



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 3119

DATE FILMED _____ CAMERA NO. 4

CAMERAMAN AS

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DEMOCRATIC
CONGRESSIONAL
CAMPAIGN COMMITTEE

90 AUG 21 Pii 2:49

MUR 3114

Beryl Anthony, Jr., AR
Chairman

August 21, 1990

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

Dear Commissioners:

I, Richard Bates, today file this complaint charging violations of the Federal Election Campaign Act of 1971, as amended ("FECA" or "the Act"), 2 U.S.C. section 431 et seq. and the Federal Election Commission's ("FEC") regulations, 11 C.F.R. section 100.1 et seq. by Robert Previdi and the Previdi for Congress Committee ("the Committee") (referred collectively hereafter as "Respondents").

Respondents have violated the FECA by failing to file accurate public disclosure reports, thereby denying the public clear information about the financial activities of the Committee.

A review of Respondents' reports filed during 1989 and 1990 shows a disturbing pattern of failure to disclose the addresses, occupations and employers of a large number of contributors. During the 1990 election cycle, for example, Respondents have raised over \$120,000. Of this amount, the campaign has failed to file appropriate identification for over \$70,000 in contributions, or close to 60 percent of all contributions during this period.

This is not a new problem for the Previdi campaign. In the 1988 election cycle, when Mr. Previdi sought the same office, the FEC contacted his campaign to remind them of the obligation to obtain this type of information for contributors. Mr. Previdi was on notice that this information should be publicly disclosed on his FEC reports since that time. Yet Previdi's 1990 campaign committee continues to fail to provide the public with this information.

The failure to provide this information is not a mere technical violation of the Act. The omissions prevent the public, on reviewing Previdi's campaign reports, from obtaining

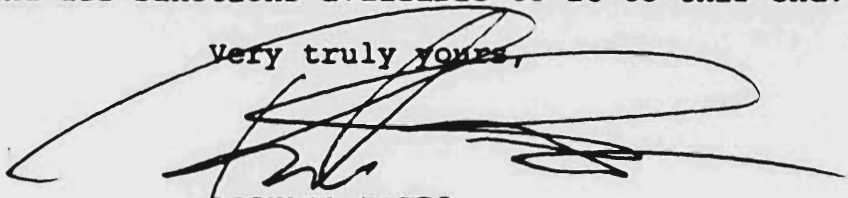
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FEDERAL ELECTION COMMISSION
90 AUG 22 PM 3:56

information vital to a clear understanding of the financial affairs of the Committee. Without addresses, the public cannot tell where contributors come from, and without occupations or employers, there is no way to determine what businesses are supporting the campaign. These are not small contributors. The vast majority of the contributors for whom Respondents failed to provide the requisite information have contributed \$1,000 to his campaign. It seems highly unlikely that contributors of \$1,000 would slip through the campaign's grasp without their obtaining an address for further contact with these large supporters.

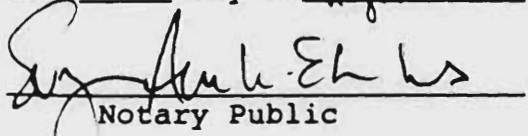
The high percentage of contributors without the requisite information makes a mockery of the Commission's "best efforts" provision of the regulations. This is not a small, underfunded campaign; nor can the campaign hide behind a lack of experience with the FECA or knowledge of requirements of the law. The campaign has consistently shown that it has been unwilling to provide information vital to the public's understanding of its financial affairs. This persistent failure to comply with the campaign laws throughout the 1988 election cycle and now continuing during the 1990 cycle must be stopped. The FEC should require amendments to all reports filed without the requisite information to ensure a clear and accurate public record of the financial activities of the Committee.

I request that the Commission take prompt action to correct these violations and to take whatever steps are necessary to ensure that the violations do not occur again. The Commission should impose any and all sanctions available to it to this end.

Very truly yours,


RICHARD BATES
EXECUTIVE DIRECTOR

SUBSCRIBED AND SWORN TO BEFORE ME
this 21st day of August 1990.


Notary Public

My Commission Expires:

SUZANNE ASCLE-EBANKS
2052E NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires October 31, 1994



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1990

Richard Bates, Executive Director
Democratic Congressional
Campaign Committee
430 South Capitol Street
Washington, D.C. 20003

RE: MUR 3114

Dear Mr. Bates:

This letter acknowledges receipt on August 22, 1990, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Robert Previdi, Previdi for Congress and Paul Hiromura, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3114. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "LGL", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

2104036339



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

August 28, 1990

Paul Hiromura, Treasurer
Previdi for Congress
P.O. Box 1044
Manhasset, NY 11030

RE: MUR 3114

Dear Mr. Hiromura:

The Federal Election Commission received a complaint which alleges that Previdi for Congress and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3114. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Previdi for Congress and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Robert Previdi

21040360341



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1990

Mr. Robert Previdi
20 LaFarge Lane
Manhasset, NY 11030

RE: MUR 3114

Dear Mr. Previdi:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3114. Please refer to this number in all future correspondence.

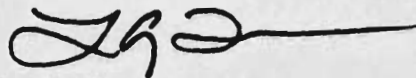
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 5 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

21040362343

OGA 7855

ROBERT PREVIDI FOR CONGRESS

RECEIVED
FEDERAL ELECTION COMMISSION
REPORTS ANALYSIS DIVISION

90 SEP 13 PM 1:41

90 SEP 13 PM 2:24

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3114

Dear Commissioners:

This memorandum is in response to the complaint filed by the Democratic Congressional Campaign Committee (hereinafter, "DCCC"). The DCCC alleges that a violation of the Federal Election Campaign Act of 1971 (FECA), as amended has occurred by Robert Previdi and the Previdi For Congress Committee (hereinafter "Respondents").

It is alleged that Respondents violated the FECA by failing to file "accurate public disclosure reports." Respondents are alleged to have failed to file addresses, occupations, and names of employers for a "large number of contributors."

THE LAW

Respondents have a duty to use best efforts to obtain and file with the F.E.C. certain contributor information. This information includes address, occupation, and name of contributor's employer. The "best efforts" standard has been met if the treasurer has made at least one attempt to obtain the required information, either in writing or orally. The request for information must include name, mailing address, occupation, and name of employer and must inform the contributor that the information is required by law.

ANALYSIS

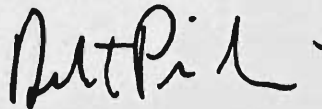
The "best efforts" test has been met in this case. Respondents have been diligent in their attempts to comply with the disclosure regulations. Every mailing sent has a return card which requests name, address, city, state, zip code, phone, employers name, and occupation (See Exhibit A). Further, a record is kept of every contributor and whether he or she has provided the information requested (See Exhibit B). If all of the identification information required by law has not been gathered, then a mailing entitled "Contribution Fix" is sent (See Exhibit C). This mailing consists of a letter and a postage paid envelope requesting any additional identification information required by law.

Every contributor who's identification file was not complete was contacted by the Respondents (See attached affidavit at Exhibit D).

SUMMARY

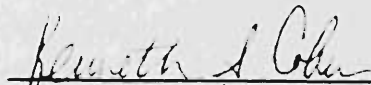
It is evident from the attached Exhibits that every contributor was contacted by Respondents. Copious records have been kept of the identity information on the additional information that was required. The affidavit at Exhibit D is clear. There was no violation of the law. Further, there were no oversights. All contributors were contacted and the additional information was requested. It is clear that the Respondents met the "best efforts" standard of 11 CFR 104.7. In each and every case, there was at least one effort to obtain the additional information.

