

^{1/} The treasurer of record is Foster Gunnison, One Gold Street, Suite 22BC, Hartford, CT 06103. Mr. Gunnison notified RAD in a letter received on July 18, 1983 that he had resigned as treasurer effective March 28, 1983. In that letter, he also supplied the address of the executive director.

^{2/} A Second Notice was incorrectly sent September 8, 1983. CPC responded to the Second Notice on September 15, 1983 by providing a copy of the August 26, 1983 response.

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termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign...." According to Mr. Gunnison, "there is no longer a bank account, nor any funds or assets belonging to the organization." The debt, which was apparently incurred by the Executive Director, David J. Ordway, without Mr. Gunnison's knowledge, related to TV productions on behalf of Mr. Lucian DiFazio (Mr. DiFazio was the Conservative Party candidate for U.S. Senate in the 1982 Connecticut general election).

CPC was again notified on an informational basis by the Reports Analysis Division ("RAD") on September 23, 1983, that it could not terminate (Attachment 5). The notice also provided information on filing a debt settlement statement.

On January 7, 1984, CPC was notified that the 1983 Year End Report was due on January 31, 1984 (Attachment 6). Since CPC failed to file the required report, a Non-Filer Notice was mailed on February 28, 1984 (Attachment 7). A copy of the Non-Filer Notice was also sent via registered mail to Mr. Ordway since the treasurer had resigned (Attachment 8). The return receipt card was returned to RAD signed by Mr. Ordway.

Mr. Gunnison contacted the RAD analyst on March 6, 1984 (Attachment 9). He stated that CPC was defunct and that he had resigned as treasurer. He suggested that Mr. Ordway, the Executive Director, be contacted regarding the affairs of CPC.

The RAD analyst phoned Mr. Ordway on March 21, 1984 and explained that CPC's Termination Report was not acceptable, as the committee had terminated with an outstanding debt (Attachment 10). In addition, the RAD analyst informed Mr. Ordway that CPC had to continue to file reports until either the debt was extinguished or settled.

As of this date, CPC has not filed a Year End Report, nor has a debt settlement statement been submitted.

B. Receipt of Excessive Contributions from Individuals -
2 U.S.C. 441a(f)

The 1982 October Quarterly Report filed by CPC disclosed contributions from two (2) individuals on September 9, 1982 totalling \$25,000 resulting in apparent excessive contributions of \$15,000 (Attachment 11). On October 20, 1982, the RAD analyst contacted CPC's treasurer

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regarding the use of non-FEC Forms (Attachment 12). Mr. Gunnison subsequently phoned and requested to speak with the Chief of the Party/Non-Party Branch (Attachment 13). During the discussion, the Chief of the Party/Non-Party Branch pointed out that it appeared as though excessive contributions had been received. Mr. Gunnison was advised that CPC could only receive \$5,000 per person in a calendar year and that the amounts in excess should either be refunded to the contributors or transferred to a non-Federal account with the contributors' approval.

On November 2, 1982, several items of correspondence were received from CPC (Attachment 14). According to the letters, Mrs. Anne C. Seggerman had contributed \$15,000 (in two (2) checks) to CPC, \$10,000 in excess of the limitations, and Mr. Harry G.A. Seggerman had contributed \$10,000 (in one (1) check) to CPC, \$5,000 in excess of the limitations. Portions of the contribution checks had been "partially mis-applied" to the Federal Account. To remedy the matter, CPC stated that it redesignated \$5,000 received from each individual to CPC's State Account. The additional \$5,000 excessive contribution received from Mrs. Seggerman was disclosed on Schedule D "as an account payable and will be refunded to Mrs. Seggerman as soon as funds were available..."

Additional correspondence was received on November 8, 1982 (Attachment 15). Mr. Gunnison reiterated that CPC had received \$15,000 in excess of the limitations; however, it was not clear how much, if any, of the excessive contributions had been transferred to the non-Federal account or considered to be an account payable.^{3/}

CPC's 1982 30 Day Post-General Report, received on December 6, 1982, disclosed two (2) \$5,000 refunds to Mrs. Seggerman on November 4 and 23, 1982 and a \$5,000 refund to Mr. Seggerman on November 23, 1982 (Attachment 16). The refunds made on November 23, 1982 were repeated on the 1982 Year End Report (Attachment 17).

^{3/} Although the response received on November 2nd indicated that \$10,000 had been redesignated to CPC's State Account, the response received on November 8th appeared to indicate that CPC was waiting for letters from the contributors approving the transfer to CPC's State Account.

CONSERVATIVE PARTY OF CONNECTICUT, INC.
REPORTS ANALYSIS OGC REFERRAL
PAGE 4

RAD sent an RFAI to CPC on June 22, 1983, which recognized the receipt and apparent refund of the excessive contributions (Attachment 18). Mr. Gunnison's response which was received on June 29, 1983, summarized the events surrounding the receipt of the excessive contributions and noted that refunds had been made (Attachment 19).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 19APR84
PAGE 1

8 5 0 4 0 5 0 1 0 9 0

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CONSERVATIVE PARTY OF CONNECTICUT INC				PARTY NON-QUALIFIED		ID #C00160754
1982	REQUEST FOR ADDITIONAL INFORMATION					1 82FEC/244/5032
	STATEMENT OF ORGANIZATION			23AUG82		2 82FEC/241/1691
	REQUEST FOR ADDITIONAL INFORMATION 2ND					2 82FEC/252/4007
	OCTOBER QUARTERLY	27,746	23,685	1JUL82 -30SEP82	13	82FEC/246/1965
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	82FEC/259/1282
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	7	82FEC/253/4088
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	2	83FEC/260/4260
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	5	83FEC/274/2296
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	2	83FEC/274/0370
	PRE-GENERAL	1,000	900	10CT82 -130CT82	13	82FEC/253/0370
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	11	82FEC/253/2155
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	82FEC/253/4357
	POST-GENERAL	304	6,301	140CT82 -22NOV82	12	83FEC/260/4262
	POST-GENERAL - AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/274/3126
	REQUEST FOR ADDITIONAL INFORMATION			140CT82 -22NOV82	1	83FEC/274/0313
	YEAR-END	14,006	12,165	23NOV82 -31DEC82	11	83FEC/262/4555
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/274/3127
	REQUEST FOR ADDITIONAL INFORMATION			23NOV82 -31DEC82	1	83FEC/274/0311
	TOTAL	43,056	0 43,051	0	87	TOTAL PAGES

All reports have received basic review.

