



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2124  
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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

A85-7

July 9, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: ROBERT J. COSTA  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: INTERIM AUDIT REPORT - PHIL SHEA FOR CONGRESS  
COMMITTEE

Attached for your review is the above subject report. Your attention is directed to Finding II.D. entitled Transfer Received from Candidate's State Senate Committee.

In reviewing the deposits comprising the cash on hand balance with respect to the transfer <sup>1/</sup> made by the Committee to Keep Phil Shea Senator ("the State Senate Committee"), the Audit staff identified a deposit representing the proceeds of a certificate of deposit ("CD"). The maturity value of the CD was \$20,854.55. Since the CD was purchased with State Senate Committee funds some time prior to the transfer and comprises a portion of the cash on hand, the Audit staff believes that the source of the funds used to purchase the CD must be ascertained and a determination made as to whether these funds are permissible under the Act.\*

11 C.F.R. § 104.12 defines cash on hand as being composed of those contributions most recently received by the Committee. The Audit staff proposes to review the deposits most recently received by the State Senate Committee just prior to the original purchase date of the CD.\*\*

1/ For your information, a copy of the memorandum forwarded to RAD concerning the registration of the State Senate Committee is attached.

\* Alternatively, one could disregard the deposit of the CD and merely review the other deposits in accordance with 11 C.F.R. § 104.12.

\*\* The remainder of the cash on hand balance as of the transfer date (approximately \$30,000) is assumed to be composed of those deposits (exclusive of the CD) most recently received.

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MEMORANDUM TO CHARLES N. STEELE

Page 2

Working back from the date on which the CD was purchased, the Audit staff will accumulate the value of deposits until the \$20,000 principal value is reached. If only a portion of a deposit (when accumulated with other deposits) is needed to arrive at the principal value, all contributions in that deposit may be considered as part of the calculated cash on hand balance. This is necessary since it is not possible to determine the exact order of receipt within a specific deposit.

Your comments on this approach are requested.

Should you have any questions, please contact John Mamone or Tom Nurthen at 523-4155.

Attachments as stated

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

A85-7

### INTERIM REPORT OF THE AUDIT DIVISION ON THE PHIL SHEA FOR CONGRESS COMMITTEE

#### I. Background

##### A. Overview

This report is based on an audit of the Phil Shea For Congress Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under section 434 of this title.

The Committee registered with the Clerk of the House of Representatives on April 3, 1984. The Committee maintains its headquarters in Lowell, Massachusetts. The Audit covered the period March 27, 1984, the opening date of the first report filed by the Committee, through December 31, 1984, the closing date for the latest report which should have been filed at the time the audit was approved.<sup>1/</sup> The Committee reported a cash balance on March 27, 1984 of \$-0-; total receipts of \$374,518.06; total expenditures of \$373,478.97; and a cash balance on October 15, 1984 of \$1,289.59. <sup>2/</sup>

This audit report is based on documents and work papers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to the Commissioners and appropriate staff for review.

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<sup>1/</sup> See Finding II.C.

<sup>2/</sup> The reported totals do not calculate correctly due to mathematical errors (see Finding II.A.). The Committee did not file reports covering the period October 16, 1984 through December 31, 1984.

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### B. Key Personnel

The Treasurer of the Committee during the period covered by the audit was Francis McDougall.

### C. Scope

The Audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

## II. Audit Findings and Recommendations

Committee officials chose not to comment on the findings discussed at the exit conference, but stated that an official explanation addressing each of the problem areas would be included in the Committee's response to the interim audit report.

### A. Misstatement of Financial Activity

Section 434(b)(4) of Title 2 of the United States Code states, in part, that each report shall disclose the total amount of all disbursements for the reporting period and the calendar year.

During the audit, it was noted that for the period March 27, 1984 to October 15, 1984, the Committee understated its disbursements by \$9,749.78 (net). This understatement was caused by math errors and the failure to report certain disbursements. The Committee was provided a schedule of the unreported disbursements.

### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, amend their reports to accurately reflect its financial activity.

### B. Documentation for Receipts

Sections 432(c)(1), (2), (3) and (d) of Title 2 of the United States Code state that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committees; the name and address of any person who makes any contribution in excess of \$50, together with the date and amount of such contributions by any person; and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year, together with the date and amount of any such

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contribution. The treasurer shall preserve all records required to be kept by this section and copies of all reports required to be filed by this subchapter for 3 years after the report is filed.

The Audit staff was provided with contribution records consisting of 1,728 checks from individuals, totaling \$208,458.68. However, based on a review of deposit records, it was noted that the Committee deposited receipts totaling \$280,268.82 during the audit period. Committee officials were unable to locate contribution records totaling \$71,810.14 <sup>3/</sup> (\$280,268.82 - \$208,458.68). Since such a large portion of the contribution records were unavailable for review (approximately 26% of the dollar amount) the Audit staff was precluded from testing the Committee's receipt system for compliance with the Act. The Committee was provided with a schedule of deposits for which receipt records were missing.

#### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, obtain and submit copies of all records for contributions received during the period March 27, 1984 through December 31, 1984. Additional recommendations may be forthcoming based on our review of the records requested.

#### C. Failure to File Reports

Section 434(a)(2)(A)(iii) of Title 2 of the United States Code states, in part, that if the political committee is the principal campaign committee of a candidate for the House of Representatives in any calendar year during which there is a scheduled election for which such candidate is seeking election, the Treasurer shall file quarterly reports, which shall be filed no later than 15 days after the last day of each calendar quarter: except that the report for the quarter ending December 31 shall be filed no later than January 31 of the following calendar year.

The Committee did not file a disclosure report for the period October 16, 1984 through December 31, 1984. Based on the Audit staff's review of the bank records made available, \$44,345 in receipt and \$44,537.41 in disbursement activity occurred during this period. As of the latest review of Committee filings done on June 21, 1985, no report had been filed disclosing this activity.

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<sup>3/</sup> Included in this amount are five cash (currency) deposits totaling \$7,314.00.

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### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, file a report which discloses all reportable activity for the period October 16, 1984 through December 31, 1984.

#### D. Transfer Received From Candidates' State Senate Committee

Sections 102.6(a)(1)(i) and (iv) of Title 11, Code of Federal Regulations state, in part, that transfers of funds may be made without limit on amounts between affiliated committees whether or not they are political committees under 11 CFR § 100.5 (2 U.S.C. 431(4)(A)). Such transfers shall be made only from funds which are permissible under the Act. See 11 CFR Parts 110, 114, and 115.

During the course of the audit, it was noted that the Committee to Keep Phil Shea Senator ("the State Senate Committee") transferred \$40,500 to the Committee. The State Senate Committee was the Candidate's campaign committee for the office of State Senator.

The Audit staff requested receipts records to verify that the funds transferred by the State Senate Committee contained only contributions permissible under the Act. Information sufficient to determine permissibility of the contributions comprising more than 31% of the amount transferred were not made available during the audit fieldwork. At the exit conference, Committee officials were asked to provide the Audit staff with those records not provided during fieldwork. The Candidate said he would obtain and provide all needed records.

### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, provide information sufficient to determine the source of funds for the transfer (see Exhibit A). After a review of the information provided, additional recommendations may be forthcoming.

#### E. Disclosure of Loans

Section 431(8)(A)(i) of Title 2 of the United States Code states, in part, that the term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value.

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Section 434(b)(3)(E) of Title 2 of the United States Code requires that each report shall disclose the identification of each person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount or value of such loan.

In addition, 11 C.F.R. § 104.3(d) requires the disclosure of the amount and nature of outstanding debts and obligations on Schedule C (Loans) or Schedule D (Debts and Obligations), as appropriate.

During the review of the Committee's loan activity, it was noted that the Committee reported the receipt of \$60,000 in loans from the Candidate. An examination of the loan documentation indicated that the Candidate received loans of \$40,000 and \$60,000 from a bank. The loans were secured by mortgages on the Candidate's personal residence. The Candidate, in turn, loaned \$60,000 to the Committee. However, the Committee did not disclose the terms of the loan (i.e. original source, due date, collateral, etc.) on Schedule C (Loans Schedule).

#### Recommendation

The Audit staff recommends that within 30 days of the receipt of this report, the Committee amend its reports to include the above described information in accordance with 11 C.F.R. 104.3(d).

#### F. Documentation for Disbursement

Section 432(h)(1) of Title 2 of the United States Code states, in part, that no disbursements may be made (other than petty cash disbursements under paragraph (2)) by such committee except by check drawn on such accounts in accordance with this section. Section 102.9(b)(2) of Title 11, Code of Federal Regulations states, in part, that a receipt or invoice from the payee or a cancelled check to the payee shall be obtained and kept for each disbursement in excess of \$200.

During the course of the audit, the staff noted that four (4) disbursements, totaling \$33,285.60, were made by transfers (direct bank charges) from the Committee's bank account.

Three of the transfers, totaling \$33,000, were supported only by bank debit advices. The bank debit advices did not contain the required information necessary to document the transactions. No documentation (invoice, bank debit advice, etc.) could be found for the remaining \$285.60 transfer.

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Committee officials stated that two transfers (\$25,000 & \$5,000) represented payments made on the Candidate's bank loan.<sup>4/</sup> However, the Committee did not provide any documentation to support these loan repayments. Further, these two transfers occurred during the period in which the Committee did not file a disclosure report (see Finding II.C.).

With respect to the remaining two transfers (\$3,000 & \$285.60), Committee officials did not know the purpose or the recipient(s) of the transfers. These transfers were not itemized by the Committee.

#### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, obtain and submit adequate supporting documentation for these transfers.

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<sup>4/</sup> The Committee maintains its campaign depository with the same bank that provided the Candidate with loans noted in Finding II.E.

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## Exhibit A

REQUESTED STATE SENATE COMMITTEE RECORDSFIRST BANK:

Documentation for all receipts comprising deposits made to the State Senate Committee's First Bank account as noted below:

<u>Deposit Date</u>	<u>Total Deposit Amount</u>	<u>Records Identified As:</u>
2/21/83	\$5,500.00	Sheet "N"
2/21/83	3,450.00	Sheet "O"
2/21/83	600.00	Sheet "P"
2/22/83	1,050.00	Sheet "Q"
2/24/83	350.00	Sheet "R"
2/27/83	1,800.00	Sheet "S"
2/29/83	450.00	Sheet "T"
3/5/83	750.00	Sheet "U"

LOWELL BANK:

Documentation (including relevant bank statements and contribution records) for all receipts comprising deposits up to the date that the Committee's \$20,854.55 certificate of deposit (maturing on 6/24/83) was purchased which, when added, equal \$20,854.55.

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

A85-7

July 9, 1985

MEMORANDUM

TO: JOHN GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

THROUGH: ROBERT J. COSTA (S) 7-9-85  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

FROM: RENE' SOULE *RS*

SUBJECT: POSSIBLE REPORTING AND/OR REGISTRATION VIOLATIONS  
UNDER SECTION 433 AND 434 OF TITLE 2, UNITED  
STATES CODE (2 U.S.C. § 433 AND § 434)

During a recent audit of the Phil Shea for Congress Committee, 630 Merrimack Street, Lowell, MA 01852, it was discovered that the following committee has failed to register and/or report transfers in accordance with the above stated sections of the U.S. Code:

Committee Name: Committee to Keep Phil Shea Senator

Address: 630 Merrimack Street  
Lowell, MA 01852

Treasurer: G. Douglas Sullivan

Possible Violation: SEE ATTACHMENT A

Attachment as stated

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D. Transfer Received From Candidates' State Senate Committee

Sections 102.6(a)(1)(i) and (iv) of Title 11, Code of Federal Regulations state, in part, that transfers of funds may be made without limit on amounts between affiliated committees whether or not they are political committees under 11 CFR § 100.5 (2 U.S.C. 431(4)(A)). Such transfers shall be made only from funds which are permissible under the Act. See 11 CFR Parts 110, 114, and 115.

During the course of the audit, it was noted that the Committee to Keep Phil Shea Senator ("the State Senate Committee") transferred \$40,500 to the Committee. The State Senate Committee was the Candidate's campaign committee for the office of State Senator.

The Audit staff requested receipts records to verify that the funds transferred by the State Senate Committee contained only contributions permissible under the Act. Information sufficient to determine permissibility of the contributions comprising more than 31% of the amount transferred were not made available during the audit fieldwork. At the exit conference, Committee officials were asked to provide the Audit staff with those records not provided during fieldwork. The Candidate said he would obtain and provide all needed records.

Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, provide information sufficient to determine the source of funds for the transfer (see Exhibit A). After a review of the information provided, additional

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## Exhibit A

REQUESTED STATE SENATE COMMITTEE RECORDSFIRST BANK:

Documentation for all receipts comprising deposits made to the State Senate Committee's First Bank account as noted below:

<u>Deposit Date</u>	<u>Total Deposit Amount</u>	<u>Records Identified As:</u>
2/21/83	\$5,500.00	Sheet "N"
2/21/83	3,450.00	Sheet "O"
2/21/83	600.00	Sheet "P"
2/22/83	1,050.00	Sheet "Q"
2/24/83	350.00	Sheet "R"
2/27/83	1,800.00	Sheet "S"
2/29/83	450.00	Sheet "T"
3/5/83	750.00	Sheet "U"

LOWELL BANK:

Documentation (including relevant bank statements and contribution records) for all receipts comprising deposits up to the date that the Committee's \$20,854.55 certificate of deposit (maturing on 6/24/83) was purchased which, when added, equal \$20,854.55.

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# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1985

## MEMORANDUM

TO: Robert J. Costa  
Assistant Staff Director  
Audit Division

THROUGH: John C. Surina  
Staff Director

FROM: Charles N. Steele *[Signature]*  
General Counsel

SUBJECT: Interim Audit Report on the Phil Shea for  
Congress Committee (AR85-28)

The Office of General Counsel has reviewed the proposed interim audit report on the Phil Shea for Congress Committee ("Committee"), forwarded with an accompanying memorandum dated July 9, 1985. Please note that the parantheticals in the headings which follow indicate the placement of the subject matter in the audit report.

### I. Misstatement of Financial Activity (II.A)

According to the audit report, the Committee understated its disbursements by \$9749.78, due to mathematical errors and a failure to report certain disbursements. The Act requires a reporting committee to disclose the total amount of all disbursements, pursuant to 2 U.S.C. §434 (b)(4).

The Audit Division recommends that the Committee amend its reports to accurately reflect all disbursements, and the Office of General Counsel concurs with this recommendation.

### II. Documentation for Receipts (II.B)

The audit report indicates that Committee officials were unable to locate contribution records totalling \$71,810.14. Under 2 U.S.C. § 432(c)(1), the treasurer of a political committee must keep an account of all contributions received by or on behalf of that political committee.

The Audit Division recommends that the Committee submit copies of records of all contributions with any additional recommendations based upon future review of these records. The Office of General Counsel concurs with this recommendation.

III. Failure to File Reports (II.C)

The Committee failed to file a report of receipts and disbursements covering the period October 16, 1984, through December 31, 1984. No such report has been filed as of the date of this writing. According to the audit report, the Committee had \$44,345 in receipts and \$44,537.41 in disbursements during this period.

The quarterly report required of the principal campaign committee of a candidate for the House of Representatives by 2 U.S.C. §434 (a)(2)(A)(iii), is due no later than January 31, for the quarter ending on December 31. The Audit Division recommends that the Committee file a report disclosing financial activity for the period October 16, 1984 through December 31, 1984. The Office of General Counsel concurs with this recommendation.

IV. Transfer Received from Candidate's State Senate Committee (II.D)

The audit report indicates that the Committee received a \$40,500 transfer from the candidate's campaign committee for the office of State Senator. Although the Commission's Regulations permit unlimited transfers of funds between affiliated committees, whether or not they are political committees under the Act, 11 C.F.R. § 102.6(a)(1)(i), such transfers may only be made from funds which are permissible under the Act, 11 C.F.R. §102.6(a)(1)(iv).

The information provided to the audit division was only sufficient to determine the permissibility of 31% of the transfer, and as a result, the Audit Division has recommended that the Committee provide information sufficient to determine the source of funds for the transfer. The Office of General Counsel concurs with this recommendation.

V. Disclosure of Loans (II.E)

The audit report indicates that complete information about loans received by the candidate was not disclosed by the Committee, as required by 2 U.S.C. § 434(b)(3)(E) and 11 C.F.R. § 104.3(d). The Audit Division recommends that the Committee amend its reports to include the required information, and the Office of General Counsel concurs with this recommendation.

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IV. Documentation of Disbursement (II.F)

According to the audit report, the Committee made four disbursements totalling \$33,285.60, and failed to provide adequate documentation for those disbursements. The Act at 2 U.S.C. §434(h)(1) provides that no disbursements, other than petty cash disbursements, may be made except by check, and under the Commission's Regulations, a receipt or cancelled check must be kept for each disbursement in excess of \$200. 11 C.F.R. 102.9(b)(2).

The Audit Division recommends that the Committee provide adequate information for the above-mentioned transfers, and the Office of General Counsel concurs with this recommendation.

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 4, 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: ROBERT J. COSTA  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: INTERIM AUDIT REPORT - PHIL SHEA FOR CONGRESS  
COMMITTEE ("THE COMMITTEE")

On August 14, 1985, the Audit Division received the legal analysis on the Committee's interim audit report. However, with respect to Finding II.D. (Transfer Received from Candidate's State Senate Committee) the legal analysis did not address the merits of the approach discussed in the covering memorandum (to the interim audit report) to verify the deposits making up the transfer of funds from the State Senate Account to the Committee.

On August 15, 1984, this matter was discussed with Ken Gross. At that time, Ken stated that a supplemental legal analysis would be forthcoming. Therefore, the Audit Division is withholding the issuance of the interim audit report pending receipt of the supplemental analysis.

Should you have any questions, please contact E. Rene' Soule' or Tom Nurthen at 523-4155.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 23, 1985

SUPPLEMENTAL MEMORANDUM

TO: Robert J. Costa  
Assistant Staff Director

THROUGH: John C. Surina  
Staff Director

FROM: Charles N. Steele *CN*  
General Counsel

SUBJECT: Interim Audit Report on the Phil Shea for  
Congress Committee

Paragraph II.D of the proposed interim audit report on the Phil Shea for Congress Committee ("Committee") notes that the Committee received a \$40,500 transfer from the Committee to Keep Phil Shea Senator ("State Senate Committee"). The latter committee was the candidate's campaign committee for the office of State Senator. In its memorandum accompanying the interim audit report, the Audit Division seeks the General Counsel's review of the former's proposal to examine the cash on hand of the State Senate Committee with respect to the \$40,500 transfer.

Initially, the Office of General Counsel notes that the Act does not prohibit the transfer of funds from a state campaign committee to a Federal campaign committee. Commission regulations provide that transfers of funds may be made without limit between "affiliated" committees. 11 C.F.R. §102.6(a). Included within the definition of affiliated committees are all those political committees that are established, financed, maintained or controlled by the same person or group of persons. See 2 U.S.C. § 441a(a)(5); 11 C.F.R. § 100.5(g)(2), 110.3(a)(1)(i). Moreover Commission regulations recognize that two committees may be deemed "affiliates" even though one of them is not a political committee under the Act. 11 C.F.R. § 102.6(a). Thus, where the state committee and Federal committee are controlled by the same person for campaign-related purposes, the state committee would be deemed affiliated with the Federal committee for the purpose of making the transfer.

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Although such transfers may be made in unlimited amounts, the transfers may only consist of funds permissible under the Act. 11 C.F.R. § 102.6(a)(1)(iv). See 11 C.F.R. Parts 110, 114 and 115. In reviewing the funds which comprised the transfer from the State Senate Committee to the Committee, the Audit Division examined the cash on hand balance of the State Senate Committee. In making this examination, the Audit Staff identified a deposit representing the proceeds of a certificate of deposit ("CD") with a value of \$20,854.55 at maturity.

Pursuant to 11 C.F.R. § 104.12, the cash on hand balance is assumed to be composed of those contributions most recently received by the committee. Because the CD is included in the cash on hand balance under this provision, the Audit Division proposes to examine the deposits of the State Senate Committee made just prior to the original date that the CD was purchased. This would enable a determination to be made regarding the permissibility of funds which were used to purchase the CD. In the alternative, the Audit Division proposes to disregard the CD and merely review the other most recent deposits of the State Senate Committee.

The Office of General Counsel believes the Audit Division must review the deposits comprising the CD and cannot merely disregard the CD when calculating the cash on hand balance of State Senate Committee. 11 C.F.R. § 104.12 prescribes that the contributions most recently received comprise the cash on hand balance. If the CD falls into this category, nothing in the Act or regulations permit it to be disregarded for contributions received earlier in time. Nothing in the Act or regulations prohibit inclusion of the CD in cash on hand by virtue of the fact that the CD was purchased with State Senate Committee funds at a time prior to the transfer to the Committee and a subsequent period of maturity passed.

To disregard the CD as a portion of cash on hand would permit an apparent loophole in the act by allowing unregistered organizations to purchase CDS with nonpermissible funds and then, after the maturity period had elapsed, to transfer them to a Federal committee without having the sources of the CDs examined. The examination of the funds used to purchase the CD is necessary to determine the permissibility of the funds transferred to the Committee. Accordingly, the Audit Division should review those receipts most recently received by the State Senate Committee just prior to the purchase of the CD, in order to determine the character of the funds' used to purchase the CD.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: JOHN C. SURINA  
STAFF DIRECTOR

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

DATE: SEPTEMBER 30, 1985

SUBJECT: OBJECTION - INTERIM AUDIT REPORT:  
PHIL SHEA FOR CONGRESS COMMITTEE  
Memorandum to the Commission  
dated September 25, 1985

The above-captioned audit report was circulated to the Commission on a 48 hour tally basis at 4:00, September 26, 1985.

Commissioner McDonald submitted an objection at 3:40 this date.

We await your Sunshine Recommendation.

cc: Audit Division  
✓ Office of General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Request For Extension Of )  
Time To Respond to Interim )  
Audit Report - Phil Shea )  
For Congress Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 14, 1985 the Commission approved by a vote of 5-0 a 30 day extension of time be granted to the Phil Shea For Congress Committee to respond to an interim audit report.

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

Attest:

11-14-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Tues., 11-12-85, 5:24  
Circulated on 48 hour tally basis: Wed., 11-13-85, 11:00  
Deadline for vote: Thurs., 11-14-85, 11:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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MEMORANDUM TO: ROBERT J. COSTA  
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CF*  
DATE: DECEMBER 19, 1985  
SUBJECT: OBJECTION - FINAL AUDIT REPORT - PHIL SHEA FOR CONGRESS COMMITTEE

The above-named document was circulated to the Commission on Thursday, December 19, 1985, 11:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, January 7, 1985.

Please advise the Office of Commission Secretary in writing no later than 10:00 A.M. on Friday \_\_\_\_\_ who will represent your Division before the Commission on this matter.  
(Pursuant to Directive #17)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

OGC Pocket

MEMORANDUM TO: ROBERT COSTA/ AUDIT DIVISION  
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*  
DATE: JANUARY 2, 1986  
SUBJECT: OBJECTION - PHIL SHEA FOR CONGRESS COMMITTEE  
DATED DECEMBER 17, 1985

The above-named document was circulated to the  
Commission on Thursday, December 19, 1985, 11:00.

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

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

This matter will be placed on the Executive Session  
agenda for Tuesday, January 7, 1986.

Please advise the Office of Commission Secretary in writing  
no later than 10:00 A.M. on Friday \_\_\_\_\_ who will  
represent your Division before the Commission on this matter.  
(Pursuant to Directive #17)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

A85-7

January 10, 1986

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: ROBERT J. COSTA  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: PHIL SHEA FOR CONGRESS COMMITTEE

On January 8, 1986, the Commission approved the final audit report of the Audit Division on the Phil Shea for Congress Committee. Attached as Exhibits A through D are matters noted in the final audit report which the Commission also voted to refer to your office for review and consideration.

It should be noted that the response date was December 9, 1985.\* On December 18, 1985, the Committee responded to the interim audit report and provided some documentation regarding Finding II.C. (Exhibit C). It is the opinion of the Audit staff that the documentation received from the Committee was incomplete. Also, attached for your information is the Committee's response (Exhibit E) which was received on December 18, 1985.

All documentation, including deposit slips and copies of contributor checks, pertaining to these matters are available for review in the Audit Division.

Should you have any questions regarding the matters addressed in this report, please contact Tom Nurthen or John Mamone at 376-5320.

\* The original response was due on November 7, 1985 and the Commission approved the Committee's request for a 30 day extension on November 14, 1985.

Attachment as stated

38040701501

Exhibit A

Misstatement of Financial Activity

Section 434(b)(4) of Title 2 of the United States Code states, in part, that each report shall disclose the total amount of all disbursements for the reporting period and the calendar year.

During the audit, it was noted that for the period March 27, 1984 to October 15, 1984, the Committee understated its disbursements by \$9,749.78 (net). This understatement was caused by math errors and the failure to report certain disbursements. The Committee was provided a schedule of the unreported disbursements.

Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, amend their reports to accurately reflect its financial activity.

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## Exhibit B

### Documentation for Receipts

Sections 432(c)(1), (2), (3) and (d) of Title 2 of the United States Code state that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committees; the name and address of any person who makes any contribution in excess of \$50, together with the date and amount of such contributions by any person; and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year, together with the date and amount of any such contribution. The treasurer shall preserve all records required to be kept by this section and copies of all reports required to be filed by this subchapter for 3 years after the report is filed.

The Audit staff was provided with contribution records consisting of 1,728 checks from individuals, totaling \$208,458.68. However, based on a review of deposit records, it was noted that the Committee deposited receipts totaling \$280,268.82 during the audit period. Committee officials were unable to locate contribution records totaling \$71,810.14 <sup>3/</sup> (\$280,268.82 - \$208,458.68). Since such a large portion of the contribution records were unavailable for review (approximately 26% of the dollar amount) the Audit staff was precluded from testing the Committee's receipt system for compliance with the Act. The Committee was provided with a schedule of deposits for which receipt records were missing.

### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, obtain and submit copies of all records for contributions received during the period March 27, 1984 through December 31, 1984. Additional recommendations may be forthcoming based on our review of the records requested.

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<sup>3/</sup> Included in this amount are five cash (currency) deposits totaling \$7,314.00.

3  
0  
4  
0  
7  
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1  
5  
0  
3

## Exhibit C

### Transfer Received From Candidate's State Senate Committee

Sections 102.6(a)(1)(i) and (iv) of Title 11, Code of Federal Regulations state, in part, that transfers of funds may be made without limit on amounts between affiliated committees whether or not they are political committees under 11 CFR § 100.5 (2 U.S.C. § 431(4)(A)). Such transfers shall be made only from funds which are permissible under the Act. See 11 CFR Parts 110, 114, and 115.

During the course of the audit, it was noted that the Committee to Keep Phil Shea Senator ("the State Senate Committee") transferred \$40,500 to the Committee. The State Senate Committee was the Candidate's campaign committee for the office of State Senator.

The Audit staff requested receipts records to verify that the funds transferred by the State Senate Committee contained only contributions permissible under the Act. Information sufficient to determine permissibility of the contributions comprising more than 31% of the amount transferred were not made available during the audit fieldwork. At the exit conference, Committee officials were asked to provide the Audit staff with those records not provided during fieldwork. The Candidate said he would obtain and provide all needed records.

### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, provide information sufficient to determine the source of funds for the transfer (see Attachment 1). After a review of the information provided, additional recommendations may be forthcoming.

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REQUESTED STATE SENATE COMMITTEE RECORDSFIRST BANK:

Documentation to include deposit slips, copies of contributor checks, and bank statements relative to all receipts comprising deposits made to the State Senate Committee's First Bank account as noted below:

<u>Deposit Date</u>	<u>Total Deposit Amount</u>	<u>Records Identified As:</u>
2/21/84	\$5,500.00	Sheet "N"
2/21/84	3,450.00	Sheet "O"
2/21/84	600.00	Sheet "P"
2/22/84	1,050.00	Sheet "Q"
2/24/84	350.00	Sheet "R"
2/27/84	1,800.00	Sheet "S"
2/29/84	450.00	Sheet "T"
3/05/84	750.00	Sheet "U"

LOWELL BANK:

Documentation (including relevant bank statements, deposit slips, and copies of contributor checks) for all receipts comprising deposits up to the date that the Committee's \$20,854.55 certificate of deposit (maturing on 6/24/83) was purchased which, when added, equal \$20,854.55.

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## Exhibit D

### Documentation for Disbursements

Section 432(h)(1) of Title 2 of the United States Code states, in part, that no disbursements may be made (other than petty cash disbursements under paragraph (2)) by such committee except by check drawn on such accounts in accordance with this section. Section 102.9(b)(2) of Title 11, Code of Federal Regulations states, in part, that a receipt or invoice from the payee or a cancelled check to the payee shall be obtained and kept for each disbursement in excess of \$200.

During the course of the audit, the Audit staff noted that four (4) disbursements, totaling \$33,285.60, were made by transfers (direct bank charges) from the Committee's bank account.

Three of the transfers, totaling \$33,000, were supported only by bank debit advices. The bank debit advices did not contain the required information necessary to document the transactions. No documentation (invoice, bank debit advice, etc.) could be found for the remaining \$285.60 transfer.

Committee officials stated that two transfers (\$25,000 & \$5,000) represented payments made on the Candidate's bank loan. However, the Committee did not provide any documentation to support these transfers. Further, these two transfers occurred during the period in which the Committee did not file a disclosure report.

With respect to the remaining two transfers (\$3,000 & \$285.60), Committee officials did not know the purpose or the recipient(s) of the transfers. These transfers were not itemized by the Committee.

### Recommendation

The Audit staff recommends that the Committee, within 30 days of receipt of this report, obtain and submit adequate supporting documentation for these transfers.

88040701506

Exhibit E  
05 DEC 18 12:09320 Clark Road  
Lowell, MA 01853  
December 17, 1985

Mr. Robert J. Costa  
Assistant Staff Director  
for the Audit Division  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Costa:

Enclosed please find the financial information you requested from the Phil Shea for Congress Committee. It took us several weeks to obtain this information from the First Bank and Trust Company in Lowell.

Upon the receipt of the information you sent on November 25, I spent several days attempting to find copies of checks for missing deposits as authorized in finding 11B. While I was able to locate approximately 11,000 dollars in checks, I decided the best way for us to provide all the information you requested was to request that information from the bank. When we had not heard from the bank as of this date I felt we should send what we have and forward the remainder as soon as we receive the information. I have enclosed the information on deposit dates and deposit amounts that will be forthcoming in the next several days.

Please call me if you have any questions or comments.

Sincerely,



Martin T. Meehan

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

M 2124.  
RECEIVED Raich  
OFFICE OF  
GENERAL COUNSEL

86 JAN 28 P12:08

January 24, 1986

A85-7

MEMORANDUM

TO: FRED EILAND  
PRESS OFFICER

FROM: ROBERT J. COSTA *RJC*  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF FINAL AUDIT REPORT -  
PHIL SHEA FOR CONGRESS COMMITTEE

Attached please find a copy of the final audit report of Phil Shea for Congress Committee which was approved by the Commission on January 8, 1986.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

Attachment as stated

cc: FEC Library  
RAD  
Press Office  
Office of General Counsel

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

A85-7

### REPORT OF THE AUDIT DIVISION ON THE PHIL SHEA FOR CONGRESS COMMITTEE

#### I. Background

##### A. Overview

3 3 0 4 0 7 0 1 5 0 9

This report is based on an audit of the Phil Shea For Congress Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Clerk of the House of Representatives on April 3, 1984. The Committee maintains its headquarters in Lowell, Massachusetts. The Audit covered the period March 27, 1984, the opening date of the first report filed by the Committee, through December 31, 1984, the closing date for the latest report which should have been filed at the time the audit was approved.<sup>1/</sup> The Committee reported a cash balance on March 27, 1984 of \$-0-; total receipts of \$374,518.06; total expenditures of \$373,478.97; and a cash balance on October 15, 1984 of \$1,289.59.<sup>2/</sup>

This audit report is based on documents and workpapers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to the Commissioners and appropriate staff for review.

---

<sup>1/</sup> The Committee did not file a disclosure report covering the period October 16, 1984 through December 1, 1984 (see Finding II.A.)

<sup>2/</sup> The reported totals do not calculate correctly due to mathematical errors.

B. Key Personnel

The Treasurer of the Committee during the period covered by the audit was Francis McDougall.

C. Scope

The Audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

II. Audit Findings and Recommendations

Committee officials chose not to comment on the findings discussed at the exit conference, but stated that an official explanation addressing each of the problem areas would be included in the Committee's response to the interim audit report. The Committee did not submit a written response to the findings contained in the interim audit report within the period provided; however, amendments were filed as noted in Findings A. and B. prior to the Committee's receipt of the interim audit report.

A. Failure to File Reports

Section 434(a)(2)(A)(iii) of Title 2 of the United States Code states, in part, that if the political committee is the principal campaign committee of a candidate for the House of Representatives in any calendar year during which there is a scheduled election for which such candidate is seeking election, the Treasurer shall file quarterly reports, which shall be filed no later than 15 days after the last day of each calendar quarter: except that the report for the quarter ending December 31 shall be filed no later than January 31 of the following calendar year.

The Committee did not file a disclosure report for the period October 16, 1984 through December 31, 1984. Based on the Audit staff's review of the bank records made available, \$44,345 in receipt and \$44,537.41 in disbursement activity occurred during this period.

On September 26, 1985 the Committee filed a disclosure report covering the period from October 16, 1984 through December 31, 1984.

Recommendation

The Audit staff recommends no further action on this matter.

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## B. Disclosure of Loans

Section 431(8)(A)(i) of Title 2 of the United States Code states, in part, that the term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value.

Section 434(b)(3)(E) of Title 2 of the United States Code requires that each report shall disclose the identification of each person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount or value of such loan.

In addition, 11 C.F.R. § 104.3(d) requires the disclosure of the amount and nature of outstanding debts and obligations on Schedule C (Loans) or Schedule D (Debts and Obligations), as appropriate.

During the review of the Committee's loan activity, it was noted that the Committee reported the receipt of \$60,000 in loans from the Candidate. An examination of the loan documentation indicated that the Candidate received loans of \$40,000 and \$20,000 from a bank. The loans were secured by mortgages on the Candidate's personal residence. The Candidate, in turn, loaned \$60,000 to the Committee. However, the Committee did not disclose the terms of the loan (i.e. original source, due date, collateral, etc.) on Schedule C (Loans Schedule).

On September 26, 1985, the Committee filed an amended Schedule C which disclosed the terms of the loan.

### Recommendation

The Audit staff recommends no further action on this matter.

## C. Matters Referred to the Office of General Counsel

Certain matters noted during the audit were referred to the Commission's Office of General Counsel.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

86 MAY 12 A10:20 Submitted Late

May 9, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel

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

SUBJECT: Errata Re: MUR 2124, First General Counsel's  
Report Signed May 1, 1986

**SENSITIVE**

EXECUTIVE SESSION

MAY 13 1986

The recommendation concerning the Committee and its treasurer should be modified to recommend an RTB finding involving 2 U.S.C. § 434(b)(4), rather than 432(b)(4). The first paragraph of the letter to the Committee and its treasurer should also be so modified.

Consequently, the attached page of the letter to the Committee and its treasurer should be substituted for Attachment 3, p. 1 of the Report. In addition, Recommendation 1 should read as follows:

- "1. Find reason to believe that Phil Shea for Congress Committee and Francis McDougall, as treasurer, violated 2 U.S.C. §§ 434(b)(4), 432(c)(1), (2), (3), (4), and (5), 432(d), 433(c), and 432(h)(1)."

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CM*  
DATE: MAY 5, 1986  
SUBJECT: OBJECTION TO MUR 2124: FIRST GENERAL COUNSEL'S  
SIGNED MAY 1, 1986

The above-named document was circulated to the  
Commission on Friday, May 2, 1986 at 2:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____X_____
Commissioner Harris	_____
Commissioner Josefiak	_____X_____
Commissioner McDonald	_____
Commissioner McGarry	_____

This matter will be placed on the Executive Session  
agenda for Tuesday, May 13, 1986.

83040701513

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

RECEIVED  
SENSITIVE

FIRST GENERAL COUNSEL'S REPORT 2 AS: 41

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

MUR # 2124

STAFF MEMBER: Robert Raich

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: Phil Shea for Congress Committee and Francis McDougall, as treasurer  
Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer

RELEVANT STATUTES: 2 U.S.C. §§ 434(b)(4), 432(c)(1), (2), (3), (4), and (5), 432(d), 433(a), 434(a), 441b(a), 433(c), 432(h)(1)  
11 C.F.R. §§ 102.6(a)(1)(i) and (iv), 104.12, 102.10  
AO 1982-85

INTERNAL REPORTS  
CHECKED:

Index of Disclosure Documents, 1983-84  
Index of Disclosure Documents, 1985-86  
Candidate Index of Supporting Documents, 1983-84  
Statement of Candidacy  
Statement of Organization

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This is a matter referred to the Office of the General Counsel following Commission approval of a Final Audit Report (Attachment 1).

SUMMARY OF ALLEGATIONS

A. Misstatement of Financial Activity

The Final Audit Report states that the Phil Shea for Congress Committee (the "Committee") understated its disbursements by over \$9,700 due to math errors and the failure to report certain disbursements.