Yours truly,



Robert Previdi

Subscribed and Sworn To Before Me This 12th day of September, 1990.


Notary Public

KENNETH S. COHEN
Notary Public, State of New York
No. 81-4924808
Qualified in New York County
Commission Expires December 29, 1992

My Commission Expires:

11040062345

**ROBERT
PREVIDI
FOR CONGRESS**

Exhibit A

(Date)

Dear :

I really believe that the future of America and the progress of the 3rd Congressional District depend on the relationship between the people and their elected leaders. "We the People" is the only reason for Congress to exist.

The current situation, where 98% of incumbents are almost automatically re-elected and returned to Congress is intolerable and challenges our very democracy. Viewed from every perspective, from our huge budget deficit, to the rampant problems of drugs and crime, to our failing system of public education, to our increasing inability as a country to be economically competitive, our Congress is, at best, stagnant. We must change this situation now by electing men and women to Congress who are responsive to the needs of the people.

As you know, I am totally committed to serving the people of my district and to making the changes in Washington that are necessary to ensure a bright future for America and the people of the 3rd Congressional District, as we approach the 21st Century.

The facts are the only way I can get elected is with your help.
So I want to thank you for supporting me with your contribution.

The people of the Third C.D. and our nation deserve fresh thinking,
creative solutions, and a full-time, dedicated Congressman. With
your help, we can make this a reality.

Again, thanks for your support.

Sincerely,

Robert Previdi

P.S. Because of the 1988 tax law, contributions to political
committees are not deductible as charitable contributions for
Federal income tax purposes.

114032341

The Federal Election Committee requires us to submit your name, address and your employer's name and your occupation. We would appreciate your filling out the information and returning it to us quickly.

Name _____

Address _____

City _____

State _____ Zip _____ Phone _____

Employer's name _____

Your occupation _____

Paid for by Robert Previdi for Congress

**ROBERT
PREVIDI
FOR CONGRESS**
P.O. Box 1044, Manhasset
New York, 11030

91040363343

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

EXHIBIT B

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Glenn Clinton Smith Address 1592 2nd Ave Apt 5B NY NY 10028 Employer Omni Public Int'l Ltd. 196 SB Broadway NY NY 10023 Occupation Advertising Sales Representative	1/10/89		✓		✓	✓	✓	✓	✓	✓
Name Morton Sweig Address Employer Nat'l Cleaning Contractors 60 Madison Ave NY NY 10010 Occupation Chairman Bldg. Maintenance	5/19/89		✓			✓	✓	✓	✓	
Name William A. Ackerman Address Employer Peres Ackerman + Levine 175 Great Neck Rd Occupation Partner Great Neck, NY 11021	5/17/89		✓			✓	✓	✓	✓	
Name Benjamin Silverstein Address 8 Earetha Dr Syosset, NY 11791 Employer Triangle Sheet Metal 115 New Hyde Park Rd Occupation VP, Treasurer, Construction New Hyde Park, NY 11040	5/16/89		✓		✓	✓	✓	✓		✓
Name James M. Goodman Address Employer Nat'l Cleaning Contractors 60 Madison Ave, NY 10010 Occupation	5/19/89		✓			✓		✓	✓	
Name Raymond S. Cohen Address 200 East 82nd St NY NY 10021 Employer Raskin, Matza + Cohen 645 Madison Ave, NY NY 10022 Occupation Partner - Real Estate	5/25/89		✓		✓	✓	✓	✓		✓
Name Roddy Raskin Address Employer Raskin, Matza + Cohen 645 Madison Ave, NY NY 10022 Occupation Partner - Real Estate	5/25/89		✓			✓	✓	✓	✓	
Name Steven M. Jacobson Address Employer HJ Kalikow + Co. 101 Park Ave, NY NY 10178 Occupation	5/23/89		✓			✓		✓	✓	
Name Gerald N. Schrager Address 27 Danton Lane North Litchfield, NY 11540 Employer Occupation	7/1/89		✓			✓		✓	✓	

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CDD: Check Deposit Date

YEAR: 1990

CND: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Mary Borack Address 62-65 Saunders St. Rego Park, NY 11374 Employer Occupation	5/30/89		✓		✓			✓	✓	
Name Manufacturers Hanover, Assoc. for Responsible Address 270 Park Ave, NY NY 10017 Government Employer (Earmarked Through PAC from Richard Barth) Occupation	6/1/89		✓		✓	n/a	n/a			✓
Name Alfred Goldberg Address 66 Falcon Rd Livingston, NJ 07039 Employer Mark Shron + Co, 111 Great Neck Rd, Great Neck NY Occupation Attorney 11021	6/2/89		✓		✓	✓	✓	✓		✓
Name Herbert S. Podell Address Employer Dreyer, Traub + Podell, 160 Broadway, NY NY 10038 Occupation Attorney	6/2/89		✓			✓	✓	✓	✓	
Name Israel Schechter Address Employer Dreyer, Traub + Podell 160 Broadway, NY NY 10038 Occupation Attorney	6/5/89		✓			✓	✓	✓	✓	
Name William E. Barnfield Address 400 Hardscrabble Rd Briarcliffe Manor, NY 10510 Employer Occupation	6/7/89		✓		✓			✓	✓	
Name Melvyn M. Rothman Address 3 Kensington Court Great Neck, NY 11021 Employer Occupation	6/2/89		✓		✓			✓	✓	
Name Bertram L. Podell Address Employer Dreyer, Traub + Podell 160 Broadway, NY 10038 Occupation Attorney	6/5/89		✓			✓	✓	✓	✓	
Name David Land Address 268 Ocean Ave Lawrence, NY 11559 Employer Occupation	6/8/89		✓		✓			✓	✓	

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 81

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Richard Land Address 170 Jny Hill Rd Woodburgh, Ny 11598 Employer Occupation	6/8/89		✓		✓			✓	✓	
Name Grace Land Address 268 Ocean Ave, Lawrence, Ny 11559 Employer Occupation	6/9/89		✓		✓			✓	✓	
Name Robert F Muir Address 6 Lewis Lane Port Washington, Ny 11050 Employer Muir Tralongo Assoc. 121 E 7th St, Ny Ny 10003 Occupation Advertising Consultant	6/12/89		✓		✓	✓	✓			✓
Name Frank Bastone Address 258 East 239th St. Bronx, Ny 10470 Employer Forest Electric Co. 7 Penn Plaza Ny Ny 10001 Occupation	6/13/89		✓		✓	✓		✓	✓	
Name Cynthia Ann Kane Address 25 Franklin Avenue White Plains, Ny 10601 Employer Occupation	6/14/89		✓		✓			✓	✓	
Name Martin Hirsch Address 2617 S. Seamans Neck Rd Seaford, Ny 11783 Employer Occupation	6/14/89		✓		✓			✓	✓	
Name Barbara Attheim Address 270 Pond Crossing Lawrence, Ny 11559 Employer Occupation	6/13/89		✓		✓			✓	✓	
Name Howard Hirsch Address 13 Leonard Dr. Morganville, NJ 07751 Employer Occupation	6/13/89		✓		✓			✓	✓	
Name Philip Attheim Address 270 Pond Crossing Lawrence, Ny 11559 Employer Occupation	6/13/89		✓		✓			✓	✓	