Ending cash-on-hand as of December 31, 1982: \$ 4
Outstanding debts owed to the committee as of December 31, 1982: \$ 0
Outstanding debts owed by the committee as of December 31, 1982: \$5,259

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 19APR84
PAGE 1

8 5 0 4 0 5 2 1 0 9 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CONSERVATIVE PARTY OF CONNECTICUT INC				PARTY NON-QUALIFIED		ID #C00160754
-	1983 NOTICE OF FAILURE TO FILE			1JUL83 -31DEC83	1	84FEC/297/3897
	TERMINATION REPORT	0	4	1JAN83 -30JUN83	7	83FEC/276/3085
	TERMINATION REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	3	83FEC/282/1979
	TERMINATION REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	4	83FEC/283/0077
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	83FEC/281/3487
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	2	83FEC/282/3994
	1'ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	1	83FEC/283/4683
	TOTAL	0	0	4	0	19 TOTAL PAGES

All reports have received basic review.
Ending cash-on-hand as of June 30, 1983: \$ 0
Outstanding debts owed to the committee as of June 30, 1983: \$ 0
Outstanding debts owed by the committee as of June 30, 1983: \$5,259

85040521092

Documentation Regarding the Non-Filing
of the 1983 Year End Report

(Attachments 2 through 10)

Filed by Mail on July 14, 1913 (Summary Page)

CPOC-1
CLOSING 6-30-83

000100754 030614
FOSTER GUNNISON
CONSERVATIVE PARTY OF CONNECTI
CUT INC
ONE GOLD ST #22-8C
HARTFORD CT 06103

2. **FEC Identification Number**

C 00 110754

3. Is this Report an Amendment?

☐ YES ☒ NO

busily reported.

PORT

- ☐ April 15 Quarterly Report
- ☒ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)

- ☐ Twelfth day report preceding _____
(Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election
on _____ in the State of _____
- ☒ Termination Report *TERMINATION*

This report contains activity for - ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period 1-1-83 Through 6-30-83

6. Net Contributions (other than loans):

(a) Total Contributions (other than loans) (from Line 11e)

(b) Total Contribution Refunds (from Line 20d)

(c) Net Contributions (other than loans) (Subtract Line 8b from 8a) . . .

7. Net Operating Expenditures:

(a) Total Operating Expenditures (from Line 17).....

(b) Total Offsets to Operating Expenditures (from Line 14).....

(c) Net Operating Expenditures (Subtract Line 7b from 7a).

8. Cash on Hand at Close of Reporting Period (from Line 27) . . . BANK: A23 (LOAN)

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D) . .

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D) . .

Column A
This Period

Column B
Column C Year-to-Date

3 0 3 0

§ §

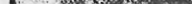
§ 87(2)(b) § 87(2)(b)

8 4 8 4

S	S
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8	4	8	4
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27 (CLOSED) O



5,259

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4088

FOSTER GUNNISON JR. (RESIGNED)

Type of Joint Name of S. granted by

East River Fr. (Chesand)

7-14-83

SIGNATURE OF FORMER TREASURER, REGISTERED AS OF
MARCH 28, 1913 De 10141 to FCC c/o Susan Kallan Smyth

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

FEC FORM 313-90

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 2 ATTACHMENT 2
LINE NUMBER 10 (Page 2 of 2)
(Use separate schedules for each numbered line)

CP06-1

CLOSING 6-30-83

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CONSERVATIVE PARTY OF CMH - PETICHT				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Castellanos & Co. River Plaza South, #1106 1011 Arlington Blvd. Arlington, Va. 22209	5,259	0	0	5,259
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1. SUBTOTALS This Period This Page (optional)				5,259
2. TOTAL This Period (last page this line only)				5,259
3. TOTAL OUTSTANDING LOANS from Schedule C (last page only)				0
4. ADD 2 and 3 and carry forward to appropriate line of Summary Page (last page only)				

0304032763091



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

BQ-2

17 August 1983

Foster Gunnison, Treasurer
Conservative Party of Connecticut,
Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: Termination Report (1/1/83-6/30/83)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your Termination Report cannot be accepted because it discloses outstanding debts and obligations. You must continue to file reports of receipts and disbursements until such debts and obligations are extinguished or settled. (11 C.F.R. 104.11)

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include the purpose of each debt. (11 CFR 104.11)

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

RECEIVED AT THE FEC

INSTITUTE OF SOCIAL ETHICS
1100 HILL PLACE NORTH, TOWSON, MARYLAND 21204
ONE BOLD STREET, HARTFORD, CONNECTICUT 06103

83 AUG 22 AM: 47

PHONE 867-4225 AREA CODE 410

ROGER GLASSMAN JR., M.A., PH.D.
ADMINISTRATOR

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington DC 20463

ASSISTANT
FRANKLIN E. KASSEY, M.A., PH.D.
BARBARA S. GUTENBERG
AUSTIN WADE, LL.B., M.A., PH.D.
JAMES L. KOPPER, JR.
STEPHEN SCHLESINGER

Aug. 28, 1983

Dear Ms. Smith:

I received today your letter of Aug. 17th requesting additional information relating to the Termination Report of the organization Conservative Party of Connecticut, Inc. (JC88168754) and I will respond herewith as best I can.

The first of your two inquiries relates to the matter of outstanding debts and obligations of the committee. Again, I must reiterate that I am no longer the treasurer of this organization, having resigned per advisory letter to Ms. Susan Valtentough of earlier this year. The termination report which is the subject of your inquiry was filed by me on an unofficial basis as former treasurer merely to furnish the FEC with closing transactions during the early part of this year following the filing of the year end report for 1982. And also to provide the FEC with a reaffirmation of the single debt outstanding against the organization.

In my opinion there is no feasible manner in which this debt as listed on schedule D of the termination report could ever be paid or settled short of the Executive Director's willingness to undertake a fundraising campaign to enable this and to appoint a new treasurer to resume reporting until this is accomplished. There is no longer a bank account, nor any funds or assets belonging to the organization.

The debt in question was racked up against the committee by the Executive Director without my knowledge, presumably in anticipation that there would be funds available to pay it (and in fact at one point there were such funds collected by the Executive Director excepting that they constituted illegal excess contributions and had to be refunded, leaving the committee essentially without funds.)

The Executive Director subsequently moved his office from Hartford suburban area to Stamford Conn., where he entered another field of endeavor, the practice of law, and that left the committee without fundraising resources and no hope of resolving outstanding debt. It was in consequence of this situation that I resigned.

You may, if you wish, however, establish contact with the executive Director concerning the matter of resolving the debt and arranging continued reporting during the time it takes to accomplish this. And I give you his address as follows:

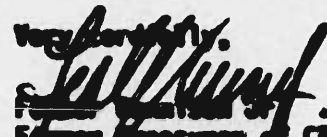
Mr. David J. Ordway
Executive Director of CPOC
c/o 70 Standish Rd., Apt. #2
Stamford, CT 06902

And his phone number is as follows:

Stanford CT. (203) 327-4376 (phone at 70 Standish Rd.)
I note there is also a number listed in Stanford under David
Ordway at 329-1975 and that may be a business number of his.

With respect to the second item of inquiry of your letter, it was my
error that I inadvertently omitted the purpose of the debt for the single
creditor shown in the schedule B reporting, Castellanos & Co. I am told that
this was for a series of TV productions having to do with the U.S. Senatorial
campaign (of 1992 general elections) of Lucian DiFazio, running as a conser-
vative party candidate from Connecticut. My apologies for this omission.

If there is any additional information that you are in need of concerning
the status or activities of this (now defunct) organization I will try to help
you in whatever way I can but with the understanding that I am no longer a part
of this organization nor have any official capacity in it.