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B. Documentation for Receipts

The Audit Report states tht the Committee could not produce contribution records for nearly \$72,000 of its contributions, a figure representing 26% of the total dollar amount of the Committee's contributions.

C. Documentation for Transfer from Affiliated Committee

The Audit Report states that the Committee to Keep Phil Shea Senator (the "State Senate Committee") transferred \$40,500 to the Committee, but information to determine the permissibility of 31% of the amount transferred was not made available to the auditors.

D. Documentation for Disbursements

The Audit Report states that the Committee provided no documentation for four disbursements in the form of bank transfers totaling \$33,286.

**FACTUAL AND LEGAL ANALYSIS**

A. Misstatement of Financial Activity

Each report must disclose the total amount of all disbursements for the reporting period and the calendar year. 2 U.S.C. § 434(b)(4). The Audit Report states that the Committee understated its disbursements by over \$9,700. Accordingly, this Office recommends that the Commission find reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(4).

B. Documentation for Receipts

The treasurer of a political committee must keep an account of: all contributions received; the name and address of any

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person who makes a contribution in excess of \$50, together with the date and amount of any such contribution; the identification of any person who makes contributions aggregating more than \$200 during a year, together with the date and amount of such contributions; and the identification of any political committee which makes a contribution, together with the date and amount of any such contribution. 2 U.S.C. § 432(c)(1), (2), (3), and (4). "Identification" means: in the case of an individual, the name, address, occupation, and employer of such individual; and in the case of any other person, the full name and address of such person. 2 U.S.C. § 431(13). The treasurer of a political committee must preserve records for three years. 2 U.S.C. § 432(d).

The Audit Report states that the Committee's deposit records indicate it deposited contributions totaling over \$280,000; however, during the audit, the Committee produced contribution records for contributions totaling only about \$208,000 and could not locate contribution records for nearly \$72,000 of contributions, representing 26% of the total dollar amount. After the Audit Division submitted the Final Audit Report to the Commission, the Committee located some additional records for contributions totaling about \$11,000. (See Attachment 1, p.7.)<sup>1/</sup>

<sup>1/</sup> While the General Counsel's Office was preparing this Report, the Committee sent the Audit Division even more records. As of this writing, this Office has received nothing further from the Audit Division concerning these records.

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Accordingly, this Office recommends that the Commission find reason to believe the Committee and its treasurer violated 2 U.S.C. § 432(c)(1), (2), (3), and (4) and 2 U.S.C. § 432(d).

C. Documentation for Transfer from Affiliated Committee

Transfers of funds may be made without limit between affiliated committees whether or not they are political committees under 11 C.F.R. § 100.5(g). 11 C.F.R. § 102.6(a)(1)(i). Those transfers may consist only of funds permissible under the Act. 11 C.F.R. § 102.6(a)(1)(iv). The funds transferred count against the threshold for registering and reporting. 11 C.F.R. § 102.6(a)(2). Labor union treasury funds are prohibited in federal elections. 2 U.S.C. § 441b(a). A "political committee" means any committee which receives contributions or makes expenditures in excess of \$1,000 during a calendar year. 2 U.S.C. § 431(4)(A). "Contribution" and "expenditure" include any deposit of money or anything of value made by any person for the purpose of influencing an election for federal office. 2 U.S.C. §§ 431(8)(A)(i) and 431(9)(A)(i). A political committee must file a Statement of Organization within ten days after becoming a political committee. 2 U.S.C. § 433(a). The treasurer of a political committee must file reports of receipts and disbursements. 2 U.S.C. § 434(a). A committee's Statement of Organization must include the name, address, and relationship of any affiliated committee. 2 U.S.C. § 433(b)(2). Any change in information previously submitted in a Statement of Organization must be reported no later than ten days

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after the date of the change. 2 U.S.C. § 433(c).

It is apparent that the State Senate Committee and the Committee were established by the same person and are controlled by the same group of persons. The two committees are, therefore, affiliated within the meaning of 11 C.F.R. § 100.5(g)(2). The State Senate Committee could thus transfer unlimited funds to the Committee, but only if such funds were permissible under the Act.

Accordingly, this Office recommends that the Commission find reason to believe the State Senate Committee and its treasurer violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv). As soon as the State Senate Committee transferred \$1,000 to the Committee, the State Senate Committee became a "political committee" within the meaning of the Act. 11 C.F.R. § 102.6(a)(2). It was, therefore, required to register and report pursuant to 2 U.S.C. §§ 433(a) and 434(a). Furthermore, to ensure the permissibility of the transferred funds, the State Senate Committee needed to do a last-in-first-out analysis of the funds in its account at the time of the transfer. 11 C.F.R. § 104.12. This information was to be included in the State Senate Committee's first report. Because the State Senate Committee failed to register and report, no information was available to determine the permissibility of a significant portion of the funds transferred. This Office believes those funds may have been impermissible under the Act.<sup>2/</sup>

<sup>2/</sup>Massachusetts permits labor union contributions in state elections. Should the investigation of this matter indicate that no prohibited funds were, in fact, transferred to the Committee, this Office will make the appropriate recommendation.

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This Office notes that the Committee failed to file an amended Statement of Organization listing the State Senate Committee as an affiliated committee. Accordingly, the General Counsel's Office recommends that the Commission find reason to believe the Committee and its treasurer violated 2 U.S.C. § 433(c).

D. Documentation for Disbursements

The treasurer of a political committee must keep an account of the name and address of every person to whom any disbursement is made, the date, amount, and purpose of any disbursement, and a receipt, invoice, or cancelled check for each disbursement in excess of \$200. 2 U.S.C. § 432(c)(5). The treasurer must preserve such records for three years. 2 U.S.C. § 432(d). The Act states that no disbursements (other than petty cash disbursements) may be made except by check. 2 U.S.C. § 432(h)(1). The Regulations state that disbursements must be by check "or similar draft." 11 C.F.R. § 102.10. The Commission has determined that a wire transfer of funds falls within the category of "similar draft" only if adequate documentation is provided and maintained by the Committee. AO 1982-25.

The Audit Report states that the Committee made four disbursements, totaling \$33,286, by bank transfers. Committee officials stated that two transfers (for \$25,000 and \$5,000) were payments on a loan, but they provided no documentation to support the contention. Committee officials did not even know the purposes or recipients of the remaining two transfers (for \$3,000

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and \$286). Accordingly, this Office recommends that the Commission find reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 432(c)(5), 432(d), and 432(h)(1).

**RECOMMENDATIONS**

1. Find reason to believe that Phil Shea for Congress Committee and Francis McDougall, as treasurer, violated 2 U.S.C. §§ 432(b)(4), 432(c)(1), (2), (3), (4), and (5), 432(d), 433(c), and 432(h)(1).
2. Find reason to believe that Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).
3. Approve and send the attached letters and General Counsel's Factual and Legal Analyses.

Charles N. Steele  
General Counsel

May 1, 1986  
Date

BY: Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Referral from Audit Division
2. General Counsel's Factual and Legal Analyses
3. Letters to respondents

88040701520

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Phil Shea for Congress Committee )  
and Francis McDougall, as treasurer )  
Committee to Keep Phil Shea Senator )  
and G. Douglas Sullivan, as treasurer )

MUR 2124

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 9, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2124:

1. Find reason to believe that Phil Shea for Congress Committee and Francis McDougall as treasurer, violated 2 U.S.C. §§ 434(b)(4), 432(c)(1), (2), (3), (4), and (5), 432(d), 441b(a), 433(c), and 432(h)(1) and 11 C.F.R. § 102.6(a)(1)(iv).
2. Find reason to believe that Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).
3. Approve and send the letters and General Counsel's Factual and Legal Analyses, as recommended in the First General Counsel's Report signed June 4, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

6-9-86  
Date

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

Received in Office of Commission Secretary: Wed., 6-4-86, 4:35  
Circulated on 48 hour tally basis: Thurs., 6-5-86, 11:00  
Deadline for vote: Mon., 6-9-86, 11:00

93040701521



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

June 13, 1986

G. Douglas Sullivan, Treasurer  
Committee to Keep Phil Shea Senator  
97 Dancause Road  
Lowell, Massachusetts 01851

RE: MUR 2124  
Committee to Keep Phil Shea Senator  
and G. Douglas Sullivan,  
as treasurer

Dear Mr. Sullivan:

On June 9, 1986, the Federal Election Commission found reason to believe the Committee to Keep Phil Shea Senator and you, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act") and 11 C.F.R. § 102.6(a)(1)(iv), a regulation promulgated pursuant to 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 and the 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

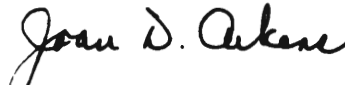
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

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 Robert Raich, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens  
Chairman

Enclosures

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

38040701523





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

June 13, 1986

**Francis McDougall, Treasurer  
Phil Shea for Congress Committee  
630 Merrimack Street  
Lowell, Massachusetts 01852**

**RE: MUR 2124  
Phil Shea for Congress  
Committee and Francis  
McDougall, as treasurer**

**Dear Mr. McDougall:**

On June 9, 1986, the Federal Election Commission found reason to believe the Phil Shea for Congress Committee and you, as treasurer, violated 2 U.S.C. §§ 434(b)(4), 432(c)(1), (2), (3), (4), and (5), 432(d), 441b(a), 433(c), and 432(h)(1), and 11 C.F.R. § 102.6(a)(1)(iv). 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 and the 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

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 Robert Raich, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

*Joan D. Aikens*

Joan D. Aikens  
Chairman

Enclosures

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

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86 JUN 27 P 1:54

*Law Office of  
Hodapp & Linnehan  
One Boston Place, Suite 1448  
Boston, Massachusetts 02108*

*Joseph F. Hodapp  
James F. Linnehan*

*Telephone 617-523-8771*

June 23, 1986

Joan D. Aikens, Chairman  
Federal Election Commission  
999 East Street - N.W.  
Washington, D.C. 20463

Dear Ms. Aikens:

Re: Phil Shea for Congress Committee  
MUR 2124

In accordance with your letter dated June 13, 1986,  
please be advised of the following:

1. I have telephoned Robert Raich, the attorney assigned to this matter, who has not returned my calls.
2. I sent a letter dated March 4, 1986 to the Federal Election Commission and have not received a reply to date. (See copy attached)
3. Mr. Martin T. Meehan, Former Campaign Manager for Mr. Shea, sent a letter dated March 3, 1986 to the Federal Election Commission and has not received a reply to date. (See copy attached)

We have tried to resolve this matter on several occasions and it is still our intent to cooperate in an effort to resolve the issues in this matter. Therefore, we respectfully request a meeting to pursue pre-probable cause conciliation.

Further, enclosed is the Statement of Designation of Counsel.

Sincerely,

*James F. Linnehan*  
James F. Linnehan

JFL:sgm  
encl.

cc: John W. McGarry, Vice Chairman  
Lee Ann Elliott, Commissioner  
Thomas E. Harris, Commissioner  
Thomas J. Josefiak, Commissioner  
Danny L. McDonald, Commissioner

86 JUN 27 P 2:55

RECEIVED  
GENERAL COUNSEL

88040701526

*Law Office of  
Hodapp & Linnehan  
One Boston Place, Suite 1448  
Boston, Massachusetts 02108*

*Joseph F. Hodapp  
James F. Linnehan*

*Telephone 617-523-8771*

March 4, 1986

Federal Election Commission  
999 East Street- N.W.  
Washington, D.C. 20463

Attention: Mrs. Robin Kelly

Dear Mrs. Kelly,

Per your letter of February 28, 1986, please be advised that this office is representing Francis McDougall, Treasurer Phil Shea For Congress Committee and as a result of our telephone conversation this March 4, 1986 you have informed me that they have not filed for the 1st Six Months of 1985 and in the reports that they have filed there are some questions still to be answered.

In order to expediate this, I request that you send the necessary forms and inform me of what else is required by your commission in order to fulfill the obligations of the Federal Election Commission.

Very truly yours,

*James F. Linnehan*

James F. Linnehan

JFL:mc

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, DC 20463

**RQ-7**

**February 28, 1986**

**Francis McDougall, Treasurer  
Phil Shea For Congress Committee  
630 Merrimack Street  
Lowell, MA 01852**

**Identification Number: C00180943**

**Reference: Year-End Report (7/1/85-12/31/85)**

**Dear Mr. McDougall:**

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 Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, Office of Public Records, 119 D Street, NE, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

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 Robin Kelly on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

**Sincerely,**

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

**John D. Gibson  
Assistant Staff Director  
Reports Analysis Division**

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March 3, 1986

Mr. Robert J. Costa  
Assistant Staff Director for  
the Audit Division  
Federal Election Commission  
Washington, D.C. 20463

Dear Mr. Costa:

Enclosed please find copies of over seventy thousand (\$70,000.00) dollars in cancelled checks from the Phil Shea for Congress Committee. While I apologize for the long delay in providing them, as I have pointed out in numerous phone conversations with the Federal Election Commission, it was a slow process for the bank to look up and copy these checks on microfilm. Needless to say, it was also expensive.

Based on my information and understanding, this represents all of the available information we need to forward to you. If you need any other information, we will take all the necessary steps to provide that information.

The Phil Shea Committee has been the subject of numerous negative newspaper stories because of your release to the press of the fact that "certain matters ... were referred to the Commission's Office of the General Counsel." As Rene Solé and Tom Nurthen stated at our exit conference, "It is clear we ran an honest campaign and the errors are simply missing checks and bookkeeping mistakes." If, upon receipt of this letter, anything has changed, I believe we should be informed what further information is needed. If need be, I am willing to go to Washington to meet with you or your auditors and provide any additional information. Our campaign does not deserve the negative newspaper stories we have been subjected to. I think due process entitles us to some kind of communication from you if you need additional information.

Thank you for your attention in this important matter. Please contact me if I can be of further assistance in resolving this matter.

Sincerely,



Martin T. Meehan  
(Former Campaign Manager)

MTM/jmt  
Enclosure

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**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2124

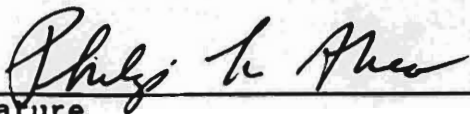
**NAME OF COUNSEL:** James F. Linnehan, Esq.

**ADDRESS:** One Boston Place, 18th Fl.  
Boston, MA 02108

**TELEPHONE:** (617) 523-8171

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.

June 23, 1986  
Date

  
Signature

**RESPONDENT'S NAME:** Philip L. Shea, Candidate

**ADDRESS:** 130 Westview Road  
Lowell, MA 01851

**HOME PHONE:** \_\_\_\_\_

**BUSINESS PHONE:** 459-0111

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*Law Office of  
Hodapp & Linnehan  
One Boston Place, Suite 1448  
Boston, Massachusetts 02108*

*Joseph F. Hodapp  
James F. Linnehan*

*Telephone 523-523-8771*

July 1, 1986

JUL 8 AIO: 33

GENERAL MAIL

Mr. Robert Raich, Esq.  
Federal Election Commission  
999 East Street - N.W.  
Washington, D.C. 20463

Dear Mr. Raich:

Re: Phil Shea for Congress Committee  
Committee to Keep Phil Shea Senator  
MUR 2124

Pursuant to our telephone conversation of June 30, 1986, I hereby respectfully request a 20-day extension of time on behalf of the Phil Shea For Congress Committee, Francis McDougall, Treasurer and the Committee to Keep Phil Shea Senator, G. Douglas Sullivan, Treasurer.

The reasons for this request are to resolve who will be counsel for the above committees; to avoid duplication of process and to present properly and answer accurately the allegations addressed to both parties so that the issues maybe resolved under pre-probable cause conciliation.

Further, the purpose of my letter dated June 23, 1986, with which I filed a Statement of Designation of Counsel of the candidate, Phil Shea, was at the insistence of Mr. Shea in order to reply within the specified time and to demonstrate our intent of resolving the issues.

Thank you for your courtesies and cooperation in this matter.

Sincerely,

*James F. Linnehan*  
James F. Linnehan

JFL:sgl  
cc: Phil Shea  
Francis McDougall  
G. Douglas Sullivan

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GOODWIN, PROCTER & HOAR  
(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)  
COUNSELLORS AT LAW  
EXCHANGE PLACE  
BOSTON, MASSACHUSETTS 02109

JOHN KENNETH FELTER  
(617) 570-1211

July 3, 1986

RECEIVED AT THE FEC  
GCE # 896  
86 JUL 9 9:28  
TELEPHONE (617) 570-1000  
TELECOPIER (617) 523-1231  
TELEX 94-0640  
CABLE: GOODPROCT, BOSTON

Robert Raich, Esq.  
Federal Election Commission  
Washington, D. C. 20463

Re: MUR 2124 (Phil Shea for Congress Committee)

Dear Rob:

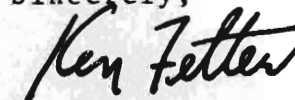
As I informed you last week on the telephone, we represent Frank G. McDougall, Jr., who is the treasurer of the Phil Shea for Congress Committee. I recently received a "Designation of Counsel" form from you. Unfortunately, Mr. McDougall is out of town and will not return until Monday, July 7. We will arrange to have Mr. McDougall date and sign the form as soon as possible and return it to you.

As I also informed you last week, we received a letter from the Commission dated June 13, 1986 (together with a summary of allegations) on June 25, 1986. You indicated to us that the 15-day response period would begin to run from the date of receipt, June 25. Thus, a response would be due on or before July 10.

By this letter, I request a 20 day extension within which to respond to the letter and summary of allegations to and including July 30. This amount of time is necessary to locate, retrieve and analyze Committee records and bank records which are two or more years old. As you can imagine, it will take a considerable amount of time to accomplish these tasks which will be necessary to respond to the Commission's letter and summary of allegations.

Thank you for your attention to this matter.

Sincerely,



John Kenneth Felter

JKF:nh

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GENERAL INVESTIGATIVE



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

July 8, 1986

Mr. James F. Linnehan  
Hodapp & Linnehan  
One Boston Place, Suite 1448  
Boston, Massachusetts 02108

Re: MUR 2124

Dear Mr. Linnehan:

This confirms the substance of your June 30, 1986 conversation with Robert Raich of this Office concerning statements made in your June 23, 1986 letter to the Commission. In that letter, you indicated you had attempted to resolve the matter concerning the Phil Shea for Congress Committee by contacting several Commission employees, but had received no response.

You contend that you left messages for Mr. Raich on two occasions, on June 19 and 20. Mr. Raich informed you that he received only one message from you, on June 19. Mr. Raich stated to you that when he called the number left on that message, he reached a private residence and was told that no one named Linnehan lived there.

With regard to your letter of March 4, 1986 to Robin Kelly, that letter was not raised in the context of MUR 2124, and does not concern the issues involved in this MUR. The General Counsel's Office, however, will be happy to assist you in obtaining FEC forms or other information.

Mr. Meehan's letter of March 3, 1986 to Robert Costa was mailed months after the deadline recommended by the Audit Division for the submission of such documentation. Nevertheless, that letter is referred to in the General Counsel's Factual and Legal Analysis prepared by the Commission in connection with this MUR, and which you possess.

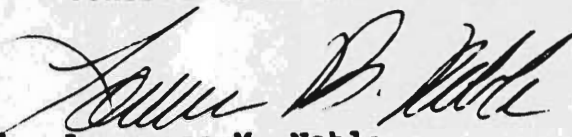
You may make a request in writing for an extension of time to respond to the Commission's findings. You would need to accompany any such request with a statement from a respondent designating you as counsel. Currently, you are representing only

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Phil Shea, the candidate. Note that Mr. Shea is not a respondent in this matter. Similarly, because you are not representing a respondent, the Commission is unable to act on your request for pre-probable cause conciliation.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Lawrence M. Noble  
Deputy General Counsel

88040701534

**GOODWIN, PROCTER & HOAR**  
(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)  
COUNSELLORS AT LAW  
EXCHANGE PLACE  
BOSTON, MASSACHUSETTS 02109

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06 JUL 14 10:38

JOHN KENNETH FELTER  
(617) 870-1211

July 8, 1986

TELEPHONE (617) 870-1000  
TELECOPIER (617) 823-1231  
TELEX 94-0840  
CABLE: GOODPROCT, BOSTON

Robert Raich, Esq.  
Federal Election Commission  
999 East Street, N.W.  
Washington, D. C. 20463

RE: MUR 2124 (Phil Shea for Congress Committee)

Dear Rob:

Enclosed herewith you will find a "Statement of Designation of Counsel" by Frank G. McDougall, Jr. in connection with the above-referenced matter. Mr. McDougall has designated me as his counsel and authorized me to receive any notifications and other communications from the Commission and to act on his behalf before the Commission.

On behalf of Mr. McDougall, I reiterate the request contained in my July 3, 1986 letter to you for a 20-day extension within which to respond to the Commission's letter dated June 13, 1986 (together with a summary of allegations) to and including July 30, 1986.

Thank you for your attention to this matter.

Sincerely,



John Kenneth Felter

JKF:nh

cc: Frank G. McDougall, Jr.  
James F. Linnehan, Esq.

06 JUL 14 14:28

GENERAL COUNSEL

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**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 2124

NAME OF COUNSEL: John Kenneth Felter, Esq.

ADDRESS: Goodwin, Procter & Hoar


Exchange Place

Boston, MA 02109

TELEPHONE: (617) 570-1211

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 7, 1986  
Date

  
Signature

RESPONDENT'S NAME: Frank G. McDougall, Jr.

ADDRESS: President and Chief Operating Officer

Lowell Institution for Savings

18 Shattuck Street

Lowell, Massachusetts 01852

HOME PHONE: (617) 454-8611

BUSINESS PHONE: (617) 454-2500

98040701536



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

*permanent*

July 14, 1986

John Kenneth Felter, Esquire  
Goodwin, Procter & Hoar  
Exchange Place  
Boston, Massachusetts 02109

RE: MUR 2124  
Francis McDougall

Dear Mr. Felter:

This is in reference to your letter dated July 3, 1986, requesting an extension of until July 30 to respond to the Commission's reason to believe notification. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on July 30, 1986.

If you have any questions, please contact Robert Raich, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 14, 1986

Mr. James F. Linnehan  
Hodapp & Linnehan  
One Boston Place, Suite 1448  
Boston, Massachusetts 02108

RE: MUR 2124

Dear Mr. Linnehan:

This confirms the substance of your July 10, 1986 conversation with Lois Lerner of this Office.

The only respondents in this matter are two political committees and their treasurers. It is our understanding that you are representing only Phil Shea, the candidate. Although Mr. Shea is not a respondent, if you wish to submit a response on behalf of Mr. Shea, this Office will be happy to entertain it.

With regard to your request for an extension of time to respond, there is no deadline for you to respond on behalf of Mr. Shea because he is not a respondent.

If this Office can be of further assistance to you, please contact Robert Raich, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Lawrence M. Noble  
Deputy General Counsel

88040701538

permanent

GOODWIN, PROCTER & HOAR

(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)

COUNSELLORS AT LAW

EXCHANGE PLACE

BOSTON, MASSACHUSETTS 02109

TELEPHONE (617) 870-1000

TELECOPIER (617) 883-1231

TELEX 94-0840

CABLE: GOODPROCT, BOSTON

JOHN KENNETH FELTER

(617) 870-1211

July 30, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Joan D. Aikens, Chairman  
Federal Election Commission  
999 East Street, N.W.  
Washington, D. C. 20463

Re: MUR 2124 - Phil Shea for Congress Committee and  
Francis McDougall, as Treasurer

Dear Ms. Aikens:

This firm represents Frank G. McDougall, Jr., as Treasurer of the Phil Shea for Congress Committee ("Committee"). This letter and the enclosed Statement of Frank G. McDougall, Jr. are submitted in response to your letter dated June 13, 1986 to Mr. McDougall.

In your letter you stated that the Federal Election Commission ("Commission") has "found reason to believe" that the Committee and Mr. McDougall, as Treasurer, violated certain provisions of the Federal Election Campaign Act ("Act") and regulations promulgated thereunder. We believe that the enclosed Statement demonstrates that no action should be taken against Mr. McDougall. By this letter we would also like to request pre-probable cause conciliation, if necessary.

If you need any additional information, please do not hesitate to call me.

Sincerely,

*John Kenneth Felter*  
John Kenneth Felter

cc: Frank G. McDougall, Jr.

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GENERAL COUNSEL

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STATEMENT OF FRANK G. McDougall, JR.

TREASURER OF THE PHIL SHEA FOR CONGRESS COMMITTEE

33040701540  
This Statement is in response to a letter dated June 13, 1986 from Joan D. Aikens, Chairman of the Federal Election Commission ("Commission"), to Frank G. McDougall, Jr., as Treasurer of the Phil Shea for Congress Committee ("Committee"), and the accompanying Factual and Legal Analysis which of General Counsel. The letter and Analysis pertain to a matter referred to the Office of the General Counsel in conjunction with Commission approval of a Final Audit Report covering the period March 27, 1984 through December 31, 1984. The Analysis lists and describes four possible violations of the Federal Election Campaign Act ("Act") and regulations promulgated thereunder. These alleged violations will be discussed seriatim at pages 5 - 12.

It is not disputed that it now appears that certain violations of the Act may have occurred. Thus, this Statement is offered primarily to explain how such violations may have occurred and also to demonstrate that no action should be taken against Mr. McDougall. As Treasurer, Mr. McDougall has responsibilities under the Act and regulations. At the same time, however, it must be emphasized that certain of the alleged violations are not Mr. McDougall's responsibility.

The alleged violations for which Mr. McDougall may be responsible pertain exclusively to record-keeping of contribu-

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tions to and disbursements from the Committee. Mr. McDougall has only recently become aware of the record-keeping inadequacies uncovered by the Commission's audit. In addition, he has only recently become aware of the delays in responding to initial audit reports and requests for information. An explanation of the record-keeping and reporting practices of the Committee may be instructive.

At the time Mr. McDougall was asked to be Treasurer of the Committee, he was an officer of a local bank, and well known in the community. He undoubtedly was asked to be Treasurer primarily because of his reputation and status in the community. When Mr. McDougall agreed to become Treasurer, he did so only on condition that the Committee retain an individual, personally known to him, who was a CPA and attorney with extensive experience in maintaining campaign records. This individual was to be primarily responsible for record-keeping. Thus, from the outset, Mr. McDougall did not contemplate being the principal record-keeper. Of course, the Commission's regulations permit the Treasurer to delegate such responsibilities. See 11 C.F.R. §§102.7; 102.9.

In fact, this experienced professional was retained as the Committee's record-keeper. Subsequently, however, persons within the campaign decided that a volunteer could handle the record-keeping duties more cheaply. Unfortunately, the volunteer who assumed the record-keeping and reporting chores could not adequately replace the professional, and his record-keeping



and reporting caused the deficiencies uncovered by the Commission's audit.<sup>/1/</sup>

As stated above, Mr. McDougall has only recently become aware of the results of the audit. Mr. McDougall did not receive the letters sent by the Commission to the Committee which identified the inadequacies in record-keeping uncovered by the audit. The letters were sent to Mr. Shea's office. The correspondence from the Commission was not forwarded to Mr. McDougall. Indeed, it is only during the last several weeks that Mr. McDougall has obtained a copy of these letters.

Instead of being apprised of record-keeping problems, Mr. McDougall was repeatedly assured by those actively participating in the campaign that all was going well and that the required reports were being filed accurately and timely. In addition, Mr. McDougall did not receive the first audit notice, and when the audit was conducted it was handled by Mr. Shea and his campaign manager, Martin Meehan. Again, Mr. McDougall was informed that the audit was proceeding without difficulty. In fact, this view twice was confirmed during conversations

---

/1/ The volunteer severed his ties with the Committee shortly after the 1984 primary, and he did not fully participate in assisting the Committee during the Commission's audit.

Other record-keeping difficulties arose because many of the relevant contribution and disbursement records were being kept on a computer at Committee headquarters. After the primary, the computer company came and retrieved the computer. At that time, through inadvertance, the information was irretrievably lost. See Affidavit of Martin Meehan, ¶18.

3 3 7 4 0 7 0 1 5 4 3  
between Mr. McDougall and Renee' Soule', the person in charge of the audit. Mr. McDougall spoke with Mr. Soule' immediately after the audit, and again some 6 or 7 weeks later. On each occasion Mr. Soule' stated that the audit revealed only minor bookkeeping problems that would be resolved, and that Mr. Meehan and Mr. Shea had been very helpful. Suffice it to say that, if Mr. McDougall had been informed that any difficulty existed, he would have taken an active role to ensure that all records and information requested during the audit were provided promptly to the Commission.

Mr. McDougall was informed concerning the issues raised by the audit less than two months ago. He had not received the Commission's notices concerning audit deficiencies. When he was finally informed, he immediately took steps to address and to resolve any and all issues raised by the Commission. He retained legal counsel to direct this effort, which included locating and mobilizing campaign workers who by 1986 were well removed from the campaign and deeply involved with other projects, tracking down and analyzing remaining campaign financial records, and recovering and copying records from banks and individuals. This was accomplished only after considerable expenditure of time and money by Mr. McDougall and the persons and entities involved.

In response to Ms. Aiken's June 13, 1986 letter, Mr. McDougall has pursued all avenues to attempt to obtain all the information sought by the Commission. It should be emphasized,

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however, that although certain of the alleged violations may be the responsibility of the Treasurer, other alleged violations -- such as those related to reporting of the Committee to Keep Phil Shea Senator ("State Senate Committee") -- simply are not. In addition, the record-keeping violations cited by Commission may be characterized as minor when compared to the substantive proscriptions on contributions that the Act's record-keeping provisions are intended to monitor. In this case, no such substantive violations occurred for which Mr. McDougall is responsible. The contributions to and disbursements from the Committee were authorized, although they were inadequately documented at the time of the audit. Thus, the Act's overriding concerns with political corruption and abuse of fiscal power simply are not implicated in the matter under review.

The following is a summary of the allegations contained in the Analysis and, for each possible violation, a description of the actions undertaken to respond, together with legal argument, where appropriate, relating to the Treasurer's obligations under the Act.

A. Misstatement of Financial Activity

The Analysis states that the auditors found that the Committee "understated its disbursements by over \$9,700 due to math errors and the failure to report certain disbursements."

As the Final Audit Report indicates, the Committee supplied the auditors with a list of the disbursements which had

not been reported. The documentation for these disbursements has now been located, and a copy of this documentation is attached hereto as Exhibit A. Only four disbursements are involved. Two of these disbursements are represented by checks, and a copy of the cancelled checks is attached. The other two "disbursements" require more explanation. One of these "disbursements" was an erroneous \$3,000 "transfer" from the Committee account to Mr. McDougall's personal banking account. This transfer occurred because Mr. McDougall's secretary accidentally deposited his personal funds in the Committee account. When this error was detected, the funds were transferred out of the account. Copies of the appropriate credit and debit statements, together with the original deposit receipt,<sup>2</sup> are included in Exhibit A.

The "transfer" for \$285.60 really was not a transfer at all. Instead, it was a simple disbursement, by certified check, to the Lowell Sun.

Finally, the relevant committee reports have been amended to reflect these disbursements, and they are attached hereto as Exhibit B.

---

/2/ The deposit receipt for \$3,000 on September 17, 1984 bears the handwritten note "56-331-5". That was Mr. McDougall's personal account number, which he wrote on the slip so his secretary would know what account to transfer the improperly deposited funds to.

B. Documentation for Contributions

3 0 4 0 7 0 1 5 4 6  
The Analysis alleges that during the audit the "Committee could not produce contribution records for nearly \$72,000 of its contributions." The Analysis states that deposit records for the Committee indicated contributions totalling \$280,269, but that the Committee produced underlying records totalling only \$208,489, for a difference of \$71,810. The Analysis also notes that the Committee was advised to obtain and submit the missing records by November 7, 1985, but did not produce the records until March 5, 1986. At that time, the Audit Division received check contribution documentation totalling \$58,326.

In the first place, it is incorrect to state that missing contribution records initially totalled \$71,810. The Audit Committee apparently arrived at that figure by subtracting \$208,459 from total contributions of \$280,269. However, the \$208,459 figure was taken from the column on the auditor's worksheet reflecting only the total amount of checks that had been supplied to the auditors. In addition to the checks supplied, the auditors verified \$7,314 in cash deposits. Thus, the total discrepancy was \$64,496, as reflected on the auditor's worksheet itself. A copy of the auditor's worksheet is attached hereto as Exhibit C.

Of the \$64,494 in missing records, \$58,326 in checks were supplied on March 5, 1986. Thus, only \$6,170 in contributions, not \$13,484, remain to be supported.

3 8 0 4 0 7 0 1 5 4 7

A review of the auditor's worksheet reveals three substantial deposits where some, but not all, of the supporting documents were supplied to the auditors: (1) on June 12, 1984, the Committee deposited \$3,269.97, but it only supplied checks totalling \$839.97, leaving a balance of \$2,430; (2) also on June 12, 1984 the Committee deposited \$4,260, but it only supplied checks for \$2,550, leaving a balance of \$1,710; and (3) on August 30, 1984, the Committee deposited \$8,506.32, but it only supplied checks for \$6,506.32 leaving a balance of \$2,000. In sum, these three deposits account for \$6,140 of the \$6,170 in unsupported contributions.

The deposit slips for these three days and the related checks are attached hereto as Exhibit D.<sup>3</sup>. The deposit slips illustrate that the difference between checks and deposit slips on June 12, 1984 can be attributed entirely to cash deposits. Those cash deposits totalled \$4,440.<sup>4</sup> All of

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/3/ The checks had to be obtained directly from the bank. The bank does not maintain copies of cancelled checks by account number, but only by date of deposit. Thus, to obtain the checks it was necessary to examine all deposits made at the bank on the dates in question. This timely, costly and cumbersome process is a good example of the efforts of Mr. McDougall to respond to the audit issues once he became aware of them and is typical of the difficulties that have been encountered in producing the requested documents and information.

/4/ The cash deposits were \$2,730 and \$1,710. In fact, only \$539.97, not \$839.97, of the \$3,269.97 deposit was represented by checks. The \$839.97 figure on the worksheet -- representing checks reviewed by the auditors for that deposit -- probably is an error.



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this cash was received at a \$10 per person fund raiser which took place at Windsor Mills Restaurant in Dracut, Massachusetts, on or about June 10, 1984. See Affidavit of Martin Meehan ¶7, attached hereto as Exhibit E.

The August 30, 1984 deposit slip shows a \$805 cash deposit. This cash deposit, together with the checks supplied, total \$8,506, and explains the \$2,000 balance for this deposit indicated on the auditor's worksheet.

The above information concerning the deposits on June 12, 1984 and August 30, 1984 supports an additional \$6,140 in contributions. This supports all but \$30 of the previous unsupported balance of \$6,170. Thus, with this submission over 99.9% of Committee contributions have been fully documented.

C. Documentation for Transfer from Affiliated Committee

The Analysis states that the auditors were not supplied with information to determine the source of funds used to purchase a \$20,000 certificate of deposit on April 29, 1983, which funds allegedly were transferred from the State Senate Committee to the Committee. In addition, it is alleged that the Committee failed to amend its Statement of Organization to list the State Senate Committee as an "affiliated" committee, and that the State Senate Committee may have violated the Act by failing to register and report as a "political committee" under the Act.

At the outset, it should be noted that the obligations of the State Senate Committee to register and report are not obli-

gations of Mr. McDougall as Treasurer of the Committee. Mr. McDougall is obligated to keep records concerning contributions to and disbursements from the Committee, and to file reports on behalf of the Committee. Reports concerning transfers from another "political committee" need not detail sources of funds since it is the responsibility of the "political committee" to file its own reports.

Nevertheless, in an effort to respond to each and every issue raised by the Commission, Mr. McDougall has undertaken to obtain the information requested by the Commission.<sup>15</sup> To do

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/5/ The law is unclear with respect to the obligations of a committee to inquire into the source of funds transferred from another "political committee". The Act only prohibits persons from "knowingly" "accepting" an improper contribution, and places the onus for determining the permissibility of a contribution on the contributor. See 2 U.S.C. §§441a(a) and (f); 441b(a). The regulations also do not appear to impose an affirmative duty to inquire. For example, 11 C.F.R. §102.6(a)(iv) states that transfers "shall be made only from funds which are permissible under the Act," but this statement is directed to the transferor committee, not the transferee. And although 11 C.F.R. §103.3(b)(1) speaks in terms of the Treasurer making "best efforts" to determine the permissibility of a contribution, it is clear that under this subsection that obligation only attaches to "contributions which appear to be illegal." Id.

Thus, it is Mr. McDougall's position that he had no obligation to inquire into the source(s) of the transferred funds. This is particularly true here, because Mr. McDougall was not the person who "accepted" the funds as that term is used in the Act. Nevertheless, it should be noted that when this transfer took place, the Committee did inquire into the source(s) of the State Senate Committee funds, and took steps to return all labor organization funds. See Meehan Affidavit, ¶¶1-6.