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Melvin Sobel Address 125 Cedar Ave Hewlett Bay Park, NY 11557 Employer Occupation	6/13/89		✓		✓			✓	✓	
Name Frank A. Pirozzi Address 15 Falcon Ave Selden, NY 11784 Employer Occupation	6/13/89		✓		✓			✓	✓	
Name Mary J. Tampan Address 722 Washington St. Hoboken, NJ 07030 Employer The Lwi Group Inc. 345 Hudson St, NY NY 10017 Occupation	6/13/89		✓		✓	✓		✓	✓	
Name Salvatore J. Zizza Address One Grace East Square NY NY 10028 Employer Nico Construction 345 Hudson St, NY NY 10014 Occupation Construction	6/13/89		✓		✓	✓	✓	✓	✓	✓
Name Richard Addeo Address Employer Adco Electrical Corp. 380 Chelsea Rd Staten Island Occupation NY 10314	6/12/89		✓			✓		✓	✓	
Name Edward J. Welsh Address 901 Fox Hill Lane Scotch Plains, NJ 07060 Employer Adco Electrical Corp. 380 Chelsea Rd Staten Island Occupation NY 10314	6/12/89		✓		✓	✓		✓	✓	
Name Walter R. Miller Address 43 North Drive Great Neck, NY 11021 Employer Occupation	6/13/89		✓		✓			✓	✓	
Name Howard Lazar Address 860 UN Plaza NY NY 10017 Employer Nico Construction 345 Hudson St NY NY 10014 Occupation Consultant	6/14/89		✓		✓	✓	✓	✓		✓
Name John R. Sacco Address 81 Geraldine Dr. Sussset NY 11791 Employer Laser Graphics 60 West 23rd St. NY NY 10010 Occupation Printing	6/21/89		✓		✓	✓	✓			✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Anne MacDonald Address 315 East 70th St. Apt. 6E NY NY 10021 Employer NW Ayer Inc. 1345 Ave of the Americas NY NY 10105 Occupation Advertising Executive	6/23/89		✓		✓	✓	✓			✓
Name Harry E. Ekblom Address 350 Highland Ave Ridgewood, NY 07450 Employer AT Hudson + Co 299 Forest Ave Paramus, NY 07652 Occupation Marketing Consultant	6/21/89		✓		✓	✓	✓			✓
Name Jan B. Hedquist Address 10125 Woodson Way Tampa, FL 33618 Employer NST Inc. 5130 Eisenhower Blvd. Tampa FL 33634 Occupation Advertising	6/17/89		✓		✓	✓	✓			✓
Name Edmund E. Michelson Address 2508 Rockville Centre Parkway Oceanside, NY 11572 Employer JM O'Brien Inc. 215 Park Ave NY NY 10003 Occupation Marketing Consultant	6/16/89		✓		✓	✓	✓			✓
Name Howard M. Stoner Address 375 Riverside Dr. Apt. 6F NY NY 10025 Employer NW Ayer Inc. 1345 Ave. of the Americas, NY NY 10105 Occupation Advertising Executive	6/22/89		✓		✓	✓	✓	✓		✓
Name James J. Cosack Address 91 High Tor Drive Watchung, NJ 07060 Employer Reader's Digest 261 Madison Ave, NY NY 10016 Occupation Media Sales Representative	6/27/89		✓		✓	✓	✓	✓		✓
Name David Cantman Address 36 Gramercy Park, NY NY 10003 Employer NW Ayer Inc. 1345 Ave. of the Americas, NY NY 10105 Occupation Advertising Executive	6/26/89		✓		✓	✓	✓			✓
Name John K. Andanese Address 300 E. 56th St NY NY 10022 Employer Total Video 136 E. 57th St NY NY 10022 Occupation President - Advertising Consulting	6/27/89		✓		✓	✓	✓	✓		✓
Name Paul Hiramura Address 596 Warwick Ave Teaneck, NJ 07666 Employer Abacos/ph 596 Warwick Ave Teaneck, NJ 07666 Occupation Marketing Research Consulting	6/27/89		✓		✓	✓	✓			✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name John Eger Address 551 Westover Rd. Stamford, CT 06902 Employer Self-Employed Occupation Communications Consultant	6/29/89		✓		✓	✓	✓			✓
Name Nicholas A. Sica Address Appleby Drive Bedford Village, NY 10506 Employer — Occupation Retired	6/29/89		✓		✓	✓	✓			✓
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										

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PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Thomas Reilly Address 72 Downing Ave Sea Cliff 11579 Employer Thomas Reilly Realty 80 Wall St NYC 10005 Occupation	7/5/89		40		✓	✓		✓		
Name John Donoghue Address 1370 Ferre Row Dr. Fairfield Ct. 06430 Employer Readers Digest 261 Madison Ave NYC 10016 Occupation Advertising Dir.	7/5/89		100		✓	✓	✓	✓		✓
Name Bruce Guthrie Address 460 Old oak Dr. Fairfield Ct. 06430 Employer Readers Digest 261 Madison Ave NYC 10016 Occupation Nat'l Sales Mgr.	7/5/89		100		✓	✓	✓	✓		✓
Name John Egan Address 551 Westovered Stamford Ct. 06902 Employer self Occupation consultant	7/5/89		250		✓	✓	✓	✓		✓
Name Nicholas Sica Address Appleby Dr. Bedford Village, NY 10506 Employer n/a Occupation retired	7/5/89		250		✓	n/a	n/a	✓		✓
Name Robert Montgomery Address 245 E. 72nd St - 11C NYC 10021 Employer Citicorp 1114 Gaffke Rd. Hawthorne NY 07506 Occupation	8/7/89		200		✓	✓		✓		
Name Anita Stewart Address 18 Kipling St. Hartsdale, NY 10530 Employer Nucleon, Inc 1345 Avenue of the Americas NYC 10105 Occupation Mgt. Sup.	8/7/89		150		✓	✓	✓	✓		✓
Name Frank Massaro Address 157 Glenwood Ave Bernia NJ 07605 Employer J Walter Thompson 420 Lexington Ave 10017 Occupation Media Director	8/7/89		100		✓	✓	✓	✓		✓
Name Peter Hanley Address 8538 Harvest Home Dr. Mentor OH 44060 Employer Lowe Marshall 601 Rockwell Ave Cleveland OH 44114 Occupation	8/7/89		100		✓	✓		✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name William Murphy Address 1641 - 25A Jhurclaw NYC 10128 Employer Media Basics 650 First Ave NYC 10016 Occupation Media Consultant	8/7/89		1000		✓	✓	✓	✓		✓
Name Martin Rosenman Address 3 Chestnut Dr. Great Neck, NY 11021 Employer Occupation	8/7/89		1000		✓			✓		
Name Matthew Walsh Address One Brookside Dr. Plandome NY 11030 Employer Cambridge Design Corp 1031 Northern Blvd Roslyn 11576 Occupation	8/7/89		150		✓	✓		✓		
Name Marvin Blass Address Employer 2 Penn Plaza NYC 10021 Occupation self	8/24/89		1000			✓	✓	✓		
Name Chae Blinn Address 211 Jewett Rd Upper Nyack, NY 10960 Employer Occupation	8/24/89		1000		✓			✓		
Name Abe Kapan Address Seven Shorewood Rd Sandspoint, NY 11050 Employer Occupation retired	8/24/89		1000		✓	na	na	✓		✓
Name Robert Starr Address Employer Occupation	8/24/89		1000						✓	
Name Edmund Nicholson Address 2508 Rockville Ctr Plaz Oceanide NY 11573 Employer JM O'Brien Inc 215 Park Ave S. NYC 10003 Occupation	9/14/89		500		✓	✓		✓		
Name Bartholomew McDonnell Address 36 Briarwood Dr. Huntington NY 11743 Employer Nat'l Geographic Mag 1251 Ave of the Americas NYC 10020 Occupation	10/11/89		100		✓	✓		✓		