Very respectfully,

Paul J. Quinn
Former Treasurer of CPDC
Resigned, March of 1993

085034005376007



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

RQ-5

September 23, 1983

David J. Ordway, Executive Director
Conservative Party of Connecticut, Inc.
70 Standish Road
Apt. #2
Stanford, CT 06902

Identification Number: C00160754

Reference: Termination Amendment Report (1/1/83-6/30/83)

Dear Mr. Ordway:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee cannot terminate its reporting requirements because of outstanding debts. To properly terminate your reporting obligation, you must either liquidate the debt(s) or provide the Commission with a statement of debt settlement. (11 CFR 102.3, 104.11, and 114.10) A statement of debt settlement must include the following information:

- The initial terms of credit,
- The steps taken by the committee to pay the debt and the steps taken by the creditor to obtain payment of the debt, and
- The terms of the agreement to settle the debt.

-Please note, according to 11 CFR 102.7, every political committee shall have a treasurer. No contribution or expenditure shall be accepted or made on behalf of a political committee at a time when there is a vacancy in the office of the treasurer.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alva Smith", is written over the typed name.

Alva Smith
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1984

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1984.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1983. Registered committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1983.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1984. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1984.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Furthermore, failure to file in a timely fashion is a serious violation and an offending committee is subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted and committees filing such documents will be required to refile.

1984 FILING REQUIREMENTS

See the January 1984 issue of the FEC Record for filing requirements during 1984.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications
202/523-4068 or 800/424-9530

95040521099



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 28 1984 RQ-7

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: 1983 Year End Report (7/1/83-12/31/83)

Dear Mr. Gunnison:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pamela Brown on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with a large initial "J" and "G".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040521100

85040521101

PS Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.	
(CONSULT POSTMASTER FOR FEES)	
1. The following service is requested (check one). ☐ Show to whom and date delivered ☒ Show to whom, date, and address of delivery	
2. ☐ RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)	
TOTAL \$	
3. ARTICLE ADDRESSED TO: David Ordway Conservative Party of Connecticut 70 Standish Rd., #2	
4. TYPE OF SERVICE: CI 06902 ☒ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COB ☐ EXPRESS MAIL	ARTICLE NUMBER R020993001 3-2
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent <i>David P. Ordway</i>	
5. DATE OF DELIVERY	POSTMARK MAY 10 1984 USPO
6. ADDRESSEE'S ADDRESS (Only if requested)	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

COMMITTEE NAME: Conservative Party of CT
PCC-Lucien DiFazio

COMMITTEE CONTACT: Foster Gunnison (ex-Treasurer)

DATE: 3/6/84

ANALYST: Brown

SUBJECT: YE Non-Filing

Mr. Gunnison called in response to 2 nonfiler letters he received: 1) one for the Conservative Party of Connecticut (which had terminated with debts outstanding); and 2) one for the PCC of Lucien DiFazio. Mr Gunnison said that he had resigned as treasurer of both committees. In addition, he stated that both committees were defunct. He mentioned that he had spoken to several people at the Commission, and suggested that we try to reach the executive director of both committees, David Ordway. His last known address was c/o his mother at 70 Standish Street, Stamford, CT . Mr Gunnison stated that Mr Ordway, had moved twice since that address, but that he would probably receive mail delivered there. Mr. Ordway has, according to Mr. Gunnison, set up a law practice in the Stamford area.

85040521102

COMMITTEE NAME: Conservative Party of Connecticut

COMMITTEE CONTACT: David Ordway, Exec. Director

DATE: 3/21/84

ANALYST: P. Brown

SUBJECT: Non-filing & inadequate termination report

I contacted Mr. Ordway to follow-up our letter concerning the committee's non-filing of the 1983 Year-end Report. I explained to Mr. Ordway that the termination report was not considered adequate, since the committee had debts and had failed to satisfy them. I explained that the Act precluded a committee from terminating with debts, and provided a vehicle for the debt settlement procedure. I suggested that he file the YE report and attempt to contact the creditor to attempt to start the debt settlement procedure. I also advised him that the committee had to continue to file reports until the settlement was approved by the Commission. I stated that I would send him the Directive so that he would know how to proceed.

Mr. Ordway said that the committee was defunct and that he was no longer associated with it. I told him that the treasurer, Mr. Gunnison had stated that he (Ordway) was in charge, and that Gunnison had resigned. Mr. Ordway asked how long would the paperwork continue. I told him that the requirements I discussed were required by the Act, and that I could not provide him with any shortcuts.

24 Hoyt Street
Stamford, CT 06905
(203) 967-4374

85040521103

85040521104

Documentation Regarding the Receipt of
Excessive Contributions

(Attachments 11 through 19)

2

MEMORANDUM: FOR FILES

RE: TELECON (initiated by analyst)

FROM: Foster Gunnison

DATE: October 20, 1982

NAME OF COMMITTEE OR CANDIDATE: CONSERVATIVE PARTY OF CONNECTICUT INC.

SUBJECT: Reporting on Form 3X and other reporting problems

I explained to Mr. Gunnison that his reports must be submitted on Form 3X. I stated that the Summary and Detailed Summary Pages were enclosed, however, the receipt and disbursement schedules for Form 3X were not. Mr. Gunnison explained that he spoke with someone at the FEC and was told that it would be okay to use his forms. He also stated that other committees submit reports on forms convenient for their use. I stated that other committees most likely submit their reports on approved computer generated schedules. The only form of reporting would be on FEC Form 3X.

He was not satisfied with my advise. He asked to speak with my supervisor. I told him that Mr. Filler was currently available but could be reached later that day.

85040521106

October 1982

MEMORANDUM TO THE FILE

FROM : MICHAEL B. FILLER
SUBJECT : DISCLOSURE AND COMPLIANCE PROBLEMS
COMMITTEE : CONSERVATIVE PARTY OF CONNECTICUT

Foster Gunnison, Treasurer of the Conservative Party, called about submitting disclosure information on non-FEC Forms. I informed him that the Commission's regulations required prior approval before such schedules could be used. In addition, I mentioned that the ledger format made it difficult to determine what was being reported. Mr. Gunnison stated that he would work on revising the format and submit his proposed schedules by the end of the year.

During our conversation, I also pointed out that the committee had apparently received excessive contributions. I informed him of the statutory limitations, of which he was not aware, and suggested that the amounts in excess either be refunded to the contributors, or transferred to a non-Federal account with the consent of the contributors. Mr. Gunnison stated that he would take the necessary steps to be in compliance.

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RECEIVED 11 FEB 1982

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 220C
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 267-4220 AREA CODE 203

82 NOV 2 49:43

FOSTER GUNSON JR., M.A., PH.D.

Mr. Michael Filler
 Chief of Party/Non-Party Section
 RADS Division
 Federal Elections Commission
 1325 "K" St. NW
 Washington, DC 20463

ASSOCIATES

FRANKLIN E. KARNENY, M.A., PH.D.
 BARBARA B. GITTINS
 AUSTIN WADE, LL.D., M.A., PH.D.
 JAMES L. KEPNER, JR.
 STEPHEN DONALDSON

Oct. 31, 1982

Dear Mr. Filler:

This repair job on our reports and finances has taken a lot longer than I could have imagined. I have been working almost solidly for 48 hours on it. It is now a day later than I had anticipated so I am mailing this by special delivery hoping to save you a day or so.

It has been exhausting work and I hope I don't get hit with something like this again at least on this scale. I will have a talk with my boss about it and the general manner of operations as well.

The figures are all interlocked and breaking them apart and reseregating them has involved endless entries.