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so, Mr. McDougall followed the guidance offered in the Analysis (at p.5, n.1) and obtained records concerning the last \$20,000 in funds deposited in the State Senate Committee account prior to April 29, 1983. The relevant bank statements, deposit slips, and State Senate Committee reports detailing the contributions have been reviewed by Martin Meehan, Campaign Manager of the Committee. They demonstrate that nine contributions from labor organizations were received during the relevant time period. Seven of these were returned prior to the transfer. The two labor contributions that apparently were not returned were a \$100 contribution in April 1983, and a \$200 contribution in June 1982. See Meehan Affidavit, ¶6.

Finally, Mr. McDougall has prepared an amended Statement of Organization, listing the State Senate Committee as an "affiliated" committee. This amended Statement of Organization has been filed with the House of Representatives, and a copy is attached hereto as Exhibit F.

D. Documentation for Disbursements

The Analysis states that "the Committee failed to provide documentation for four disbursements in the form of bank transfers totalling \$33,286." The documentation requested is attached hereto as Exhibit G. It demonstrates that two bank transfers, one for \$25,000 and one for \$5,000, were transferred from the Committee account at First Bank to Mr. Shea's personal account, and thereafter to the Bank. These transfers were in

partial repayment of a loan from the candidate, Phil Shea, to the Committee totalling \$60,000. Mr. Shea, in turn, had obtained a \$60,000 line of credit from the Bank, and the transfer was payment on that loan and line of credit.

The \$3,000 and \$286 "transfers" have already been explained above, see supra p.6.

### Conclusion

In sum, Mr. McDougall has now provided all the record-keeping information requested by the Commission. This information reveals no violations of the substantive proscriptions of the Act, but, at worst, possible violations of record-keeping requirements which have now all been remedied. In addition, as stated previously, Mr. McDougall simply was not informed, or was misinformed, concerning the audit and previous letters and reports from the Commission. At considerable personal time and expense, Mr. McDougall has now done his best to provide all the information requested.<sup>6/</sup> The Commission need take no further action against Mr. McDougall to ensure that the standards and principles embodied in the Act are properly enforced.

Mr. McDougall also formally requests that the Commission enter into pre-probable cause conciliation, if necessary.

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/6/ The Act and regulations state at several points that a Treasurer must use "best efforts" to discharge the record-keeping and reporting requirements. Clearly, Mr. McDougall has satisfied this standard.

I certify on the basis of my personal knowledge, information and belief, that the foregoing statement is true. Signed under the pains and penalties of perjury this 30th day of July, 1986.

  
Frank G. McDougall, Jr.

Dated: July 30, 1986

VS-3476/m  
7/29/86

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88040701553

EXHIBIT A




379

PHIL SHEA CONGRESSIONAL COMMITTEE 100-88 9-3-84 53-691 113

PAY TO THE ORDER OF Frank Boruff \$ 5,000

Five thousand DOLLARS

CHELMSEFORD  FIRST BANK

PROCESSED

MEMO

⑆011306913⑆ ⑈77 540 ⑈ 0379 ⑈000050000⑈

ADVICE  
OF DEBIT



Date 9/20/84

775401 We have this day debited your account \$ 3,000.00  
Covering: TRANSFER TO 563315

MAIL  
TO

FRANK MCDOUGALL

Approved by

LJF

⑈ 77 540 1 ⑈

Customer Receipt

56-3315



**FIRST  
BANK**  
Member FDIC  
256-2565

- ☒ Checking/NOW  
☐ Credit Card  
☐ Safe Deposit  
☐ Loan  
☐ Other

Savings Deposit ☐  
Savings Withdrawal ☐

All deposited items are received for collection.  
All credits for these items are provisional.

The Deposit or Withdrawal for which this receipt is issued is subject to the rules and regulations of the bank

075 07 9-17-84#093 \$3,000.00 D

Thank you for banking with us.

Rev 12/83 SM

ADVICE  
OF CREDIT



Date 9/20/84

563315 We have this day credited your account \$ 3,000.00  
Covering: TRANSFER FROM ACCOUNT 775401

MAIL  
TO

FRANK MCDOUGALL

Approved by

LJF

⑈ 56 331 5 ⑈

389

PHIL SHEPARD CONGRESSIONAL COMMITTEE

9-5-1984

63-691  
113

PAY TO THE ORDER OF

VEGA, LUIS  
C/O 112 BOYLSTON ST  
CHELSEA, MA 02156

POSTMASTER: RETURN TO  
112 BOYLSTON ST  
CHELSEA, MA 02156

SEP 06 84

\$ 1,736.41

THOUSAND SEVEN HUNDRED THIRTY SIX 41/100 DOLLARS

MEMO

0000017864

83 140701557

PAID

239

*Handwritten:* 123  
To the order of *[illegible]* \$25.00  
*[illegible signature]*  
123 (K 22)  
27-540-1  
55000000-2500

• • NOTICE OF DEFICIT OR UNCOLLECTED FUNDS • •

to

38040701558

EXHIBIT B

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page \_\_\_\_ of \_\_\_\_ for  
**LINE NUMBER** \_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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)

Phil Shea for Congress Committee (October 15 Quarterly Report) (1984)  
 (Amended)

A. Full Name, Mailing Address and ZIP Code F. Baraff Assoc., Inc. 604 Riverside Drive New York, NY 10031	Purpose of Disbursement Media Consultant	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/3/84	\$5,000.00
B. Full Name, Mailing Address and ZIP Code U. S. Postmaster Lowell, MA	Purpose of Disbursement Bulk Mailing	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	9/5/84	1,736.41
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			6,736.41
TOTAL This Period (last page this line number only)			\$117,452.62



## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page \_\_\_\_ of \_\_\_\_ for  
 LINE NUMBER \_\_\_\_  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

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)

Phil Shea for Congress Committee (July 15 Quarterly Report) (1984)  
 (Amended)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Wooden Shoe Hampshire Street Cambridge, MA	Media/Brochures Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/21/84	\$ 3,495.00
B. Full Name, Mailing Address and ZIP Code Jack Keefe 275 Old March Hill Road Dracut, MA	Purpose of Disbursement Orchestra Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/30/84	275.00
C. Full Name, Mailing Address and ZIP Code Attorney George Eliades 133 Market Street Lowell, MA 01852	Purpose of Disbursement Rent Lowell Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/7/84	386.75
D. Full Name, Mailing Address and ZIP Code Lowell Sun 15 Kearney Sq. Lowell, MA	Purpose of Disbursement Media Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/14/84	285.60
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	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) . . . . .			\$59,378.72

23040701560

R 8 0 4 0 7 0 1 5 6 1

EXHIBIT C

PHIL S. DE CONGRESS  
REVIEW OF RECEIPT DOCUMENTATION

JPM

5/27/85

PG 1/2

1	2	3	4	← DOCUMENTATION FOR	
				CHECKS	
DEPOSIT # / REFERENCE	DATE OF DEPOSIT	DEPOSIT TOTAL R R B K SMT	# OF ITEMS	# AMT	
1					
2	#1	3.30.84	7025.00	30	7025
3	#2	4.02	3000.00	3	3000
4	#3	4.02	180996	35	18099
5	#4	4.02	398781	20	247
6	#5	4.12	179493	24	1794
7	#6	4.30	695.00	10	695
8	#7	5.03	4480.00	10	4480
9	#8	5.08	7755.00	101	7755
10	#10	5.23	980.00	21	980
11	#11	5.23	8275.00	94	8265
12	#12	5.18	770.00	8	180
13	#13	5.18	1050.00	2	1050
14	#14	5.21	2009.00	97	1840
15	#15	5.12	326997	16	839
16	#16	6.12	12305.00	51	12305
17	#17	6.12	3800.00	19	3800
18	#18	6.12	4260.00	31	2550
19	#19	6.13	4755.00	11	1185
20	#20	6.12	7575.00	58	74025
21	#21	6.25	4100.00	10	4100
22	#22	6.25	7799	8	6999
23	#23	6.25	650.00	NOT	FOUND
24	#24, 25, + 26	6.25	{ 3600.00 4000.00 2750.00 }	24	10350
25					
26	#27	6.22	220250	NOT FOUND	
27	#28	6.22	750.00	NOT FOUND	
28	#29 + #30	6.22	595.00	15	1065
29	#31	6.22	245.00	4	235
30	#32	6.28	6425.00	13	6425
31	#33	6.28	900.00	19	900
32	#34	6.28	225.00	3	75
33	#35	6.28	4530.00	36	4530
34	#36	6.28	4250.00	21	4250
35	#37	6.28	4700.00	21	4400
36	#38	6.28	14175.00	36	14175
37	#43	7.02	10275.00	35	10275
38	#44	6.29	1165.00	4	35
39	#45	6.29	500.00	1	500
40	—	6.29	200.00	NOT FOUND	
41	—	6.29	410.00	NOT FOUND	
42	SUBTOTAL 261		14765416	983	12914016
43					
44	SOURCE: Cont. Contribution Documentation, R R SMTS				
45	PURPOSE: see title				
46					

DOCUMENTATION STATES "WITH CASH". HOWEVER, ALL OF CASH DEPOSITS COULD HAVE BEEN DEPOSITED

SPD 937

83040701562

83040701563

BY CMTE-	TOTAL	
CASH	VERIFIED RE	DIFFERENCE
AMT VERIFIED	DOCUMENTATION	*
	7025 <sup>00</sup>	-
	3000 <sup>00</sup>	-
	1800 <sup>96</sup>	-
3740 <sup>00</sup>	3987 <sup>81</sup>	-
	1794 <sup>93</sup>	-
	695 <sup>00</sup>	-
	4480 <sup>00</sup>	-
	755 <sup>00</sup>	-
130 <sup>00</sup>	930 <sup>00</sup>	-
	8265 <sup>00</sup>	10 <sup>00</sup>
590 <sup>00</sup>	770 <sup>00</sup>	-
	1050 <sup>00</sup>	-
169 <sup>00</sup>	2000 <sup>00</sup>	-
	2399 <sup>7</sup>	2430 <sup>00</sup>
	12305 <sup>00</sup>	-
	3800 <sup>00</sup>	-
	2550 <sup>00</sup>	710 <sup>00</sup>
2685 <sup>00</sup>	3870 <sup>00</sup>	865 <sup>00</sup>
	7402 <sup>50</sup>	17250 <sup>00</sup>
	4100 <sup>00</sup>	-
	699 <sup>99</sup>	80 <sup>00</sup>
	>	630 <sup>00</sup>
	10350 <sup>00</sup>	-
		2202 <sup>50</sup>
		750 <sup>00</sup>
	1065 <sup>00</sup>	120 <sup>00</sup>
	225 <sup>00</sup>	20 <sup>00</sup>
	6485 <sup>00</sup>	-
	900 <sup>00</sup>	-
	75 <sup>00</sup>	150 <sup>00</sup>
	4530 <sup>00</sup>	-
	4250 <sup>00</sup>	-
	4400 <sup>00</sup>	300 <sup>00</sup>
	14175 <sup>00</sup>	-
	0275 <sup>00</sup>	-
①	35 <sup>00</sup>	130 <sup>00</sup>
	800 <sup>00</sup>	-
		200 <sup>00</sup>
		410 <sup>00</sup>
7314 <sup>00</sup>	136454 <sup>16</sup>	11200 <sup>00</sup>



PHIL SMIL FOR CONGRESS  
REVIEW OF RECEIPT DOCUMENTATION

JPM

DG 2/2

3/27/85

1	2	← DOCUMENTATION	
		← DEPOSIT	← CHECKS
DEPOSIT # / REFERENCE	DATE OF DEPOSIT	DEPOSIT TOTAL PER BIL STMT	# OF ITEMS # A1
1 subtotal from page 1	-	147654.16	983 1291
2			
3 NO DEPOSIT # / REFERENCE FOUND FOR THESE	7.24.84	604.00	NOT FOUND
4	7.24	2500.00	" "
5	7.24	2885.00	" "
6	7.24	3940.00	" "
7	7.24	6300.00	" "
8	8.09	250.00	NOT FOUND
9	8.09	1230.00	" "
10	8.09	1825.00	" "
11	8.09	2720.00	" "
12	8.14	1500.00	" "
13	8.21	650.00	" "
14	8.21	2000.00	" "
15	8.21	6963.64	" "
16 Bob Kelly 8/20	8.21	725.00	15 725
17 MISC 8/21	8.21	9868.50	59 10138
18 Pawtucket Party 8/20	8.21	10875.00	72 10825
19 Fundraising Letter 8/21	8.21	4860.00	72 4680
20 Rizzo II	8.21	3925.00	22 3750
21	8.22	2360.00	NOT FOUND
22	8.28	3350.00	NOT FOUND
23	8.29	4740.00	NOT FOUND
24 MISC 8/24	8.29	7415.00	29 7415
25	8.30	8506.32	48 6506
26	9.04	5740.00	43 5758
27 MISC 9/6	9.06	945.00	18 945
28 Murphy 9/6	9.06	3400.00	32 3400
29	9.06	2400.00	NOT FOUND
30	9.07	300.00	" "
31	9.07	7175.00	" "
32	9.12	8065.00	43 8065
33	9.17	2800.00	66 2800
34	9.17	3150.00	39 3250
35	9.17	1895.00	NOT FOUND
36	9.17	3000.00	NOT FOUND
37	9.18	1455.00	30 1455
38	9.26	1320.00	15 1320
39	10.12	961.20	3 24120
40 DEPOSIT DOCUMENTATION WHICH COULD NOT BE			
41 ATTRIBUTED TO ANY PARTICULAR DEPOSIT - APRIL		-	4 1150.00
42 MAY		-	52 4240.00
43 SOURCE } see prior page JUNE		-	17 1180.00
44 EXPENSE } AUGUST		-	16 1475.00
45			
46 TOTAL RECEIPTS 3/27/84 - 10/15/84		270268.82	1728 208458.68

88040701564

98040701565

PROVIDOR	DATE	TOTAL	VERIFIED PER DOCUMENTATION	DIFFERENCE
4096	7314.00	15615.16	11200.00	
			600.00	
			2500.00	
			2875.00	
			3940.00	
			4300.00	
			250.00	
			1230.00	
			1825.00	
			2720.00	
			1500.00	
			650.00	
			2000.00	
			6463.64	
		725.00		
		10138.00	<26950>	
		10825.00	50.00	
		4630.00	180.00	
		3750.00	175.00	
			2360.00	
			3350.00	
			4760.00	
		7415.00		
		6506.32	2000.00	
		5758.00	<1800>	
		945.00		
		3400.00		
			2400.00	
			300.00	
			7175.00	
		8465.00		
		2800.00		
		3250.00	<1000>	
			1875.00	
			3000.00	
		1455.00		
		1320.00		
		24120.00	720.00	
		1150.00	<1150.00>	
		4240.00	<4240.00>	
		1180.00	<1180.00>	
		1475.00	<1475.00>	
	7314.00	215772.62		



88040701566

EXHIBIT D

11900-2002

072 07 612/040371

050864, 97 5

1010  
1011

22

**CONSANGV**

2750

COIN

**CHECKS**

53-6211-113



421-13

20

45-48

24

4-11-68

20

**Figure 1**

10

5221

83-67-483

52



11-25-61



7-13

1

53 750-114

75 75 75

3452

1

PERSONAL  
CHECK



Phil Shea

01568

NOT VALID OVER \$250.00

Pay to the order of

761 William St.

000000000000

000000000000

000000000000

LINDA J. KAWA  
102 GREENMONT AVE.  
DRACUT, MA 01820

Pay to the order of Phil  
\$5.00 dollars



000000000000

000000000000

FOR REPORT ONLY  
PHIL. 37-18A  
FOR CONGRESS COMMITTEE

FOR REPORT ONLY  
PHIL. 37-18A  
FOR CONGRESS COMMITTEE

FOR REPORT ONLY  
PHIL. 37-18A  
FOR CONGRESS COMMITTEE

3 3 2 4 0 7 0 1 5 5 9

1096

DATE: 10/22/78

TO: *Don Campbell*

FOR: *One hundred*

*Don Campbell*

000000 100000

6266371337C 880358150

3099

100 EAST BROAD DRIVE  
ORACUT, MA 01822

*Phil Shea Inc. Lawyers Conn*

*NINE + Nine*

**Union National**  
A COMMERCE BANK

*John P. Shea*

FOR REPORT ONLY  
FBI-SEA  
FOR CONGRESS COMMITTEE





FOR REPORT ONLY  
PHIL SHERA  
FOR CONGRESS COMMITTEE

FOR REPORT ONLY  
PHIL SHERA  
FOR CONGRESS COMMITTEE

FOR REPORT ONLY  
PHIL SHERA  
FOR CONGRESS COMMITTEE



757-100-4

FOR DEPOSIT ONLY  
FIVE SHEET  
FOR CONGRESS COMMITTEE

80040701375

101  
May 23 54  
Committee to Study the  
Twenty and Twenty  
National  
Donor  
John C. Longenecker  
CO113004562 #50 250000 0101 67 #0000002000

U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION  
May 23, 1954  
161  
PART 500 for Congress Committee  
Twenty and Twenty  
CO113004562  
12-1058-07

TALK OF THE TOWN OF DRACUT  
14 BROADWAY ROAD  
DRACUT, MA 01928  
Mr. J. Edgar Hoover  
Washington, D.C.  
Dear Sir:  
Enclosed please find  
Twenty and Twenty  
National  
Donor  
John C. Longenecker

FOR DIRECT ONLY  
PWL 2-24  
FOR CONGRESS CONSIDERATION

FOR DIRECT ONLY  
PWL 2-24  
FOR CONGRESS CONSIDERATION

00040701371





569

ELLEN M. DILLON  
PAUL M. DILLON

*Handwritten:* The Union National Bank

Union National Bank  
100 State Street  
Boston, MA 02109

*Signature:* Ellen M. Dillon

⑆000000000000⑆

547

STEVEN JONCAS  
14 BIRCH STREET  
WELL, MA 01882  
TEL. 464-1003

*Handwritten:* I am to Elect Mr. Joncas  
Four hundred and no. 400.00

The Central Bank

*Signature:* Steven Joncas

⑆000000400000⑆

83040701579

3503.32 \*

7-10-1968

1333

83040701580

88040701581

1000.00 +	200.00 +
400.00 +	400.00 +
100.00 +	200.00 +
100.00 +	50.00 +
25.00 +	25.00 +
10.00 +	400.00 +
100.00 +	400.00 +
50.00 +	21.32 +
50.00 +	15.00 +
200.00 +	100.00 +
200.00 +	100.00 +
200.00 +	5.00 +
200.00 +	25.00 +
200.00 +	10.00 +
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200.00 +	25.00 +
200.00 +	25.00 +
200.00 +	50.00 +
200.00 +	300.00 +
200.00 +	45.00 +
200.00 +	40.00 +
200.00 +	5.00 +
200.00 +	7701.32 *
100.00 +	
10.00 +	
0.10 +	
9.90 +	
50.00 +	
200.00 +	
200.00 +	

00-384-23-6  
077 07 0/27/194403  
#0072-006277 540 1 M\*

TOTAL  
DEPOSIT  
\$5,000.00

COIN

## CHECKS

[illegible]

PAUL ROUTHIER  
JUL 21 1964  
CINCINNATI OHIO

169

AUGUST 11 1964 53-691  
113

Pay to the  
order of

Phil Shea for Congress Committee - - - \$ 100.00

One hundred dollars and no/100 - - - - - DOLLARS



*Paul Routhier*

60113069136 489 601 94 0169 55/0000010000/

9 8 1 3 0 7 1 5 8 3





Armen J. Karamanian  
 POST OFFICE LOUISBURGH  
 100 GORHAM STREET  
 LOWELL, MA 01852

2609

Aug 24 1984 53-001  
 113

PAID TO THE ORDER OF Phil Shea for Congress Comm 100.00

One Hundred 00 / 100 DOLLARS

*Armen J. Karamanian*

⑆001106913⑆ ⑆32 320 1⑆ 2609 ⑆5⑆00000010000⑆

PAUL A. BAIN  
 120 Middle Street  
 Lowell, MA 01852

8/22 1984 53-001  
 113

PAID TO THE ORDER OF Phil Shea For Congress Committee 50

FIFTY and 00 / 100 DOLLARS

*Paul A. Bain*

⑆001106913⑆ ⑆51 047 18⑆ 0003 ⑆5⑆00000005000⑆

HARRY L. BAIN  
 137 LINCOLN PARK  
 WELLS, MA 01885

304

PAID TO THE ORDER OF Phil Shea

Fifty 00 / 100 DOLLARS

*Harry L. Bain*

⑆001106913⑆ ⑆00 632 03⑆ 14 ⑆00000005000⑆

111  
53 691

111

111



WINFRED A. KEEFE 4-52  
95 BUTTERFIELD ST.  
LOWELL, MA 01853

711

10-2113

Committee to Elect the new  
Two Hundred



WINSTON-SAVENBURY BANK  
2000 WASHINGTON ST. WASHINGTON, D.C. 20001

Winthrop Savings Bank

42663740046 01 7500317 50 0000 000000

SUSAN M. PERRAULT  
4 HIGMAN STREET  
LAWRENCE, MA 01840

3041

113

Two Hundred  
Merrimack Valley  
Merrimack Valley N.A.  
Massachusetts

4066306666 176 2656 3041 000000 000000

JOHN PAPPANAS  
J.P. REALTY  
100 PLEASANT ST.  
METHUEN, MASS.

7443

113

Shen For Congress in the 8 200 7/10  
left 200 0000

ARLINGTON TRUST CO.  
ARLINGTON, MASS.

40663066700 4 0 000 50

83040701588



JAMES E. RICCI

P.O. Box 83

BRADFORD MA 01830

Shoe Committee

two hundred

**Arlington Trust**

Lawrence  
Massachusetts

⑆01830⑆⑆70⑆ ⑆47 7947 9⑆

⑈00000⑈00000⑈

*James E. Ricci*



CHRISTOPHER J. RIZZO

BARBARA J. RIZZO

151 BUNFORD STREET

LAWRENCE, MA 01840

Pay to the  
Order of

*Shoe Committee*

*Two Hundred*

**Arlington Trust**

Lawrence  
Massachusetts

⑆01830⑆⑆70⑆ ⑆38 7487 ⑆⑆

⑈00000⑈00000⑈

*Christopher J. Rizzo*

MICHAEL J. TAREHI  
ATTY AT LAW

*August 21*

PAY TO THE  
ORDER OF

*Spec. for Congress Committee*

*Two Hundred*

*100.00*

⑆001647⑆ ⑆00000⑆⑆10⑆





EUGENE J O'NEILL  
SUSAN O'NEILL  
141 BROADWAY  
HAVERHILL, MA 01930

*Ph. Shea for Congress*  
*to H. DALL*  
ARLINGTON TRUST COMPANY  
HAVERHILL, MASSACHUSETTS

CO 113011700 P44 4780 BP

000000200000

ATTORNEY ROBERT F. KELLEY  
211 ESSEX STREET  
LAWRENCE, MA 01840

3732

August 21 1964

PAY TO THE  
ORDER OF

Shea For Congress

associates \$ 200.00

ARLINGTON TRUST COMPANY  
LAWRENCE, MASSACHUSETTS

CO 113011700 P93 0495 BP

000000200000

MARIE A. LABOND  
21 ABBOTT STREET  
LAWRENCE, MA 01840

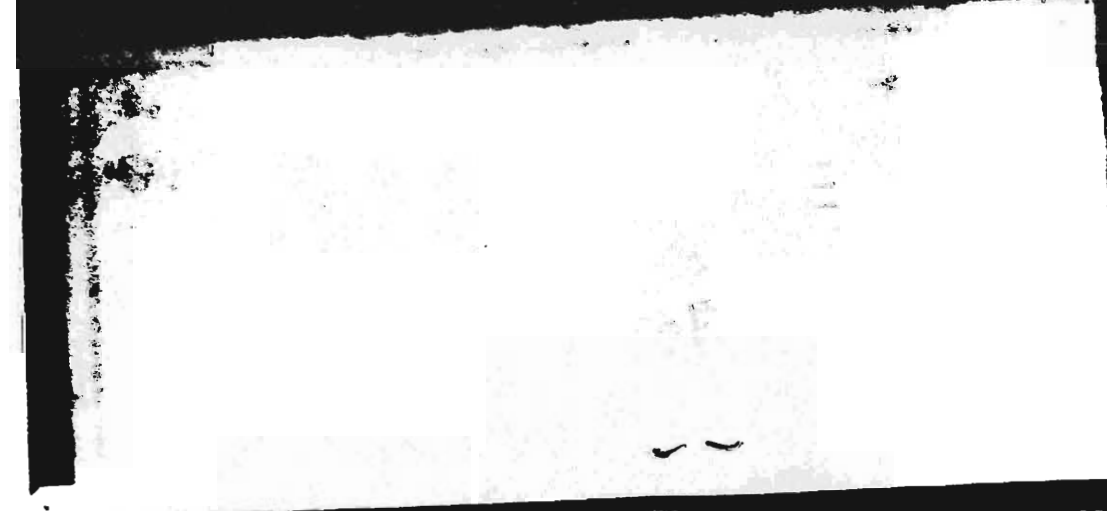
PAY TO THE  
ORDER OF

*P.*

LAWRENCE SAVINGS BANK  
LAWRENCE, MASSACHUSETTS



CO 113011700 P00 16500 00 000



INEZ ACCURSIO  
157 SUTTON HILL RD.  
NORTH ANDOVER, MA 01845

Aug 30 1964  
Pay to the order of *Shea for Congress Committee*  
*Two Hundred and 90/100*

ARLINGTON TRUST COMPANY  
LAWRENCE, MASSACHUSETTS

⑆066306670⑆ ⑆67 3977 9⑆

*Ray Beaman*

⑆00000⑆00000⑆

JOHN J. BUCO TRUCKING  
207 EAST STREET  
METHUEN, MA 01844

1749

*Shea for Congress Committee*

Aug. 23 1964

53-117  
113

\$ 200.00

DOLLARS

ARLINGTON TRUST COMPANY  
LAWRENCE, MASSACHUSETTS

⑆066306670⑆ ⑆07 4906 0⑆

⑆00000⑆00000⑆

ABRAHAM BASHARA

530

Aug 21 1964  
Pay to the order of *Shea for Congress Committee*  
*Two hundred*

ARLINGTON TRUST COMPANY  
LAWRENCE, MASSACHUSETTS

⑆066306670⑆ ⑆42 3500 ⑆

⑆00000⑆00000⑆

88040701594

JACK & MARY H. LEAHY  
45 SPRING ST.  
LOWELL, MA 01852

PAY TO THE ORDER OF

Committee to elect H. [unclear]  
Two Hundred

FOR SERVICE

donation

⑆26637808⑆ 23 567553⑆ 0728 ⑆00000000⑆

K W ENTERTAINMENT AGENCY  
P. O. BOX 98  
LOWELL, MA 01852



Pay to the order of  
Two Hundred Dollars

July 18 84  
200.00



BANK OF BOSTON

Pay to the order of (2 Trustees)  
⑆00020⑆ ⑆011301662⑆

John O. [unclear]  
12-1056

⑆00000000⑆

CAROL A. SLAVIN  
27 BALCONY RD  
PELHAM, MA 01968

Committee to elect [unclear]  
One Hundred Dollars

Union National Bank

Lowell, Massachusetts 01852

⑆011301662⑆





GEORGE M. CUNHA  
ANN M. CUNHA  
418 ROBERT ST.  
LOWELL, MA 01850

2428

TO THE

*Common to elect Phil Shea*



*George M. Cunha*

001137162146 1 09 055385P 2428 000000000000

M. BRINDAN FLEMING  
BERNICE E. FLEMING

1307

13 700 200

*Common to elect Phil Shea*

*copy*

*Bernice E. Fleming*

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PULASKI CLUB INC.  
400 CENTRAL STREET  
LOWELL, MA 01850

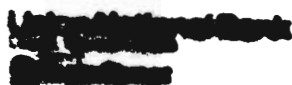
7769

*Nov 27 1987*

*Phil Shea for Congress Committee*  
*FIFTY*

*\$*

100 CENTS



*Lyette J. ...*  
*John J. ...*

*From ...*

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1954

20

117

10-10-68

53-65



111

42

MICHAEL L. GRIECO

August 23, 1984

PAY TO THE  
ORDER OF

Shea For Congress Committee

\$

Two Hundred

**Washington Trust**  
LAWRENCE  
MASSACHUSETTS  
company

⑆066301170⑆ ⑆38 3257 0⑆

⑈000002000⑈

ATTORNEY MICHAEL J. EARLY  
BUSINESS ACCOUNT  
25 KENDALL AVENUE  
HAVERHILL, MASS 01830

RESERVANCE ADVICE

841

PAY

Two Hundred

DOLLARS

PAY

TO THE ORDER OF

PAUL SHEA COMMITTEE

FOR AMOUNT

841

⑆066301170⑆ ⑆08 2848 ⑆

EDWARD T. COOREY  
335 COMMON STREET  
LAWRENCE, MA 01840

1835

8 2, 1984

PAY TO THE  
ORDER OF

Shea For Congress Committee

\$

Two Hundred

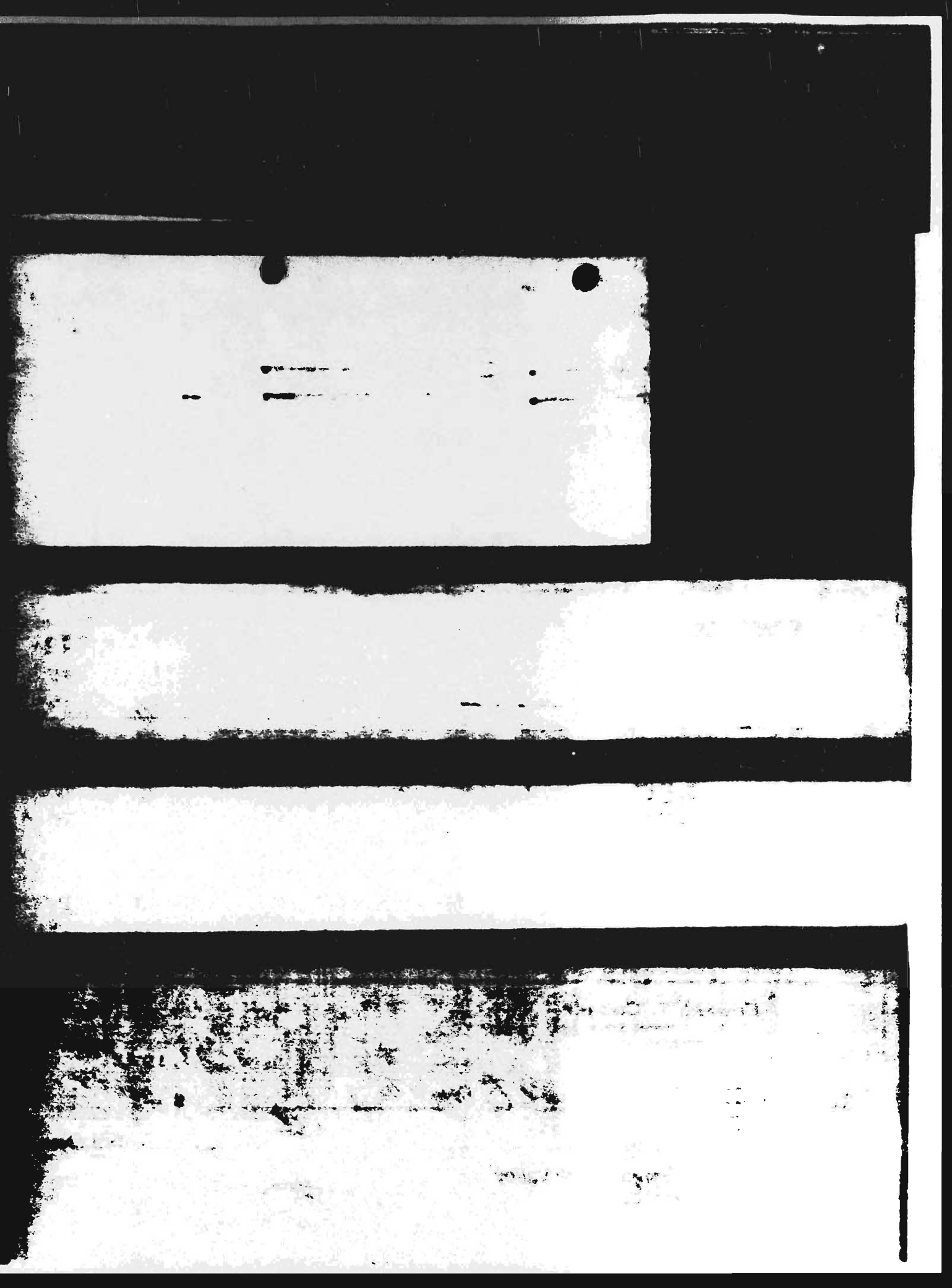
**BayBank Merrimack Valley**

MASSACHUSETTS  
LAWRENCE, MA

FOR

⑆066301170⑆ ⑆58 2848 ⑆

⑈00000⑈



BARBARA POPCHER  
WILMER POPCHER  
22 FAIRBANKS ROAD  
CHELMSFORD, MA 01864

2415

8 25 1984 53-001  
113

PAY TO THE  
ORDER OF

Committee Elsie Phil 3100 00

One thousand 00 DOLLARS

*ASchultz*

00113069130: #63 983 SP 2415 55/000000100000

RAYMOND R. ROWE, JR.  
MARY I. ROWE  
20 GREENWICH RD.  
DRAUT, MA 01826

358

6 26 84 53-001  
113

Phil Shanahan for Congress. 25 00  
Twenty Five 00

*Tha. Rowe*

00113069130: #00 618 08P 0358 55/000000025000

PHILIP E. GIBSON  
PHILIP E. GIBSON, JR.  
204 STEVENS STREET  
LOWELL, MA 01851

3172

53-001  
113

PAY TO THE  
ORDER OF

July 30 84  
Phil Shanahan Committee 10.00  
Ten 00

*Philip E. Gibson*

00113069130: #43 798 0P 3172 55/000000010000



JAMES J. OR GAIL M. WALSH  
78 BARTLETT ST.  
CHILMARK, MA 01924

645

PAY TO THE  
ORDER OF

*Committee to elect Phil Shea*  
*On Hand*

First Trust Company  
Chilmark, MA

60113023574 567 226 30 0045

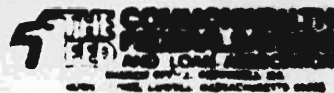
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JOHN W. LYNCH, JR.  
78 MILL STREET  
EAST PEPPERELL, MASS 01827

3169

PAY TO THE  
ORDER OF

*Phil Shea Campaign for Governor 100-*  
*On Hand*



62113701054 0588 34088 33 3169

000000000000

ROGER A. YOUNG  
600 BROADWAY 2D  
SACRAMENTO, CA 95811

PAY TO THE ORDER OF

*Shea for Governor Campaign*  
*One hundred and no/100*

NEW ENGLAND MERCHANTS NATIONAL BANK  
BOSTON, MASSACHUSETTS

60110001134 5949-69920

000000000000

HENRY F. BOWEN  
LEONARD L. BOWEN  
60 ARDEN ST  
LOWELL, MA 01852

PAY TO THE  
ORDER OF

*Committee to elect Phil Shea*  
*One hundred and no/100*

United National Bank  
Lowell, MA

*Aug. 24, 84*  
*Henry F. Bowen*

33040701503



J. ARTHUR POITRAS, III  
11 CAMILLA AVE.  
ORACUT, MA 01826

PAY TO THE  
ORDER OF

*SON Phil Sizer*  
*One Hundred and*

**THE LOWELL**  
**SAVINGS BANK**  
LOWELL, MASSACHUSETTS 01854

**LOWELL TRAINER**

⑆011371337⑆ 880122783⑆

⑈0000010000⑈

VINCENT J. BURKE 400  
TEL. 917-422-5400  
1000 STREET  
EAST PEPPERELL, MA 01437

PAY TO THE  
ORDER OF

*son To Phil Sizer*  
*One Hundred*

\$ 100.00  
100

MINUTEMAN TRUST COMPANY  
NATIONAL AUTOMATIC BANK



MEMO

⑆011400194⑆ 845-532-7006

⑈0000010000⑈

RALPH R. KAPLAN  
MARY KAPLAN  
130 FLORENCE RD  
LOWELL, MA 01851

PAY TO THE  
ORDER OF

*Phil Sizer*  
*FIFTY AND*

**United National Bank**  
NATIONAL AUTOMATIC BANK

⑆00156⑆ ⑈60 2229⑈ 0995 67 ⑈000000500⑈

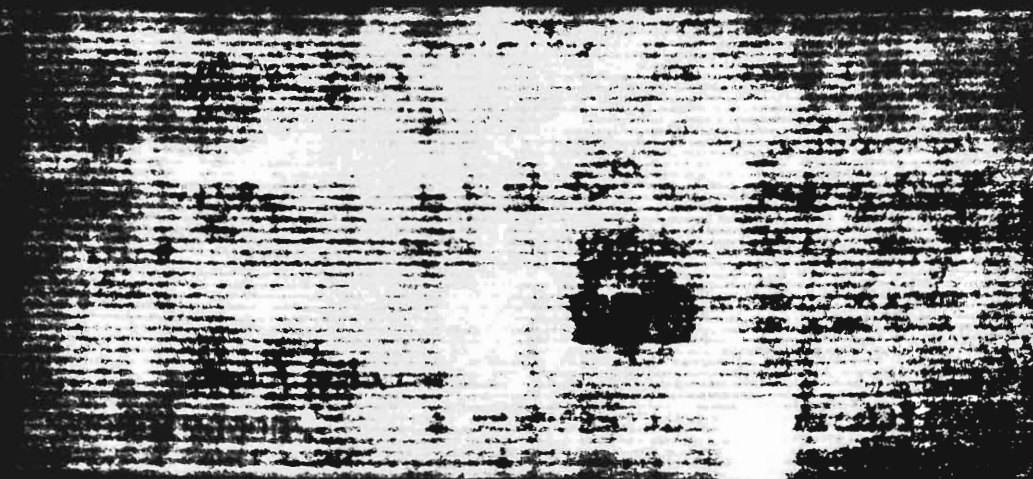
ELWOOD R. DISHARON  
24A PARK ST  
PEPPERELL, MA 01861