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation Prim. Gen. Other			Resid. Known	Emp. Known	Occup. Known	Follow-Up Letter	Phone	Info. Recd.
Name Howard Olsen Address 18 Hulse Ave New Hyde Park NY 11040 Employer Occupation retired	10/11/89		25		✓	n/a	n/a	✓		✓
Name Stanley Gottfried Address 11 The Poppars Roslyn Estates NY 11576 Employer Occupation	10/11/89		100		✓			✓		
Name James Fleming Address 4411 East Castle Dr. Falcon Cts N. Mcguire AFB NJ 08641 Employer Occupation retired	10/11/89		100		✓	n/a	n/a	✓		✓
Name Richard Boyle Address 24 Brauer Ave. Great Neck NY 11023 Employer Occupation	10/11/89		25		✓			✓		
Name Francis Sabo Address 18 E Maple Rd Greenlawn NY 11740 Employer Occupation retired	10/11/89		15		✓	n/a	n/a	✓		✓
Name Robert Jonstone Jr. Address 56 Saw Mill Rd. Huntington NY 11743 Employer Occupation	10/11/89		25		✓			✓		
Name William Muir Address 31 Elm Sea Lane Randsome Manor NY 11030 Employer Muir Brothers Hooke, Inc 750 Third Ave. NYC 10017 Occupation	10/16/89		1000		✓	✓		✓		
Name Chester Clifton Address 2334 Massachusetts Ave. NW Washington MD 20008 Employer Chester Clifton 4801 Massachusetts Ave NW #400 Wash. D.C. 20016 Occupation self employed	10/16/89		1000		✓	✓	✓	✓		✓
Name James Cusack Address 91 High Tor, Waltham NJ 07090 Employer Waltham Digest 21st Madison Ave NYC 10016 Occupation Adv. Sales	10/24/89		100		✓	✓	✓	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Richard Wright Address 851 Jelliff Mill Rd New Canaan Ct 06840 Employer Occupation	10/24/89		100		✓			✓		
Name James Murphy Address 270 Billerica Rd Chelmsford, MA 01824 Employer Hewlett/Packard Apollo Lokenilworth Rd, Wrentham MA 01890 Occupation	11/7/89		100		✓	✓		✓		
Name Glen Perry Address Apt 877 Willcroft 255 Rossum Pl Rd Newark DE 19711 Employer Occupation Retired	11/14/89		500		✓	n/a	n/a	✓		✓
Name John Gagliardi Address 21 Woodside Ln Westport Ct 06880 Employer Citibank 330 Madison Ave NYC 10017 Occupation	11/21/89		250		✓	✓		✓		
Name Bruce Roger Burt Address 18 Boston Ave #2 Somerville MA 02114 Employer The Reserve Fund 810 Seventh Ave NYC 10019 Occupation	11/21/89		100		✓	✓		✓		
Name Jeffrey H. Cunningham Address 16 Park Ave NYC Bronxville NY 10708 Employer Forde Co 60 Fifth Ave NYC 10011 Occupation	11/21/89		500		✓	✓		✓		
Name Walter Ganzini Address 2733 Chainbridge Rd NW Wash. D.C. 20016 Employer Palm Mt Corp 1010 14th St NW #500 Wash DC 20036 Occupation	11/21/89		1000		✓	✓		✓		
Name Burt Manning Address 543 Wile Rd Stamford Ct 06903 Employer J. Walter Thompson 466 Lex Ave NYC 10017 Occupation	11/28/89		250		✓	✓		✓		
Name James W Johnston Address 726 Wiscot St New Canaan Ct 06840 Employer RJ Reynolds Tobacco USA Winston Salem NC 27102 Occupation	11/28/89		500		✓	✓		✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Charles Cogen Address 400 E 70th St NYC 10021 Employer Crown River Display 50-25 34th St LIC 11101 Occupation owner	11/28/89		1000		✓	✓	✓	✓		✓
Name Eugenia Piculillo Address 110-31 73rd Rd #3B Forest Hills NY 11375 Employer Newsweek 444 Madison Ave NYC 10022 Occupation	11/28/89		100		✓	✓		✓		
Name Dr. John Burke Address Four Eastland Dr Glen Cove NY 11542 Employer 486 Plandome Rd Manhasset 11030 Occupation Podiatrist	12/5/89		100		✓	✓	✓	✓		✓
Name Col. Samuel A Jackson Address 12 Homer Pl Manhasset 11030 Employer Nassau County Correctional Ctr. East Meadow NY Occupation	12/5/89		100		✓	✓		✓		
Name James Patterson Address 500 Fulton Ave NYC 10010 Employer J. Walter Thompson 400 Lex Ave NYC 10017 Occupation	12/5/89		250		✓	✓		✓		
Name John Friedberg Address 334 E 53 NYC 10022 Employer NWC Corp Inc 825 Eighth Ave NYC 10019 Occupation	12/5/89		50		✓	✓		✓		
Name Stephanie Patrucco Address 60 Quake Lane Pearl River NY 10916 Employer NWC Corp Inc 825 Eighth Ave NYC 10019 Occupation	1/4/89		100		✓	✓		✓		
Name Timothy C. Forbes Address 60 W 11th St NYC 10011 Employer Forbes 60 Fulton Ave NYC 10011 Occupation self	12/14/89		500		✓	✓	✓	✓		✓
Name Clifford Brochy Address 3023 D St. N.W. Wash. DC 20007 Employer 1819 L St NW #1000 Wash. DC 20036 Occupation self	12/12/89		250		✓	✓	✓	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name John Collins Address 103 E. 86 St NYC 10028 Employer Occupation Retired	12/12/89		100		✓	n/a	n/a	✓		✓
Name Matthew I Schwach Address 4445 Post Rd Riverdale NY 10471 Employer NW Ayer Inc 825 Eighth Ave NYC 10019 Occupation	12/12/89		100		✓	✓		✓		
Name Robert B Cox Address 30 E. 21st St NYC 10010 Employer Cox Lancelotti Partners Inc 501 Madison Ave NYC 10022 Occupation partner	12/12/89		50		✓	✓	✓	✓		✓
Name Francis X Gallagher Address 14 Linden St Rockville Ct. NY 11570 Employer Chaney Communications 425 Smith St Farmingdale 11735 Occupation	12/12/89		100		✓	✓		✓		
Name John Condorese Address 300 E 57th St NYC 10022 Employer Total Video Inc 136 E 57 NYC 10022 Occupation Pres	12/14/89		500		✓	✓	✓	✓		✓
Name Dominick T Rossi Address 25 Greenacres Ln Westport Ct. 06880 Employer NW Ayer Inc 825 Eighth Ave NYC 10019 Occupation	12/14/89		500		✓	✓		✓		
Name David Gantman Address 247 W 87 NYC 10024 Employer NW Ayer Inc 845 Avenue Americas NYC 10105 Occupation Exec. Acct. Dir.	12/14/89		500		✓	✓	✓	✓		✓
Name Jerry Siard Address 958 Old Delington Rd Newtown PA 18940 Employer NW Ayer Inc 825 Eighth Ave NYC 10019 Occupation Chairman	12/14/89		1000		✓	✓	✓	✓		✓
Name Francis Cwaci Address Le Kumbler Ct Lake Grove NY 11755 Employer One to One Marketing 100 Jeffry Blvd Dan Park 11724 Occupation Pres.	12/14/89		500		✓	✓	✓	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 9