But I think the job is pretty much done. And it appears that we have been able to clear up just about all the violations excepting a remaining \$5,000 in excess contribution by Mrs. Seggerman. My boss has a fundraiser in the mail now (by coincidence - he had planned it for this time) and I would guess that that will enable this refund to take place within reasonable time. We will of course keep you advised of any change in the situation.

Surprisingly enough, the state appeared to have no objection to the use of state committee funds for helping federal candidates. Without limitation in fact. I would not have counted on that. But it enabled us to shift \$10,000 of the contribution overage to our state account, leaving only the aforementioned \$5,000 to be dealt with. All other items have been cleared out as per copy enclosed of my letter to NCPAC and the vendors, and the letter of amendment which I am herewith leaving in your care.

If anything more needs to be done you can let me know. Otherwise my next contact with you (other than for occasional information) will probably be related to the final refunding of the \$5,000. But in any event I plan to be in touch with you late Nov. or sometime in early Dec. with regards to ideas and samples I have in mind that will make our reports more convenient to FEC applications as well as to our own operations. While still maintaining the key features we need here in order to make this thing viable without computer help. I want to struggle through on the current basis until year's end and be able to start out fresh next year with an improved format. This has all been new to me anyway and I've needed the past two years of experience to gain some familiarity with the structure of campaign financing and regulations (obviously with some ways yet to go.)

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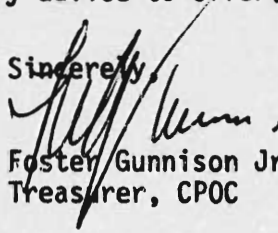
Filler/FEC/10-31-82/Page 2

I do appreciate your kind help in all of this. And that of Mr. Ed Ryan's as well. I have been impressed with your manuals, once I got a chance to glance through them.

I do have one suggestion to make. Something that threw me off the track here in one of these foul-ups. Your Schedule #21 is officially titled "Contributions to Federal Candidates and Other Political Committees." I took this to mean political committees other than our own, i.e. any committees other than our own - and thus wound up entering contributions to our state candidates here instead of Schedule #27. Had it said "...to Federal Candidates and other Federal Political Committees" I would have checked first to find out where to put state stuff which would have led me to Schedule 27. Just an ambiguity of wording.

I'll take leave of you now to get this into the Sunday mail -(only one pickup) and you can get hold of me if things still aren't right or if you need any other information or have an other cautionary advice to offer.

Sincerely,


Foster Gunnison Jr.
Treasurer, CPOC

8 5 004 0:5:2:12110:9

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 22BC
ONE GOLD STREET, HARTFORD, CONN. 06103
PHONE 527-4880 AREA CODE 203

FOSTER GUNNISON JR., M.A., PH.D.
ADMINISTRATOR

Office of Public Records
The Federal Elections Commission
1325 "K" St. NW
Washington DC 20463

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JAMES L. KEPNER, JR.
STEPHEN DONALDSON

Oct. 30, 1982

IN RE: The Conservative Party of Connecticut, Inc. (CPOC-1)
FEC Committee i.d. No. C-00160754

Subject: Letter of Amendment to the following reports:

- a. The Report of 9-30-82 closing, due 10-15-82
- b. The Report of 10-13-82 closing, due 10-21-82

Dear Sirs:

We wish to take this opportunity to offer in amendment to the above listed reports filed on behalf of the above captioned organization the following revised data and correcting entries.

1. Applicable to both reports. In schedule Alla, Itemized Individual Donations Exceeding \$200, contributions shown as items #001 and #002 totalling \$15,000 from Anne C. Seggerman of 5060 Congress St, Fairfield CT 06430, received in two checks on September 9th, were partially mis-applied to the Federal Account of this organization resulting in a technical exceedment of the \$5,000 per individual limit by \$10,000. Of this excess, one half or \$5,000 has been re-designated to the Connecticut State account (CPOC-2) of this organization, leaving an excess of \$5,000 still remaining in the Federal Account. This remaining excess has now been entered into Schedule D as item #001, as an account payable and will be refunded to Mrs. Seggerman as soon as funds are available to enable this final clearing transaction.
2. Applicable to both reports. Again in schedule Alla, a contribution shown as item #003 in amount of \$10,000 by Mr. Harry G. Seggerman of same address, and in one check of same date was received by us also on same date and, similarly, was partially mis-applied to the Federal Account (CPOC-1) of this organization. In like manner to the above, one half of this amount or \$5,000 has been redesignated to the Connecticut State account of the organization, thus clearing the violation of contribution limits incurred by the initial transaction.
3. Applicable to both reports. In schedule 21, Contributions To Federal Candidates and Other Political Committees, and acting as an offset to the above redesignation of contributions from Federal to State account, the first item listed (as #001) in amount of \$20,000 paid to Murphy Powers Media Inc. of Mt. Kisco, NY for a program of advertising in support of the Connecticut State candidate for U.S. Senate, Mr. Lucien P. DiFazio, has been reduced in

8 2 0 4 2 5 2 1 1 5 9

FEC/10-30-82/Page 2

the Federal Account to one half or \$10,000, and the balance of \$10,000 has been redesignated and transferred to the State account, thus compensating for the aforedecaldred transfer of contributions.

4. Applicable to both reports. In scedule Allc, Itemized Donations Received From other Political Organizations. The first two listed items (#001-#002) represented contributions by the Organizaton NCPAC (National Conservative Political Action Committee) of Arlingto, VA. to our organization in amounts of \$1225.33 and \$671.49 respectively. These contributions were, however, received and accepted by us in the form of refunds due NCPAC by two temp-oarrary help oompanies for in-kind payments made to them by NCPAC in support of a candidate of our party here in Connecticut. Because these contributions, in the nature of diverted refunds, were received by us in the form of corporate checks issued by commercial companies our acceptance of them put us in violation of the Federal Election laws prohibiting the accepatnce of such payments. Both of these contributions have now been refunded by our organizationto the respective temporary help companies and the integrity of our organization has been restored in these reagrds.

The above described contributions were received on September 8th and 13th respectively. A similar third such contribution in the amount of \$302.20 was received from another temporary help company on October 22nd after the closing dates, and hence not applicable to, the listed reports. This contribution has also been refunded and will stand cleared as of the next report filed.

5. Applicable to both reports. In schedule 21, Contributions to Federal Candidates and Other Political Committees. and due to ambiguity in the official schedule description, three in-kind class expenditures by the organization NCPAC on behalf of three CPOC candidates running for state offices (items #005-006-007 in the schedule) were logged in error instead of in schedule 27 Other Expenditures as they ought to have been. These three items totalling \$2,107.50 have now been deducted from Schedule 21 and re-entered in Schedule 27, as items #004-005-006.
6. Applicable to both reports. Referring back to item #3 of page #1 of this letter of amendment, Scedule 21. item #001 and the remaining balance in the Federal Account of \$10,000 in advertising paid to Murphy Powers Media on behalf of the DiFazio for U.S. Senate campaign it was intended that this be in the class of a coordinated expenditure and therefore ought to have been enetred in schedule "F" for line item #23. This remaining balnce of \$10,000 has now been eliminated entirely from Schedule 21 and transferred to schedule 23F as the first (and thus far only) entry in that schedule.
7. Applicable to both reports. In schedule ~~21~~ #21, of the 9/30 closing report, items #004 (in amount of \$702.50) and #005-006-007 Totaling ~~0000~~ \$2,107.50 and since transferred to schedule 27) are incorrectly entered under the date of 9/28 instead of the correct date of 10/02. This would have the effect of reducing schedule 21 for the 9/30 closing report by \$2,810.00 and increasing the 10/13 closing period by same amount, or, under the amended recalassification of three of the four items to Scedule 27, would have the effect of reducing Schedule 21 by \$2,810.00 for the 9/30 closing period and by \$2,107.50 for the 10/13 closing period (with item #004 redated to that period and items #005-006-007 transfered out completely for both periods). Additionally, it would have the effect of increasing schedule 27 by \$2,107.50 for the 10/13 closing period under the combined practice of redating and transferring in.