PAY TO THE  
ORDER OF

*Phil Sizer*  
*Twenty five and*

**United National Bank**  
NATIONAL AUTOMATIC BANK

89040701505



JAMES A BURKE  
PATRICIA A. BURKE  
17 APPLE HILL RD  
WILBRAHAM, MA 01095

5-2  
53 11 28  
2115

PAY TO THE  
ORDER OF

*Shea for Congress*  
*One Hundred Dollars*



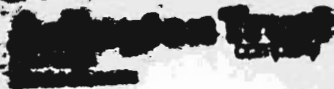
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ROBERT E. DREW, SR.  
GERMAINE M. DREW

8-21 1984 24/18

PAY TO THE  
ORDER OF

*Shea For Congress Committee* 100 00  
*One Hundred Dollars*



00113011700 23 8 8675 00

*Robert E. Drew*

00000100000



ROBERT W KOHANSKI  
MARY E KOHANSKI  
21 HEMLOCK STREET  
DRACUT, MASS. 01828

1306

August 2, 1984

*Committee to Elect Phil Saxe* 100 00  
*One Hundred Dollars*

**Union National**

PAY TO THE ORDER OF

001110104584 24 8 80717 1306 67 00000100000

*Robert W. Kohanski*

THOMAS S ROUX  
66 LANCASTER ROAD  
SHIRLEY, MA 01464

1000, 34

PAY TO THE  
ORDER OF

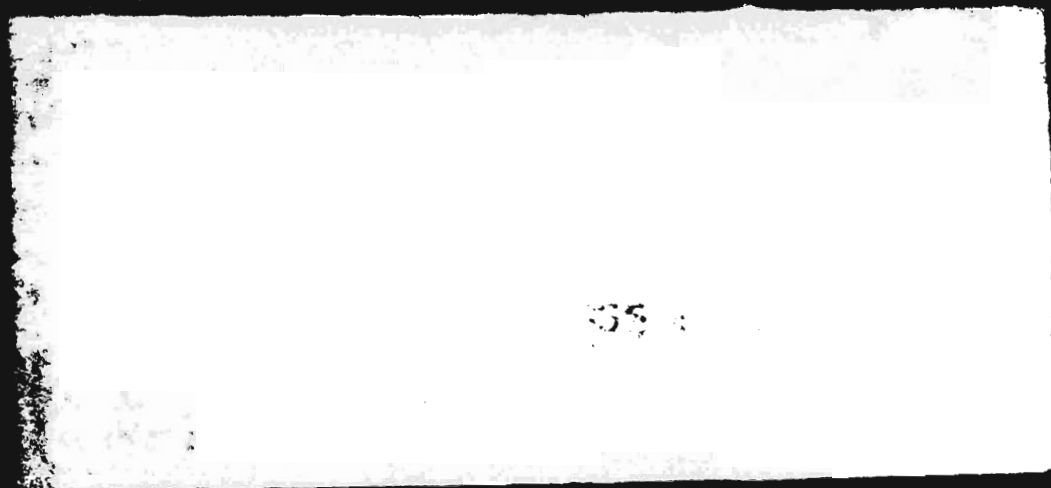
*Pay Shea for Congress Committee* 100 00  
*One Hundred Dollars*



**Shirley County Bank, N.A.**  
SHIRLEY, MA 01462

*Thomas S. Roux*

33343701537





JOHN D. SIMPSON

PAY TO THE ORDER OF

*John for Congress Committee*  
*One Hundred and*

**Arlington Trust**

Lowell  
Massachusetts

7700

⑆000000000000 99 4523076⑆

⑆000000000000⑆

THOMAS W. SHERMAN  
ANNE B. SHERMAN

1558

11/28/87

*Aug 22 1987*

PAY TO THE ORDER OF

*John for Congress Committee*  
*One Hundred and*

**Norfolk Trust**

Norfolk County Trust Company  
Norfolk, Massachusetts

⑆000000000000 066-45607⑆ 1598

⑆000000000000⑆

JOSEPH A. RAFFALE  
MAY L. RAFFALE  
18 GIFFORD BROOK  
SHERBORN, MA 01770

1517

*Aug 23 1987*

PAY TO THE ORDER OF

*John for Congress Comm. \$100.00*  
*One Hundred and 00/100*

**Bank of America**

⑆000000000000 ⑆900 29 58⑆ 1517

⑆000000000000⑆

S. ROBERT JEFFERY

139

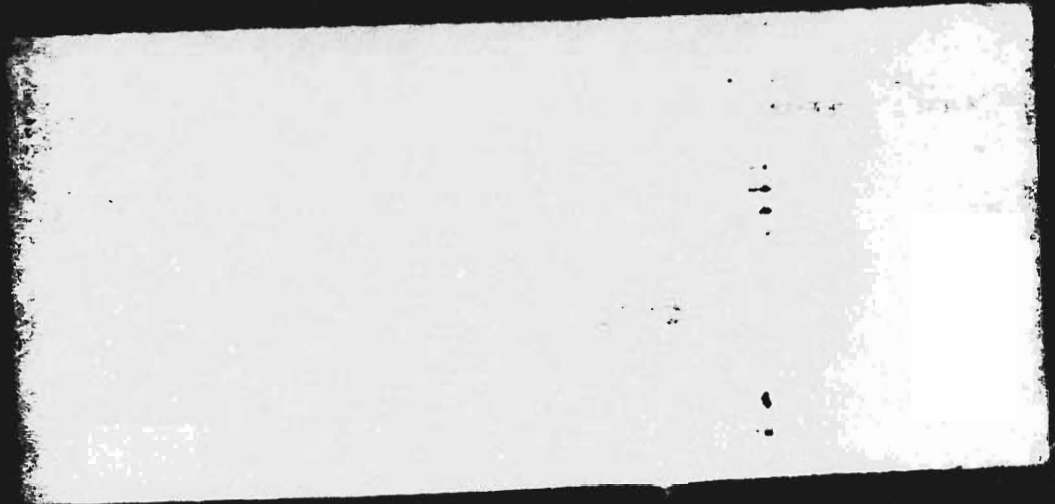
11/28/87

PAY TO THE ORDER OF

*John for Congress Committee*  
*One Hundred and*

**Norfolk Trust**

Norfolk County Trust Company  
Norfolk, Massachusetts



RECORDED - 10

0000001500 0391 220672 2 09 220672 0391 0000001500

08 AUG 68 14:45 5740-3497# 1033 / 0000000000

**ALLINGTON TRADING COMPANY**  
LONDON, ENGLAND

*[Faint handwritten notes]*

3 3 0 4 0 7 0 1 5 1 1

MAXIMUM 1000  
WEIGHT HUNDRED 100 LBS

169-691

169-691

169-691

KATHERINE WHALEN

LOWE, MA 01854

Union National Bank

Lowell, Massachusetts

Lowell, MA 01854

6011300456: #19 58459# 0582 42 000000000000

JOSEPH KORAVOS CR. 7-84

101

8-14-84  
SHEA FOR CREDIT \$25.00  
Twenty Five Dollars

Joseph Koravos

6266571244 88 600573 52 0101 000000025000

JOSEPH OR JAMES FENDERBAST  
10 TURBOW AVE.  
BRACUT, MA 01820

357

PAID TO THE ORDER OF  
TRILL SHEA  
Ten Dollars  
Union National Bank

NOV 23 1984 53 48 113

Joseph O. Fenderbast

6266571244 88 600573 52 0101 000000010000

JOSEPH OR JAMES FENDERBAST  
10 TURBOW AVE.  
BRACUT, MA 01820

0324

Committee to Elect Phil Shea 30<sup>th</sup>  
and 2<sup>nd</sup> District

August 1984

Letter # 8000

6266571244 88 600573 52 0101 000000010000

First Bank  
53-691

First Bank  
53-691

First Bank  
53-691

C  
1  
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0  
0  
F  
1  
3  
3



ROBERT D. LEONARD  
SHARON L. LEONARD  
175 S MOODY STREET  
LOWELL, MA 01852

799

PAY TO THE  
ORDER OF

*Phil Shee for Congress*  
*Twenty-five and 00/100*

Union

Signature

⑆0113004566 ⑆35 9824 0799 67 ⑈0000002500⑈

KATHLEEN M. HADNEY  
18 STAD DRIVE PM. 017-887-0100  
BELLINGHAM, MA 01821

*Wm. Logg*  
*Wm. Lab (Union)*

753

*Aug 17 1987*

PAY TO THE  
ORDER OF

*Shee for Congress*  
*Twenty-five and 00/100*

\$ 25.00

Signature

*Kathleen M. Hadney*

⑆013023576 ⑆46 680 30 0753

⑈0000002500⑈

JOAN M. FENLON  
ONE BROAD STREET  
LOWELL, MA 01852

0863

*Aug 24 1987*

*Phil Shee for Congress Committee*  
*Twenty-five and 00/100*

*Joan M. Fenlon*

⑆013023576 ⑆46 680 30 0753

⑈0000002500⑈

JAMES SCARLATA  
SCARLATA ST.  
LOWELL, MA 01852

0270

*Phil Shee for Congress Committee*  
*Fifty*



The Boston Firm  
Credit Services Group  
Lowell, MA 01852





2151020511

ROGER F. KENNEDY  
JEAN C. KENNEDY  
97 OLD MARSH HILL ROAD  
BRACUT, MA 01929

PAID TO THE  
ORDER OF

Union National

100162004561: #49 121360 0968 67 00000030000

RACHEL A. DODSON  
ALBERT J. DODSON  
440 TEXTILE AVE.  
BRACUT, MA 01929

1321

8:56 1982  
Committee to Elect Phil  
Fifty-five dollars  
45.12  
DOLLARS

LOVELL  
CONTRIBUTOR

Rachel A. Dodson

000000045000

ROBERT A. DODSON  
ALBERT J. DODSON  
600 LINDSEY ST., W-000  
LOVELL, MA 01929

677

542.4 For Congress  
DOLLARS

LOVELL  
CONTRIBUTOR

Robert A. Dodson

000000040000

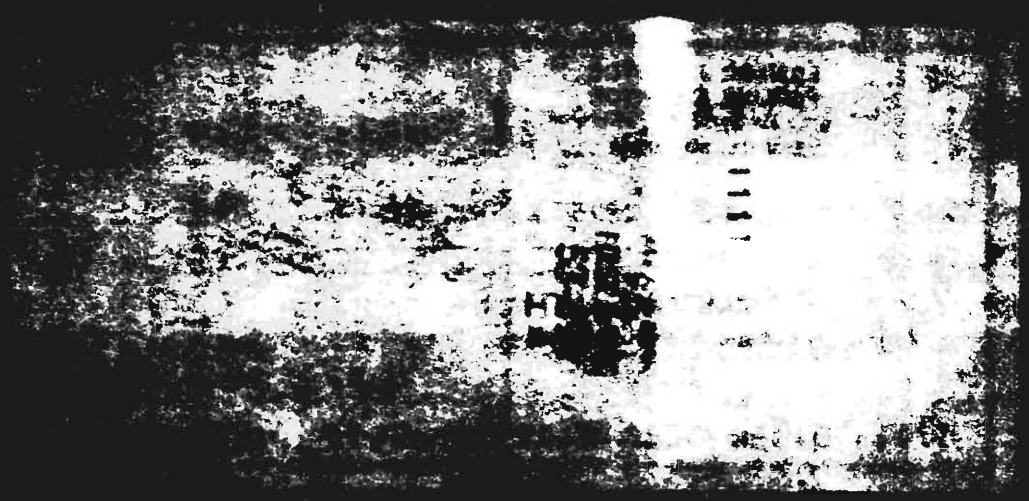
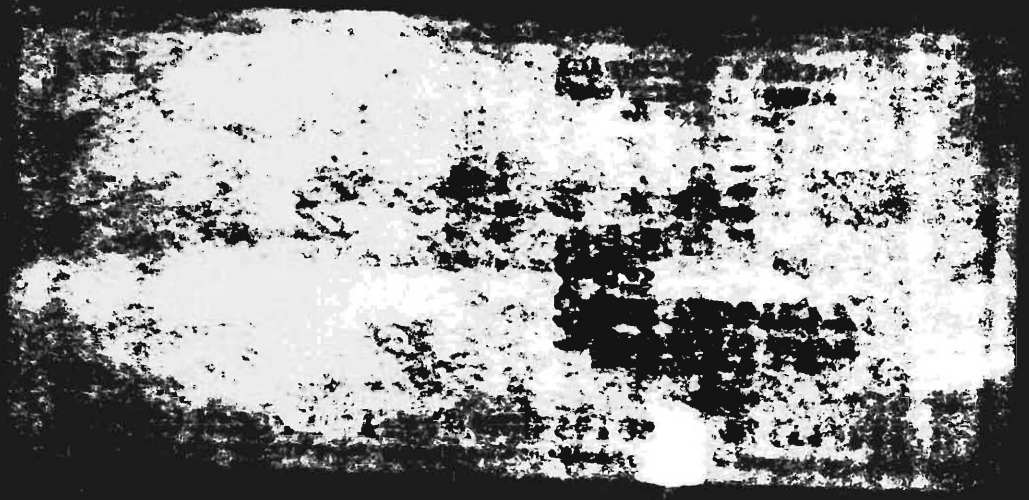
ROBERT A. DODSON  
ALBERT J. DODSON  
600 LINDSEY ST., W-000  
LOVELL, MA 01929

388

July 8 1982  
Phil Kennedy Congressional Committee  
Five Dollars and 00/100



Robert A. Dodson



33040701617

88040701618

0.\*

20.00+

20.00+

20.00+

10.00+

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20.00+

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20.00+

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00.00+

40.00+

50.00+

100.00+

100.00+

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100.00+

50.00+

100.00+

100.00+

2,500.00+

1,710.00+

4,200.00+

4,200.00+

0.\*

0.\*

50.00+

150.00+

100.00+

9.99+

50.00+

20.00+

20.00+

10.00+

50.00+

40.00+

10.00+

20.00+

10.00+

500.00+

2,750.00+

5,000.00+

5,000.00+



May 25

When the Congress meets:  
Twenty dollars and ten cts



*[Illegible signature]*

**SECRET**

10

84

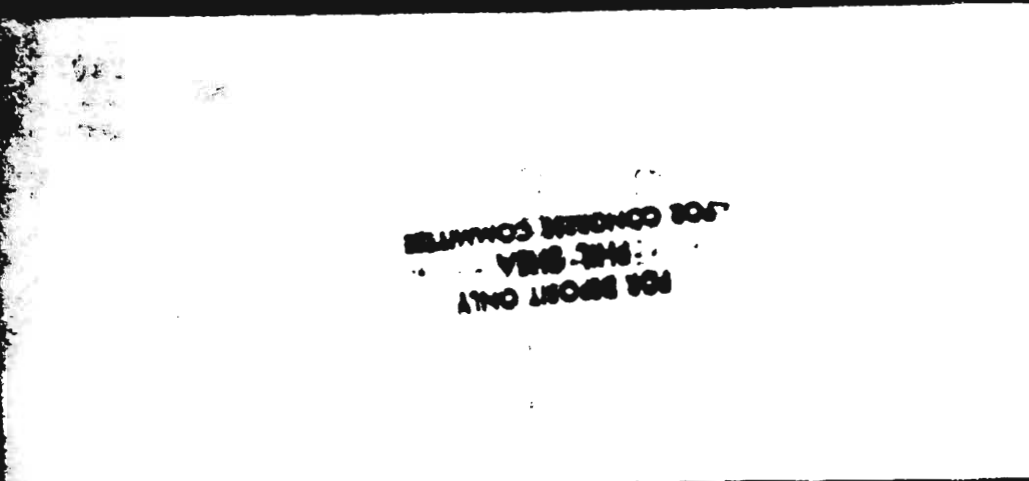
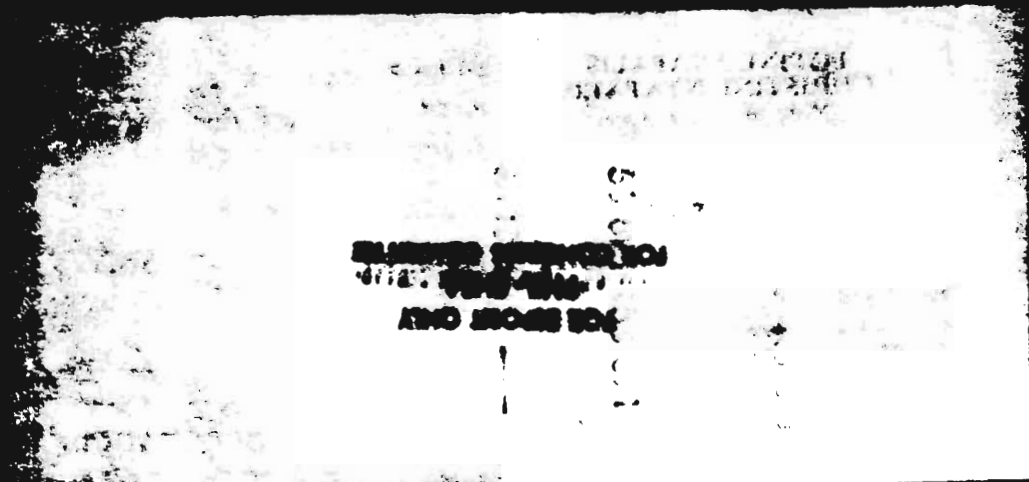


*John Doe*

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*Donald W. [Signature]*

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10 DOLLARS

*John W. [Signature]*

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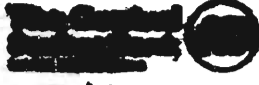
1407

May 25

TO THE

*James E. [Signature]*

*Ten and 00/100*



No. 211

0000000000

JOAN GRIFFIN  
118 ANDOVER ST  
LOWELL, MA 01851

3387

*Committee to Protect the Rights of*

*Privacy*



*Joan Griffin*

118 ANDOVER ST 01851 55/000000 20000

WILLIAM W. STEPHENSON J. NICHOLS  
UNIT 4, RUFFIN WAY  
200 SCHMIDT ROAD  
BRIDGE, MA 01920

1037

12-000  
120

*100.00*

DOLLARS

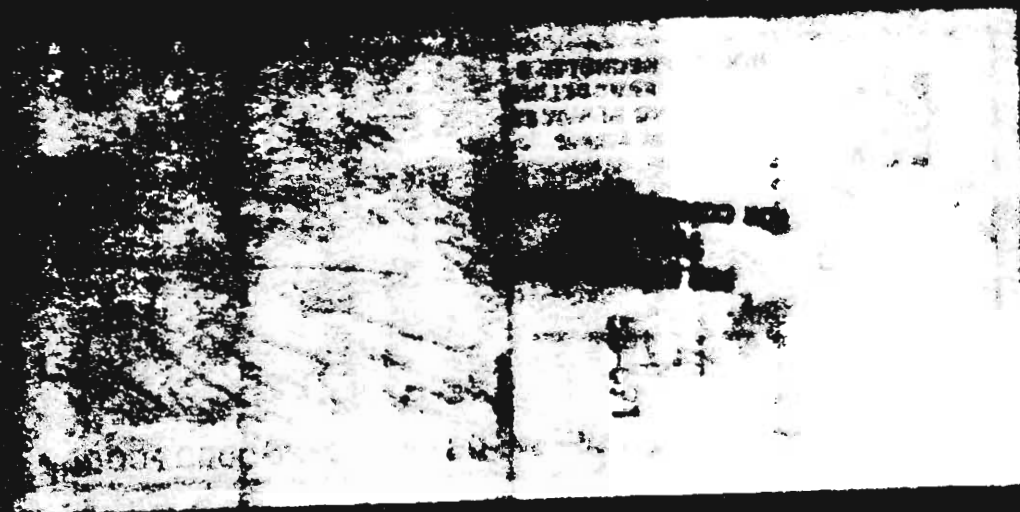
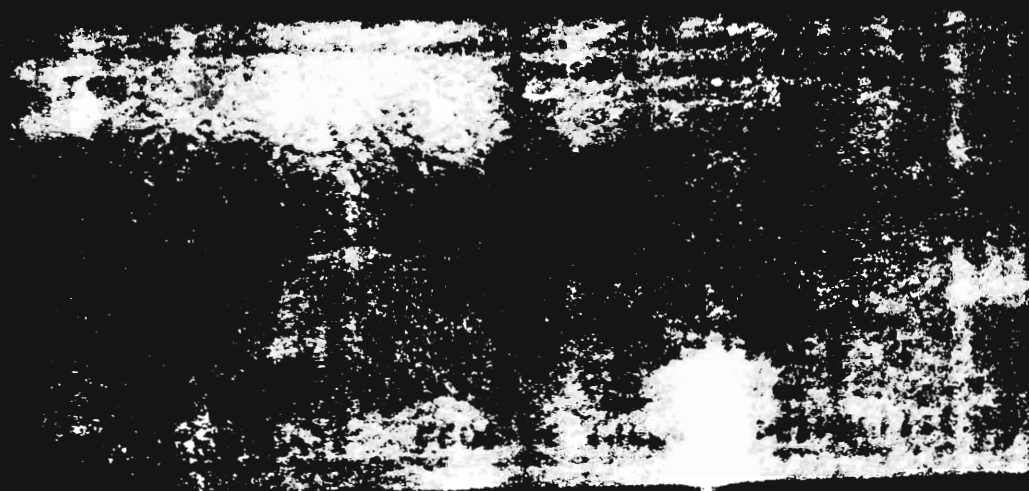
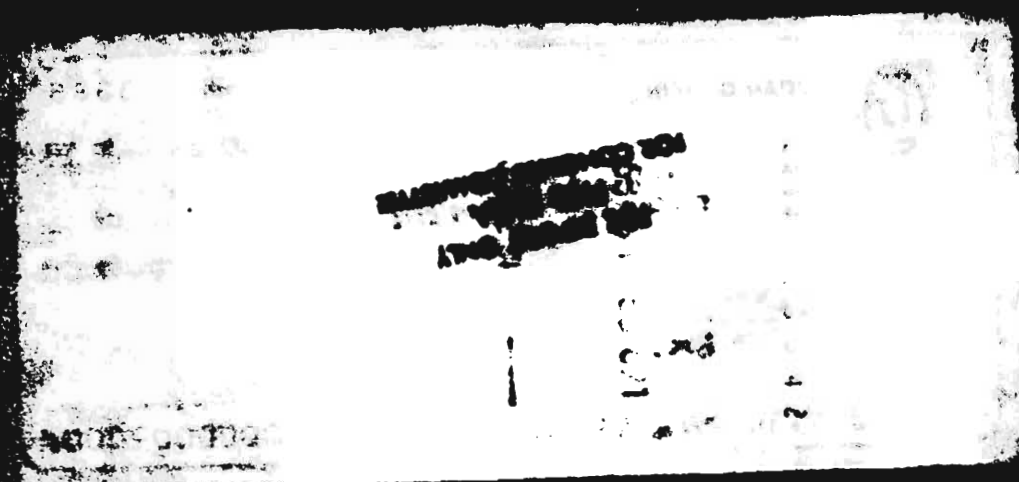
*Ed. W. Rob*

118 ANDOVER ST 01851 55/000000 20000

JOHN J. FERRANTE'S  
BOOKS, RECORDS, & EQUIPMENT  
SERVICES  
8 CALEDONIA AVENUE 01850  
BRIDGE, MA 01920

*John J. Ferrante*

8 CALEDONIA AVENUE 01850 55/000000 20000



39040701623

Edmond N. Brain  
Kathleen R. Conlin  
30 Putnam Avenue  
Lowell, Ma 01858

133

*John Jay League*  
*Love Humboldt, William*

*John Jay League*

*Edmond N. Brain*

00 527 79 0133 55/0000050000

Stanley Brand  
21 Warren St.  
Lowell, Ma 01851

190

*Committee to Elect Chisholm*  
*Presently*

*May 20*

*Stanley Brand*

00 528 17 0190

000000020000

PAUL E. SMITH  
MARY C. SMITH  
26 CAMP STREET  
LOWELL, MASS. 01802

*Committee to Elect Chisholm*

00 54 144 37 3348

00000000



FOR ALL INFORMATION  
SEE PAGE 104  
AND PAGE 105

FOR ALL INFORMATION  
SEE PAGE 104  
AND PAGE 105

FOR ALL INFORMATION  
SEE PAGE 104  
AND PAGE 105

202

JOSEPH D. BROWN  
10 WEST ST.  
LOWELL, MA 01450

5-23-84

53-117  
113

Shawmut Savings Bank 100.00

Handwritten: *Handwritten*

DOLLARS

Signature: *Joseph D. Brown*

000000100000

269

JOSEPH D. BROWN  
10 WEST ST.  
LOWELL, MA 01450

5-23-84

53-117  
113

Shawmut Savings Bank 100.00

Handwritten: *Handwritten*

DOLLARS

Signature: *Joseph P. Brown*

000000100000

109

JOSEPH D. BROWN  
10 WEST ST.  
LOWELL, MA 01450

5-23-84

53-117  
113

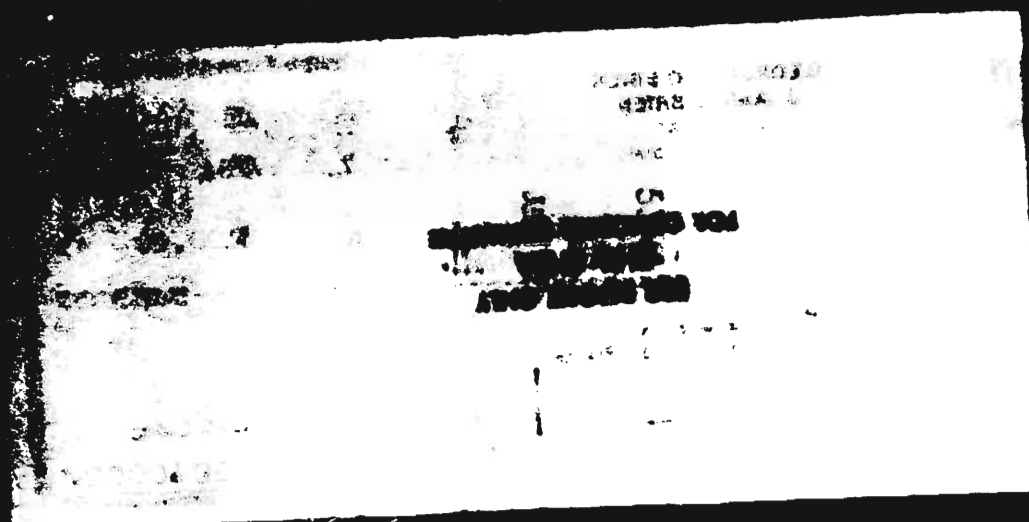
Shawmut Savings Bank 100.00

Handwritten: *Handwritten*

DOLLARS

Signature: *Joseph P. Brown*

000000100000



33040701530

LOWELL COOPERATIVE BANK

LOWELL, MASSACHUSETTS

Pay to the order of *Raymond J. Shaw*

SEVENTEEN DOLLARS

DOLLARS

000000000000

RAYMOND J. SHAW  
C/O A. J. THORNTON  
100 WILSON ST.  
LOWELL, MA 01850

PAY TO THE ORDER OF

*Raymond J. Shaw*

United National Bank

0011001520 #16

8742

*Raymond J. Shaw*

3511

May 10

10

93740701531

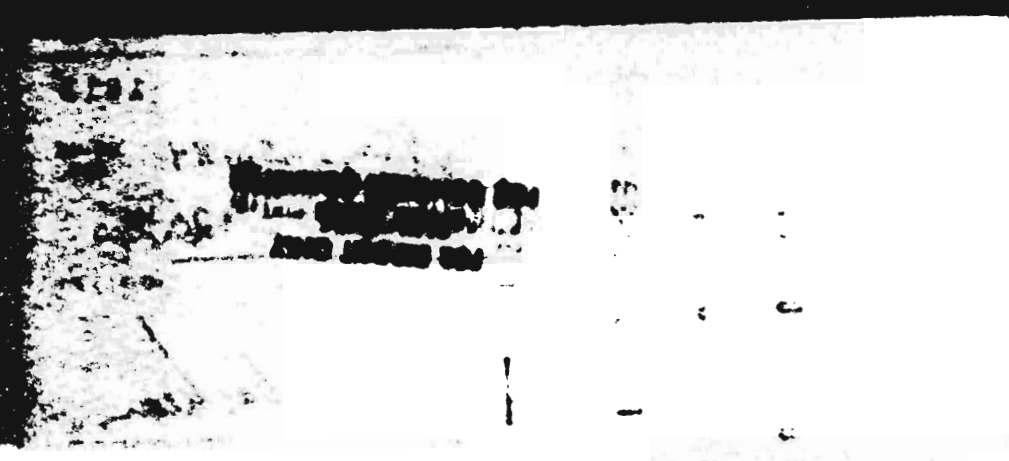
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Cash  
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BRUCE W. AKASHIAN  
KATHLEEN M. AKASHIAN  
11 A. HOWARD RD  
ATLANTA, GA 30342  
May 25, 89  
Phil Shea for Congress Committee - 20.00  
Twenty and 00/100  
Union National Bank  
Lombard, Massachusetts  
3rd Street

3 3 0 9 0 7 0 1 5 7 2



**TECH**

**TERRENCE J MCCARTHY  
KATHLEEN O MCCARTHY**

10 WOOD ST  
WILMA MA 01867

*Maryland*

*East Liberty Pa.*

*Sept 1967*

**SECURITY  
NATIONAL  
DATA**



83040701534

FOR DEPOSIT ONLY  
FBI MEA  
FOR CONGRESS COMMITTEE

719 LON 400  
Lowell  
454-4857  
Office of Field  
City of Lowell

[REDACTED]

[REDACTED]

[REDACTED]

33040701533

100 DOLLARS

100000100000

100 DOLLARS

100000100000

100 DOLLARS

100000100000

RAYMOND F. ROUSSE  
FLORENCE ROUSSE

1847

COMMONWEALTH  
FEDERAL SAVINGS  
AND LOAN ASSOCIATION

0314701630

FOR DIRECT ONLY  
PAC-SEA  
FOR COMINTS COMMITTEE

FOR DIRECT ONLY  
PAC-SEA  
FOR COMINTS COMMITTEE

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DOLLARS  
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B. White

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100000050000  
100000050000

1525  
1525  
LOWELL  
8800010231 1525  
100000050000

23740701533

FOR REPORT ONLY  
MIL. SERA  
FOR CONGRESS COMMITTEE

FOR REPORT ONLY  
MIL. SERA  
FOR CONGRESS COMMITTEE

38040701639

EXHIBIT E

AFFIDAVIT OF MARTIN MEEHAN

Re: MUR 2124  
PHIL SHEA FOR CONGRESS COMMITTEE  
AND FRANCIS G. McDOUGALL, JR. AS  
TREASURER

I, Martin Meehan, having been duly sworn, hereby depose and state, on the basis of my personal knowledge:

1. I was campaign manager for the Phil Shea for Congress Committee.

2. As campaign manager, I participated in fundraising activities and played a principal role in decisions concerning what types of funds the Committee would accept.

3. Around the time Phil Shea announced he would run for Congress in 1984, Mr. Shea and his campaign advisors met and agreed that Mr. Shea would not accept any funds from any political action committees, including political committees from labor organizations. That policy was in force throughout Mr. Shea's campaign.

4. In June of 1984, approximately \$40,000 held by Mr. Shea's State Senator Campaign Committee, the Committee to Keep Phil Shea Senator (the "State Senate Committee"), were transferred to the Phil Shea for Congress Committee.

5. Because of Mr. Shea's policy of not receiving funds from political action committees, at the time the funds were transferred from the State Senate Committee we reviewed information concerning the sources of the funds deposited with the State Senate Committee during 1983 and 1984. At that time,

83040701640



we returned all funds from political action committees, including labor organizations, to those organizations.

6. I understand that the Federal Election Commission has asked the Committee to review the last \$20,000 in deposits made with the State Senate Committee prior to April 29, 1983, to determine what funds made up a \$20,000 certificate of deposit purchased on that date. I have reviewed bank statements, deposit slips, and the reports filed by the State Senate Committee with the Massachusetts State Election Commission, with respect to the \$20,000 in question. Several of the relevant contributions came from impermissible sources under the Federal Election Campaign Act -- specifically, labor organizations. Of the nine contributions from labor organizations, however, all but two were returned, pursuant to the policy outlined in the previous paragraphs, prior to the transfer to the federal committee. The two contributions that were not returned were: (1) a \$100 contribution from the International Brotherhood of Police officers, Local 493, in April 1983, and (2) a \$200 contribution from the Local 254, Cope Fund, in June 1982.

Because \$2200 of the \$20,000 had been returned, I reviewed and additional \$2200 in 1982 contributions. None of these contributions were impermissible under the FECA.

A copy of the 1984 State Report of the Committee to Keep Phil Shea Senator is attached to this affidavit as Exhibit A. The Report shows that in March 1984, the Committee refunded 7 union contributions received in April 1983. I do not know why the eighth union contribution received in April 1983 is not


recorded as being returned. I expect that this is either an error in the 1984 report, or that the union in question could not be located when the refunds were made.

7. On or about June 10, 1984, the Phil Shea Campaign Committee conducted a fundraiser at the Windsor Mills Restaurant in Dracut, Massachusetts. Several hundred people appeared for this fundraiser, and each contributed \$10 in cash to the Phil Shea campaign. On information and belief, these cash contributions account for the \$4,440 in cash deposits into the Committee account on June 12, 1984.

8. Much of the information concerning contributions and disbursements to the Phil Shea for Congress Committee was kept on a computer at Committee headquarters. After the primary the computer company came and took back the computer, at which time, through inadvertance, the computer information was irretrievably lost.

Signed under the pains and penalties of perjury, this

29th day of July, 1986.

  
Martin Meehan

VS-0976/1  
7/29/86



THE GENERAL COURT OF MASSACHUSETTS  
CAMPAIGN & POLITICAL  
State Senate  
FINANCE  
Committee on Ways and Means  
1001  
STATE HOUSE, BOSTON 02133 30

HON. PHILIP L. SHEA  
FIRST MIDDLESEX DISTRICT  
ROOM 513  
TEL. 722-1630

December 14, 1984

OTHER COMMITTEES:  
RULES  
STATE ADMINISTRATION-CHAIRMAN  
GOVERNMENT REGULATIONS  
HOUSING AND URBAN DEVELOPMENT  
HEALTH CARE  
LOCAL AFFAIRS  
SELECT COMMITTEE  
ON SMALL BUSINESS

Bradley Balzer  
Chief of Accounting  
Office of Campaign and Finance  
One Ashburton Place  
Boston, MA 02108

AMENDED

Dear Mr. Balzer:

Per your request for additional information concerning the  
June 30, 1984 campaign report of Senator Philip L. Shea.

1. Missing Addresses (enclosed)
2. Expenditure of "Cash" on March 6, 1984 to;  
-Edward Donnelly of 11 Bricket Ave. Lowell, MA. \$200.00  
reimbursement for party tickets.  
-Patrick Smith of Lowell, MA \$300.00 reimbursement for auto  
mileage
3. Expenditure of "Philip L. Shea" on March 23, 1984 and April  
5, 1984;  
-Philip L. Shea of 130 Westview Rd. Lowell, MA 01851 for  
travel expenses;  
Hyannis Regency \$119.63  
Hyatt(Washington) \$116.66  
Wills Air \$ 27.00  
Hyatt(Washington) \$357.00  
TWA \$506.00  
TWA \$506.00  
Misc. under \$25 \$143.71  
  
Total \$1,676.00
4. Expenditure of "Philip L. Shea" on January 4, 1984  
Reimbursement to Philip L. Shea for the balance of Auto  
Mileage expenses from 1983. Senator Shea only received  
\$500.00 of the \$1,500.00 he had been allotted for auto  
mileage in 1983, therefore he received the balance of  
\$1,000.00 on January 4, 1984.

Sincerely yours,

*G. Douglas Sullivan*  
G. Douglas Sullivan  
Campaign Treasurer

THIS BOX IS FOR USE  
BY A BALLOT QUESTION  
COMMITTEE ONLY.