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Jeffrey M Keller Address 441 Woodland Pl. Secaucus NJ 07095 Employer One to One Marketing 100 Flynn Blvd Deer Park 11729 Occupation partner	12/14/84		500		✓	✓	✓	✓		✓
Name Fred Posner Address 23 Bellamy Way New City NY 10956 Employer New Center Inc 825 Eighth Ave NYC 10019 Occupation	12/14/84		250		✓	✓		✓		
Name John Egan Address 551 Westover Rd Stamford Ct. 06902 Employer self Occupation consultant	12/14/84		250		✓	✓	✓	✓		✓
Name Thomas Loftis Address 310 E 20th St - 4D NYC 10009 Employer Newsweek 444 Madison NYC 10022 Occupation	12/14/84		125		✓	✓		✓		
Name F Clayton Smith Address P.O. Box 57246 Wash. D.C. 20037 Employer Campaigns + Elections 1835 K N.W. #403 Occupation Wash. D.C. 20006	12/14/84		100		✓	✓		✓		
Name James Wilson Address 70 E. 46th NYC 10128 Employer Newspaper Adv. Bureau 1180 Ave of the Americas Occupation NYC 10036	12/14/84		100		✓	✓		✓		
Name John Brodsky Address 311 W. 47 - 2N NYC 10025 Employer New Center Inc 825 Eighth Ave NYC 10019 Occupation	12/14/84		100		✓	✓		✓		
Name Joseph Abruozzo Address 29 Oxford Rd Manhasset NY 11030 Employer New Center 825 Eighth Ave NYC 10019 Occupation	12/14/84		100		✓	✓		✓		
Name Linda H. Scerna Address 808 Bronx River Rd. Bronxville NY 10706 Employer Citicorp 399 Park Ave NYC 10022 Occupation & Corp Adv.	12/14/84		100		✓	✓	✓	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 89

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Beth Gordon Address 14 E 4th St NYC 10012 Employer NW Amer 1345 Ave of the Americas NYC 10105 Occupation	12/14/89		100		✓	✓		✓		
Name Conrad Sauer Address Lakeside Rd Mt Kisco NY 10549 Employer NW Amer 1345 Ave of the Americas NYC 10105 Occupation	12/14/89		100		✓	✓		✓		
Name Kirk E. Oberfeld Address 2127 California St NW 207 Wash D.C. 20008 Employer Insight Mag. 3000 N.Y. Ave NE Wash. D.C. 20002 Occupation Manag. Educatn	12/14/89		100		✓	✓	✓	✓		✓
Name John Kirchen Address 11217 Cranbrook Lane Oakton VA 22124 Employer US Chamber of Commerce 1615 H St. NW Wash. D.C. 20002 Occupation	12/14/89		50		✓	✓		✓		
Name Sydney Lister Address 135 A Old Army Rd Scarsdale 10583 Employer Occupation	12/21/89		100		✓			✓		
Name Robert Gaudioso Address 104 Stetson Dr Centereach NY 11720 Employer EAB - EAB Plaza Unwindale NY 11555 Occupation	12/21/89		200		✓	✓		✓		
Name Patricia Michelson Address 2508 Rockville Ctr. Plwy. Oceanside NY 11572 Employer J.H. O'Brien Inc 215 Park Ave S NYC 10003 Occupation	12/21/89		500		✓	✓		✓		
Name Robert G. Richardson Address Employer Occupation	12/21/89		1000							
Name Rachel Miller Address 43 N. Drive Great Neck 11021 Employer Occupation n/a	12/21/89		1000		✓	n/a	n/a	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 81

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name <u>Camille Prozzi</u> Address <u>15 Falcon Ave Selden NY 11784</u> Employer Occupation <u>n/a</u>	<u>12/1/84</u>		<u>1000</u>		☒	<u>n/a</u>	<u>n/a</u>	☒		☒
Name <u>Michael J Errico</u> Address <u>40 La Duette Dr Toms River NJ 08757</u> Employer Occupation	<u>12/21/84</u>		<u>1000</u>		☒			☒		
Name <u>Thomas Venerose</u> Address Employer Occupation	<u>12/21/84</u>		<u>1000</u>							
Name <u>Drive Political French</u> Address <u>25 Louisiana Ave NW Wash DC 20001</u> Employer Occupation <u>returned.</u>	<u>12/28/84</u>		<u>3000</u>			☒				
Name <u>Paul A Cruz</u> Address <u>29 Ridgewood Ave Briarwood NY 11717</u> Employer <u>EAB EAB Plaza Uniondale NY 11555</u> Occupation	<u>12/28/84</u>		<u>50</u>		☒	☒		☒		
Name <u>Stefan Anhalt</u> Address <u>2 W 46th St NYC 10036</u> Employer Occupation	<u>12/28/84</u>		<u>100</u>		☒			☒		
Name <u>Neil D Levin</u> Address <u>45 East End Ave 18F NYC 10028</u> Employer Occupation	<u>12/28/84</u>		<u>500</u>		☒			☒		
Name <u>Fred Drasner</u> Address <u>1 UN Plaza # 3531 NYC 10017</u> Employer <u>US News 599 Lex. Ave NYC 10022</u> Occupation	<u>12/28/84</u>		<u>1000</u>		☒	☒		☒		
Name <u>Louis T Hagoian</u> Address <u>5 Haverbrook Rd Darien CT 06820</u> Employer <u>NW Cyber 825 Eighth Ave NYC 10019</u> Occupation	<u>12/28/84</u>		<u>1000</u>		☒	☒		☒		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 8/90