The net affect of these transactions in sum for all affected accounts would

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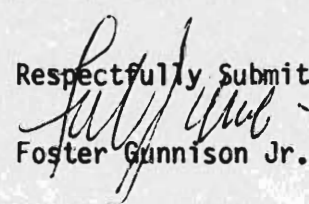
FEC/10-30-82/Page 3

yield the following balances per reporting period:

	SEPTEMBER 30 CLOSING		OCTOBER 13 CLOSING	
	Period	Annum	Period	Annum
Schedule 11a (Indiv. Don.)	15,850	15,850	1,000	16,850
Schedule 11c (Pol Org Dons)	Unchanged until refunds were made in a later period.			
Schedule 19 (oper. exp.)	Unchanged including transfers in and out and adjustments made as of each reporting date.			
Schedule 21 (Dons to Fed Cands)	298	298	702	1,000
Schedule 23F (Coord. Exp.)	10,000	10,000	0	10,000
XXXXXXXXXXXXXXXXXXXX	00000	00000	00000	00000
Schedule 27 (other Exp.)	200	200	2,007	2,207
Schedule A11a (Large Dons)	23,500	23,500	1,000	24,500
Schedule A11c (Pol Org Dons)	Same as Schedule 11c above			
Schedule D (Accts Payable)	5,000	5,000	0	5,000
Line 6c Receipts	17,746	17,746	unchanged	18,747
Line 7 Disbursements	(13,686)	(13,686)	(unchanged)	(14,587)
Cash On Hand, Closing	<u>4,060</u>	<u>4,060</u>	<u>4,160 (unch)</u>	<u>4,160</u>

Enclosed is a copy of the new schedule #23F and the new Schedule D.

Respectfully Submitted,


Foster Gunnison Jr.

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MDE FORM
7-3 MARCH
RIGHT

2

OMS/UNC
CAPTION
MODEL
81-131

TREASURER
CAPTION
MODEL
81-131

SECRET FORM 3X
FED 3X
SECTION: 3-80

DESCRIPTION
COORDINATOR
CAPTION

CPOC-1
CONSERVATIVE PARTY
OF CONNECTICUT
LINE: PARTY MODEL 0016084

FORM 10
PAGE 1

MODEL	DATE	ENTRY	AMOUNT	SUB-CUM	NAME	(Election Class)	E	PAID	TER (M)	AMOUNT	NEXT	DESCRIPTION + DETAIL	
81-0202-E1		JOUR	PER-CUM	AMT-CUM	ADDRESS							OCCUPATION OR PURPOSE	
		MEMO			CITY	ST	ZIP	ZIP				EMPLOYER OR PURPOSE (CONT)	
FORM	914	001	20,000		Murphy Power Media Inc.				20,000	20,000	002	Transfer from Sub. 21-001	1
REPRO		056	20,000	20,000	C/o City Bank Acct # 1164-9902				MEDIA ADS - DIFAZIO PR SQUARE			Via 21-009 + G3 056. Media	
GM 90 CUM					MT. KISCO	NY	NY	NY	DIFAZIO CUM PR = 20,000			Media DiFazio Account.	
0	914	002	10,000		Murphy Power Media Inc.				1001	10,000	10,000	Transfer 1/2 share 001	2
10 98 98.00		000	10,000	10,000	(ibid)							to CPOC-2 to be 1/2 share	
20 98 98.00												donation transfer (As CPOC-2 Exp)	
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FORM
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(FROM)

ATTACHMENT 14
(Page 7 of 8)

OPIS/UMC
MDE FORM
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8.5.0004 0-5-27 12K 1.5

NO. 131
MODEL
31-131

CLERK
CLERK
CLERK

RECORDS
RECORDS
RECORDS

DESCRIPTION
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DESCRIPTION

CPOC-1
CLERK OF PARTY
CLERK OF PARTY
CLERK OF PARTY

RECORDS
RECORDS
RECORDS

MODEL	DATE	EMPY	AMOUNT	SUB CUM	NAME	(S-Location Class) -	PERIOD	AMOUNT	RENT	DESCRIPTION & DETAIL
81-0207-R1		TOUR	PER-CUM	ANN CUM	ADDRESS					
	MEMO				CITY	ST	ZIP	ZIP		
FORM	1029	00	2000		Ann C. Saggelman		5,000	5000		Donation 2003 Refundable
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GH 90 CUM					Carfield		10706470			limitation.
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LEDGER										
(FRONT)										

FOSTER GUNNISON, JR.
BUSHNELL PLAZA NORTH TOWER SUITE 2200
ONE GOLD STREET, HARTFORD, CONN. 06103
(203) 847-1281

RECEIVED NOV 8 1982

A10:22

Mr. Michael Filler
Chief of Party/Non-Party Section
Federal Elections Commission
1325 "K" St. NW
Washington DC 20463

Nov. 3, 1982

Dear Mr. Filler:

Enclosed please find a second Letter of Amendment to the previous letter and the earlier reports, disclosing transactions as discussed over the phone at the beginning of this week.

Please advise if anything remaining still causes you concern or does not appear right. Or I may phone down to you in a few days to determine that this communication has been duly received and to check on any further items you may have in mind.

I have just learned that our organization director, Mr. David J. Ordway, is intending to move from his present nearby home and office in Rocky Hill to his former home and family base in Stamford, Conn. down at the bottom of the state, approximately Dec. 15.

Just what effect this may have on the continued operation of the various PACS and committees, including the ones involved in the present correspondence, remains to be seen. As mentioned to you earlier all of the fundraising for all of the organizations is wholly contingent on his functioning in these regards.

Alternatively, there conceivably could be a question of my own continued involvement as Treasurer for these organizations if operations are relocated to Stamford as well in such degree that my end of things can not be effectively maintained from such a distance.

I will try to keep you advised on this as well.

Sincerely,
Foster Gunnison Jr.