(CHECK ONE)

Initial Report  
60th day prior  
to election  
5th of month  
20th of month  
Dissolution

# The Commonwealth of Massachusetts

OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

## CAMPAIGN FINANCE REPORT



FORM CPF 102

(CHECK ONE)

☐ 8th day preceding primary  
☐ 8th day preceding election  
☐ 30th day following a  
special election  
☐ 10th day of January  
☐ Dissolution

File with Director, Office of Campaign & Political Finance

Read instructions on Page 4 before completing this form.

Candidates with NO ACTIVITY to report: Follow instructions for Category #1 or #4 as applicable on Page 4.

BOX A	
Philip L. Shea	
Full Name of Candidate	
Mass. State Senate 1 <sup>st</sup> Middle	District
Office Sought	
130 West View Road	
Residential Address	
Lowell, Mass	
City or Town	Zip

BOX B	
Committee to Keep Phil Shea Senator	
Name of Committee	
G. Douglas Sullivan	
Name of Committee Treasurer	
97 Dancause Road	
Mailing Address	
Lowell, Mass	01852
City or Town	Zip

Fill in Dates:

Reporting Period Beginning Jan 1 1984 and Ending June 30 1984

- |   |                 |         |
|---|-----------------|---------|
| 1. Ending balance from last previous report .....                     | \$ 38,465.51    |         |
| 2. Total receipts (from Page 2, Summary All Receipts) .....           | + 70,807.16     |         |
| 3. Subtotal. Line 1 plus Line 2 .....                                 | = \$ 109,272.67 |         |
| 4. Total expenditures (from Page 3, Summary All Expenditures) ...     | - 106,026.12    |         |
| 5. Ending balance. Line 3 minus Line 4 .....                          | = \$ 3,246.55   |         |
| 6. Total "In Kind" contributions (Sched. C). Do NOT include on Line 2 |                 | \$ None |
| 7. Total liabilities (from Schedule D). Do NOT include on Line 4 ..   |                 | \$ None |
| 8. Name of bank(s) used: First Bank + Trust (Lowell)                  |                 |         |

OFFICE USE ONLY

CAMPAIGN & POLITICAL  
FINANCE

100 JUL 31 AM 11:13

### CERTIFICATION BOX C

I certify that the within report including attached schedules is a true statement of all receipts, expenditures, disbursements, loans and liabilities for the above reporting period of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chapter 55, as amended.

Signed under the penalties of perjury

x Philip L. Shea 7/31/84  
CANDIDATE SIGNATURE Date

### BOX D CERTIFICATION

Signed under the penalties of perjury

x G. Douglas Sullivan 7-8-84  
TREASURER SIGNATURE Date

**AFFIDAVIT. Read before signing.** For use only by a candidate who has not received contributions, incurred liabilities, or made expenditures on his/her own behalf. Sign Box E (candidate with no committee) or Box F (candidate who has a committee), as appropriate.

### BOX E

#### Affidavit of Category 1 Candidate

I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.

I do not have a political committee.

Signed under the penalties of perjury

Candidate Signature Date

### BOX F

#### Affidavit of Category 4 Candidate

I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.

All campaign finances were handled by my committee. I have examined the committee report as stated on this form and to the best of my knowledge and belief it is true, correct and complete.  
Signed under the penalties of perjury

x Philip L. Shea 7/31/84  
Candidate Signature Date

[illegible]

### SUMMARY OF ALL RECEIPTS FOR THE REPORTING PERIOD

- |  |                                   |                     |
|--|-----------------------------------|---------------------|
| 9. Total "General" receipts of \$15 or more. . . . .                         | (From Schedule A) . . . . .       | \$ <u>38,571.16</u> |
| 10. Total "Fund Raising" receipts of \$15 or more. . .                       | (From Schedule A) . . . . .       | \$ <u>66,950.00</u> |
| 11. Total "General" receipts under \$15. . . . .                             | (From your own records) . . . . . | \$ <u>None</u>      |
| 12. Total "Fund Raising" receipts under \$15. . . . .                        | (From your own records) . . . . . | \$ <u>None</u>      |
| 13. Total all receipts for the period. Enter also on Page 1, Line 2. . . . . |                                   | \$ <u>70,807.16</u> |





# SCHEDULE D

DATE CURSED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
TOTAL, ENTER ALSO ON PAGE 1, LINE 7				None

## INSTRUCTIONS

FILE with DIRECTOR, OFFICE OF CAMPAIGN & POLITICAL FINANCE, 8 Beacon Street, Boston, MA 02108.

File on or before the 8th day preceding a primary, the 8th day preceding a biennial state election and January 10th of the year following the election. An additional report is required the 30th day following a special election. While the account remains open, an annual report is required on or before January 10. Each report must be complete as of the tenth day preceding the last day for filing.

Read the following descriptions of Filing Categories. Select the one that describes you. Check one box. Follow the instructions printed in *italics* for your category.

**CANDIDATE:** If you have received no contributions, made no expenditures and incurred no liabilities select Category 1 or 4, as appropriate.  
All other candidates select Category 2 or 3.

**TREASURERS:** Select only Category 5, 6 or 7.

Check One

### Candidate Categories

- CATEGORY 1** ☐ Report of a candidate who does not have a committee and has not received contributions or made expenditures.  
*Complete Box A on Page 1. Sign and date Box E. Omit remainder of form.*
- CATEGORY 2** ☐ Report of a candidate who does not have a committee but has received contributions or made expenditures or incurred liabilities.  
*Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1.*
- CATEGORY 3** ☐ Report of a candidate who has a committee and the candidate has received contributions, made expenditures or incurred liabilities independent of the committee.  
*Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1. Remind your treasurer to file a separate committee report.*
- CATEGORY 4** ☒ Report of a candidate who has a committee but the candidate has not received contributions or made expenditures independent of the committee.  
*Candidate: File a COMBINED report with your committee. See your treasurer and complete the affidavit in Box F of the committee's report. Do not use a separate form. Use the same form as the treasurer.*

Check One

### Committee Treasurer Categories

- CATEGORY 5** ☒ Report of the treasurer of a committee organized on behalf of a candidate and the candidate has not received contributions or made expenditures independent of the committee.  
*Treasurer: See Category 4. File a combined report with your candidate. You make out the report. Complete Boxes A and B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Arrange with your candidate to complete the affidavit in Box F.*
- CATEGORY 6** ☐ Report of the treasurer of a committee organized on behalf of a candidate and the candidate has received contributions or made expenditures independent of the committee.  
*Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Remind your candidate to make out and file the candidate's separate report disclosing receipts and expenditures transacted by the candidate independent of the committee.*
- CATEGORY 7** ☐ Report of the treasurer of a political committee not organized on behalf of a candidate; for example, referendum committee, committee organized to promote a principle, etc.  
*Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1.*

Page 1. Top of Page: Check the appropriate report box.

Page 1. Line 1: If this is your initial report enter "0".

Page 1. Bottom of page. The Affidavits in Box E and Box F are for use **only** by candidates who have received **no** contributions, incurred **no** liabilities or made **no** expenditures on their own behalf. The purpose of the Affidavits is to provide a simplified form of reporting. Such candidates complete Box A and sign either Box E or F as appropriate.

Schedules A-D: If additional space is needed attach 8½ x 11 sheets, identifying the Schedule and using the same format.

Identify attached sheets with name of candidate or committee.



SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF \$25.00 OR MORE SCHEDULE B

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
3/27/84	93 AFSCME Council	8 Beacon St. Boston	Returned \$	\$400.00	
3/27/84	464 AFSCME Local	Box 43 Norfolk, MA	Returned \$	\$100.00	
3/27/84	760 AFSCME Local	P.O.Box 466 Gardner	Returned \$	\$100.00	
2/8/84	Ancient Order Hibernians	P.O.Box 8575 Lowell, MA	Donation	\$ 10.00	
1/23/84	Belmont Spring Water	P.O.Box 1 Belmont, MA	Office Expense	\$ 16.80	
2/8/84	" "	" "	" "	\$ 16.80	
3/10/84	" "	" "	" "	\$ 16.80	
4/6/84	" "	" "	" "	\$ 16.80	
5/22/84	" "	" "	" "	\$ 16.80	
6/12/84	" "	" "	" "	\$ 16.80	
2/1/84	Billerica Pub.	Billerica	Fundraising Expense		\$194.25
3/6/84	Bishops Rest	Lawrence	Meeting Exp.	\$432.00	
2/24/84	Blatus, Mike	Forest Pk, Dracut	Expenses	\$250.00	
5/29/84	Bogies Place	350 Middlesex Tyngsboro, MA	Meeting Exp.	\$117.45	
3/27/84	Bricklayers & Allied Craft.	384 Acushnet St. New Bedford, MA	Returned \$	\$500.00	
3/27/84	Bridge & Iron #351	200 Sutton St. N. Andover, MA	Returned \$	\$100.00	
1/23/84	Bridle & Spur	Rt. 119 Groton, MA	Fundraising Expense		\$1,059.06
6/3/84	Bull Run	Shirley	Meeting Exp.	\$ 78.50	
3/27/84	COPE Fund Local 254	59 Temple Pl. Boston, MA	Returned \$	\$100.00	
3/27/84	Cable PAC	8 1/2 State St. Concord, MA	Returned \$	\$300.00	
3/10/84	Gallery Pk Little League	Lowell	Donation	\$175.00	
1/6/84	Casey Paint & Wallpaper	118 Middlesex St. Lowell, MA	Office Exp.	\$103.22	
4/6/84	" "	" "	" "	\$ 47.95	
3/6/84	Cash	11 Bricket St Lowell West Fifth Lowell	Donnelly, Ed Smith, Pat	\$500.00	
				\$3,414.92	\$1,253.31

**SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF \$25.00 OR MORE - SCHEDULE B**

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDRAS.
3/27/84	Central Agency	995 Central St. Lowell, MA	Returned \$	\$100.00	
3/27/84	Chiropractic PAC	57 Bruce St. Lawrence, MA	Returned \$	\$200.00	
3/27/84	Committee on Political Act.	21 Beach St. Boston, MA	Returned \$	\$100.00	
3/27/84	Committee on Polit. Act. 509	14 Beacon St. Boston, MA	Returned \$	\$100.00	
1/6/84	Connors Recogn Dinner	36 Putnam Ave. Lowell, MA	Tickets Donation	\$150.00	
3/27/84	Cooperative Banks Pol. Act.	1 Washington MALL Boston, Ma	Returned \$	\$100.00	
2/13/84	Corey Food	16 Normac St Woburn, MA	Office Expenses	\$ 9.70	
5/9/84	" "	" "	" "	\$ 9.89	
1/6/84	" "	" "	" "	\$ 26.70	
2/17/84	Don Julio	Boston	Fundraising Expense/music		\$1,450.00
3/27/84	Dracut Firefighter Local 2586	P.O. BOX 51 Dracut, MA	Returned \$	\$100.00	
1/8/84	" "	" "	Donation	\$ 45.00	
1/28/84	East End Club	14 W. 4th St. Lowell, MA	Donation	\$100.00	
1/26/84	" "	" "	" "	\$100.00	
1/1/84	Emerson, John Committee	Chelmsford	Donation	\$ 50.00	
1/4/84	Flowers by Voyer	628 Merrimack St. Lowell, MA	Flowers	\$ 31.50	
1/6/84	" "	" "	" "	\$ 52.50	
1/17/84	Formal Shop	Pine St. Lowell, MA	Fundraising Expense		\$440.00
1/6/84	" "	" "		\$ 50.00	
1/16/84	Galvin, Will. Committee	Boston	Donation	\$100.00	
1/26/84	St John's Girls Colonial F&D	c/o Paul Dineen Dunstable	Donation	\$250.00	
1/19/84	Granite State Tickets	Rt. 3A Nashua	Tickets Donation	\$ 50.00	
1/15/84	Greater Lowell YMCA	206 Rogers St. Lowell, MA	Donation	\$150.00	
1/8/84	Groton/ Pepperell Rotary		Donation	\$ 10.00	
				\$1885.29	\$1890.00

SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF 125.00 OR MORE SCHEDULE B

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
1/27/84	IUOE Local 4	26 Mt. Hope Roslindale, MA	Returned \$	\$200.00	
1/27/84	Insurance Men's PAC	11 Beacon St. Boston, MA	Returned \$	\$200.00	
1/27/84	International Ass. Firefight	93 Epping Lowell, MA	Returned \$	\$300.00	
1/26/84	Irish American Club Of Westf.	Westford	Donation	\$ 50.00	
1/26/84	Irish Cultural Week	St. Patrick's Lowell	Donation	\$1,000.00	
1/21/84	Kaplovitz, Barry	60 Charlesgate West Boston, MA	Consultant	\$9,000.00	
3/1/84	" "	" "	" "	\$3,000.00	
1/7/84	" "	" "	" "	\$6,000.00	
1/4/84	Lambert Printing	Gerstman Ave. Lowell, MA	Fundraising Expense		\$250.00
1/4/84	Locke-Ober Rest	Boston	Staff Xmas gift/dinner	\$1,084.00	
1/26/84	Lowell Jr. Bowling League	46 Carlisle Lowell, MA	Donation	\$ 25.00	
3/27/84	Lowell Central Labor Council	21 George St. Lowell, MA	Returned \$	\$200.00	
3/27/84	Lowell Police Patrolman 382	JFK Civic Ctr. Lowell 657 Middlesex St.	Returned \$	\$200.00	
4/4/84	Lowell Boys Clb	Lowell, MA	Donation	\$100.00	
3/10/84	Lowell Girls Clb		Donation	\$250.00	
3/23/84	Lowell Lions Clb		Donation	\$200.00	
1/6/84	Lowell Sun	Kearney Sq. Lowell	Advertisemnt	\$122.22	
3/5/84	" "	" "	" "	\$ 72.80	
2/8/84	Lowell Tele. Ans. Servic	22 Merrimack St. Lowell, MA	Office Expen	\$ 50.50	
4/6/84	" "	" "	" "	\$ 50.50	
5/2/84	" "	" "	" "	\$ 50.50	
5/3/84	" "	" "	" "	\$ 50.50	
6/29/84	" "	" "	" "	\$ 50.50	
1/6/84	" "	" "	" "	\$ 50.50	
				\$22,307.02	\$250.00

SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF 125.00 OR MORE SCHEDULE B

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
28/84	Lowell Tele Ans. Service	22 Merrimack St. Lowell, MA	Office Exper	\$ 50.50	
10/84	Lull & Hartford	Prescott St. Lowell, MA	Donation to sports org.	\$564.00	
19/84	Lytle Tickets	99 Chelmsford St. Chelmsford, MA	Donation	\$210.00	
27/84	MABSOA-PAC	56 Middlesex Turnpk Bedford, MA	Returned \$	\$100.00	
27/84/	MCI-Concord AFSCME 429	MCI Concord	Returned \$	\$200.00	
27/84	Mass Bldg. Trade Council PAC	6 Beacon St. Boston	Returned \$	\$200.00	
27/84	Mass Cour Carpenters PAC	232 Lowell St. Lawrence	Returned \$	\$200.00	
27/84	Mass Afl-CIO Voter Fund	8 Beacon St. Boston	Returned \$	\$200.00	
27/84	Mass Claims Investigators	82 Oxyard Cambridge	Returned \$	\$100.00	
27/84	Mass Committee Good Gov't	250 Hammond Pond Rd Chestnut Hill, MA	Returned \$	\$200.00	
27/84	Mass DEAC	331 Mayflowers St. Hanover	Returned \$	\$1,000.00	
27/84	Mass Police Officers Org	16 Pierce Westford, MA	Returned \$	\$1,000.00	
27/84	Mass Thrift PAC	50 Congress St. Boston, MA	Returned \$	\$200.00	
27/84	Mass PAC	4 Longfellow Pl Boston, MA	Returned \$	\$300.00	
27/84	Mass Valley Bldg. Trd Coun	P.O.Box 92 E. Cambr	Returned \$	\$100.00	
27/84	Mass Conty Sup Court Officers	P.O.Box 92 E. Cambr	Returned \$	\$300.00	
27/84	Montefiore Sist.	700 Princeton Blvd Lowell, MA	Donation	\$ 35.00	
27/84	Mountain Greenhouse	23 Main St. Pepperell	Flowers	\$ 26.25	
24/84	New England Telephone	Boston	Off Expen.	\$182.77	
10/84	" "	" "	Boston Off Expenses	\$ 33.43	
23/84	" "	" "	Off Expen	\$272.79	
04/84	" "	" "	Boston Off Expenses	\$ 67.92	
24/84	" "	" "	Lowell Off Exp	\$ 66.33	
2/84	" "	" "	" "	\$384.03	
				\$5,993.02	



SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF \$25.00 OR MORE SCHEDULE B

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL/FNDAS.
9/9/84	New England Telephone	Boston	Boston Phone Expenses	\$ 83.24
12/23/84	" "	" "	Lowell Off Expenses	\$ 359.34
12/26/84	" "	" "	Boston Off Expenses	\$ 35.56
1/4/84	" "	" "	Lowell Phone Expenses	\$281.13
1/13/84	" "	" "	Boston Off Expenses	\$ 39.84
1/12/84	" "	" "	" "	\$ 90.03
1/21/84	" "	" "	Lowell Off Expenses	\$ 398.40
1/23/84	" "	" "	" "	\$223.16
1/24/84	Order Hibernian	Lawrence	Donation	\$260.00
1/27/84	Painters & Allied Trades Peltier, Larry	30 Jackson St. Lowell, MA	Returned \$	\$100.00
1/4/84	Committee	Dracut	Donation	\$100.00
1/29/84	Phil Shea for Congress	11 Kearney Sq. Lowell, MA 01852	Transfer	\$40,500.00
2/27/84	Plumbers U/12	581 Boylston St. Boston	Returned \$	\$100.00
2/27/84	Retired Public Employees	11 Pearl St. Walpole	Returned \$	\$ 300.00
2/28/84	Rourke, Susan Committee		Donation	\$100.00
1/4/84	Rush, Jim	22 Cheever/Dracut, Ma	Lowell Rent	\$135.00
1/28/84	" "	" "	" "	\$135.00
2/28/84	" "	" "	" "	\$135.00
3/27/84	" "	" "	" "	\$135.00
5/2/84	" "	" "	" "	\$135.00
6/3/84	" "	" "	" "	\$135.00
2/7/84	Sacred Heart Centennial	Lowell	Donation	\$ 75.00
6/13/84	Shea, Philip	130 Westview Rd. Lowell, MA	Auto. Expenses	\$375.00
3/19/84	" "	" "	" "	\$ 375.00
1/4/84	" "	" "	Repaid Loan 11/23/83	\$5,000.00
				\$49,605.70

**SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF \$25.00 OR MORE SCHEDULE B**

[illegible]



7/26/84

## SENATE CONTRIBUTIONS

NAME	ADDRESS	CITY/TOWN	ZIP	AMOUNT
A				
Abbott, David	Box 2094	Lowell	01851	150
Akashian, Bruce	41 Winward Rd.	Lowell	01852	300
Akashian, Newton	263 OldWestfordRd.	Chelms	01824	150
Albert, Norman	8 Page St.	Shirley	01464	100
Alden, Richard	138 Main St.	Andover	01810	450
Allen, Paul	735 School St.	Lowell	01851	150
Angell, Evangeline	262 Middlesex Rd.	Tyngs	01879	150
Armstrong, Walter				150
Arnold, John	4 Hayden Rd.	No.Billerica	01862	150
Atamian, Robert	11 April Ln.	Lexington	02173	150
B				
Babineau, Chester	Box 56	E. Pepperell	01437	100
Bailey, Kath. Meehan-	40 Cascade St.	Lowell		300
Bain, Paul				150
Ballou, Daniel	194 Woburn St.	Wilmington	01887	150
Barker, Thomas A.	76 Village Dr.	Dracut	01826	300
Bates, Robert	106 University Ave.	Lowell	01854	150
Beati, Anthony				150
Behrakis, George	Mansur St.	Lowell		300
Belle, Bernard H.	1 Schooner Ridge	Marblehead	01945	300
Bendetson, Richard	63 Atlantic Ave.			300
Bergeron, Rachel	2 Willowdale Ave.			300
Bishop, Edward	Bouchard Ave.	Dracut		150
Bomil, Thomas	355 Pawtucket Blv.	Lowell	01854	150
Bornstein, Rochelle	60 Colonial Dr.	Andover	01810	150
Bornstein, Stanley	113 NorthRidge Rd.	Ipswich	01938	150
Boumil, S. James				150
Bournival, Richard D.	831 Rogers St.	Lowell	01852	300
Boyle, Arthur	129 W. Jenness St.	Lowell	01851	150
Boyle, Janet M.	115 Westview Rd.	Lowell	01851	300
Brennan, Peter J.	85 Clark Rd.	Lowell	01852	300
Bresnahan, John	Box 354	Harvard	01451	100
Breton, Leo	1275 Bridge St.	Dracut	01826	300
Broderick, Peter	Center St. RFD 3	Groveland	01834	150
Buckley, John	83 Dalton Rd.	Chelms	01824	150
Bugler, John	37 Black Oak Dr.	Dracut	01826	150
Burton, David	106 Brookline St.	Pepperell	01463	150

total

7200

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C

Caffrey, Carolyn	1400 Gorham St.	Lowell	01852	150	
Cahoon, Donald	27 Holten St.	Danvers	01823	150	
Callery, Michael J.	4 Morninview Ave.	Dracut		300	
Callery, Paul	45 Merrimack St.	Lowell	01852	150	
Campbell, Gilbert	Box 381	Tyngs	01879	150	
Carnevale, Robert	700 Chelmsford St.	Lowell	01851	300	
Cavanaugh, Paul	158 Pine Ridge Rd.	Medford	02155	200	
Chiungos, John C.		Lowell	01852	300	
Cicerchia, Vincent	170 Concord Rd.	Chelms	01824	150	
Cincerchia, Vincent	170 Concord Ave.	Chelms	01824	150	
Cleary, John T.	Box 554	Groton	01450	200	
Conlon, Dorothy	28 Walker St.	Lowell	01851	300	
Connell, Daniel	190 Littleton Rd.	Westford	01886	150	
Connell, John L.Jr.	174 Central St.	Lowell	01852	450	
Coravos, Stephen	469 Nashua Rd.	Dracut		1000	
Corey, Arthur	37 Monadnock Ave.	Dracut	01826	150	
Costos, George				150	
Coughlin, Kevin	61 Lakeview Ave.	Tyngs	01879	150	
Coughlin, Richard	75 Lakeview Ave.	Tyngs	01879	300	
Coughlin, Thomas	160 Sherburne Ave.	Tyngs	01879	150	
Courtney, George	3 Ardell St.	Lowell	01854	150	
Cox, Kenneth	49 Maryland Ave.	Lowell	01851	150	
Cullen, Thomas	99 Depot Rd.	Westford	01886	150	
Curran, Charles	20 Colonial Dr.	Chelms	01824	150	
Curry, James	67 Walker St.	Lowell	01851	1000	3/6/84
Curry, Pearl	67 Walker St.	Lowell	01851	500	3/6/84

D

Dabilis, George	189 Walker St.	Lowell	01851	750	
Daggett, John	31 Central St.	Lowell	01852	150	
Dalphon, Leo	511 Merrimack St.	Dracut	01826	150	
Davidson, Jeffery	58 Beaver Brook Ln	Dracut	01826	300	
Dawson, Paul				150	
Dawson, Walter				150	
Day, Wm. A.	1968 Lakeview Ave.	Dracut	01826	150	
DeFilippo, Charles	255 North Rd.	Chelms	01824	150	
Demetroulakos, A.	35 Varnum Ave.	Lowell		150	
Demitropoulos, Peter	5 Clare Circle	Westford	01886	150	
Dennen, Harold	102 Parson Circle	Fitchburg	01420	150	
Desmarais, James	195 D St.	Dracut	01826	150	
Devane, Mark	11 Prospect St.	Maynard	01754	150	
Devincenzi, Aldo	176 Church St.	Lowell		150	
Donahue, Joseph	60 Havilah St.	Lowell	01852	300	
Donovan, Ellen	104 High St.	Chelms	01824	300	
Dorman, James J.	307 Pawtucket Bvd.	Lowell	01854	300	
Dowling, John F.	75 Dunbar Ave.	Lowell		300	
Duffy, A.	176 Church St.	Lowell	01852	150	
Duggan, George	23 Alaska Ave.	Bedford	01730	150	
Dumser, C.G.	Eldridge Rd.	Harvard		200	3/10/84
Dunbar, Stephen M.	11 Walnut St.	Townsend		750	
Duncan, George	710 Andover St.	Lowell	01852	150	
Durkin, Gerald				150	

total 12.700

Name	Address	City	Phone	Amount
Elliott, George	Market St.	Lowell	01852	150
Elliott, Esther	19 Main St.	Ferris	01443	400
Eriksen, Walter Jr.	119 Farwell Rd.	Tyngs	01879	150

Name	Address	City	Phone	Amount	Date
Farley, James	24 Beech St.	Lowell	01850	150	
Farley, Leo	24 Beech St.	Lowell	01850	150	
Ferreira, N.M.	240 Barker Ave.	Lowell	01850	600	
Field, Eldred	9 Central St.	Lowell	01852	150	
Field, Marshall	4 Phaeton Cir.	Andover	01810	150	
Finnegan, Beverly				150	
Fish, Edward	17 Roundhill Rd.	Weston	02193	300	
Fitzpatrick MaryEl.	112 Clark Rd.	Lowell	01852	300	
Flaherty, Patrick	282 Middlesex St.	Lowell	01851	150	
Flood, James				150	
Florio, Salvatore				100	
Flynn, Gerald J.	9 Seneca Ave.	Chelms	01824	300	
Flynn, James	29 Chamberlain	Chelms	01824	150	
Flynn, Walter	6 Marriner St.	Lowell	01851	150	
Flynn, Walter	6 Marriner St.	Lowell	01851	100	
Forsley, Michael	511 High St.	Lowell	01852	150	
Forsley, Victor	463 Merrimack St.	Lowell	01852	150	
Fosse, Arthur				150	
Frame, James	3 Essex Place	Chelms	01824	150	
Frawley, David F.	same			300	
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	150	
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	300	
Frotin, Frank	19 Wentworth Ave.	Lowell	01852	300	2/1/84
Fryer, Mel				150	3/19/84

Name	Address	City	Phone	Amount
GJF Realty Trust	149 Pleasant St.	Dracut	01826	150
Gagnon, Harvey	1483 Hildreth St.	Dracut		750
Gagnon, Lorraine	1492 Hildreth St.	Dracut		750
Gagnon, Paul		Lowell	01852	150
Garmon, George	20 Upton Dr.	Tyngs	01879	50
Gaudet, Frederick				150
Gaudette, Robert	5 Ashwood Ave.	Salem NH	03079	150
Geary, James M. Jr.	7 Fletcher Hill	Chelms	01824	300
Georgalos, James	54 Columbus Ave.	Lowell	01851	300
Georgeou, Richard	510 Merrill Ln.	Dracut	01826	150
Gervais, Aime	15 Hillside Ave.	Westford	01886	300
Gervais, Phillip				150
Gervais, Robert		Lowell	01852	300
Gonsalves, Thomas	193 Main St.	Chelms	01824	300
Gosselin, Robert	41 Main St.	Groton	01450	100
Graham, Andrew	47 Black Oak Dr.	Dracut	01826	150
Grayson, Edward	33 Audubon Ln.	Belmont	02178	150
Greene, Philip	33 Old Marsh Hill Rd.	Dracut	01826	150
Greenwood, Ronald	14 Crosby Ln.	Chelms	01824	300
Griffin, Joan	528 Andover St.	Lowell		300
Griffin, John T.	528 Andover St.	Lowell	01852	600

total

11,900

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H

Haggerty, George				150
Hall, James	35 Paige St.	Lowell	01852	150
Hallissy, Peter	Rogers St.	Lowell	01852	300
Hamel, Raymond	25 Jeremy Hill Rd.	Pelham NH	03076	150
Happnie, Joseph P.	28 Carl Rd.	Walpole	02081	300
Harkins, Ken	Hurd St.	Lowell	01852	150
Harrington, John	149 Boston Rd.	Chelms	01824	150
Hartnett, Frank	43 Townsend St.	Pepperell	01437	500
Haven, Allan	90 Salisbury Rd.	Brookline	02146	150
Hayward, P. Edward	87 Main St.	E. Pepperell	01437	100
Herscot, James	185 Country Dr.	Weston	02193	150
Hickman, James	12 Silver Hill Rd.	Acton	01720	150
Hogan, Mary L.				300
Hogan, Wm.	30 Locust Rd.	Chelms	01824	150
Hubers, Carolyn	9 Montview Rd.	Chelms	01824	150

I

Iannotti, Peter J. Jr.	15 Clover Hill Rd.	Chelms	01824	300
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J

Jaffe, Mark	77 Maple Ave.	Andover	01810	150
Janas, John Dr.	17 Warren St.	Lowell	01852	150
Johnson, Louis	Box 854	Lowell	01853	150
Jozokos, James	58 13th St.	Lowell		300
Jumpp, Richard	122 Robin Hill Rd.	Chelms	01824	150

K

Kaknes, Ernest		Westford		1000
Katsikas, Antonios	2000 Lakeview Ave.	Dracut	01826	600
Kazanjan, Ann	21 Rindo Park Rd.	Lowell	01851	3/8/84
Kazeniach, H. James	4 Robinson Rd.	Westford	01886	150
Keefe, Francis	59 Maryland Ave.	Lowell	01851	150
Kelakos, Thomas	77 Frothingham St.	Lowell	01852	150
Kelley, Kathleen	38 Walter St. 9	Lowell	01851	150
Kelty, Reb. Dabilis	62 Lakeshore Dr. So.	Westford	01886	750
Kemp, John	Box 565	E. Pepperell	01437	200
Kennedy, John Sr.	960 Main St.	Acton	01720	300 2/1/84
Kettenbach, Francis	40 Coachman Ln.	Andover	01810	750 3/1/84
Kettenbach, Michael	40 Coachman Ln.	Andover	01810	750 3/1/84
King, Francis Jr.	41 W. Forest St.	Lowell	01851	300
King, Wm.	658 Andover St.	Lowell		300
Kirby, Robert L.	16 Pierce Ave.	Westford		200
Kopka, Jack				150
Koumantzelis, Arthur	Round Hill Rd.	Lincoln	01773	150

total

10550

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L

LaRoche, Richard F.				300
LaValley, James	426 Townsend Rd.	Groton	01450	150
Lambert, James F.	12 Wellesley Rd.	Nashua NH	03060	200
Lazaro, Marshall	15 Seminole Ave.	Waltham	02154	150
Leahy, Daniel		Lowell	01852	150
Lenzi, Albert F.	105 Georgia Ave.	Lowell	01852	300
Levine, Paul	385 Gorham St.	Lowell	01852	150
Lezberg, Melvin	15 Crane Ave.	Peabody	01960	150
Lorden, C.W.				150
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	100
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	400
Lussier, Gerald	1734 Lakeview Ave.	Dracut	01826	600

M

Machado, Thomas	147 Billerica St.	Lowell	01852	150
Mack, Walter	119 Holyrood Ave.	Lowell	01852	150
Maguire, Michael				150
Main, Richard				150
Malliaros, George	1105 Lakeview Ave.	Dracut	01826	150
Marcella, Walter	16 Tadmuck Rd.	Westford	01886	150
Marcotte, Al	Merrimack St.	Lowell	01852	300 2/1/84
Marquis, Geoffrey	16 Hollis St.	Groton	01450	200
Mason, Stephen J.				300
Mastacouris, Cath.	5 Barton Ave.	Dracut	01826	150
McCarthy, James	78 Glenwood St.	Lowell	01852	???
McCarthy, Justin	190 Littleton Rd.	Westford	01886	150 2/1/84
McCartney, Richard				300
McDermott, Brendon				150
McDougall, Frank	30 Westminster St.	Lowell	01851	150
McDowell, Wm.	235 Wentworth Ave.	Lowell	01852	150
McDuffee, David H.	Cabot Rd.	Merrimack NH	03054	200
McKenna, Hyacinth	Thorndike St.	Dunstable	01827	150
McKenney, Francis J.	15 Marriner	Lowell		150
McKiel, Robert	100 Hale St.	Lowell	01852	300
McLaughlin, Charles	7 Summit Ave.	Chelms	01824	500
McLaughlin, Kathryn	38 Second Ave.	Lowell	01854	150
McLaughlin, Robert	38 Second Ave.	Lowell	01854	150
McManus, James	255 Patricia Ln.	Dracut	01826	600
McNabb, John	15 Shirley St.	Pepperell	01437	100
Meehan, Martin	22 London St.	Lowell	01852	150
Mello, Louis	90 Lincoln St.	Lowell	01852	300
Milinazzo, James	12 Carriage Dr.	Lowell	01852	150
Montminy, George, OD	107 Lincoln Ln.	Dracut	01826	25
Morrissey, E.A.	168 Concord Rd.	Westford	01886	150
Muldoon, Frank	49 Vangreenby Rd.	Lowell	01851	150
Murphy, Garry	63 Shamut Ave.	Lowell	01851	150
Murphy, Gregory				150
Murphy, Robert J.	38 Rindo Park Dr.	Lowell	01851	300
Murphy, Vincent	700 Hildreth St.	Dracut	01826	150

N

Nelson, John	931 Methuen St.	Dracut	01826	150
Neves, John E.	75 Norcross St.	Lowell	01851	300
Normand, Victor R.	106 Park Ave. W.	Lowell	01852	300
Nyman, Philip	385 Gorham St.	Lowell	01852	300

total

10,875

O'Connor, Ann	21 Tyler Park	Lowell	01851	150
O'Neill, Mary E.				300
Ouellette, Reginald				150
Ozella, R.M.	219 Lincoln St.	Lowell	01851	150

Palm, Nels A. III	24 Berkley Dr.	Chelms	01824	300
Panageotopoulos, Cha.	22 Hope St.	Dracut	01826	150
Pare, Maura	Brick Kiln Rd.	Chelms	01824	150
Pare, Ronald		Chelms	01824	150
Plomaritis, Claire	Bridge St.	Pelham NH		300
Poor, Stephen Dr.	20 Hurd St.	Lowell	01852	150
Psaino, George	1059 East St.	Tewks	01976	150

Guirk, Daniel	37 Commercial St.	Braintree	02184	300
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Rabias, Nicholas	24 Merrimack St.	Lowell	01852	300
Rechnitz, Paula	23 Maple St.	Pepperell	01463	200
Redstone, Edward	Central Sq.	Chelms	01824	900
Richards, Frederick	50 Christman Ave.	Lowell		150
Riley, Wm.	11 Crabapple Ln.	Chelms	01824	150
Riney, M. Edward	2 Bartlett St.	Chelms	01824	150
Rizzo, Jerome	10 Beech St.	Townsend	01469	150
Roberto, Richard	147 Bunkerhill Ave.	Lowell	01850	300
Rogers, Richard	75 Middlesex St.	No. Chelms	01863	150
Ronan, James	95 Frothingham St.	Lowell	01852	150
Ryan, Arthur Jr.	651 Westford St.	Lowell	01851	300

Samaras, John				150
Sandelli, John				125
Schiripo, Richard	277 Willard St.	Dracut	01826	150
Schiripo, Richard	277 Willard St.	Dracut	01826	150
Scully, Brian P.	124 Belrose Ave.	Lowell		300
Sergi, Nat	9 Checkerberry Ln.	Chelms	01824	300
Shapiro, Martin	21 Betanray Ct.	Leominster	01453	100
Shea, Wm.	33 Wagonwheel Rd.	Dracut	01826	150
Sheehan, George	262 White St.	Lowell	01854	150
Shepard, Warren	1465 Middlesex St.	Lowell	01851	150
Singleton, Richard	91 Norris Rd.	Tyngs	01879	300
Slavin, Carol A.	27 Balcom Rd.	Pelham NH		200
Slotnick, Marc	175 Woodward St.	Newton	02161	150
Smith, Paul	24 Cady St.	Lowell	01851	150
Smith, Raymond	24 Cady St.	Lowell	01852	150
Smith, Wilber H. Jr.	4 Summit Dr.	Atkinson NH	03811	150
Spinelli, Michael		Lowell		300
Stapinski, Stephen	49 5th Ave.	Haverhill	01830	150
Stone, James	5 Providence Hill Rd.	Atkinson NH	03811	150
Straub, Robert	Varnum Ave.	Lowell	01854	150
Sullivan, James S.	77 Front St.	Shirley	01464	300
Sullivan, John E.	25 Aberdeen Rd.	Chelms	01824	300

total 9475



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T

Tabloski, Donna				150
Talty, Francis	138 Felton St.	Lowell	01852	300
Tanger, Arthur A.				300
Thompson, D. Eric	North Rd.	Chelms	01824	300
Tobin, Brendan	57 Harland Ave.	Lowell	01852	150
Tobin, John	20 Southwick Rd.	N. Reading	01864	150
Tobin, Thomas				150
Trivers, Theodore	10 Tanglewood Dr.	Chelms	01824	150
Trombly, Robert	57 Belmont Ave.	Lowell	01852	150 3/19/84
Tucke, Gerald	20 Fairview Ave.	Chelms	01863	300
Tucke, Sheila				150
Twarog, Louis	18 Wedge St.	Lowell	01851	300

V

Vachon, Joseph	34 Mt. Pleasant Ave.	Dracut	01826	150
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W