	CDD	Designation Prim. Gen. Other			Resid. Known	Emp. Known	Occup. Known	Follow-Up Letter	Phone	Info. Recd.
Name Philip Peppas Address 161 W. 86 NYC 10024 Employer Occupation Self / same copywriter	12/28/89		1000		✓	✓	✓	✓		✓
Name Jacob Winebaum Address 12 E 87 83 NYC 10128 Employer Occupation	12/28/89		1000		✓			✓		
Name William Hamilton Harris Address 2400 N St NW #504 Wash DC 20037 Employer Occupation	12/28/89		1000		✓			✓		
Name R.C. Thompson Address 4265 Congress St Fairfield Ct 06430 Employer USNews 599 Lex. NYC 10022 Occupation	12/28/89		1000		✓	✓		✓		
Name Ivan Rosenstach Address 2 Euclid Ln. Larchmont NY 10538 Employer Payment Sys. Inc 100 Fulton NYC 10038 Occupation Owner	1/10/90		200		✓	✓	✓	✓		✓
Name Joseph Susseller Address 12 Hockanum Rd Westport Ct 06880 Employer Clear-Knit Sales Inc 191 West Rd W Occupation Westport Ct 06880	1/10/90		200		✓	✓		✓		
Name Paul W Ho Address 419 W. 17th St 1F NYC 10011 Employer Citibank 666 Fith NYC 10019 Occupation	1/10/90		100		✓	✓		✓		
Name Mark E. McDonald Address 876 Stanchfield Ave Mountainside NJ 07090 Employer USNews 599 Lex NYC 10022 Occupation	1/10/90		500		✓	✓		✓		
Name Stephen Garofalo Address Red Ground Rd Old Westbury NY 11568 Employer Occupation	1/10/90		1000		✓			✓		

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CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Catherine Garabalo Address Red Ground Rd Old Westbury NY 11568 Employer Occupation	1/19/90		1000		✓			✓		
Name Robert Igel Address 300 E. 12nd St NYC 10021 Employer Occupation	1/19/90		150		✓			✓		
Name Edward W Dooley Address Employer The Statue of Liberty Foundation 101 Park Ave Occupation NYC 10048	1/26/90		250			✓		✓		
Name Dan J. Bacila Address 4 York Blvd Northport NY 11768 Employer Pharma-Tek Inc PO Box A13 Huntington NY 11743 Occupation	1/26/90		50		✓	✓		✓		
Name Gordon Olios Address One Grace Service 7A NYC 10028 Employer EAB EAB Plaza Unwindale NY Occupation	1/26/90		125		✓	✓		✓		
Name Harry E. Ekblom Address 350 Highland Ave Redgewood NJ 07450 Employer AT Hudson 299 Forest Ave Paramus NY 11765 Occupation Pres	1/26/90		500		✓	✓	✓	✓		✓
Name Christopher Kurtz Address Elmwood Dr Brewster NY 10509 Employer Washington Post 444 Madison Ave NYC 10022 Occupation	1/26/90		95		✓	✓		✓		
Name Harry E Ekblom Address 350 Highland Ave Redgewood NJ 07450 Employer AT Hudson 299 Forest Ave Paramus NY 11765 Occupation Pres	1/26/90	1000			✓	✓	✓	✓		✓
Name Cynthia Ann Kane Address 25 Franklin Ave White Plains NY 10601 Employer Occupation	1/16/90	1000			✓			✓	✓	

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 1990

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Philip Altheim Address 270 Pond Crossing Lawrence NY 11559 Employer Occupation	1/16/90	1000			✓			✓	✓	
Name Howard Hirsch Address 13 Leonard Dr. Morristown NJ 07751 Employer Occupation	1/16/90	1000			✓			✓	✓	
Name Melvin Seibel Address 125 Cedar Ave Hewlett Bay Park NY 11557 Employer Forst Electric Corp Seven Penn Plaza NYC 10001 Occupation	1/16/90	1000			✓	✓		✓		
Name Curtis Katz Address 104 Ash Dr. Great Neck NY 11021 Employer self Occupation	2/8/90		500		✓	✓		✓		
Name Isidore Mayrock Address 4 Popwood Hill Brookville NY 11545 Employer Occupation	2/8/90		100		✓			✓		
Name Thomas Cahill Murphy Address 145 Rim Lane Hicksville NY 11801 Employer EAB EAB Plaza Uniondale NY Occupation	2/8/90		100		✓	✓		✓		
Name Spencer Plavoukos Address 22 Hill Rd. New Canaan Ct 06840 Employer Lintas New York One Dag Hammarskjold Plaza NYC 10017 Occupation	2/8/90		500		✓	✓		✓		
Name Nicholas A Onorato Address 154 Lincoln St Garden City NY 11530 Employer Citibank 319 Park Ave NYC 10013 Occupation	3/1/90		100		✓	✓		✓		
Name WS Sancts Kaplan Address 16 Nightingale Court Manhasset NY 11030 Employer Occupation	3/1/90		100		✓			✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Moreton Binn Address 55 Montrose Ct. Roslyn Harbor NY 11576 Employer Citicorp Richard Inc 90 Park Ave NYC 10016 Occupation	3/5/90		1000		✓	✓		✓		
Name Edmund E Michelson Address 2508 Rockville Ctr. Plz. Oceanside NY 11572 Employer JH O'Brien Inc 25 Park Ave S. NYC 10003 Occupation	3/6/90	1000			✓	✓		✓		
Name Kelly Ann Gallagher Address 46 Sherwood Ave Franklin Sq. NY 11010 Employer Occupation	3/20/90		1000		✓			✓		
Name Guido Cuetta Address 3100 Corner St Yorktown Hts NY 10598 Employer Cuetta Cousins 1100 E 156th St Bronx 10474 Occupation Owner	3/20/90		1000		✓	✓	✓	✓		✓
Name Pieraci Cuetta Address Employer Cuetta Cousins 1100 E 156th St Bronx 10474 Occupation owner	3/20/90		1000			✓	✓	✓		
Name James T Corneen Address 249 Highland Ave Ridgewood NJ 07070 Employer Occupation	3/20/90		1000		✓			✓		
Name William Leggio Address Employer 321 5th Broadway NYC 10012 Occupation Architect	3/20/90		1000			✓	✓	✓		
Name Richard Forcino Address 733 Yonkers Ave Yonkers NY 10704 Employer Occupation	3/20/90		1000		✓			✓		
Name C. A. Kane Address 25 Franklin Ave Whit Plains NY 10601 Employer Occupation	3/28/90	1000			✓			✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Philip Althelm Address 270 Pond Crossing Lawrence NY 11559 Employer Occupation	3/28/90	1000			✓			✓	✓	
Name Pedro Sobel Address 125 Cedar Ave Hewlett Park NY 11557 Employer Occupation	3/28/90	1000			✓			✓	✓	
Name Frank DiDizze Address 15 Falcon Ave Selden NY 11784 Employer Occupation	3/28/90	1000			✓			✓	✓	
Name Mrs H Hirsch Address 13 Leonard Dr. Morganville NJ 07757 Employer Occupation	3/28/90	1000			✓			✓	✓	
Name Donald Jacobson Address Employer People Care, Inc 500 Eighth Ave NYC 10018 Occupation	3/28/90		100			✓		✓		
Name Robert W Burden Address 48 Jacobus Ave Little Falls NJ 07424 Employer Occupation	3/28/90		100		✓			✓		
Name Marilyn Kolterjahn Address 644 Shackamaxon Dr. Westfield NJ 07090 Employer Occupation	3/28/90		200		✓			✓		
Name Peter A. Hanley Address 8538 Harvest Home Dr. Mentor OH 44060 Employer Lowe Marshall 1370 W. 6th St Cleveland 44113 Occupation	3/28/90		100		✓	✓		✓		
Name Charles H. Cozen Address 18 Coldenfield Ln White Plains NY 10605 Employer Crown River Resear 50-25 34th St LIC 11101 Occupation owner	3/28/90	1000			✓	✓	✓	✓		✓