82 NOV 8 AIO: 22

INSTITUTE OF SOCIAL ETHICS
BUSHNELL PLAZA NORTH TOWER SUITES 22BC
ONE GOLD STREET, HARTFORD, CONN. 06103

PHONE 527-4890 AREA CODE 203

FOSTER GUNNISON JR., M.A., PH.D.
ADMINISTRATOR

Office Of Public Records
The Federal Elections Commission
1325 "K" St. NW
Washington DC20463

ASSOCIATES

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BARBARA B. GITTINGS
AUSTEN WADE, LL.B., M.A., PH.D.
JAMES L. KEPNER, JR.
STEPHEN DONALDSON

IN RE: The Conservative Party of Connecticut, Inc. (CPOC-1)

Nov. 3, 1982

FEC Committee i.d. No. C-00160754

Subject: Letter of Re-Amendment to the following reports:

C00160754

- a. The Report of 9-30-82 closing, due 10-15-82
- b. The report of 10-13-82 closing, due 10-21-82

And of Amendment to the following Letter of Amendment:

- a. Letter of Amendment dated Oct. 30, 1982

Dear Sirs:

We wish to take this opportunity to offer for public record the following list of transactions executed in respect to the above captioned organization and having the effect of amending and re-amending the above listed reports and letters:

These transactions were based on the following information received since the aforementioned reports and letters were filed.

- a. Information received from the State of Connecticut SEC indicating that the state accounting unit of a combined state/federal state central party committee could make expenditures without limit on behalf of a candidate for federal office supported by the federal accounting unit of said combined committee was discovered to be in error insofar as the state of Connecticut has no jurisdiction over regulations pertaining to the supporting of federal candidates, that the federal FEC has primacy over the state in any conflict of regulations relating to federal candidates, and that federal FEC regulations do not permit the support of federal candidates by state accounting units.
- b. That federally regulated state central committees of a political party are limited in the amount of annual contributions they may make, either in cash or in kind, to a committee-supported candidate for federal office to an amount not exceeding \$1,000 in the case of a non-qualifying federal committee (as is the case with the subject organization) or \$5,000 if qualifying in terms of number of contributors, number of donees, and other status determining criteria.

Because of these conditions, and in order to maintain the books of subject organization in conformance with FEC requirements, the following transactions have been effected.

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a. Restoration of Contributions:

\$10,000 in contributions, \$5,000 each from Anne C. and Harry G.A. Seggerman of Greenwich, CT, originally booked into the CPOC-1 federal accounting unit of subject organization, and since transferred to the CPOC-2 state accounting unit of subject organization, have been reversed in the books of CPOC-2 and restored to their 11a account in the books of CPOC-1. AB

b. Restoration of Expenditures:

In tandem with the foregoing transaction, \$10,000 in expenditures for media ads in support of the DiFazio for Senate (U.S.) campaign, made to Murphy Powers Media Inc., of Mt. Kisco, N.Y., originally booked into schedule 21 of the books of CPOC-1, and since transferred to the CPOC-2 account, have been restored to the books of CPOC-1, this time under the schedule 23F account for coordinated expenditures, not subject to the lower limitations of class 21 candidate expenditures, and thus raising the current total in this 23F account to the original \$20,000 expended to Murphy Powers Media.

c. Refund of Contributions:

Under part "a" above, restoration of the Seggerman Contributions to the CPOC-1 account resulted in the restoration also of \$10,000 in excess allowable contributions per annum from these sources, which, added to the \$5,000 in excess remaining on the CPOC-1 books after transfer of contribution portions to CPOC-2, yielded a total of \$15,000 in excess contributions now on the CPOC-1 books.

It is understood that to resolve this violation of FEC regulations pertaining to annual individual contribution limits, \$15,000 in new money (i.e. contributions) must be now raised from alternative sources and then: either \$10,000 must be refunded to Anne C. Seggerman and \$5,000 to Harry G.A. Seggerman, or \$5,000 must be refunded to Anne C. Seggerman and \$5,000 for each party must be transferred to the state CPOC-2 account as originally-intended state account donations, providing that letters of intent and approval to this effect are forthcoming from the Seggermans covering the amounts specified. AS

In the meantime, and pending resolution of the outstanding violation, \$5,000 in excess contributions has been entered in the Schedule D portion of the books of CPOC-1 under the account of Ann C. Seggerman as refundable to her, and, combined with the existing \$5,000 in that account, remainered from previous transactions, makes for a new total of \$10,000 refundable to her in Schedule D. Similarly, \$5,000 in excess contributions has been entered in Schedule D under the account of Harry G.A. Seggerman, as refundable to him, and, with no remainder in that account, making the total of that account \$5,000 present balance.

This completes the correcting entries to date in the books of both accounting units of CPOC, and the organization awaits activity that will generate sufficient new income to enable refund of the contributions excess (or combination refund and transfer to CPOC-2 as outlined above.)

Respectfully Submitted,

Foster Gunnison Jr.
Foster Gunnison Jr.
Treasurer, CPOC (1 & 2)