Wallace, Gerald				150
Wais, Heiner	19 Parkhurst Rd.	Chelms	01824	150
Walantis, John H.	One Hollis St.	Groton	01450	200
Welch, Wm.	645 Robbins Ave.	Dracut	01826	150
Wojcik, Daniel	385 Gorham St.	Lowell	01852	150
Wojcik, Stephen	20 Stedman St.	Lowell	01851	300

Z

Zaharoolis, S. George	14 Harding St.	Lowell	01851	150
Zwicker, Beatrice	41 Donald Ter.	Lowell	01852	300

12108

total 4250

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7/26/84

## SENATE CONTRIBUTIONS

NAME	ADDRESS	CITY/TOWN	ZIP	AMOUNT
Abbott, David	Box 2094	Lowell	01851	150
Akashian, Bruce	41 Winward Rd.	Lowell	01852	300
Akashian, Newton	263 Old Westford Rd.	Chelms	01824	150
Albert, Norman	8 Page St.	Shirley	01464	100
Alden, Richard	138 Main St.	Andover	01810	450
Allen, Paul	735 School St.	Lowell	01851	150
Angell, Evangeline	262 Middlesex Rd.	Tyngs	01879	150
Armstrong, Walter	50 Marshall Ave	Lowell		150
Arnold, John	4 Hayden Rd.	No. Billerica	01862	150
Atamian, Robert	11 April Ln.	Lexington	02173	150
AMENDED				
Babineau, Chester	Box 56	E. Pepperell	01437	100
Bailey, Kath. Meehan-	40 Cascade St.	Lowell		300
Bain, Paul				150
Ballou, Daniel	194 Woburn St.	Wilmington	01887	150
Barker, Thomas A.	76 Village Dr.	Dracut	01826	300
Bates, Robert	106 University Ave.	Lowell	01854	150
Beati, Anthony	40 Fairmont Ave	Lowell		150
Behrakis, George	Mansur St.	Lowell		300
Belle, Bernard H.	1 Schooner Ridge	Marblehead	01945	300
Bendetson, Richard	63 Atlantic Ave.			300
Bergeron, Rachel	2 Willowdale Ave.			300
Bishop, Edward	Bouchard Ave.	Dracut		150
Bomil, Thomas	355 Pawtucket Blv.	Lowell	01854	150
Bornstein, Rochelle	60 Colonial Dr.	Andover	01810	150
Bornstein, Stanley	113 North Ridge Rd.	Ipswich	01938	150
Boumil, S. James				150
Bournival, Richard D.	831 Rogers St.	Lowell	01852	300
Boyle, Arthur	129 W. Jenness St.	Lowell	01851	150
Boyle, Janet M.	115 Westview Rd.	Lowell	01851	300
Brennan, Peter J.	65 Clark Rd.	Lowell	01852	300
Bresnahan, John	Box 354	Harvard	01451	100
Breton, Leo	1275 Bridge St.	Dracut	01826	300
Broderick, Peter	Center St. RFD 3	Groveland	01834	150
Buckley, John	83 Dalton Rd.	Chelms	01824	150 2/1/84
Bugler, John	37 Black Oak Dr.	Dracut	01826	150
Burton, David	105 Brookline St.	Pepperell	01463	150

total

7200

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CAMPAIGN & POLITICAL  
FINANCE

Page 1

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CAMPAGN & POLITICAL  
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3 3 1 4 7

total 12.700

Early, Edward	463 Merrimack St.	Lowell	01852	150
Eisenberg, Herbert				150
Eliades, George	Market St.	Lowell	01852	300
Elliott, Esther	19 Main St.	Pepperell	01463	400
Eriksen, Walter Jr.	119 Farwell Rd.	Tyngs	01879	150

Farley, James	24 Beech St.	Lowell	01850	150
Farley, Leo	24 Beech St.	Lowell	01850	150
Ferreira, N.M.	240 Barker Ave.	Lowell	01850	600
Field, Eldred	9 Central St.	Lowell	01852	150
Field, Marshall	4 Phaeton Cir.	Andover	01810	150
Finnegan, Beverly				150
Fish, Edward	17 Roundhill Rd.	Weston	02193	300
Fitzpatrick MaryEl.	112 Clark Rd.	Lowell	01852	300
Flaherty, Patrick	282 Middlesex St.	Lowell	01851	150
Flood, James	9 CENTRAL ST	LOWELL		150
Florio, Salvatore				100
Flynn, Gerald J.	9 Seneca Ave.	Chelms	01824	300
Flynn, James	29 Chamberlain	Chelms	01824	150
Flynn, Walter	6 Marriner St.	Lowell	01851	150
Flynn, Walter	6 Marriner St.	Lowell	01851	100
Forsley, Michael	511 High St.	Lowell	01852	150
Forsley, Victor	463 Merrimack St.	Lowell	01852	150
Fosse, Arthur				150
Frame, James	3 Essex Place	Chelms	01824	150
Frawley, David F.	same			300
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	150
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	300
Frotin, Frank	19 Wentworth Ave.	Lowell	01852	300 2/1/84
Fryer, Mel				150 3/19/84

GJF Realty Trust	149 Pleasant St.	Dracut	01826	150
Gagnon, Harvey	1483 Hildreth St.	Dracut		750
Gagnon, Lorraine	1492 Hildreth St.	Dracut		750
Gagnon, Paul	214 SIXTH AVE	Lowell	01852	150
Garmon, George	20 Upton Dr.	Tyngs	01879	50
Gaudet, Frederick	35 BROOKS ST	Dracut	01826	150
Gaudette, Robert	5 Ashwood Ave.	Salem NH	03079	150
Geary, James M. Jr.	7 Fletcher Hill	Chelms	01824	300
Georgalos, James	54 Columbus Ave.	Lowell	01851	300
Georgeou, Richard	510 Merrill Ln.	Dracut	01826	150
Gervais, Aime	15 Hillside Ave.	Westford	01886	300
Gervais, Phillip	SAME			150
Gervais, Robert	750 Andover St	Lowell	01852	300
Gonsalves, Thomas	193 Main St.	Chelms	01824	300
Gosselin, Robert	41 Main St.	Groton	01450	100
Graham, Andrew	47 Black Oak Dr.	Dracut	01826	150
Grayson, Edward	33 Audubon Ln.	Belmont	02178	150
Greene, Philip	33 Old Marsh Hill Rd.	Dracut	01826	150
Greenwood, Ronald	14 Crosby Ln.	Chelms	01824	300
Griffin, Joan	523 Andover St.	Lowell		300
Griffin, John	523 Andover St.	Lowell	01852	600

CAMPAIGN & POLITICAL  
FINANCE

total

11,900

Haggerty, George	35 Paige St.	Lowell	01852	150
Hall, James	Rogers St.	Lowell	01852	150
Hallissy, Peter	25 Jeremy Hill Rd.	Lowell	01852	300
Hamel, Raymond	28 Carl Rd.	Palham NH	03076	150
Happnie, Joseph P.	Hurd St.	Walpole	02081	300
Harkins, Ken	149 Boston Rd.	Lowell	01852	150
Harrington, John	43 Townsend St.	Chelms	01824	150
Hartnett, Frank	90 Salisbury Rd.	Pepperell	01437	500
Haven, Allan	87 Main St.	Brookline	02146	150
Hayward, P. Edward	185 Country Dr.	E. Pepperell	01437	100
Herscot, James	12 Silver Hill Rd.	Weston	02193	150
Hickman, James	JAME	Acton	01720	150
Hogan, Mary L.	30 Locust Rd.	Chelms	01824	300
Hogan, Wm.	9 Montview Rd.	Chelms	01824	150
Hubers, Carolyn				150

I

Iannotti, Peter J. Jr.	15 Clover Hill Rd.	Chelms	01824	300
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J

Jaffe, Mark	77 Maple Ave.	Andover	01810	150
Janas, John Dr.	17 Warren St.	Lowell	01852	150
Johnson, Louis	Box 854	Lowell	01853	150
Jozokos, James	58 13th St.	Lowell		300
Jumpp, Richard	122 Robin Hill Rd.	Chelms	01824	150

K

Kaknes, Ernest		<del>Westford</del> chelmsford		1000
Katsikas, Antonios	2000 Lakeview Ave.	Dracut	01826	600
Kazanjian, Ann	21 Rindo Park Rd.	Lowell	01851	3/8/84
Kazeniak, H. James	4 Robinson Rd.	Westford	01886	150
Keefe, Francis	59 Maryland Ave.	Lowell	01851	150
Kelakos, Thomas	77 Frothingham St.	Lowell	01852	150
Kelley, Kathleen	38 Walter St. 9	Lowell	01851	150
Kelty, Reb. Dabilis	62 Lakeshore Dr. So.	Westford	01886	750
Kemp, John	Box 565	E. Pepperell	01437	200
Kennedy, John Sr.	960 Main St.	Acton	01720	300 2/1/84
Kettenbach, Francis	40 Coachman Ln.	Andover	01810	750 3/1/84
Kettenbach, Michael	40 Coachman Ln.	Andover	01810	750 3/1/84
King, Francis Jr.	41 W. Forest St.	Lowell	01851	300
King, Wm.	658 Andover St.	Lowell		300
Kirby, Robert L.	16 Pierce Ave.	Westford		200
Kopka, Jack				150
Koumantzelis, Arthur	Round Hill Rd.	Lincoln	01773	150

total 10550

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CAMPAIGN & POLITICAL  
FINANCE



Lafayette, Richard F.	426 Townsend Rd.	Groton	01450	150
LaValley, James	12 Wellesley Rd.	Nashua NH	03060	200
Lambert, James F.	15 Seminole Ave.	Waltham	02154	150
Lazaro, Marshall		Lowell	01852	150
Leahy, Daniel	105 Georgia Ave.	Lowell	01852	300
Lenzi, Albert F.	385 Gorham St.	Lowell	01852	150
Levine, Paul	15 Crane Ave.	Peabody	01960	150
Lezberg, Melvin	<del>15 Crane Ave.</del>	<del>Peabody</del>		150
Lorden, C.W.				150
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	100
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	400
Lussier, Gerald	1734 Lakeview Ave.	Dracut	01826	600

M

Machado, Thomas	147 Billerica St.	Lowell	01852	150
Mack, Walter	119 Holyrood Ave.	Lowell	01852	150
Maguire, Michael	<del>183 Methuen St.</del>	<del>Lowell</del>		150
Main, Richard	Westchester	Chelmsford		150
Malliaros, George	1105 Lakeview Ave.	Dracut	01826	150
Marcella, Walter	16 Tadmuck Rd.	Westford	01886	150
Marcotte, Al	Merrimack St.	Lowell	01852	300 2/1/84
Marquis, Geoffrey	16 Hollis St.	Groton	01450	200
Mason, Stephen J.	147 Merrimack	Lowell	01852	300
Mastacouris, Cath.	5 Barton Ave.	Dracut	01826	150
McCarthy, James	78 Glenwood St.	Lowell	01852	???
McCarthy, Justin	190 Littleton Rd.	Westford	01886	150 2/1/84
McCartney, Richard	16 STATE ST	LOWELL		300
McDermott, Brendon	305 PINE ST	LOWELL		150
McDougall, Frank	30 Westminister St.	Lowell	01851	150
McDowell, Wm.	235 Wentworth Ave.	Lowell	01852	150
McDuffee, David H.	Cabot Rd.	MerrimackNH	03054	200
McKenna, Hyacinth	Thorndike St.	Dunstable	01827	150
McKenney, Francis J.	15 Marriner	Lowell		150
McKiel, Robert	100 Hale St.	Lowell	01852	300
McLaughlin, Charles	7 Summit Ave.	Chelms	01824	500
McLaughlin, Kathryn	38 Second Ave.	Lowell	01854	150
McLaughlin, Robert	38 Second Ave.	Lowell	01854	150
McManus, James	255 Patricia Ln.	Dracut	01826	600
McNabb, John	15 Shirley St.	Pepperell	01437	100
Meehan, Martin	22 London St.	Lowell	01852	150
Mello, Louis	90 Lincoln St.	Lowell	01852	300
Milinzazo, James	12 Carriage Dr.	Lowell	01852	150
Montminy, George, OD	107 Lincoln Ln.	Dracut	01826	25
Morrissey, E.A.	128 Concord Rd.	Westford	01886	150
Muldoon, Frank	40 Vangreenby Rd.	Lowell	01851	150
Murphy, Garry	63 Shamut Ave.	Lowell	01851	150
Murphy, Gregory				150
Murphy, Robert J.	38 Rindo Park Dr.	Lowell	01851	300
Murphy, Vincent	700 Hildreth St.	Dracut	01826	150

N

Nelson, John	931 Methuen St.	Dracut	01826	150
Neves, John E.	75 Norcross St.	Lowell	01851	300
Norman, Philip	105 Park Ave. W.	Lowell	01852	300
Nyman, Philip	315 Gorham St.	Lowell	01852	300

FINANCE  
CAMPAIGN & POLITICAL

total

58,101



O'Neill, Mary E.  
Ouellette, Reginald  
Ozella, R.M.

219 Lincoln St.

Lowell

01851

300  
150  
150

P

Palm, Nels A. III 24 Berkley Dr.  
Panageotopoulos, Cha. 22 Hope St.  
Pare, Maura Brick Kiln Rd.  
Pare, Ronald 5 Berk Kiln Rd.  
Plomaritis, Claire Bridge St.  
Poor, Stephen Dr. 20 Hurd St.  
Psaino, George 1059 East St.

Chelms  
Dracut  
Chelms  
Chelms  
Pelham NH  
Lowell  
Tewks

01824  
01826  
01824  
01824  
01852  
01976

300  
150  
150  
150  
300  
150  
150

Q

Quirk, Daniel 37 Commercial St.

Braintree

02184

300

R

Rabias, Nicholas 24 Merrimack St.  
Rechnitz, Paula 23 Maple St.  
Redstone, Edward Central Sq.  
Richards, Frederick 50 Christman Ave.  
Riley, Wm. 11 Crabapple Ln.  
Riney, M. Edward 2 Bartlett St.  
Rizzo, Jerome 10 Beech St.  
Roberto, Richard 147 Bunkerhill Ave.  
Rogers, Richard 75 Middlesex St.  
Ronan, James 95 Frothingham St.  
Ryan, Arthur Jr. 651 Westford St.

Lowell  
Pepperell  
Chelms  
Lowell  
Chelms  
Chelms  
Townsend  
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No. Chelms  
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Lowell

01852  
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01824  
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01824  
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01852  
01851

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S

Samaras, John  
Sandelli, John 149 Pleasant St.  
Schiripo, Richard 277 Willard St.  
Schiripo, Richard 277 Willard St.  
Scully, Brian P. 124 Belrose Ave.  
Sergi, Nat 9 Checkerberry Ln.  
Shapiro, Martin 21 Betanray Ct.  
Shea, Wm. 33 Wagonwheel Rd.  
Sheehan, George 262 White St.  
Shepard, Warren 1405 Middlesex St.  
Singleton, Richard 91 Norris Rd.  
Slavin, Carol A. 27 Balcom Rd.  
Slotnick, Marc 175 Woodward St.  
Smith, Paul 24 Cady St.  
Smith, Raymond 24 Cady St.  
Smith, Wilber H. Jr. 4 Summit Dr.  
Spinelli, Michael 7  
Stapinski, Stephen 49 5th Ave.  
Stone, James 5 Providence Hill Rd.  
Straub, Robert Varum Ave.  
Sullivan, James S. 77 Front St.  
Sullivan, John E. 25 Aberdeen Rd.

Dracut  
Dracut  
Lowell  
Chelms  
Leominster  
Dracut  
Lowell  
Lowell  
Tyngs  
Pelham NH  
Newton  
Lowell  
Lowell  
Atkinson NH  
Lowell  
Haverhill  
Atkinson NH  
Lowell  
Shirley  
Chelms

01824  
01826  
01826  
01824  
01453  
01826  
01854  
01851  
01879  
02161  
01851  
01852  
03811  
01830  
03811  
01854  
01464  
01824

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300

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CAMPAIGN & POLITICAL  
FINANCE

total

9475

Page 6

Tanser, Arthur A.	18 Felton St.	Lowell	01852	150
Thompson, D. Eric	North Rd.	Chelms	01824	300
Tobin, Brendan	57 Harland Ave.	Lowell	01852	300
Tobin, John	20 Southwick Rd.	N. Reading	01864	150
Tobin, Thomas				150
Trivers, Theodore	10 Tanglewood Dr.	Chelms	01824	150
Trombly, Robert	57 Belmont Ave.	Lowell	01852	150
Tucke, Gerald	20 Fairview Ave.	Chelms	01863	300
Tucke, Sheila	"	"	"	150
Twarog, Louis	18 Wedge St.	Lowell	01851	300

3/19/

V  
 Vachon, Joseph 34 Mt. Pleasant Ave. Dracut 01826 150

W  
 Wallace, Gerald 150  
 Wais, Heiner 150  
 Walantis, John H. 19 Parkhurst Rd. Chelms 01824 150  
 Welch, Wm. One Hollis St. Groton 01450 200  
 Wojcik, Daniel 645 Robbins Ave. Dracut 01826 150  
 Wojcik, Stephen 385 Gorham St. Lowell 01852 150  
 20 Stedman St. Lowell 01851 300

Z  
 Zaharoolis, S. George 14 Harding St. Lowell 01851 150  
 Zwicker, Beatrice 41 Donald Ter. Lowell 01852 300

12108

total 4250

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CAMPAIGN & POLITICAL  
 FINANCE  
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EXHIBIT F

# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) <input type="checkbox"/> Check if name or address is changed. <b>Phil Shea for Congress Committee</b>	2. Date <b>July 21, 1986</b>
(b) Address (Number and Street) <b>630 Merrimack Street</b>	3. FEC Identification Number <b>110-361</b>
(c) City, State and ZIP Code <b>Lowell, MA 01852</b>	4. Is this an amended Statement? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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.)
- ☐ (c) This committee supports/opposes only one candidate \_\_\_\_\_ and is NOT an authorized committee.  
(name of candidate)
- ☐ (d) This committee is a \_\_\_\_\_ committee of the \_\_\_\_\_ 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.

**Philip L. Shea** **Democrat** **House of Representatives 5th** **MA**  
Name of Candidate Candidate Party Affiliation Office Sought State/District

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Committee to keep Phil Shea Senator	430 Merrimack Street Lowell, MA 01852	Affiliated 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. 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
Frank G. McDougall Jr.	Lowell Institution for Savings 18 Shattuck St., Lowell, MA 01852	Treasurer

## 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
Frank G. McDougall Jr.	Lowell Inst. for Savings, 18 Shattuck St., Lowell, MA 01852	Treasurer
Mary Ellen Fitzpatrick	First Bank, 170 Merrimack St., Lowell, MA	Asst. Treasurer

## 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
First Bank	170 Merrimack St. Lowell, MA 01852

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

**Frank G. McDougall Jr.**  
Type or Print Name of Treasurer

**SIGNATURE OF TREASURER**

**7/30/86**  
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 800-424-9630, Local 202-523-4068

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83040701670

EXHIBIT G

83040701671

109581000000755

77-540-1

1578 of 22



ADVICE  
OF DEBIT



Date 9/20/84

775401 We have this day debited your account \$ 3,000.00  
Covering: TRANSFER TO 563315

MAIL  
TO

FRANK MCDOUGALL

Approved by

LJP

⑈ 77 540 1 ⑈

Customer Receipt

56-3315



**FIRST  
BANK**  
Member FDIC  
256-2565

- ☒ Checking/NOW  
☐ Credit Card  
☐ Safe Deposit  
☐ Loan  
☐ Other

Savings Deposit ☐  
Savings Withdrawal ☐

All deposited items are received for collection.  
All credits for these items are provisional.

The Deposit or Withdrawal for which this receipt is issued is subject to the rules and regulations of the bank.

075 07 9-17-84#093 \$3,000.00 D

Thank you for banking with us.

Rev. 12/83 SM

ADVICE  
OF CREDIT



Date 9/20/84

563315 We have this day credited your account \$ 3,000.00  
Covering:

TRANSFER FROM ACCOUNT 775401

MAIL  
TO

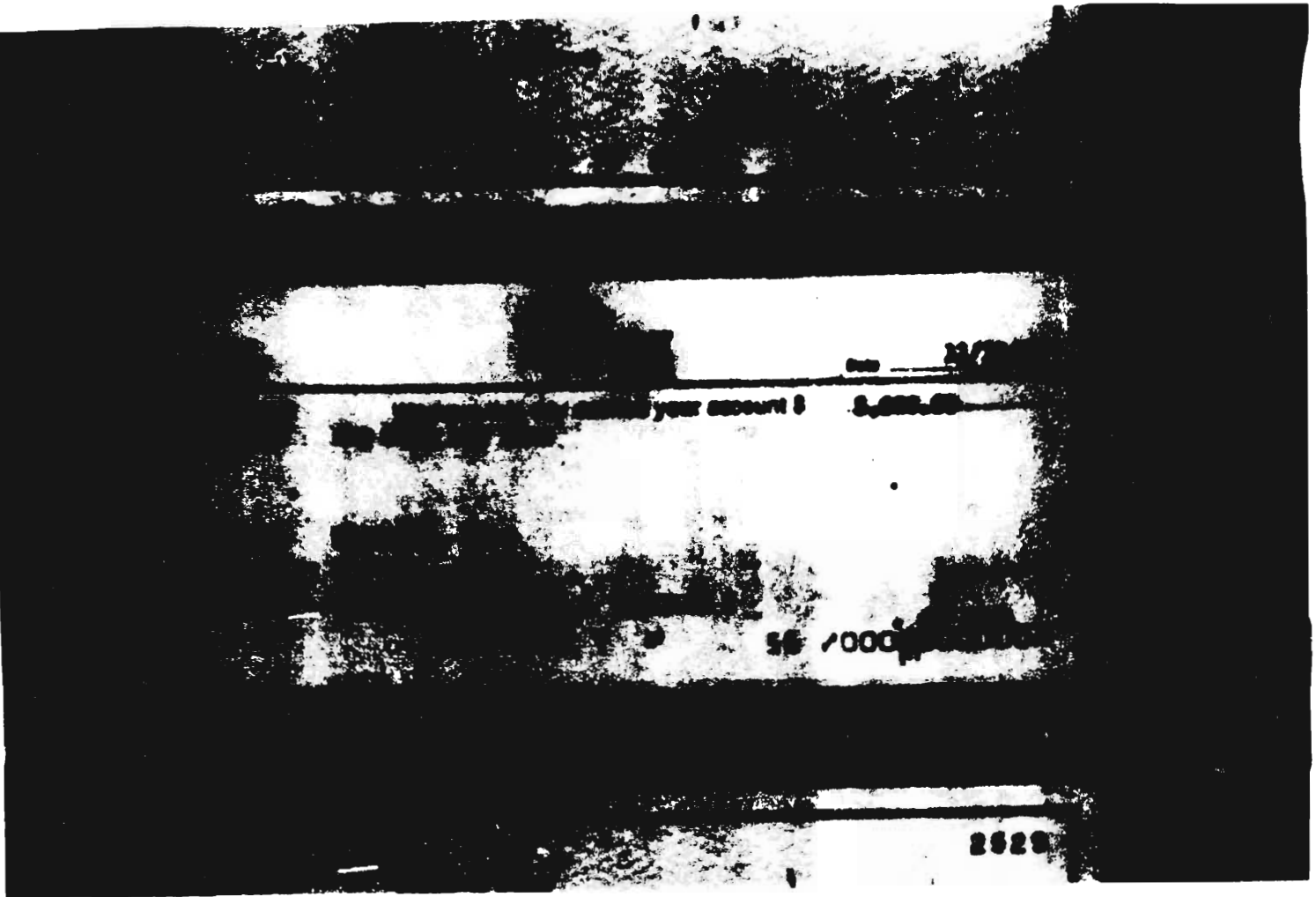
FRANK MCDOUGALL

Approved by

LJP

⑈ 56 331 5 ⑈

33740701573



DATE 12/28/2000

AMOUNT OF YOUR ACCOUNT \$ 3,000.00

\$ 1,000.00

2529

4626. JORDAN

[illegible]

.. 11/15, 84

1  
Covering:

~~Transit~~ We have this day debited your a/c with \$ 5,000.00

MAIL  
TO

Philip L. Shen

77 540 6 100005000000

ARMED & DANGEROUS  
THIS INDICATES OF  
LOWELL, MA 01801

280

43-681  
113

#53 998

100

ADVISE  
OF CREDIT



BANK

11/15/84

5,000.00

7  
Covering

Transfer

Phillip L. Stone

MAIL  
NO

075 07 11/16/84037

15,000.00

#53 959 7 04 200000000000

DEPOSIT TICKET

MARY C SLATTERY

3 BELDING ROAD  
CHELMSFORD, MA 01824

22.50

53-001  
113



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SECRET  
WILLIAM B. BRYAN, JR.  
1984

ASH 10

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RECEIVED AT THE FEC

**GOODWIN, PROCTER & HOAR**

(A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS)

COUNSELLORS AT LAW

EXCHANGE PLACE

BOSTON, MASSACHUSETTS 02109

86 SEP 2 12:37

TELEPHONE (617) 570-1000

TELECOPIER (617) 523-1231

TELEX 94-0840

CABLE: GOODPROCT, BOSTON

August 28, 1986

Robert Raich, Esq.  
Federal Election Commission  
999 East Street, N.W.  
Washington, D.C. 20463

Re: MUR 2124 (Phil Shea for Congress Committee)

Dear Mr. Raich:

Enclosed, per your request, is a Supplemental Affidavit of Martin Meehan addressing the origins of the cash contributions to the Phil Shea for Congress Committee. Please contact us if any additional information is required.

Sincerely,

*John C. Englander*  
John C. Englander

JCE:sjb  
Encl.

5 AUG 2 3:44

RECEIVED  
GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION

88040701679

SUPPLEMENTAL AFFIDAVIT OF MARTIN MEEHAN

I, Martin Meehan, on the basis of my personal knowledge, hereby depose and state as follows:

1. I was campaign manager for Phil Shea during his campaign for election as the United States Congressman from the Fifth District of Massachusetts.

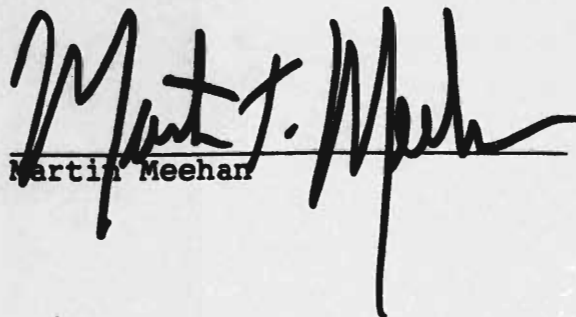
2. During the course of Mr. Shea's campaign, the campaign committee held six \$10 per head fundraisers, in various towns in the Fifth Congressional District. These fundraisers were held in Lowell, Dracut, Chelmsford, Pepperell, Westford and Methuen. We advertised concerning these fundraisers in the newspapers, and each person who attended was asked to contribute ten dollars to Phil Shea's campaign. We informed the Federal Election Commission auditors of these fundraisers at the time they conducted their audit.

3. To the best of my recollection, on or about August 29, 1984 we held the ten dollar fundraiser in Pepperell. The proceeds from this fundraiser account for the \$805 in cash deposited in the Committee account on August 30, 1984.

4. The campaign had a written policy, which was distributed to campaign workers, of not accepting more than \$15 in cash deposits from any one person. I am confident that no single person contributed over \$100 in cash to the Phil Shea campaign.

98040701680

. Signed under the pains and penalties of perjury this 28<sup>th</sup>  
day of August, 1986.

  
Martin Meehan

VS-1112/1  
8/27/86

33040701681

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
 )  
Phil Shea for Congress )  
Committee and Francis McDougall, )  
as treasurer )  
Committee to Keep Phil Shea )  
Senator and G. Douglas )  
Sullivan, as treasurer )

MUR 2124

86 OCT 2 P4:16

GENERAL COUNSEL'S REPORT

The Commission has made reason to believe findings in this matter with respect to two political committees and their treasurers: Phil Shea for Congress Committee (the "Committee") and Francis McDougall, as treasurer, and Committee to Keep Phil Shea Senator (the "State Senate Committee") and G. Douglas Sullivan, as treasurer. This Report addresses the violations by each political committee in a separate section.

I. Violations by the Committee

The Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 434(b)(4); 432(c)(1), (2), (3), (4), and (5); 432(d); 432(h)(1); 441b(a); 433(c); and 11 C.F.R. § 102.6(a)(1)(iv). Attorneys for the Committee's treasurer have submitted two responses to the Commission (Attachments 1 and 2).

A. Misstatement of Financial Activity

The Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b)(4) because, on the basis of the audit, it appeared that the Committee understated its disbursements by approximately \$9,700 on its reports. In his response to the Commission, the Committee's treasurer explained the disbursements and submitted amended reports, which have been placed on the public record.

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Although the Committee's reports were incorrect initially, the Committee's treasurer has now amended the reports and produced documentation supporting the amendments. Accordingly, the General Counsel's Office recommends that the Commission take no further action against the Committee and its treasurer concerning this issue.

B. Documentation for Contributions

3  
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1  
0  
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0  
1  
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3  
The Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (4) and 432(d) because, on the basis of the audit, it appeared that the Committee failed to keep and preserve records of contributions totalling nearly \$72,000. The Committee's treasurer has now produced documentation supporting all but \$30 of the Committee's \$280,269 in contributions. In addition, with regard to the Committee's cash contributions, the treasurer produced evidence indicating that the Committee did not accept currency in prohibited amounts. (See Attachment 1, p. 72 and Attachment 2, p. 2.)

Because the Committee's treasurer has now produced documentation for 99.99% of the Committee's contributions, the General Counsel's Office recommends that the Commission take no further action against the Committee and its treasurer concerning this issue.

C. Documentation for Disbursements

The Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 432(c)(5), 432(d), and



432(h)(1) because, on the basis of the audit, it appeared that the Committee failed to keep and preserve adequate documentation for disbursements totalling \$33,286. The Committee's treasurer has now produced documentation supporting the entire \$33,286. Accordingly, the General Counsel's Office recommends that the Commission take no further action against the Committee and its treasurer concerning this issue.

D. Documentation for Transfer from Affiliated Committee

The Commission found reason to believe the Committee and its treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv) because, on the basis of the audit, it appeared that the Committee may have accepted contributions from labor unions as part of funds transferred from the State Senate Committee. In addition, the Commission found reason to believe the Committee violated 2 U.S.C. § 433(c) by failing to file an amended Statement of Organization listing the State Senate Committee as an affiliated committee.

In his response to the Commission, the Committee's treasurer provided evidence that the State Senate Committee refunded most labor union contributions it received before it transferred any funds to the Committee (Attachment 1, p. 70-72). However, a total of \$300 may have been among the \$40,500 transferred by the State Senate Committee to the Committee. Of that \$300, \$100 was a contribution that may have been refunded although the State Senate Committee's Massachusetts report fails to disclose the

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refund. The other \$200 was a contribution the State Senate Committee received in June, 1982. The transfer to the Committee took place in June, 1984. Both the \$100 and the \$200 contributions were among funds the State Senate Committee used to purchase a \$20,000 certificate of deposit, the proceeds of which constituted a portion of the transfer to the Committee.

Because of the small amount of labor union contributions involved and the indirect route by which the funds found their way into the Committee's receipts, this Office recommends that the Commission take no further action against the Committee and its treasurer concerning violations of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

The Committee's treasurer has now filed an amended Statement of Organization listing the State Senate Committee as an affiliated committee. (Attachment 1, p. 99) The amended Statement of Organization has been placed on the public record. Although the amendment was not filed within ten days after the State Senate Committee became an affiliated political committee, because of the nature of this violation, and in light of the other recommendations in this Report, the General Counsel's Office recommends that the Commission take no further action against the Committee and its treasurer concerning this violation of 2 U.S.C. § 433(c).

## II. Violations by the State Senate Committee

The Commission found reason to believe the State Senate Committee and its treasurer violated 2 U.S.C. §§ 433(a), 434(a),

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and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv). The State Senate Committee and its treasurer have not responded to the Commission's findings.

An attorney named James Linnehan is representing the candidate's interests in this matter. (See Attachment 3, p. 1.) Linnehan has purported to act on behalf of all of the respondents. (See, e.g., Attachment 3, p. 2.) On several occasions, by telephone and letter, this Office explained to Linnehan that he was representing the candidate only, not any of the respondents. (See, e.g., Attachment 3, p. 3.)

Neither Linnehan nor any other person has responded to the reason to believe findings against the State Senate Committee and its treasurer. Accordingly, this Office will proceed to the next phase of the enforcement process with respect to Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer.

### III. Recommendations

1. Take no further action and close the file with regard to Phil Shea for Congress Committee and Francis McDougall, as treasurer.
2. Approve and send the attached letter.

Charles N. Steele  
General Counsel

10/2/86  
Date

By: Lawrence M. Noble (RM7)  
Lawrence M. Noble  
Deputy General Counsel

### Attachments

1. Committee's Treasurer's first response
2. Committee's Treasurer's second response
3. Communications with the candidate's attorney
4. Letter



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*

DATE: OCTOBER 7, 1986

SUBJECT: MUR 2124 - GENERAL COUNSEL'S REPORT  
SIGNED OCTOBER 2, 1986

Attached is a copy of Commissioner McGarry's  
vote sheet with comments regarding the above-captioned matter.

Attachment:  
copy of vote sheet

88040701687

BALLOT

SENSITIVE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

DATE & TIME TRANSMITTED: FRIDAY, -OCTOBER 3, 1986, 2:00

COMMISSIONER: AIKENS, ELLIOTT, HARRIS, JOSEFIK, McDONALD, McGARRY

RETURN TO COMMISSION SECRETARY BY TUESDAY, OCTOBER 7, 1986, 4:00

SUBJECT: MUR 2124 - General Counsel's Report  
Signed October 2, 1986

RECEIVED  
FEDERAL ELECTION COMMISSION  
OCT 7 1986  
A9:32

- ( ) I approve the recommendation  
( ) I object to the recommendation

COMMENTS:

*I recuse myself from  
consideration of this  
matter*

DATE:

*10/7/86*

SIGNATURE

*John Vincent McGarry*

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

83040701688



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / CHERYL A. FLEMING *CAF*

DATE: OCTOBER 8, 1986

SUBJECT: OBJECTION TO MUR 2124 - GENERAL COUNSEL'S REPORT  
SIGNED OCTOBER 2, 1986

The above-captioned document was circulated to the  
Commission on Friday, October 3, 1986 at 2:00 P.M.

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

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u></u>
Commissioner Josefiak	<u></u>
Commissioner McDonald	<u>X</u>
Commissioner McGarry	<u></u>
Commissioner Thomas	<u></u>

This matter will be placed on the Executive Session  
agenda for Tuesday, October 21, 1986.

38040701689



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Phil Shea for Congress Committee )  
and Francis McDougall, as )  
treasurer )  
Committee to Keep Phil Shea Senator ) MUR 2124  
and G. Douglas Sullivan, as )  
treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 21, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2124:

1. Take no further action and close the file with regard to Phil Shea for Congress Committee and Francis McDougall, as treasurer.
2. Approve and send the letter attached to the General Counsel's report dated October 2, 1986.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision. Commissioner McGarry recused in this matter and was not present during its consideration.

Attest:

10-22-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

88040701690



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 24, 1986

John Kenneth Felter, Esquire  
Goodwin, Procter & Hoar  
Exchange Place  
Boston, Massachusetts 02109

Re: MUR 2124  
Francis McDougall,  
as treasurer

Dear Mr. Felter:

This is to advise you that after conducting an investigation, the Commission determined on October 21, 1986, to take no further action against the Phil Shea for Congress Committee and Francis McDougall, as treasurer. Accordingly, the file in this matter, numbered MUR 2124, has been closed as it pertains to your client.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any additional factual or legal materials to appear on the public record, please do so within ten days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed.

If you have any questions, contact Robert Raich, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Lawrence M. Noble  
Deputy General Counsel

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000-123  
RECEIVED AT THE FEC  
**HAND DELIVERED**  
86 NOV 28 AM 10:25

*Law Office of*  
*Coyne, Hodapp and Linnehan*  
*One Boston Place, Eighteenth Floor*  
*Boston, Massachusetts 02108*

*Michael J. Coyne*  
*Joseph F. Hodapp*  
*James F. Linnehan*  
*Diane M. Nealon*

*Telephone 617-523-8771*

November 26, 1986

16 DEC 1 A 9:32

RECEIVED  
GENERAL COUNCIL

Mr. Robert Raich, Esq.  
Federal Election Commission  
999 East Street - N.W.  
Washington, D.C. 20463

Dear Mr. Raich:

Re: G. Douglas Sullivan, Treasurer  
Committee To Keep Phil Shea Senator  
97 Dancause Road  
Lowell, MA 01851

As I advised you pursuant to our telephone conversation of Tuesday, November 25th, I am in the process of marshalling all the financial records for the above captioned committee, which is necessary to file the proper reports with your commission as an affiliated committee.