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Alex Butwinoski Address 9 Hillside Ave Mahwah NJ 07430 Employer Occupation	3/30/90	1000			✓			✓		
Name Gerald N. Schrage Address 27 Danton Ln N. Lathrop town 11560 Employer Occupation	4/10/90	1000			✓			✓		
Name Howard Kalka Address 2 Knolls Dr. del Westbury NY 11568 Employer Occupation	4/10/90	1000			✓			✓		
Name Steven M Jacobson Address Employer Dreyer + Traub 101 Park Ave NYC 10178 Occupation Attorney	4/10/90		1000			✓	✓	✓		
Name Paul H. Pincus Address 1700 4th Ln Pt Washington 11050 Employer Occupation	4/10/90		1000		✓			✓		
Name Matthew Kusner Address 235 W. End Ave NYC 10023 Employer Occupation	4/10/90		75		✓			✓		
Name John Gaiorni Address 327 Lakewood Ave Rockville Ct 11570 Employer Occupation	4/10/90		1000		✓			✓		
Name William J Bryan Address 14 Orchard Pl Bernardsville NJ 07004 Employer Circle Indus. 129-09 26th Ave Flushing 11354 Occupation	4/24/90		500		✓	✓		✓		
Name Martin Walkes Address 1048 Fox Meadow Ct Yorktown Hts NY 10598 Employer Circle Indus 129-09 26th Ave Flushing 11354 Occupation	4/10/90		1000		✓	✓		✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Steven Keriakos Address Employer Circle Indus 129-09 26th Ave Flushing 11354 Occupation	4/24/90		500			✓		✓		
Name Thomas Gibson Address Building Ln Crumpond NY 10517 Employer Circle Indus 129-09 26th Ave Flushing 11354 Occupation	4/24/90		500		✓	✓		✓		
Name Richard Romano Address 1878 Ryden St Brooklyn NY Employer Circle Indus 129-09 26th Ave Flushing 11354 Occupation	4/24/90		500		✓	✓		✓		
Name Mary Jane Macdugan Address 27 McCann Ln Glen Head NY 11545 Employer Occupation	5/18/90		100		✓			✓		
Name Stanley Gottfried Address 11 The Pipers Roslyn Estates 11576 Employer Occupation	5/18/90		100		✓			✓		
Name Steven J. Reilly Address 30 Fredrick Rd Fort Salonga 11768 Employer Occupation retired	5/18/90		100		✓	n/a	n/a	✓		✓
Name Charles E Harris Address 11 E 85 NYC 10021 Employer Harris + Harris Group 620 Fifth Ave NYC 10020 Occupation chairman	5/18/90		1000		✓	✓	✓	✓		✓
Name J. E. Lilemstock Address 771 Carroll St Brooklyn 11215 Employer Pratt Inst. 200 Willoughby Ave Brooklyn 11205 Occupation Research Analyst	5/18/90		25		✓	✓	✓	✓		✓
Name Eileen L. Leto Address Le Roy Court Brookville 11545 Employer Occupation	5/18/90		100		✓			✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 2000

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name John Lynch Address 16 Torii Pl. Wethers Ct 06847 Employer Cables Mag. 911 Hope St Six River Bend Ct Box 4949 Occupation Standard Ct 06907	5/18/90		100		✓	✓		✓		
Name Burnanettin Bastiani Address 872 Park Ave Manhasset 11030 Employer Occupation	6/4/90		200		✓			✓		
Name Roosevelt Savings PAC Address 1122 Franklin Ave Garden City 11530 Employer Occupation	6/4/90		250			✓				✓
Name Joseph Redington Address 111 Seagate Rd Staten Island 10305 Employer Occupation	6/4/90		50		✓			✓		
Name Wela Yungst Address 455 Bayberry Ln Mountainside NJ 07092 Employer Occupation	6/4/90		300		✓			✓		
Name George E Seegers Address 6 Surrey Ln E Windsor NJ 08520 Employer Citibank 349 Park Ave NYC 10022 Occupation	6/4/90		25		✓	✓		✓		
Name Ivan Rosenstrach Address 2 Quin Ln Larchmont 10538 Employer Payment Sup Inc 100 Fulton St NYC 10038 Occupation Self owner	6/4/90		200		✓	✓	✓	✓		✓
Name Rudolf H. Hertz Address 32 Colony Ln Roslyn HTS 11577 Employer Merchants Bank of NY 434 B. Way NYC 10013 Occupation	6/20/90		100		✓	✓		✓		
Name Thomas P. Rully Address 72 Downing Ave Sea Cliff NY 11579 Employer Thomas Rully Realty 80 Wall St NYC 10005 Occupation owner	6/20/90		50		✓	✓	✓	✓		✓

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Frederick A. Loesch Address 5 Settlers Hill Darien Ct 06820 Employer Citicorp Citibank 349 Park NYC 10022 Occupation	6/30/90		200		✓	✓		✓		
Name Alexander David Sohn Address 66 The Hemlocks Roslyn Est. NY 11576 Employer WPIX Channel 11 11 WPIX Plaza NYC 10017 Occupation	6/30/90		100		✓	✓		✓		
Name Michael Capri Address 120 Aqueduct Dr Scarsdale NY 10583 Employer Citibank 850 Third Ave NYC 10043 Occupation	6/30/90		100		✓	✓		✓		
Name Margaret Sacco Address 81 Gerald Dr. Syosset NY 11791 Employer Laser Graphics 61 W. 23 NYC 10010 Occupation owner	6/30/90		25		✓	✓	✓	✓		✓
Name Margaret Sacco, Sr. Address 81 Gerald Dr. Syosset NY 11791 Employer Laser Graphics 61 W. 23 NYC 10010 Occupation owner	6/30/90		50		✓	✓	✓	✓		✓
Name David Sacco Address 81 Gerald Dr. Syosset NY 11791 Employer Occupation student	6/30/90		25		✓	n/a	✓	✓		✓
Name John E Sacco, Jr. Address 81 Gerald Dr. Syosset NY 11791 Employer Laser Graphics 61 W. 23 NYC 10010 Occupation owner	6/30/90		25		✓	✓	✓	✓		✓
Name John Sacco, Sr. Address 81 Gerald Dr. Syosset NY 11791 Employer Laser Graphics 61 W. 23 NYC 10010 Occupation owner	6/30/90		100		✓	✓	✓	✓		✓
Name Jacqueline McDonnell Address 86 Briarwood Dr Huntington 11743 Employer O.T.B 321 W. 17th St New York City 10011 Occupation	6/30/90		10		✓	✓		✓		