8652004302552314101980

OMS/UMC		TREASURER		DESCRIPTION		CPOC-1	
MODE FORM	81-131	81-131	81-131	81-131	81-131	81-131	81-131
TAB MARGIN	81-131	81-131	81-131	81-131	81-131	81-131	81-131
RIGHT	81-131	81-131	81-131	81-131	81-131	81-131	81-131
MODEL	DATE	ENTRY	AMOUNT	SUB-CUM	NAME	(Election Class)	DESCRIPTION + DETAIL
81-0202-R1	1019	001	1225		Unisearch Inc. (formerly Unisearch Inc.)	ALLC	1225 1225 1
FORM	MEMO				CITY	ST	ZIP
REPRO	1019	002	671		Middlebury Tpk (formerly Middlebury Tpk)	ALLC	671 671 1
GM 90	1019	003	302		Middlebury Tpk (formerly Middlebury Tpk)	ALLC	302 302 1
CUMI	1019	004	2198	2,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	2198 2198 1
0	1019	005	5,000		Middlebury Tpk (formerly Middlebury Tpk)	ALLC	5,000 5,000 1
1X 98	1019	006	7,198	7,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	7,198 7,198 1
2P 100	1019	007	14,198	14,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	14,198 14,198 1
3	1019	008	19,198	19,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	19,198 19,198 1
4	1019	009	24,198	24,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	24,198 24,198 1
5	1019	010	29,198	29,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	29,198 29,198 1
6	1019	011	34,198	34,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	34,198 34,198 1
7	1019	012	39,198	39,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	39,198 39,198 1
8	1019	013	44,198	44,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	44,198 44,198 1
9	1019	014	49,198	49,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	49,198 49,198 1
10	1019	015	54,198	54,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	54,198 54,198 1
11	1019	016	59,198	59,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	59,198 59,198 1
12	1019	017	64,198	64,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	64,198 64,198 1
13	1019	018	69,198	69,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	69,198 69,198 1
14	1019	019	74,198	74,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	74,198 74,198 1
15	1019	020	79,198	79,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	79,198 79,198 1
16	1019	021	84,198	84,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	84,198 84,198 1
17	1019	022	89,198	89,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	89,198 89,198 1
18	1019	023	94,198	94,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	94,198 94,198 1
19	1019	024	99,198	99,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	99,198 99,198 1
20	1019	025	104,198	104,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	104,198 104,198 1
21	1019	026	109,198	109,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	109,198 109,198 1
22	1019	027	114,198	114,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	114,198 114,198 1
23	1019	028	119,198	119,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	119,198 119,198 1
24	1019	029	124,198	124,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	124,198 124,198 1
25	1019	030	129,198	129,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	129,198 129,198 1
26	1019	031	134,198	134,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	134,198 134,198 1
27	1019	032	139,198	139,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	139,198 139,198 1
28	1019	033	144,198	144,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	144,198 144,198 1
29	1019	034	149,198	149,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	149,198 149,198 1
30	1019	035	154,198	154,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	154,198 154,198 1
31	1019	036	159,198	159,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	159,198 159,198 1
32	1019	037	164,198	164,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	164,198 164,198 1
33	1019	038	169,198	169,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	169,198 169,198 1
34	1019	039	174,198	174,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	174,198 174,198 1
35	1019	040	179,198	179,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	179,198 179,198 1
36	1019	041	184,198	184,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	184,198 184,198 1
37	1019	042	189,198	189,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	189,198 189,198 1
38	1019	043	194,198	194,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	194,198 194,198 1
39	1019	044	199,198	199,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	199,198 199,198 1
40	1019	045	204,198	204,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	204,198 204,198 1
41	1019	046	209,198	209,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	209,198 209,198 1
42	1019	047	214,198	214,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	214,198 214,198 1
43	1019	048	219,198	219,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	219,198 219,198 1
44	1019	049	224,198	224,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	224,198 224,198 1
45	1019	050	229,198	229,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	229,198 229,198 1
46	1019	051	234,198	234,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	234,198 234,198 1
47	1019	052	239,198	239,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	239,198 239,198 1
48	1019	053	244,198	244,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	244,198 244,198 1
49	1019	054	249,198	249,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	249,198 249,198 1
50	1019	055	254,198	254,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	254,198 254,198 1
51	1019	056	259,198	259,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	259,198 259,198 1
52	1019	057	264,198	264,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	264,198 264,198 1
53	1019	058	269,198	269,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	269,198 269,198 1
54	1019	059	274,198	274,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	274,198 274,198 1
55	1019	060	279,198	279,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	279,198 279,198 1
56	1019	061	284,198	284,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	284,198 284,198 1
57	1019	062	289,198	289,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	289,198 289,198 1
58	1019	063	294,198	294,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	294,198 294,198 1
59	1019	064	299,198	299,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	299,198 299,198 1
60	1019	065	304,198	304,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	304,198 304,198 1
61	1019	066	309,198	309,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	309,198 309,198 1
62	1019	067	314,198	314,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	314,198 314,198 1
63	1019	068	319,198	319,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	319,198 319,198 1
64	1019	069	324,198	324,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	324,198 324,198 1
65	1019	070	329,198	329,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	329,198 329,198 1
66	1019	071	334,198	334,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	334,198 334,198 1
67	1019	072	339,198	339,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	339,198 339,198 1
68	1019	073	344,198	344,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	344,198 344,198 1
69	1019	074	349,198	349,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	349,198 349,198 1
70	1019	075	354,198	354,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	354,198 354,198 1
71	1019	076	359,198	359,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	359,198 359,198 1
72	1019	077	364,198	364,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	364,198 364,198 1
73	1019	078	369,198	369,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	369,198 369,198 1
74	1019	079	374,198	374,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	374,198 374,198 1
75	1019	080	379,198	379,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	379,198 379,198 1
76	1019	081	384,198	384,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	384,198 384,198 1
77	1019	082	389,198	389,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	389,198 389,198 1
78	1019	083	394,198	394,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	394,198 394,198 1
79	1019	084	399,198	399,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	399,198 399,198 1
80	1019	085	404,198	404,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	404,198 404,198 1
81	1019	086	409,198	409,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	409,198 409,198 1
82	1019	087	414,198	414,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	414,198 414,198 1
83	1019	088	419,198	419,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	419,198 419,198 1
84	1019	089	424,198	424,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	424,198 424,198 1
85	1019	090	429,198	429,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	429,198 429,198 1
86	1019	091	434,198	434,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	434,198 434,198 1
87	1019	092	439,198	439,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	439,198 439,198 1
88	1019	093	444,198	444,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	444,198 444,198 1
89	1019	094	449,198	449,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	449,198 449,198 1
90	1019	095	454,198	454,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	454,198 454,198 1
91	1019	096	459,198	459,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	459,198 459,198 1
92	1019	097	464,198	464,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	464,198 464,198 1
93	1019	098	469,198	469,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	469,198 469,198 1
94	1019	099	474,198	474,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	474,198 474,198 1
95	1019	100	479,198	479,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	479,198 479,198 1
96	1019	101	484,198	484,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	484,198 484,198 1
97	1019	102	489,198	489,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	489,198 489,198 1
98	1019	103	494,198	494,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	494,198 494,198 1
99	1019	104	499,198	499,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	499,198 499,198 1
100	1019	105	504,198	504,198	Middlebury Tpk (formerly Middlebury Tpk)	ALLC	504,198 504,198 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

22 June 1983

RQ-2

Foster Gunnison, Treasurer
Conservative Party of Connecticut, Inc.
One Gold Street, #22-BC
Hartford, CT 06103

Identification Number: C00160754

Reference: October Quarterly Report (7/1/82-9/30/82)

Dear Mr. Gunnison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or an individual in excess of \$5,000 per calendar year. (2 U.S.C. 441a(f))

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt action in refunding the contribution(s) will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Alva Smith
Reports Analyst
Reports Analysis Division

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83 JUN 29 PG: 21

Ms. Alva Smith
Reports Analyst
RADS Division
Federal Elections Commission
Washington, DC 20463

June 26, 1983

Dear Ms. Smith:

I received today from you, three letters of inquiry dated June 22 of this year, and designated RQ-2, having to do with 1982 reports filed for the organization CPDC Conservative Party of Connecticut, I.d. #C00160754.

Please be advised that I am no longer treasurer of this organization. I sent in my letters of resignation both to this organization and to the FEC (by was of Ms. Susan Kaltenbaugh) earlier this year.

I will, however, try to furnish you with the information that you are requesting and to help you in whatever way I can in regards to matters relating to your analytic work with respect to this organization.

The first of your three letters inquires as to a negative ending cash balance of \$1,837 showing at the close of the period ending 11/22/82 and whether this was a consequence of overdraw, mathematical error, or incurrence of debt. Please be advised that this was an overdraw. And that it resulted from one of several refund checks - issued prematurely at the request of the executive director - to pay back the excess of allowable contributions that are the subject matter of your second letter. The check in question was eventually cleared enabling that portion of the total refund of excess contributions.

The second of your three letters inquires as to the excess contributions. Actually there were two of these. Both from the same family, Husband and wife. The executive director, temporarily confusing allowable limits at the state level with those permissible at the federal level, accepted contributions totalling \$25,000 from this particular family - \$15,000 from one and \$10,000 from the other of husband and wife - resulting in excess donations of \$10,000 and \$5,000 respectively. It was during discussions on other matters with the officers of the Federal Elections Commission around about October of last year that that these excess contributions came to light and a program was undertaken to get them refunded. These repayments and resolutions of the corresponding debts of the organization which they represented were reported both verbally week by week to your chief investigating officer and in writing in the succession of reports (BX) covering the periods during which the refunds were made and the Schedule D debt accounts reduced as declared in the supplementary schedules.

The third of your letters, I am not quite sure what the problem is here. Your query related to outstanding debt together with attendant descriptive information, having to do with the final year end report of 12/31. As of that date only one outstanding debt remained - the others, all relating to the excess contributions having been progressively extinguished and reported.