I have requested the following records:

1. I have requested from the Commonwealth of Massachusetts, Secretary of States' Office, certified copies of the Financial Reports submitted by the Shea Senate Committee.
2. John C. Englander of Goodwin, Procter & Hoar, who filed reports for the Shea Congress Committee, is forwarding any records that he has that pertain to the Shea Senate Committee.
3. Martin Meehan, who was the Campaign Manager for the Shea Congress Committee, is compiling any records he has that may assist me.
4. Phil Shea, the candidate himself, is assisting me in compiling the required documents, and;
5. G. Douglas Sullivan, due to health problems, is unable to assist me, but his daughter, Patricia Talty, Attorney at Law, is compiling any records her father has that may assist me.

33040701692

*Law Offices of  
Coyne, Hodapp and Linnehan  
One Boston Place, Eighteenth Floor  
Boston, Massachusetts 02108*

*Michael J. Coyne  
Joseph F. Hodapp  
James F. Linnehan  
Diane M. Nolan*

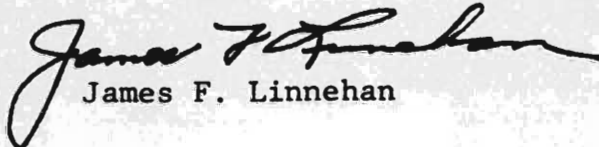
*Telephone 617-523-8171*

-2-

As soon as I have received all the information, I will file the required reports. I hope to conclude this matter by the year end.

Thank you once again for your courtesies and cooperation in this matter.

Sincerely,

  
James F. Linnehan

JFL:sgm  
Federal Express

33040701693



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *CEH*  
3

DATE: DECEMBER 19, 1986

SUBJECT: MUR 2124 - COMPREHENSIVE INVESTIGATIVE REPORT  
SIGNED DECEMBER 17, 1986

8 9 0 4 0 7 0 1 6 9 4

The above-captioned matter was received in the Office of the Secretary of the Commission Thursday, December 18, 1986 at 11:38 A.M. and circulated to the Commission on a 24-hour no-objection basis Thursday, December 18, 1986 at 4:00 P.M.

There were no objections received in the Office of the Secretary of the Commission to the Comprehensive Investigative Report at the time of the deadline.

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Committee to Keep Phil Shea ) MUR 2124  
Senator and G. Douglas )  
Sullivan, as treasurer )

00000018 ALL: 88

COMMUNICATIONS SECTION

**COMPREHENSIVE INVESTIGATIVE REPORT**

On June 9, 1986, the Commission found reason to believe the Act was violated by Committee to Keep Phil Shea Senator (the "State Committee") and G. Douglas Sullivan, as treasurer, and by Phil Shea for Congress Committee (the "Federal Committee") and Francis McDougall, as treasurer. Attorneys for the Federal Committee's treasurer cooperated with the Commission's investigation, and on October 21, 1986, the Commission voted to take no further action with regard to the Federal Committee and its treasurer. The State Committee and its treasurer have not responded to the reason to believe findings.

On October 21, 1986, a Commission attorney telephoned G. Douglas Sullivan and stated the Commission's intention to proceed to the next stage of the enforcement process. Sullivan stated that he was not represented by counsel, and he urged the Commission attorney not to take action until at least the next day (October 22), when Sullivan would phone the Commission attorney. Sullivan did not call. On October 23, 1986, the attorney again called Sullivan, who stated he might be represented by James Linnehan, who would phone the attorney the next day.

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On October 24, 1986, Sullivan called the attorney and stated that he would represent Linnehan and the State Committee and that he would send a Designation of Counsel Statement signed by Sullivan, a pre-probable cause conciliation request, a Statement of Organization, and a report of receipts and disbursements. Linnehan sent nothing to the Commission. On November 7, 1986, the attorney phoned Linnehan, who said the Commission would receive the information within ten days. Linnehan again sent nothing to the Commission. On November 25, 1986, the attorney again called Linnehan. Linnehan said he was working on the matter and that we would get the information shortly. The attorney instructed Linnehan to verify his statements in writing and to send such verification by Federal Express. On December 1, 1986, this Office received the attached letter, stating, "I hope to conclude this matter by the year end." On December 2, 1986, the Commission attorney phoned Linnehan, stating that the end of the year was unacceptable, and that this Office would proceed to the next phase of the enforcement process. Linnehan pleaded with the Commission to wait. He stated that Sullivan was too sick to sign a Designation of Counsel Statement or a Statement of Organization. Linnehan also stated that he would send information to the Commission by Federal Express "in a few weeks."

3 8 0 4 0 7 0 1 6 9 5

This Office will move to the next phase of the enforcement process if no response is received on behalf of the State Committee by January 2, 1987.

Charles N. Steele  
General Counsel

Date 12/17/86

By: Lois Lerner  
Associate General Counsel

Attachment  
Letter

38040701697

*Law Office of  
Coyne, Hodapp and Linnehan  
One Boston Place, Eighteenth Floor  
Boston, Massachusetts 02108*

*Michael J. Coyne  
Joseph F. Hodapp  
James F. Linnehan  
Diane M. Nealon*

*Telephone 677-523-8771*

GCCH 2554  
RECEIVED AT THE FEC  
**HAND DELIVERED**  
87 JAN 27 P4:18  
Wm 2124

January 21, 1987

- JAN 28 AM 11:24

Mr. Robert Raich, Esq.  
Federal Election Commission  
999 East Street - N.W.  
Washington, D.C. 20463

Dear Mr. Raich:

Re: Phil Shea for Congress Committee

Since our telephone conversation of January 8, 1987, I took a fall on the ice and have been laid up in the hospital with a broken hip and shoulder and hope to be released this week. But, fortunately I have finally been able to get copies of the Commonwealth of Massachusetts Campaign Finance Reports and enclose herewith a copy for the period January 1, 1984 to June 30, 1984. This report discloses that on June 29, 1984, a transfer was made from the Senate Committee to the Congress Committee in the amount of \$40,500.00

For your further review, I enclosed a copy of the report for the period July 1, 1984 to January 10, 1985.

Also, I am still trying to resolve the issue of who will become counsel for the Senate Committee. I have requested that Patty Talty become counsel, but is she does not desire to do so, I may have my client, Phil Shea, become treasurer along with Mr. Sullivan and then Mr. Shea can appoint his own counsel.

Sincerely,

*James F. Linnehan*  
James F. Linnehan

JFL:sgm  
encl.  
Federal Express

88040701698



THE GENERAL COURT OF MASSACHUSETTS  
State Senate  
Committee on Ways and Means  
STATE HOUSE, BOSTON 02111 30

HON. PHILIP L. SHEA  
FIRST MIDDLESEX DISTRICT  
ROOM 813  
TEL. 722-1630

December 14, 1984

OTHER COMMITTEES:  
RULES  
STATE ADMINISTRATION-CHAIRMAN  
GOVERNMENT REGULATIONS  
HOUSING AND URBAN DEVELOPMENT  
HEALTH CARE  
LOCAL AFFAIRS

SELECT COMMITTEE  
ON SMALL BUSINESS

Bradley Balzer  
Chief of Accounting  
Office of Campaign and Finance  
One Ashburton Place  
Boston, MA 02108

AMENDED

Dear Mr. Balzer:

Per your request for additional information concerning the  
June 30, 1984 campaign report of Senator Philip L. Shea.

1. Missing Addresses (enclosed)
2. Expenditure of "Cash" on March 6, 1984 to;  
-Edward Donnelly of 11 Bricket Ave. Lowell, MA. \$200.00  
reimbursement for party tickets.  
-Patrick Smith of Lowell, MA \$300.00 reimbursement for auto  
mileage
3. Expenditure of "Philip L. Shea" on March 23, 1984 and April  
5, 1984;  
-Philip L. Shea of 130 Westview Rd. Lowell, MA 01851 for  
travel expenses;  
Hyannis Regency \$119.63  
Hyatt(Washington) \$116.66  
Wills Air \$ 27.00  
Hyatt(Washington) \$357.00  
TWA \$506.00  
TWA \$506.00  
Misc. under \$25 \$143.71  
  
Total \$1,676.00
4. Expenditure of "Philip L. Shea" on January 4, 1984  
Reimbursement to Philip L. Shea for the balance of Auto  
Mileage expenses from 1983. Senator Shea only received  
\$500.00 of the \$1,500.00 he had been allotted for auto  
mileage in 1983, therefore he received the balance of  
\$1,000.00 on January 4, 1984.

Sincerely yours,

*G. Douglas Sullivan*

G. Douglas Sullivan  
Campaign Treasurer

- ☐ Initial Report
- ☐ 60th day prior to election
- ☐ 5th of month
- ☐ 20th of month
- ☐ Dissolution

# CAMPAIGN FINANCE REPORT



FOR CPF 102

- ☐ 8th day preceding primary
- ☐ 8th day preceding election
- ☐ 30th day following a special election
- ☐ 10th day of January
- ☐ Dissolution

File with Director, Office of Campaign & Political Finance

Read instructions on Page 4 before completing this form.

Candidates with NO ACTIVITY to report: Follow instructions for Category #1 or #4 as applicable on Page 4.

<b>BOX A</b>	
Philip L. Shea	
Full Name of Candidate	
Mass. State Senate 1 <sup>st</sup> Middlesex	District
Office Sought	
130 West View Road	
Residential Address	
Lowell, Mass	
City or Town	Zip

<b>BOX B</b>	
Committee to Keep Phil Shea Senator	
Name of Committee	
G. Douglas Sullivan	
Name of Committee Treasurer	
97 Danvers Road	
Mailing Address	
Lowell, Mass	01852
City or Town	Zip

Fill in Dates:

Reporting Period Beginning Jan 1 1984 and Ending June 30 1984

1. Ending balance from last previous report ..... \$ 38,465 51
2. Total receipts (from Page 2, Summary All Receipts) ..... + 70,807 16
3. Subtotal. Line 1 plus Line 2 ..... = \$ 109,272 67
4. Total expenditures (from Page 3, Summary All Expenditures) ... - 106,026 12
5. Ending balance. Line 3 minus Line 4 ..... = \$ 3246 55
6. Total "In Kind" contributions (Sched. C). Do NOT include on Line 2 \$ None
7. Total liabilities (from Schedule D). Do NOT include on Line 4 .. \$ None
8. Name of bank(s) used: First Bank + Trust (Lowell)

OFFICE USE ONLY  
 CAMPAIGN & POLITICAL FINANCE  
 JUL 31 AM 11:33

<b>CERTIFICATION BOX C</b>	
I certify that the within report including attached schedules is a true statement of all receipts, expenditures, disbursements, loans and liabilities for the above reporting period of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chapter 55, as amended.	
Signed under the penalties of perjury	
<u>Philip L. Shea</u>	<u>7/31/84</u>
CANDIDATE SIGNATURE	Date

<b>BOX D CERTIFICATION</b>	
I certify that the within report including attached schedules is a true statement of all receipts, expenditures, disbursements, loans and liabilities for the above reporting period of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chapter 55, as amended.	
Signed under the penalties of perjury	
<u>G. Douglas Sullivan</u>	<u>7-28-84</u>
TREASURER SIGNATURE	Date

**AFFIDAVIT. Read before signing.** For use only by a candidate who has **not** received contributions, incurred liabilities, or made expenditures on his/her own behalf. Sign Box E (candidate with no committee) or Box F (candidate who has a committee), as appropriate.

<b>BOX E</b>	
Affidavit of Category 1 Candidate	
I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.	
I do not have a political committee.	
Signed under the penalties of perjury	
Candidate Signature	Date

<b>BOX F</b>	
Affidavit of Category 4 Candidate	
I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.	
All campaign finances were handled by my committee. I have examined the committee report as stated on this form and to the best of my knowledge and belief it is true, correct and complete.	
Signed under the penalties of perjury	
<u>Philip L. Shea</u>	<u>7/31/84</u>
Candidate Signature	Date







7/26/84

## SENATE CONTRIBUTIONS

NAME	ADDRESS	CITY/TOWN	ZIP	AMOUNT
A				
Abbott, David	Box 2094	Lowell	01851	150
Akashian, Bruce	41 Winward Rd.	Lowell	01852	300
Akashian, Newton	263 Old Westford Rd.	Chelms	01824	150
Albert, Norman	8 Page St.	Shirley	01464	100
Alden, Richard	138 Main St.	Andover	01810	450
Allen, Paul	735 School St.	Lowell	01851	150
Angell, Evangeline	262 Middlesex Rd.	Tyngs	01879	150
Armstrong, Walter				150
Arnold, John	4 Hayden Rd.	No. Billerica	01862	150
Atamian, Robert	11 April Ln.	Lexington	02173	150
B				
Babineau, Chester	Box 56	E. Pepperell	01437	100
Bailey, Kath. Meehan-	40 Cascade St.	Lowell		300
Bain, Paul				150
Ballou, Daniel	194 Woburn St.	Wilmington	01887	150
Barker, Thomas A.	76 Village Dr.	Dracut	01826	300
Bates, Robert	106 University Ave.	Lowell	01854	150
Beati, Anthony				150
Behrakis, George	Mansur St.	Lowell		300
Belle, Bernard H.	1 Schooner Ridge	Marblehead	01945	300
Bendetson, Richard	63 Atlantic Ave.			300
Bergeron, Rachel	2 Willowdale Ave.			300
Bishop, Edward	Bouchard Ave.	Dracut		150
Bomil, Thomas	355 Pawtucket Blv.	Lowell	01854	150
Bornstein, Rochelle	60 Colonial Dr.	Andover	01810	150
Bornstein, Stanley	113 North Ridge Rd.	Ipswich	01938	150
Boumil, S. James				150
Bournival, Richard D.	831 Rogers St.	Lowell	01852	300
Boyle, Arthur	129 W. Jenness St.	Lowell	01851	150
Boyle, Janet M.	115 Westview Rd.	Lowell	01851	300
Brennan, Peter J.	85 Clark Rd.	Lowell	01852	300
Bresnahan, John	Box 354	Harvard	01451	100
Breton, Leo	1275 Bridge St.	Dracut	01826	300
Broderick, Peter	Center St. RFD 3	Groveland	01834	150
Buckley, John	83 Dalton Rd.	Chelms	01824	150
Bugler, John	37 Black Oak Dr.	Dracut	01826	150
Burton, David	106 Brookline St.	Pepperell	01463	150

total

7200

Page 1

7/26/84

## SENATE CONTRIBUTIONS

NAME	ADDRESS	CITY/TOWN	ZIP	AMOUNT
Abbott, David	Box 2094	Lowell	01851	150
Akashian, Bruce	41 Winward Rd.	Lowell	01852	300
Akashian, Newton	263 OldWestfordRd.	Chelms	01824	150
Albert, Norman	8 Page St.	Shirley	01464	100
Alden, Richard	138 Main St.	Andover	01810	450
Allen, Paul	735 School St.	Lowell	01851	150
Angell, Evangeline	262 Middlesex Rd.	Tyngs	01879	150
Armstrong, Walter	<del>50 MARSHALL AVE</del>	<del>Lowell</del>		150
Arnold, John	4 Hayden Rd.	No.Billerica	01862	150
Atamian, Robert	11 April Ln.	Lexington	02173	150

AMENDED

Babineau, Chester	Box 56	E. Pepperell	01437	100
Bailey, Kath. Meehan-	40 Cascade St.	Lowell		300
Bain, Paul				150
Ballou, Daniel	194 Woburn St.	Wilmington	01887	150
Barker, Thomas A.	76 Village Dr.	Dracut	01826	300
Bates, Robert	106 University Ave.	Lowell	01854	150
Beati, Anthony	<del>NO FARMONT AVE</del>	<del>Lowell</del>		150
Behrakis, George	Mansur St.	Lowell		300
Belle, Bernard H.	1 Schooner Ridge	Marblehead	01945	300
Bendetson, Richard	63 Atlantic Ave.			300
Bergeron, Rachel	2 Willowdale Ave.			300
Bishop, Edward	Bouchard Ave.	Dracut		150
Bomil, Thomas	355 Pawtucket Blv.	Lowell	01854	150
Bornstein, Rochelle	60 Colonial Dr.	Andover	01810	150
Bornstein, Stanley	113 NorthRidge Rd.	Ipswich	01938	150
Boumil, S. James				150
Bournival, Richard D.	831 Rogers St.	Lowell	01852	300
Boyle, Arthur	129 W. Jenness St.	Lowell	01851	150
Boyle, Janet M.	115 Westview Rd.	Lowell	01851	300
Brennan, Peter J.	65 Clark Rd.	Lowell	01852	300
Bresnahan, John	Box 354	Harvard	01451	100
Breton, Leo	1275 Bridge St.	Dracut	01826	300
Broderick, Peter	Center St. RFD 3	Groveland	01834	150
Buckley, John	83 Dalton Rd.	Chelms	01824	150 2/1/84
Bugler, John	37 Black Oak Dr.	Dracut	01826	150
Burton, David	105 Brookline St.	Pepperell	01463	150

total

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C					
Caffrey, Carolyn	1400 Gorham St.	Lowell	01852	150	
Cahoon, Donald	27 Holten St.	Danvers	01823	150	
Callery, Michael J.	4 Morninview Ave.	Dracut		300	
Callery, Paul	45 Merrimack St.	Lowell	01852	150	
Campbell, Gilbert	Box 381	Tyngs	01879	150	
Carnevale, Robert	700 Chelmsford St.	Lowell	01851	300	
Cavanaugh, Paul	158 Pine Ridge Rd.	Medford	02155	200	
Chiungos, John C.	45 MERRIMACK	Lowell	01852	300	
Cicerchia, Vincent	170 Concord Rd.	Chelms	01824	150	
Cincerchia, Vincent	170 Concord Ave.	Chelms	01824	150	
Cleary, John T.	Box 554	Groton	01450	200	
Conlon, Dorothy	28 Walker St.	Lowell	01851	300	
Connell, Daniel	190 Littleton Rd.	Westford	01886	150	
Connell, John L.Jr.	174 Central St.	Lowell	01852	450	
Coravos, Stephen	469 Nashua Rd.	Dracut		1000	
Corey, Arthur	37 Monadnock Ave.	Dracut	01826	150	
Costos, George	5 AGNES Rd	Lowell		150	
Coughlin, Kevin	61 Lakeview Ave.	Tyngs	01879	150	
Coughlin, Richard	75 Lakeview Ave.	Tyngs	01879	300	
Coughlin, Thomas	160 Sherburne Ave.	Tyngs	01879	150	
Courtney, George	3 Ardell St.	Lowell	01854	150	
Cox, Kenneth	49 Maryland Ave.	Lowell	01851	150	
Cullen, Thomas	99 Depot Rd.	Westford	01886	150	
Curran, Charles	20 Colonial Dr.	Chelms	01824	150	
Curry, James	67 Walker St.	Lowell	01851	1000	3/6/84
Curry, Pearl	67 Walker St.	Lowell	01851	500	3/6/84

D					
Dabilis, George	189 Walker St.	Lowell	01851	750	
Daggett, John	31 Central St.	Lowell	01852	150	
Dalphon, Leo	511 Merrimack St.	Dracut	01826	150	
Davidson, Jeffery	58 Beaver Brook Ln	Dracut	01826	300	
Dawson, Paul				150	
Dawson, Walter				150	
Day, Wm. A.	1958 Lakeview Ave.	Dracut	01826	150	
DeFilippo, Charles	255 North Rd.	Chelms	01824	150	
Demetroulakos, A.	35 Varnum Ave.	Lowell		150	
Demitropoulos, Peter	5 Clare Circle	Westford	01886	150	
Dennen, Harold	102 Parson Circle	Fitchburg	01420	150	
Desmarais, James	195 D St.	Dracut	01826	150	
Devane, Mark	11 Prospect St.	Maynard	01754	150	
Devincenzi, Aldo	175 Church St.	Lowell		150	
Donahue, Joseph	60 Havilah St.	Lowell	01852	300	
Donovan, Ellen	104 High St.	Chelms	01824	300	
Dorman, James J.	307 Pawtucket Bvd.	Lowell	01854	300	
Dowling, John F.	75 Dunbar Ave.	Lowell		300	
Duffy, A.	175 Church St.	Lowell	01852	150	
Duggan, George	23 Alaska Ave.	Bedford	01730	150	
Dumser, C.G.	Eldridge Rd.	Harvard		200	3/10/84
Dunbar, Stephen M.	11 Walnut St.	Townsend		750	
Duncan, George	713 Dover St.	Lowell	01852	150	
Durkin, Gerald				150	

CAMPAIGN &amp; POLITICAL

total 12.700

Early, Edward	463 Merrimack St.	Lowell	01852	150
Eisenberg, Herbert	Market St.	Lowell	01852	300
Eliades, George	19 Main St.	Pepperell	01463	600
Elliott, Esther	119 Farwell Rd.	Tyngs	01879	150
Eriksen, Walter Jr.				150

Farley, James	24 Beech St.	Lowell	01850	150
Farley, Leo	24 Beech St.	Lowell	01850	150
Ferreira, N.M.	240 Barker Ave.	Lowell	01850	600
Field, Eldred	9 Central St.	Lowell	01852	150
Field, Marshall	4 Phaeton Cir.	Andover	01810	150
Finnegan, Beverly				150
Fish, Edward	17 Roundhill Rd.	Weston	02193	300
Fitzpatrick MaryEl.	112 Clark Rd.	Lowell	01852	300
Flaherty, Patrick	282 Middlesex St.	Lowell	01851	150
Flood, James	9 CENTRAL ST	Lowell		150
Florio, Salvatore				100
Flynn, Gerald J.	9 Seneca Ave.	Chelms	01824	300
Flynn, James	29 Chamberlain	Chelms	01824	150
Flynn, Walter	6 Marriner St.	Lowell	01851	150
Flynn, Walter	6 Marriner St.	Lowell	01851	100
Forsley, Michael	511 High St.	Lowell	01852	150
Forsley, Victor	463 Merrimack St.	Lowell	01852	150
Fosse, Arthur				150
Frame, James	3 Essex Place	Chelms	01824	150
Frawley, David F.	same			300
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	150
Freitas, Richard	78 Pilgrim Dr.	Westford	01886	300
Frotin, Frank	19 Wentworth Ave.	Lowell	01852	300 2/1/84
Fryer, Mel				150 3/19/8

GJF Realty Trust	149 Pleasant St.	Dracut	01826	150
Gagnon, Harvey	1483 Hildreth St.	Dracut		750
Gagnon, Lorraine	1492 Hildreth St.	Dracut		750
Gagnon, Paul	241 SIXTH AVE	Lowell	01852	150
Garmon, George	20 Upton Dr.	Tyngs	01879	50
Gaudet, Frederick	20 BROOKSIDE	Dracut	01826	150
Gaudette, Robert	5 Ashwood Ave.	Salem NH	03079	150
Geary, James M. Jr.	7 Fletcher Hill	Chelms	01824	300
Georgalos, James	54 Columbus Ave.	Lowell	01851	300
Georgeou, Richard	510 Merrill Ln.	Dracut	01826	150
Gervais, Aime	15 Hillside Ave.	Westford	01886	300
Gervais, Phillip	SAME			150
Gervais, Robert	750 Andover St.	Lowell	01852	300
Gonsalves, Thomas	193 Main St.	Chelms	01824	300
Gosselin, Robert	41 Main St.	Groton	01450	100
Graham, Andrew	47 Black Oak Dr.	Dracut	01826	150
Grayson, Edward	33 Audubon Ln.	Belmont	02178	150
Greene, Philip	33 Old Marsh Hill Rd.	Dracut	01826	150
Greenwood, Ronald	14 Crosby Ln.	Chelms	01824	300
Griffin, Joan	523 Andover St.	Lowell		300
Griffin, John	523 Andover St.	Lowell	01852	600

FORMER  
THOMAS & COMPANY

total

11,900



H	35 Paige St.	Lowell	01852	150
	Rogers St.	Lowell	01852	300
	25 Jeremy Hill Rd.	Pelham NH	03076	150
	28 Carl Rd.	Walpole	02081	300
	Hurd St.	Lowell	01852	150
	149 Boston Rd.	Chelms	01824	150
	43 Townsend St.	Pepperell	01437	500
	90 Salisbury Rd.	Brookline	02146	150
	87 Main St.	E. Pepperell	01437	100
	185 Country Dr.	Weston	02193	150
	12 Silver Hill Rd.	Acton	01720	150
	JAME			300
	30 Locust Rd.	Chelms	01824	150
	9 Montview Rd.	Chelms	01824	150

I	15 Clover Hill Rd.	Chelms	01824	300
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J	77 Maple Ave.	Andover	01810	150
	17 Warren St.	Lowell	01852	150
	Box 854	Lowell	01853	150
	58 13th St.	Lowell		300
	122 Robin Hill Rd.	Chelms	01824	150

K	2000 Lakeview Ave.	Westford		1000
	21 Rindo Park Rd.	Dracut	01826	600
	4 Robinson Rd.	Lowell	01851	3/8/84
	59 Maryland Ave.	Westford	01886	150
	77 Frothingham St.	Lowell	01851	150
	38 Walter St. 9	Lowell	01851	150
	62 Lakeshore Dr. So.	Lowell	01851	150
	Box 565	Westford	01886	750
	960 Main St.	E. Pepperell	01437	200
	40 Coachman Ln.	Acton	01720	300 2/1/84
	40 Coachman Ln.	Andover	01810	750 3/1/84
	41 W. Forest St.	Andover	01810	750 3/1/84
	658 Andover St.	Lowell	01851	300
	16 Pierce Ave.	Lowell		300
		Westford		200
				150
	Round Hill Rd.	Lincoln	01773	150

total 10550

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LaRoche, Richard F.	426 Townsend Rd.	Groton	01450	300
LaValley, James J.	12 Wellesley Rd.	Nashua NH	03060	150
Lambert, James F.	15 Seminole Ave.	Waltham	02154	200
Lazaro, Marshall		Lowell	01852	150
Leahy, Daniel		Lowell	01852	150
Lenzi, Albert F.	105 Georgia Ave.	Lowell	01852	300
Levine, Paul	385 Gorham St.	Lowell	01852	150
Lezberg, Melvin	15 Crane Ave.	Peabody	01960	150
Lorden, C.W.				150
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	100
Lorden, Timothy	65 Mill St.	E. Pepperell	01437	400
Lussier, Gerald	1734 Lakeview Ave.	Dracut	01826	600

Machado, Thomas	147 Billerica St.	Lowell	01852	150
Mack, Walter	119 Holyrood Ave.	Lowell	01852	150
Maguire, Michael	<del>183 Merrimack St.</del>	<del>Lowell</del>		150
Main, Richard	Westchester	Chelmsford		150
Malliaros, George	1105 Lakeview Ave.	Dracut	01826	150
Marcella, Walter	16 Tadmuck Rd.	Westford	01886	150
Marcotte, Al	Merrimack St.	Lowell	01852	300 2/1/8
Marquis, Geoffrey	16 Hollis St.	Groton	01450	200
Mason, Stephen J.	147 Merrimack	Lowell	01852	300
Mastacouris, Cath.	5 Barton Ave.	Dracut	01826	150
McCarthy, James	78 Glenwood St.	Lowell	01852	???
McCarthy, Justin	190 Littleton Rd.	Westford	01886	150 2/1/8
McCartney, Richard	16 STATE ST	LOWELL		300
McDermott, Brendon	315 PINE ST	LOWELL		150
McDougall, Frank	30 Westminster St.	Lowell	01851	150
McDowell, Wm.	235 Wentworth Ave.	Lowell	01852	150
McDuffee, David H.	Cabot Rd.	Merrimack NH	03054	200
McKenna, Hyacinth	Thorndike St.	Dunstable	01827	150
McKenney, Francis J.	15 Marriner	Lowell		150
McKiel, Robert	100 Hale St.	Lowell	01852	300
McLaughlin, Charles	7 Summit Ave.	Chelms	01824	500
McLaughlin, Kathryn	38 Second Ave.	Lowell	01854	150
McLaughlin, Robert	38 Second Ave.	Lowell	01854	150
McManus, James	255 Patricia Ln.	Dracut	01826	600
McNabb, John	15 Shirley St.	Pepperell	01437	100
Meehan, Martin	22 London St.	Lowell	01852	150
Mello, Louis	90 Lincoln St.	Lowell	01852	300
Milinazzo, James	12 Carriage Dr.	Lowell	01852	150
Montminy, George, OD	107 Lincoln Ln.	Dracut	01826	25
Morrissey, E.A.	138 Concord Rd.	Westford	01886	150
Muldoon, Frank	40 Vangreenby Rd.	Lowell	01851	150
Murphy, Garry	63 Shamut Ave.	Lowell	01851	150
Murphy, Gregory				150
Murphy, Robert J.	38 Rindo Park Dr.	Lowell	01851	300
Murphy, Vincent	700 Hildreth St.	Dracut	01826	150

Nelson, John	931 Methuen St.	Dracut	01826	150
Neves, John E.	71 Norcross St.	Lowell	01851	300
Norman, E. J.	105 Park Ave. W.	Lowell	01852	300
Nyman, Philip	385 Gorham St.	Lowell	01852	300

FINANCE  
CAMPAIGN & POLITICAL

total

51,875

5

O'Connor, Ann	21 Tyler Park	Lowell	01851	150
O'Neil, Mary E.				300
Ouellette, Reginald				150
Ozella, R.M.	219 Lincoln St.	Lowell	01851	150

Palm, Nels A. III	24 Berkley Dr.	Chelms	01824	300
Panageotopoulos, Cha.	22 Hope St.	Dracut	01826	150
Pare, Maura	Brick Kiln Rd.	Chelms	01824	150
Pare, Ronald	5 Brick Kiln Rd.	Chelms	01824	150
Plomaritis, Claire	Bridge St.	Pelham NH		300
Poor, Stephen Dr.	20 Hurd St.	Lowell	01852	150
Psaino, George	1059 East St.	Tewks	01976	150

Guirk, Daniel	37 Commercial St.	Braintree	02184	300
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Rabias, Nicholas	24 Merrimack St.	Lowell	01852	300
Rechnitz, Paula	23 Maple St.	Pepperell	01463	200
Redstone, Edward	Central Sq.	Chelms	01824	900
Richards, Frederick	50 Christman Ave.	Lowell		150
Riley, Wm.	11 Crabapple Ln.	Chelms	01824	150
Riney, M. Edward	2 Bartlett St.	Chelms	01824	150
Rizzo, Jerome	10 Beech St.	Townsend	01469	150
Roberto, Richard	147 Bunkerhill Ave.	Lowell	01850	300
Rogers, Richard	75 Middlesex St.	No. Chelms	01863	150
Ronan, James	95 Frothingham St.	Lowell	01852	150
Ryan, Arthur Jr.	651 Westford St.	Lowell	01851	300

Samaras, John				150
Sandelli, John				125
Schiripo, Richard	277 Willard St.	Dracut	01826	150
Schiripo, Richard	277 Willard St.	Dracut	01826	150
Scully, Brian P.	124 Belrose Ave.	Lowell		300
Sergi, Nat	9 Checkerberry Ln.	Chelms	01824	300
Shapiro, Martin	21 Betanray Ct.	Leominster	01453	100
Shea, Wm.	33 Wagonwheel Rd.	Dracut	01826	150
Sheehan, George	262 White St.	Lowell	01854	150
Shepard, Warren	1455 Middlesex St.	Lowell	01851	150
Singleton, Richard	91 Norris Rd.	Tyngs	01879	300
Slavin, Carol A.	27 Balcom Rd.	Pelham NH		200
Slotnick, Marc	175 Woodward St.	Newton	02161	150
Smith, Paul	24 Cady St.	Lowell	01851	150
Smith, Raymond	24 Cady St.	Lowell	01852	150
Smith, Wilber H. Jr.	4 Summit Dr.	Atkinson NH	03811	150
Spinelli, Michael		Lowell		300
Stapinski, Stephen	49 5th Ave.	Haverhill	01830	150
Stone, James	5 Providence Hill Rd.	Atkinson NH	03811	150
Straub, Robert	Varnum Ave.	Lowell	01854	150
Sullivan, James S.	77 Front St.	Shirley	01464	300
Sullivan, John E.	75 Aberdeen Rd.	Chelms	01824	300

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total 9475

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Labinski, Donna	138 Felton St.	Lowell	01852	150
Talty, Francis				300
Tanger, Arthur A.				300
Thompson, D. Eric	North Rd.	Chelms	01824	300
Tobin, Brendan	57 Harland Ave.	Lowell	01852	150
Tobin, John	20 Southwick Rd.	N. Reading	01864	150
Tobin, Thomas				150
Trivers, Theodore	10 Tanglewood Dr.	Chelms	01824	150
Trombly, Robert	57 Belmont Ave.	Lowell	01852	150
Tucke, Gerald	20 Fairview Ave.	Chelms	01863	300
Tucke, Sheila	"	"	"	150
Twarog, Louis	18 Wedge St.	Lowell	01851	300

V

Vachon, Joseph	34 Mt. Pleasant Ave.	Dracut	01826	150
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W

Wallace, Gerald				150
Wais, Heiner	19 Parkhurst Rd.	Chelms	01824	150
Walantis, John H.	One Hollis St.	Groton	01450	200
Welch, Wm.	645 Robbins Ave.	Dracut	01826	150
Wojcik, Daniel	385 Gorham St.	Lowell	01852	150
Wojcik, Stephen	20 Stedman St.	Lowell	01851	300

Z

Zaharoolis, S. George	14 Harding St.	Lowell	01851	150
Zwicker, Beatrice	41 Donald Ter.	Lowell	01852	300

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total 4250

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CAMPBELL POLITICAL  
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DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
2/27/84	AFSCME Council 93	8 Beacon St. Boston	Returned \$	\$400.00	
2/27/84	AFSCME Local 464	Box 43 Norfolk, MA	Returned \$	\$100.00	
2/27/84	AFSCME Local 760	P.O.Box 466 Gardner	Returned \$	\$100.00	
2/8/84	Ancient Order Hibernians	P.O.Box 8575 Lowell, MA	Donation	\$ 10.00	
2/23/84	Belmont Spring Water	P.O.Box 1 Belmont, MA	Office Expense	\$ 16.80	
2/8/84	" "	" "	" "	\$ 16.80	
2/10/84	" "	" "	" "	\$ 16.80	
2/6/84	" "	" "	" "	\$ 16.80	
2/22/84	" "	" "	" "	\$ 16.80	
2/12/84	" "	" "	" "	\$ 16.80	
2/1/84	Billerica Pub.	Billerica	Fundraising Expense		\$194.25
2/6/84	Bishops Rest	Lawrence	Meeting Exp.	\$432.00	
2/24/84	Blatus, Mike	Forest Pk, Dracut	Expenses	\$250.00	
2/29/84	Bogies Place	350 Middlesex Tyngsboro, MA	Meeting Exp.	\$117.45	
2/27/84	Bricklayers & Allied Craft.	384 Acushnet St. New Bedford, MA	Returned \$	\$500.00	
2/27/84	Bridge & Iron #351	200 Sutton St. N. Andover, MA	Returned \$	\$100.00	
2/23/84	Bridle & Spur	Rt. 119 Groton, MA	Fundraising Expense		\$1,059.06
2/3/84	Bull Run	Shirley	Meeting Exp.	\$ 78.50	
2/27/84	COPE Fund Local 254	59 Temple Pl. Boston, MA	Returned \$	\$100.00	
2/27/84	Cable PAC	8 1/2 State St. Concord, MA	Returned \$	\$300.00	
2/10/84	Callery Pk. Little League	Lowell	Donation	\$175.00	
2/6/84	Casey Paint & Wallpaper	118 Middlesex St. Lowell, MA	Office Exp.	\$103.22	
2/6/84	" "	" "	" "	\$ 47.95	
2/6/84	Cash	11 Bricket St Lowell West Fifth Lowell	Donnerly, Ed Smith, Pat	\$500.00	
				\$3,414.92	\$1,253.31



**EXPENDITURES OF DISBURSEMENTS OF 125.00 OR MORE SCHEDULE B**

ID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDRAS.
	Central Agency	995 Central St. Lowell, MA	Returned \$	\$100.00	
	Chiropractic PAC	57 Bruce St. Lawrence, MA	Returned \$	\$200.00	
	Committee on Political Act.	21 Beach St. Boston, MA	Returned \$	\$100.00	
	Committee on Polit. Act. 509	14 Beacon St. Boston, MA	Returned \$	\$100.00	
	Connors Recogn Dinner	36 Putnam Ave. Lowell, MA	Tickets Donation	\$150.00	
	Cooperative Banks Pol. Act.	1 Washington MALL Boston, Ma	Returned \$	\$100.00	
	Corey Food	16 Normac St Woburn, MA	Office Expenses	\$ 9.70	
	" "	" "	" "	\$ 9.89	
	" "	" "	" "	\$ 26.70	
	Don Julio	Boston	Fundraising Expense/music		\$1,450 00
	Dracut Firefighter Local 2586	P.O.Box 51 Dracut, MA	Returned \$	\$100.00	
	" "	" "	Donation	\$ 45.00	
	East End Club	14 W. 4th St. Lowell, MA	Donation	\$100.00	
	" "	" "	" "	\$100.00	
	Emerson, John Committee	Chelmsford	Donation	\$ 50.00	
	Flowers by Voyer	628 Merrimack St. Lowell, MA	Flowers	\$ 31.50	
	" "	" "	" "	\$ 52.50	
	Formal Shop	Pine St. Lowell, MA	Fundraising Expense		\$440.00
	" "	" "		\$ 50.00	
	Galvin, Will. Committee	Boston	Donation	\$100.00	
	John's Girls Colonial F&D	c/o Paul Dineen Dunstable	Donation	\$250.00	
	Granite State Tickets	Rt. 3A Nashua	Tickets Donation	\$ 50.00	
	Greater Lowell YMCA	206 Rogers St. Lowell, MA	Donation	\$150.00	
	Gröton/ Pepperell Rotary		Donation	\$ 10.00	
				\$1885.29	\$1890.00



DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDRAS.
3/27/84	IUOE Local 4	26 Mt. Hope Roslindale, MA	Returned \$	\$200.00	
3/27/84	Insurance Men's PAC	11 Beacon St. Boston, MA	Returned \$	\$200.00	
3/27/84	International Ass. Firefight	93 Epping Lowell, MA	Returned \$	\$300.00	
1/26/84	Irish American Club Of Westf.	Westford	Donation	\$ 50.00	
1/26/84	Irish Cultural Week	St. Patrick's Lowell 60 Charlesgate West	Donation	\$1,000.00	
2/21/84	Kaplovitz, Barry	Boston, MA	Consultant	\$9,000.00	
3/1/84	" "	" "	" "	\$3,000.00	
2/7/84	" "	" "	" "	\$6,000.00	
3/4/84	Lambert Printing	Gerstom Ave. Lowell, MA	Fundraising Expense		\$250.00
1/4/84	Locke-Ober Rest	Boston	Staff Xmas gift/dinner	\$1,084.00	
1/26/84	Lowell Jr. Bowling League	46 Carlisle Lowell, MA	Donation	\$ 25.00	
3/27/84	Lowell Central Labor Council	21 George St. Lowell, MA	Returned \$	\$200.00	
3/27/84	Lowell Police Patrolman 382	JFK Civic Ctr. Lowell 657 Middlesex St.	Returned \$	\$200.00	
1/4/84	Lowell Boys Clb	Lowell, MA	Donation	\$100.00	
3/10/84	Lowell Girls Clb		Donation	\$250.00	
2/23/84	Lowell Lions Clb		Donation	\$200.00	
1/6/84	Lowell Sun	Kearney Sq. Lowell	Advertisemnt	\$122.22	
3/5/84	" "	" "	" "	\$ 72.80	
2/8/84	Lowell Tele. Ans. Servic	22 Merrimack St. Lowell, MA	Office Expen	\$ 50.50	
4/6/84	" "	" "	" "	\$ 50.50	
5/2/84	" "	" "	" "	\$ 50.50	
6/3/84	" "	" "	" "	\$ 50.50	
6/29/84	" "	" "	" "	\$ 50.50	
1/6/84	" "	" "	" "	\$ 50.50	
				\$22,307.02	\$250.00

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
2/28/84	Lowell Tele Ans. Service	22 Merrimack St. Lowell, MA	Office Exper	\$ 50.50	
2/10/84	Lull & Hartford	Prescott St. Lowell, MA	Donation to sports org.	\$564.00	
3/19/84	Lytle Tickets	93 Chelmsford St. Chelmsford, MA	Donation	\$210.00	
3/27/84	MABSOA-PAC	56 Middlesex Turnpk Bedford, MA	Returned \$	\$100.00	
3/27/84/	MCI-Concord AFSCME 429	MCI Concord	Returned \$	\$200.00	
3/27/84	Mass Bldg. Trade Council PAC	6 Beacon St. Boston	Returned \$	\$200.00	
3/27/84	Mass Coun Carpenters PAC	232 Lowell St. Lawrence	Returned \$	\$200.00	
3/27/84	Mass Afl-CIO Voter Fund	8 Beacon St. Boston	Returned \$	\$200.00	
3/27/84	Mass Claims Investigators	82 Oxyard Cambridge	Returned \$	\$100.00	
3/27/84	Mass Committee Good Gov't	250 Hammond Pond Rd Chestnut Hill, MA	Returned \$	\$200.00	
3/27/84	Mass DEAC	331 Mayflowers St. Hanover	Returned \$	\$1,000.00	
3/27/84	Mass Police Officers Org	16 Pierce Westford, MA	Returned \$	\$1,000.00	
3/27/84	Mass Thrift PAC	50 Congress St. Boston, MA	Returned \$	\$200.00	
3/27/84	Mass PAC	4 Longfellow Pl Boston, MA	Returned \$	\$300.00	
3/27/84	Mass Valley Bldg. Trd Coun	P.O.Box 92 E. Cambr	Returned \$	\$100.00	
3/27/84	Mass Conty Sup Court Officers	P.O.Box 92 E. Cambr	Returned \$	\$300.00	
3/27/84	Montefiore Sist	700 Princeton Blvd Lowell, MA	Donation	\$ 35.00	
3/27/84	Mountain Greenhouse	23 Main St. Pepperell	Flowers	\$ 26.25	
2/24/84	New England Telephone	Boston	Off Expen.	\$182.77	
3/10/84	" "	" "	Boston Off Expenses	\$ 33.43	
3/23/84	" "	" "	Off Expen	\$272.79	
4/04/84	" "	" "	Boston Off Expenses	\$ 67.92	
4/24/84	" "	" "	Lowell Off Exp	\$ 66.33	
5/2/84	" "	" "	" "	\$384.03	
				\$5,993.02	

SCHEDULE B EXPENDITURES OF DISBURSEMENTS OF 125. OR MORE SCHEDULE B

DATE PAID	TO WHOM PAID	ADDRESS	PURPOSE	AMT. GENERAL	FNDAS.
5/9/84	New England Telephone	Boston	Boston Phone Expenses	\$ 83.24	
5/23/84	" "	" "	Lowell Off Expenses	\$359.34	
1/26/84	" "	" "	Boston Off Expenses	\$ 35.56	
1/4/84	" "	" "	Lowell Phone Expenses	\$281.13	
2/13/84	" "	" "	Boston Off Expenses	\$ 39.84	
6/12/84	" "	" "	" "	\$ 90.03	
6/21/84	" "	" "	Lowell Off Expenses	\$398.40	
1/23/84	" "	" "	" "	\$223.16	
2/24/84	Order Hibernian	Lawrence	Donation	\$260.00	
3/27/84	Painters & Allied Trades Peltier, Larry	30 Jackson St. Lowell, MA	Returned \$	\$100.00	
2/4/84	Committee	Dracut	Donation	\$100.00	
6/29/84	Phil Shea for Congress	11 Kearney Sq. Lowell, MA 01852	Transfer	\$40,500.00	
3/27/84	Plumbers U/12	581 Boylston St. Boston	Returned \$	\$100.00	
3/27/84	Retired Public Employees	11 Pearl St. Walpole	Returned \$	\$300.00	
2/28/84	Rourke, Susan Committee	.	Donation	\$100.00	
1/4/84	Rush, Jim	22 Cheever/Dracut, Ma	Lowell Rent	\$135.00	
1/28/84	" "	" "	" "	\$135.00	
2/28/84	" "	" "	" "	\$135.00	
3/27/84	" "	" "	" "	\$135.00	
5/2/84	" "	" "	" "	\$135.00	
6/3/84	" "	" "	" "	\$135.00	
2/7/84	Sacred Heart Centennial	Lowell	Donation	\$ 75.00	
6/13/84	Shea, Philip	130 Westview Rd. Lowell, MA	Auto. Expenses	\$375.00	
3/19/84	" "	" "	" "	\$375.00	
1/4/84	" "	" "	Repaid Loan 11/23/83	\$5,000.00	
				\$49,605.70	





TOTAL, ENTER ALSO ON PAGE 1, LINE 7 .....

NONE

## INSTRUCTIONS

FILE with DIRECTOR, OFFICE OF CAMPAIGN & POLITICAL FINANCE, 8 Beacon Street, Boston, MA 02108.

File on or before the 8th day preceding a primary, the 8th day preceding a biennial state election and January 10th of the year following the election. An additional report is required the 30th day following a special election. While the account remains open, an annual report is required on or before January 10. Each report must be complete as of the tenth day preceding the last day for filing.

Read the following descriptions of Filing Categories. Select the one that describes you. Check one box. Follow the instructions printed in *italics* for your category.

**CANDIDATE:** If you have received no contributions, made no expenditures and incurred no liabilities select Category 1 or 4, as appropriate.  
All other candidates select Category 2 or 3.

**TREASURERS:** Select only Category 5, 6 or 7.

- 3  
8  
7  
1  
0  
7  
0  
4  
0  
7  
3
- | Check One                                      | Candidate Categories   |
|--|--|
| CATEGORY 1 <input type="checkbox"/>            | Report of a candidate who does not have a committee and has not received contributions or made expenditures.<br><i>Complete Box A on Page 1. Sign and date Box E. Omit remainder of form.</i>  |
| CATEGORY 2 <input type="checkbox"/>            | Report of a candidate who does not have a committee but has received contributions or made expenditures or incurred liabilities.<br><i>Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1.</i>   |
| CATEGORY 3 <input type="checkbox"/>            | Report of a candidate who has a committee and the candidate has received contributions, made expenditures or incurred liabilities independent of the committee.<br><i>Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1. Remind your treasurer to file a separate committee report.</i>                       |
| CATEGORY 4 <input checked="" type="checkbox"/> | Report of a candidate who has a committee but the candidate has not received contributions or made expenditures independent of the committee.<br><i>Candidate: File a COMBINED report with your committee. See your treasurer and complete the affidavit in Box F of the committee's report. Do not use a separate form. Use the same form as the treasurer.</i> |

- | Check One                                      | Committee Treasurer Categories   |
|--|--|
| CATEGORY 5 <input checked="" type="checkbox"/> | Report of the treasurer of a committee organized on behalf of a candidate and the candidate has <b>not</b> received contributions or made expenditures independent of the committee.<br><i>Treasurer: See Category 4. File a combined report with your candidate. You make out the report. Complete Boxes A and B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Arrange with your candidate to complete the affidavit in Box F.</i> |
| CATEGORY 6 <input type="checkbox"/>            | Report of the treasurer of a committee organized on behalf of a candidate and the candidate has received contributions or made expenditures independent of the committee.<br><i>Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Remind your candidate to make out and file the candidate's separate report disclosing receipts and expenditures transacted by the candidate independent of the committee.</i>          |
| CATEGORY 7 <input type="checkbox"/>            | Report of the treasurer of a political committee not organized on behalf of a candidate; for example, referendum committee, committee organized to promote a principle, etc.<br><i>Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1.</i>   |

Page 1. Top of Page: Check the appropriate report box.

Page 1. Line 1: If this is your initial report enter "0".

Page 1. Bottom of page. The Affidavits in Box E and Box F are for use **only** by candidates who have received **no** contributions, incurred **no** liabilities or made **no** expenditures on their own behalf. The purpose of the Affidavits is to provide a simplified form of reporting. Such candidates complete Box A and sign either Box E or F as appropriate.

Schedules A-D: If additional space is needed attach 8½ x 11 sheets, identifying the Schedule and using the same format.

Identify attached sheets with name of candidate or committee.

THIS BOX IS FOR USE  
BY A BALLOT QUESTION  
COMMITTEE ONLY.

(CHECK ONE)

- ☐ Initial Report  
☐ 60th day prior  
to election  
☐ 5th of month  
☐ 20th of month  
☐ Dissolution

The Commonwealth of Massachusetts  
OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

CAMPAIGN  
FINANCE  
REPORT



FORM CPF 102

(CHECK ONE)

- ☐ 8th day preceding primary  
☐ 8th day preceding election  
☐ 30th day following a  
special election  
☐ 10th day of January  
☐ Dissolution  
30 days

Inspection

Date

File with Director, Office of Campaign & Political Finance

Read instructions on Page 4 before completing this form.

Candidates with NO ACTIVITY to report: Follow instructions for Category #1 or #4 as applicable on Page 4.

BOX A

Philip L. Shea

Full Name of Candidate

Massachusetts State Senator 1st Midd. G. Douglas Sullivan

Office Sought

District

130 Westview Rd.

Residential Address

Lowell, MA 01851

City or Town

Zip

BOX B

Committee to Keep Phil Shea Senator

Name of Committee

97 Dancause St

Name of Committee Treasurer

Lowell, MA

Mailing Address

01852

City or Town

Zip

Fill in Dates:

Reporting Period Beginning July 1 1984 and Ending January, 10 1985

OFFICE USE ONLY

CAMPAIGN & POLITICAL  
FINANCE

1985 JAN 10 PM 2:27

1. Ending balance from last previous report ..... \$ 3,246 55
2. Total receipts (from Page 2, Summary All Receipts) ..... + 77 01
3. Subtotal, Line 1 plus Line 2 ..... = \$ 3,323 56
4. Total expenditures (from Page 3, Summary All Expenditures) ..... - 3,262 52
5. Ending balance, Line 3 minus Line 4 ..... = \$ 61 04
6. Total "In Kind" contributions (Sched. C). Do NOT include on Line 2 \$ NONE
7. Total liabilities (from Schedule D). Do NOT include on Line 4 \$ NONE
8. Name of bank(s) used: First Bank and Trust (Lowell)

CERTIFICATION BOX C

I certify that the within report including attached schedules is a true statement of all receipts, expenditures, disbursements, loans and liabilities for the above reporting period of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chapter 55, as amended.

Signed under the penalties of perjury

CANDIDATE SIGNATURE

Date

BOX D CERTIFICATION

Signed under the penalties of perjury

x G. Douglas Sullivan  
TREASURER SIGNATURE

1-9-85

**AFFIDAVIT. Read before signing.** For use only by a candidate who has **not** received contributions, incurred liabilities, or made expenditures on his/her own behalf. Sign Box E (candidate with no committee) or Box F (candidate who has a committee), as appropriate.

BOX E

Affidavit of Category 1 Candidate

I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.

I do not have a political committee.

Signed under the penalties of perjury

Candidate Signature

Date

BOX F

Affidavit of Category 4 Candidate

I certify that I have not received any contributions, made any expenditures or incurred any obligations during this reporting period.

All campaign finances were handled by my committee. I have examined the committee report as stated on this form and to the best of my knowledge and belief it is true, correct and complete.  
Signed under the penalties of perjury

Philip L. Shea - 1/7/85  
Candidate Signature

Date





33040701721

			Office Expen	16.80
		Belmont, MA	Office Exp	16.80
1/7/84	Belmont Spring H20		Office Exp	17.85
10/2/84	Belmont Spring H20		Office Exp	17.85
11/3/84	Belmont Spring H20		Office Exp	17.85
8/4/84	Flowers by Voyer	Lowell, MA	Gift	52.50
7/16/84	Flowers by Albert	Lowell, MA	Gift	42.00
12/1/84	Flowers by Voyer	Lowell, MA	Gift	31.50
10/2/84	Friends of LHS	Lowell, MA	Donation	150.00
12/5/84	Kiwanis Club Low.	Lowell, MA	Donation	100.00
7/31/84	Lowell Tel Ans.	22 Merrimack St. Lowell, MA	Office Exp	69.10
9/7/84	Lowell Tel Ans		Office Exp	73.30
10/2/84	Lowell Tel Ans		Office Exp	70.10
11/5/84	Lowell Tel Ans		Office Exp	56.10
12/2	Lowell, Tel Ans		Office Exp	50.50
7/23/84	N.E.Telephone	Boston	Phones	348.62
8/23/84	N.E.Telephone	Boston	Phones	428.17
10/23	N.E.Telephone	Boston	Phones	336.52
8/7/84	N.E.Telephone	Boston	Phones	213.85
7/25/84	Oblate Father Mis.		Donation	150.00
8/14/84	Pepperell Fire Dpt	Pepperell, MA	Donation	40.00
8/8/84	Philip L. Shea	130 Westview Rd. Lowell, MA	Auto Expense	250.00

CAMPBELL & POLITICAL  
FINANCE  
1985 JAN 10 PM 2:29

8/4/84	Rush, Jim	22 Cheever, Dracut	Lowell Rent	135.00
8/31/84	Rush, Jim		Lowell Rent	135.00
9/20/84	Rush, Jim		Lowell Rent	135.00
11/3/84	Rush, Jim		Lowell Rent	135.00
11/29	Rush, Jim		Lowell Rent	135.00
10/8/84	Windsor Mills Rest Rt. 110, Dracut MA	Meeting Exp		88.11

830407017222

1905 JAN 10 PM 2:29

CAN-PACIFIC POLITICAL  
FINANCE

## EXPENDITURES OR DISBURSEMENTS OF

SCHEDULE B

FROM WHOM PAID

Spontaneous Listing Mandatory

ADDRESS

PURPOSE

AMOUNT

General

Fund Raising

## SUMMARY OF ALL EXPENDITURES FOR THE REPORTING PERIOD

"General" Expenditures of \$25 or more. . . . (From Schedule B) . . . . \$ 3,262.52  
 "Fund Raising" Expenditures of \$25 or more. (From Schedule B) . . . . \$ NONE  
 "General" Expenditures under \$25. . . . . (From your own records) . . . . \$ NONE  
 "Fund Raising" Expenditures under \$25. . . . (From your own records) . . . . \$ NONE  
 All Expenditures for the period. Enter also on Page 1, Line 4. . . . . \$ 3,262.52

E C

## "IN KIND" CONTRIBUTIONS OF \$15.00 OR MORE

SCHEDULE C

DATE  
RECEIVED

FROM WHOM RECEIVED

RESIDENTIAL ADDRESS

DESCRIPTION  
of CONTRIBUTION

VALUE RECEIVED

TOTAL "IN KIND" CONTRIBUTIONS OF \$15.00 OR MORE

TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$15.00

TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD

GENERAL

FUND RAISING

 General + Fund Raising  
 COMBINED TOTAL

 22. COMBINED "In Kind" Total.  
 Enter also on Page 1, Line 6.

\$ NONE

# SCHEDULE D

# LIABILITIES

# SCHEDULE D

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
TOTAL, ENTER ALSO ON PAGE 1, LINE 7				NONE

## INSTRUCTIONS

FILE with DIRECTOR, OFFICE OF CAMPAIGN & POLITICAL FINANCE, One Ashburton Place, Boston, MA 02108.

File on or before the 8th day preceding a primary, the 8th day preceding a biennial state election and January 10th of the year following the election. An additional report is required the 30th day following a special election. While the account remains open, an annual report is required on or before January 10. Each report must be complete as of the tenth day preceding the last day for filing.

Read the following descriptions of Filing Categories. Select the one that describes you. Check one box. Follow the instructions printed in *italics* for your category.

**CANDIDATE:** If you have received no contributions, made no expenditures and incurred no liabilities select Category 1 or 4, as appropriate.  
All other candidates select Category 2 or 3.

**TREASURERS:** Select only Category 5, 6 or 7.

### Check One Candidate Categories

**CATEGORY 1** ☐ Report of a candidate who does not have a committee and has not received contributions or made expenditures.  
*Complete Box A on Page 1. Sign and date Box E. Omit remainder of form.*

**CATEGORY 2** ☐ Report of a candidate who does not have a committee but has received contributions or made expenditures or incurred liabilities.  
*Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1.*

**CATEGORY 3** ☐ Report of a candidate who has a committee and the candidate has received contributions, made expenditures or incurred liabilities independent of the committee.  
*Complete Box A and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box C. Omit remainder of Page 1. Remind your treasurer to file a separate committee report.*

**CATEGORY 4** ☒ Report of a candidate who has a committee but the candidate has not received contributions or made expenditures independent of the committee.  
*Candidate: File a COMBINED report with your committee. See your treasurer and complete the affidavit in Box F of the committee's report. Do not use a separate form. Use the same form as the treasurer.*

### Check One Committee Treasurer Categories

**CATEGORY 5** ☒ Report of the treasurer of a committee organized on behalf of a candidate and the candidate has not received contributions or made expenditures independent of the committee.  
*Treasurer: See Category 4. File a combined report with your candidate. You make out the report. Complete Boxes A and B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Arrange with your candidate to complete the affidavit in Box F.*

**CATEGORY 6** ☐ Report of the treasurer of a committee organized on behalf of a candidate and the candidate has received contributions or made expenditures independent of the committee.  
*Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1. Remind your candidate to make out and file the candidate's separate report disclosing receipts and expenditures transacted by the candidate independent of the committee.*

**CATEGORY 7** ☐ Report of the treasurer of a political committee not organized on behalf of a candidate; for example, referendum committee, committee organized to promote a principle, etc.  
*Complete Box B and Lines 1-8 on Page 1. Complete Schedules A-D. Sign Box D. Omit remainder of Page 1.*

Page 1. Top of Page: Check the appropriate report box.

Page 1. Line 1: If this is your initial report enter "0".

Page 1. Bottom of page. The Affidavits in Box E and Box F are for use **only** by candidates who have received **no** contributions, incurred **no** liabilities or made **no** expenditures on their own behalf. The purpose of the Affidavits is to provide a simplified form of reporting. Such candidates complete Box A and sign either Box E or F as appropriate.

Schedules A-D: If additional space is needed attach 8 1/2 x 11 sheets, identifying the Schedule and using the same format.

Identify attached sheets with name of candidate or committee.

**SENSITIVE**

OCC

87 APR 2 P 4:40

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Committee to Keep Phil Shea )  
Senator and G. Douglas Sullivan, )  
as treasurer )

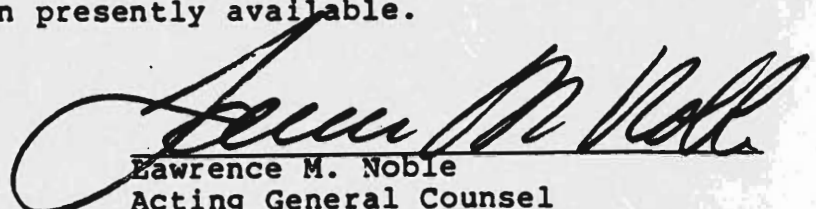
MUR 2124

**GENERAL COUNSEL'S REPORT**

The Office of the General Counsel is prepared to close the investigation in this matter as to Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, based on the assessment of the information presently available.

Date

4/2/87

  
Lawrence M. Noble  
Acting General Counsel

33040701723



**SENSITIVE**



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

April 13, 1987

87 APR 13 4:50

RECEIVED  
OFFICE OF THE  
COMMISSIONER  
FEDERAL ELECTION COMMISSION

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lawrence M. Noble  
Acting General Counsel

**SUBJECT:** MUR #2124

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 find of probable cause to believe was mailed on April 13, 1987. 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

33040701726



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

April 13, 1987

G. Douglas Sullivan, Treasurer  
Committee to Keep Phil Shea Senator  
97 Dancause Road  
Lowell, Massachusetts 01851

RE: MUR 2124  
Committee to Keep  
Phil Shea Senator  
and G. Douglas  
Sullivan, as  
treasurer

Dear Mr. Sullivan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 9, 1986, found reason to believe Committee to Keep Phil Shea Senator and you, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv), 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 a violation occurred. The Commission may or may not approve the General Counsel's recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation occurred.

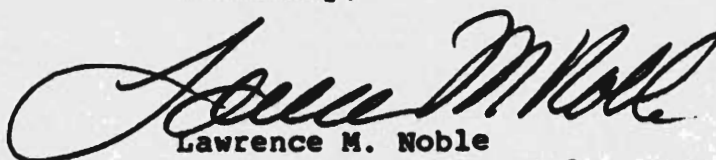
88040701727

If you are unable to file a response 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. All requests for extensions of time must be submitted in writing five days prior to the due date. Further, good cause must be shown.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90, days to settle this matter through conciliation.

Should you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Brief

88040701728

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Committee to Keep Phil Shea ) MUR 2124  
Senator and G. Douglas Sullivan, )  
as treasurer )

**GENERAL COUNSEL'S BRIEF**

**I. STATEMENT OF THE CASE**

This matter was internally generated following an audit of Phil Shea for Congress Committee (the "Federal Committee"). The Commission found reason to believe Committee to Keep Phil Shea Senator (the "State Committee") and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv). The General Counsel's Office has completed its investigation.

In 1984, Phil Shea was a candidate in a primary election for a seat in the U.S. House of Representatives. His principal campaign committee in that election was the Federal Committee. Mr. Shea had previously utilized the State Committee in connection with earlier elections to the Massachusetts state Senate.

On June 29, 1984, the State Committee transferred \$40,500 to the Federal Committee. That transfer, in part, consisted of labor union treasury funds. The State Committee has not registered or reported as a political committee with the Commission.

88040701729

## II. ANALYSIS

Transfers of funds may be without limit between affiliated committees whether or not they are political committees.

11 C.F.R. § 102.6(a)(1)(i). Those transfers may consist only of funds permissible under the Act. 11 C.F.R. § 102.6(a)(1)(iv).

The funds transferred count against the threshold for determining whether a committee is a political committee. 11 C.F.R.

§ 102.6(a)(2). A "political committee" means any committee which receives contributions or makes expenditures in excess of \$1,000

during a calendar year. 2 U.S.C. § 431(4)(A). A political committee must file a Statement of Organization within ten days

after becoming a political committee. 2 U.S.C. § 433(a). The treasurer of a political committee must file reports of receipts

and disbursements. 2 U.S.C. § 434(a). It is unlawful for any political committee knowingly to accept or receive any

contribution from any labor organization. 2 U.S.C. § 441b(a).

As soon as the State Committee transferred the \$40,500 to the Federal Committee, the State Committee became a political committee under the Act. The State Committee did not register as a political committee, in violation of 2 U.S.C. § 433(a). The State Committee did not file reports of receipts and disbursements, in violation of 2 U.S.C. § 434(a).

The \$40,500 transfer included the proceeds of a \$20,000 certificate of deposit which the State Committee purchased on April 29, 1983. The evidence indicates that the certificate of

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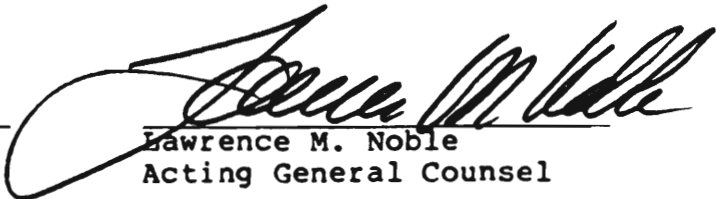
deposit was purchased with funds including \$300 of unrefunded labor union contributions -- specifically, with a \$100 contribution the State Committee received from the International Brotherhood of Police Officers, Local 493, in April 1983, and with a \$200 contribution the State Committee received from Local 254, Cope Fund, in June 1982. Because the State Committee did not refund those contributions prior to making its transfer to the Federal Committee, the State Committee, as a federal political committee, knowingly accepted contributions from labor union treasury funds, in violation of 2 U.S.C. § 441b(a). Because contributions from labor unions were included among the funds the State Committee transferred to the Federal Committee, the State Committee made a transfer consisting of impermissible funds, in violation of 11 C.F.R. § 102.6(a)(1)(iv).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

Date

4/10/87

  
Lawrence M. Noble  
Acting General Counsel



**BEFORE THE FEDERAL ELECTION COMMISSION**

**SENSITIVE**

**EXECUTIVE SESSION**

**JUL 14 1987**  
MUR 2124

In the Matter of )  
Committee to Keep Phil Shea )  
Senator and G. Douglas Sullivan, )  
as treasurer )

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On March 13, 1987, this Office mailed the respondents a General Counsel's Brief. The Commission has received no reply brief from the respondents or from any attorney representing the respondents. Accordingly, for the reasons stated in the General Counsel's Brief, this Office recommends that the Commission find probable cause to believe the respondents violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

**II. CONCILIATION PROVISIONS AND CIVIL PENALTY**

83040701732

83040701735

98040701734

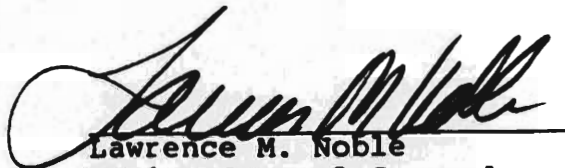
83040701735

### III. RECOMMENDATIONS

1. Find probable cause to believe Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).
2. Approve the attached conciliation agreement.
3. Approve and send the attached letter.

Date

6/25/87

  
Lawrence M. Noble  
Acting General Counsel

#### Attachments

- I. Proposed Conciliation Agreement
- II. Letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Committee to Keep Phil Shea )  
Senator and G. Douglas ) MUR 2124  
Sullivan, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 14, 1987, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2124:

1. Find probable cause to believe Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).
2. Approve the conciliation agreement attached to the General Counsel's report dated June 25, 1987.
3. Approve and send the letter attached to the General Counsel's report dated June 25, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision; Commissioner McGarry recused and was not present during consideration of this matter.

Attest:

7-15-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 17, 1987

G. Douglas Sullivan, Treasurer  
Committee to Keep Phil Shea Senator  
97 Dancause Road  
Lowell, Massachusetts 01851

RE: MUR 2124  
Committee to Keep Phil  
Shea Senator and  
G. Douglas Sullivan,  
as treasurer

Dear Mr. Sullivan:

On July 14, 1987, the Federal Election Commission found that there is probable cause to believe Committee to Keep Phil Shea Senator and you, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 11, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James F. Linnehan, Esquire  
Coyne, Hadapp and Linnehan  
One Boston Place, Eighteenth Floor  
Boston, Massachusetts 02108

RE: MUR 2124  
Committee to Keep Phil  
Shea Senator and  
G. Douglas Sullivan,  
as treasurer

Dear Mr. Linnehan:

You were previously notified that on July 14, 1987, the Federal Election Commission found probable cause to believe Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv). The Commission sent you a proposed conciliation agreement in settlement of this matter. On October 13, 1987, the Commission received a counterproposal from you. Be advised that on January 6, 1988, the Commission considered and rejected your counterproposal.

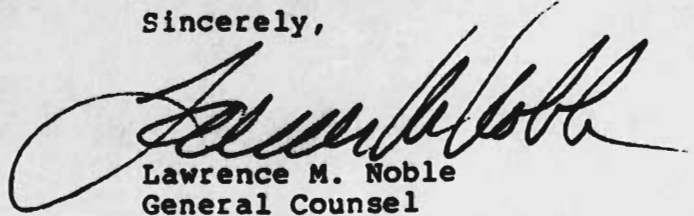
Enclosed herewith is a new conciliation agreement incorporating the language changes you sought in the introductory paragraph and paragraphs IV.4., IV.5., V.1.b., and VI.2. In addition, the civil penalty has been lowered to \$1,000.

Although I am hopeful that this matter can be settled through a conciliation agreement, please be advised that the Commission has authorized this Office to institute a civil action in U.S. District Court against your clients if the enclosed conciliation agreement is not signed and returned within ten days after your receipt of this letter.

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Should you have any questions, please contact Robert Raich,  
the attorney handling this mater, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

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**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION 88 FEB 16 AM 11:16

In the Matter of )  
 )  
Committee to Keep Phil Shea ) MUR 2124  
Senator and G. Douglas Sullivan, )  
as treasurer )

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On January 6, 1988, the Commission authorized the General Counsel's Office to file suit against the respondents if they did not sign and return a conciliation agreement within ten days after their receipt of a letter from the Commission. The respondents received the Commission's letter on January 15, 1988. With a letter dated January 25, 1988 (Attachment I), the respondents enclosed a signed conciliation agreement and a check.

**II. DISCUSSION OF CONCILIATION PROVISIONS**


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III. RECOMMENDATIONS

1. Accept the attached conciliation agreement.
2. Approve and send the attached letter.
3. Close the file.

Lawrence M. Noble  
General Counsel

2/12/88  
Date

By:   
Lois G. Lerner  
Associate General Counsel

Attachments

- I. Conciliation Agreement
- II. Letter

Staff Member: Robert Raich

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE:

FEBRUARY 18, 1988

SUBJECT:

COMMENTS TO MUR 2124 - General Counsel's Report  
Signed February 12, 1988

Attached is a copy of Commissioner McGarry's vote  
sheet with comments regarding the above-captioned matter.

Attachment:  
copy of vote sheet

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BALLOT

SENSITIVE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: TUESDAY, FEBRUARY 16, 1988 4:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAR, McDONALD, ~~REDACTED~~, THOMAS

RETURN TO COMMISSION SECRETARY BY THURSDAY, FEBRUARY 18, 1988 4:00

SUBJECT: MUR 2124 - General Counsel's Report  
Signed February 12, 1988

- ( ) I approve the recommendation  
( ) I object to the recommendation

COMMENTS:

*I have recused myself re: this matter*

DATE:

*2/17/88*

SIGNATURE

*[Signature]*

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.  
PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.  
PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

RECEIVED  
FEDERAL ELECTION COMMISSION

88 FEB 17 AM 11:09

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE:

FEBRUARY 18, 1988

SUBJECT:

COMMENTS TO MUR 2124 - General Counsel's Report  
Signed February 12, 1988

Attached is a copy of Commissioner Thomas's vote  
sheet with comments regarding the above-captioned matter.

Attachment:  
copy of vote sheet

88040701744

BALLOT

SENSITIVE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: TUESDAY, FEBRUARY 16, 1988 4:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAK, McDONALD, MCGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY THURSDAY, FEBRUARY 18, 1988 4:00

SUBJECT: MUR 2124 - General Counsel's Report  
Signed February 12, 1988

- (✓) I approve the recommendation  
( ) I object to the recommendation

COMMENTS: Cite in line 4, 1st H of letter should be 102.6(a)(1)(iv).

88 FEB 18 PM 2:26

FEDERAL ELECTION COMMISSION

DATE: 2/18/88

SIGNATURE John Thomas

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee to Keep Phil Shea  
Senator and G. Douglas Sullivan,  
as treasurer

MUR 2124

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 18, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2124:


1. Accept the conciliation agreement, as recommended in the General Counsel's report signed February 12, 1988.
2. Approve and send the letter, as recommended in the General Counsel's report signed February 12, 1988.
3. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for the decision; Commissioner McGarry recused.

Attest:

2-18-88

Date

  
for Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 2-16-88, 11:16  
Circulated on 48 hour tally basis: Tues., 2-16-88, 4:00  
Deadline for vote: Thurs., 2-18-88, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1988

James F. Linnehan, Esquire  
Coyne, Rodapp and Linnehan  
One Boston Place, Eleventh Floor  
Boston, Massachusetts 02108

RE: MUR 2124  
Committee to Keep  
Phil Shea Senator  
and G. Douglas  
Sullivan, as treasurer

Dear Mr. Linnehan:

On February 18, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(9)(1)(iv). Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Committee to Keep Phil Shea ) MUR 2124  
Senator and G. Douglas )  
Sullivan, as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe Committee to Keep Phil Shea Senator and G. Douglas Sullivan, as treasurer, ("Respondents") did not fulfill the requirements of 2 U.S.C. §§ 433(a), 434(a), and 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

NOW, THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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, Committee to Keep Phil Shea Senator, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, G. Douglas Sullivan, is the treasurer of Committee to Keep Phil Shea Senator.

3. On June 29, 1984, Respondents transferred \$40,500 to Phil Shea for Congress Committee, an affiliated political committee.

4. Respondents did not register Committee to Keep Phil Shea Senator as a political committee with the Commission until August 27, 1987.

5. Respondents have filed no reports of receipts and disbursements with the Commission. Specifically, Respondents have failed to file a 1984 Pre-Primary Report, a 1984 October Quarterly Report, a 1984 Year-End Report, a 1985 Mid-Year Report, a 1985 Year-End Report, a 1986 Mid-Year Report, and a 1986 Year-End Report. However, the Respondents voluntarily sent copies of their State Reports to the Commission.

6. Among the money Respondents transferred to Phil Shea for Congress Committee was \$300 of contributions from labor union treasury funds.

V. 1. a. Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization.

b. Respondents failed to file a timely Statement of Organization, which is in violation of 2 U.S.C. § 433(a).

2. a. Pursuant to 2 U.S.C. § 434(a), the treasurer of a political committee must file reports of receipts and disbursements.

b. Respondents failed to file reports of receipts and disbursements, in violation of 2 U.S.C. § 434(a).

3. a. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any political committee knowingly to accept or

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receive any contribution from any labor organization.

b. Respondents accepted and received contributions from labor organizations, in violation of 2 U.S.C. § 441b(a).

4. a. Pursuant to 11 C.F.R. § 102.6(a) (1) (iv), transfers of funds may be made between affiliated political committees only from funds which are permissible under the Act.

b. Respondents transferred impermissible funds to an affiliated political committee, in violation of 11 C.F.R. § 102.6(a) (1) (iv).

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

2. Respondents have filed a Statement of Organization and will disclose all required financial activity concerning federal elections.

VII. The Commissions, 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 constitute a civil action for relief in the United States District Court for the District of Columbia.

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

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IX. 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.

X. 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 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:

Lawrence M. Noble  
Lawrence M. Noble  
General Counsel

2/22/88  
Date

FOR THE RESPONDENTS:

James Douglas Sullivan  
AS TREASURER OF COMMITTEE  
TO KEEP Phil Shea SENATOR

JANUARY 22, 1988  
Date

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2124  
DATE FILMED 4/23/88 CAMERA NO. 4  
CAMERAMAN SPC

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