With regard to this remaining debt, the schedule D report insofar as I can see offers the detail you are seeking with the exception that I apparently did indeed omit the purpose of the debt, and may I offer that information to you herewith. The \$5,259.00 owing to Castellanos & Co. of Arlington, VA was, I was informed, for TV Productions in connection with the DiFazio for US senate Campaign of that year and was incurred, I am advised, as a coordinated expenditure with the DiFazio campaign. This debt remains outstanding and to the best of my knowledge - unpayable and unconvertible.

Aiva Smith/FEC/RADS 6/24/83

Now, a few remarks relating to these organizations in general - the DiFazio Committee and the Conservative Party organization (which was the subject of your inquiries.)

Both organizations ended up in a mess. DiFazio worse than the Party. I was dependent on the executive director of the organization for his knowledge of the rules relating to fundraising and expenditures. Much of what went on in both organizations I learned of only after the fact. Other matters I learned of only accidentally during discussions with officers of FEC. It was a result of this plus the apparent hopelessness of ever resolving some of the outstanding issues including overwhelming debt ~~xxx~~ particularly in view of the departure of the executive director upon whom all fundraising was dependent that I resigned from both units.

A third unit I was able to save through action on my part, though the problems here were far more manageable.

At this moment I am in communication with Susan Kaltenbaugh of the legal staff of FEC in trying to help her to wrap up the Di Fazio committee as best as possible under the circumstances. And I am in communication with Mr. Ryan with the regards to the CPOC Party organization (subject of your letters) to help him likewise with that organization, and am waiting now to hear back from him, probably by phone, as he makes further checks on his own.

In all of this and from the beginning I have done whatever I could do to maintain a complete and proper set of records on all of the organizations and in all aspects of the financial operations.

However, as said, I was dependent all the way through on the organization's executive director for his knowledge of campaign financing. Nearly everything came to me after the fact - contributions, bills, and so on. Additionally I had no way of knowing what the fund raising capacity was going to be to pay incurred debt. There was an air of excess optimism from the very beginning. But until the end when bills appeared out of nowhere and income plummeted, and major and crucial contributions were turned over to me that subsequently turned out to be unlawful that I began to realize the organizations were in serious financial difficulty. Then with the departure of the executive director I was left holding the bag on all of this. It was then that I resigned.

I will still do what I can to help the FEC in making resolution of any outstanding information needed, such as the subject matters of your three letters, but quite frankly I am beginning to feel a bit put upon from all sides. I intend to furnish Ms. Kaltenbaugh with an up to date Schedule D type listing of all of the outstanding debt on the DiFazio Committee - as best as I can determine it, no way to know if I have it all since I can only report what was reported to me by the executive director plus whatever confirming copies of invoices I was able to round up on my own following these reports. And, as said, I am waiting to hear from Mr. Ryan in regards to his needs.

Likewise with you, whatever additional information you need I will try to get for you. But I am hoping that someone down at FEC will sympathize with my situation in this.

As to the future I don't know quite what to expect or do. I had wanted to help out with these political action groups up here in Connecticut. It seemed a good way to be able to participate at a grass roots level in political activity using whatever skills I could bring to bear, having mostly to do with bookkeeping. But somehow one gets a feeling he's stepped into a hornets nest.

I still have one remaining organization, a standard PAC, which is now clear with boards on all counts as best as I can tell. It too is abandoned at the leadership

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level, and wont be useable until new leadership picks up on it if indeed any comes along to do so. I thought I would keep it on the books here and down with you folks at FEC and see what happens. But now, while I kind of hate to see it go - it was the first of its kind I had association with (and I guess kind of threw me off the track with what was to come - I never had any trouble with it of the kind that caused me woe with the candidate and party groups - I am wonder if that is a wise thing to do.

That I will have to decide. I may close it down with my June report to Ms. Kaltenbaugh. And whether to ever take up again with any of these groups in the future I dont know. There is much that lies beyond the control of a treasurer. The racking up of debt is one. The resolution of debt is another. The acceptance of contributions seemingly is controllable - but it gets so complicated that one can never be sure of where he stands unless he is something of an expert on campaign financing law which I am certainly not - more or less learning as I go along, but with much frustration along the way.

At any rate, thats not your worry. As said, let me know if you need additional information. You can also check if you want with the stuff I send to Ms. Kaltenbaugh (DiFazio Committee) after the June reporting period and with Mr. Ryan for whatever I send him according to his wishes. I wont be submitting regular reports for either of those two organizations given my resignation. ~~BMX~~ They are all closed out anyway including the bank accounts. But I will give whatever informal information I can as an aid to FEC's needs.

Sincerely,

Foster Gunnison Jr.
Foster Gunnison Jr.

Former Treasurer of

DFS DiFazio for US Senate
CPOC Conservative Party
of Connecticut.

And currently still Treasurer of
CPAC - Conn Pol. Act. Comm.

85040521124

85040521125



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1732

Date Filmed 4/12/85 Camera No. --- 1

Cameraman AS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1732 .

85040554159

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

6-11-73
RECEIVED AT THE FEC

85 MAY 23 4:08 PM

25 MAY 23 1973

P 3: 02

David J. Ordway

Attorney at Law

24 Hoyt Street

Stamford, Connecticut 06905

(203) 967-4374

Mary Beth Tarnant:

Enclosed check for \$1,000.00

in matter of MUR 1732

Thank you.

David J. Ordway,
Treasurer C-POC-1

85040554160

MEMORANDUM

Sent 5/23/85
6007461

TO: CHERYL THOMAS
FROM: JOAN HARRIS

CHECK NO. 51-110 (a copy of which is attached) RELATING
TO MUR 1732 AND NAME Conservative Party of Connecticut, Inc. & David Ordway, Treas.
WAS RECEIVED ON May 23, 1985. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)
/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE C. Thomas DATE 5/23/85

May 17, 1985

PAY TO THE ORDER OF United States Treasury \$ 1,000.00
One thousand and no DOLLARS

Union **TRUST**
UNION TRUST COMPANY
STAMFORD EXECUTIVE OFFICE
STAMFORD, CONNECTICUT 06904

MEMO MUR 1732 By David Ordway
Treasurer

1021101108 11148 148

85040554161



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
David J. Ordway, Treasurer
Conservative Party of Connecticut
24 Hoyt Street
Stamford, Connecticut 06905

Re: MUR 1732

Dear Mr. Ordway:

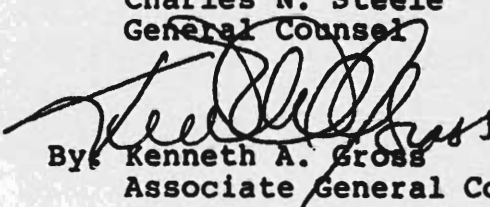
On February 26, 1985, the Commission accepted the conciliation agreement signed by you on behalf of yourself and the Conservative Party of Connecticut. The agreement provided for the payment of a civil penalty of \$1,000 within 30 days of the effective date of the agreement (March 1, 1985). Accordingly, payment of the civil penalty was to have been received by the Commission by March 31, 1985.

This is to inform you that as of this date the Commission has not received a check for the civil penalty. Please be advised that if payment for the civil penalty is not received within five days of your receipt of this letter, this Office will recommend that the Commission institute a civil action in United States District Court.

If you have any questions, please contact Marybeth Tarrant at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

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