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation Prim. Gen. Other			Resid. Known	Emp. Known	Occup. Known	Follow-Up Letter Phone		Info. Recd.
Name Robert Muir Address Employer Chase Manhattan, Madison at 26th St NYC Occupation	6/30/90		1000			✓		✓		
Name James E. Wilson, Jr. Address 70 E. 96 NYC 10028 Employer Newspaper Adv. Bureau 1180 Ave of the Americas NYC 10036 Occupation	6/30/90		100		✓	✓		✓		
Name William E. Luigiero Address 21 Old Shelter Road Manhasset NY 11030 Employer Dr. H. H. Pharmacy 176 Plandome Rd Manhasset Occupation Pharmacist	6/30/90		10		✓	✓	✓	✓		✓
Name Francis E. Rea Address 21 Shorewood Dr Sands Point 11050 Employer retired Occupation	6/30/90		200		✓	n/a	n/a	✓		✓
Name Citicorp Voluntary PAC Address 1101 Penn Ave NW Wash D.C. 20004 Employer Occupation	6/30/90		100		n/a	✓	n/a			✓
Name Lawrence Weiss Address 2 Sutton Pl. S. NYC 10022 Employer Citibank 34 Park Ave NYC 10043 Occupation	7/9/90		400		✓	✓		✓		✓
Name Arthur Thomas Bent, III Address 54-50 Burbank St #23 Boston MA 02115 Employer Occupation	7/9/90		1000		✓			✓		
Name Frank Grassi Address 16 Sarah Dr. Dix Hills NY 11746 Employer Occupation retired	7/13/90		25		✓	n/a	n/a	✓		✓
Name Hector J. Battaglia, Jr. M.D. Address 32 Seaspray Dr. Box 66 Centerport NY 11721 Employer Hazeltone Corp Greenlawn NY 11740 Occupation	7/13/90		25		✓	✓		✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 70

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Bernard F. Farrell Address 4 Cornwall Ln 2E Carle Pt. NY 11514 Employer Occupation	7/13/90		5		✓			✓		
Name Bruce Roger Beal, II Address 18 Boston Ave #2 Somerville MA 02114 Employer The Reserve Fund 810 7th Ave NYC 10019 Occupation	7/13/90	1000			✓	✓		✓		
Name James Cameron Whitehead Address 3 Greely Sq. Clent Head NY 11545 Employer Occupation n/a	7/14/90		20		✓	n/a	n/a	✓		✓
Name Harry J. Kemp Address 3142 Paramount Rd Menasha NY 11501 Employer Occupation	7/14/90		100		✓			✓		
Name Thomas B. Treacy Address 330 Huntington Rd Syosset NY 11791 Employer Occupation	7/25/90		25		✓			✓		
Name Ira S. Rimerman Address 63 Sands Pt. Rd. Sands Pt. NY 11050 Employer Occupation	7/25/90		100		✓			✓		
Name N.R.C.C. Address 320 First St SE Wash. D.C. 20003 Employer Occupation	8/8/90	5000			n/a	✓	n/a	✓		✓
Name John X Ward Address 780 Maple Ridge Rd Bethesda MD 20814 Employer Washington Times 3000 N.Y. Ave. NE Wash. D.C. Occupation 20002	8/8/90		25		✓	✓		✓		
Name Thomas C Walsh, Jr. Address 5 Service Ct Pt. Washington NY 11050 Employer Occupation	8/8/90		5		✓			✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Rhonda C. Sturtz Address Employer Manufacturer Hanover 1275 Sixth Ave NYC Occupation	8/8/90		150			✓		✓		
Name John McLaughlin Address 5 Carleton Rd Commack NY 11725 Employer Occupation	8/8/90		10		✓			✓		
Name Albert Sabay Address 249 E Sanford Blvd Lit Vernon 10550 Employer AIN Plastics same Occupation	8/8/90		100		✓	✓		✓		
Name Samuel P Harosca Address 409 Roslyn Rd. E. Lilliston 11596 Employer Occupation	8/8/90		5		✓			✓		
Name Kenneth C Jthg. Jr Address 62 Craven St Huntington Sta 11746 Employer NY Tel. 720 Larkfield Rd Commack 11725 Occupation	8/8/90		5		✓	✓		✓		
Name Welford O White Address 83 Wain Dr. Northport NY 11768 Employer Occupation	8/8/90		50		✓			✓		
Name Joe Wiernstock Address 771 Carroll St Brooklyn 11215 Employer Occupation n/a	8/8/90		25		✓	n/a	n/a	✓		✓
Name Keith W Bose Address 11 Dexter Ln Kings PK 11754 Employer Occupation	8/8/90		25		✓			✓		
Name Fred J McGhee Address 44 Mark Dr. Smithtown NY 11787 Employer Occupation n/a	8/8/90		10		✓	n/a	n/a	✓		✓

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PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Col. Samuel A. Jackson Address 12 Homer Pl. Manhasset 11030 Employer Nassau Cty Corr. Ch. E. Meadow NY Occupation	8/8/90		100		✓	✓		✓		
Name Ralph Carrella Address 8-15th St Bayville 11709 Employer CICO Film Corp 84 Pine Hollow Rd Chester Bay 11771 Occupation	8/8/90		10		✓	✓		✓		
Name Donald L Miller Address 295 C.P.W. NYC 10024 Employer self/same Occupation Photographer	8/8/90		100		✓	✓	✓	✓		✓
Name Citicorp PAC Address 1101 Penn. Ave N.W. Wash. D.C. 20004 Employer Occupation	8/10/90	5000			n/a	✓	n/a			✓
Name Fred Franz Address 404 Lowell Ave New Hyde Park 11040 Employer Occupation Retired	8/12/90		1		✓	n/a	n/a	✓		✓
Name Ralph L Whipple M.D. Address 153 Old Hill Rd Manhasset 11030 Employer Occupation Retired	8/12/90		5		✓	n/a	n/a	✓		✓
Name Pius, Donald Address Employer Pius Realty 434 E Main St returned Occupation Realtor 1172	8/12/90		100			✓	✓	✓		
Name Henry Ann Monticciolo Address 9 Kaisti Lane Woodbury 11797 Employer Occupation	8/12/90		25		✓			✓		
Name James P. Quinn Address 7 Orchard Meadow Rd. E. Williston 11596 Employer Occupation / / S S 0 0 1 1	8/12/90		15		✓			✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name F.L. Tracy, II Address 513 E Acm St Deer Park 11729-3611 Employer Occupation	8/12/90		25		✓			✓		
Name Ferruccio Cupo Address 8 Sparrow Ln Huntington NY 11743 Employer Occupation	8/12/90		25		✓			✓		
Name Philip J O'Reilly Address 1505 Kellum Pl Menasha 11501 Employer Occupation	8/12/90		100		✓			✓		
Name Fred Bruning Address 3 Chatman Place Dix Hills NY 11746 Employer Occupation	8/12/90		25		✓			✓		
Name Adolph J Boos Address 4 Middleberry Rd Hauppauge 11787 Employer Knickerbocker Elec. Supply 55 Knickerbocker Ave Occupation Bohemia 11716	8/12/90		20		✓	✓		✓		
Name Arthur A Hazel Address 203 4th Ave Huntington Sta 11746 Employer Suffolk Cty P.D. 30 Wapack Ave Wapack 11980 Occupation	8/12/90		20		✓	✓		✓		
Name George Lorenz Address 4 Fairlee Dr. E. Northport NY 11731 Employer Occupation retired	8/12/90		5		✓	n/a	n/a	✓		✓
Name Otto J. Fleig Address 93 Gaynor Ave Manhasset NY 11030 Employer Occupation retired	8/12/90		10		✓	n/a	n/a	✓		✓
Name Robert C. Murphy Address 37 Edging Rd Manhasset NY 11030 Employer Community Futures Trading Comm 1 Wadsworth Ch Occupation NYS 10048	8/12/90		100		✓	✓		✓		

CDD: Check Deposit Date

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR: 90

	CDD	Designation			Resid. Known	Emp. Known	Occup. Known	Follow-Up		Info. Recd.
		Prim.	Gen.	Other				Letter	Phone	
Name Herbert Meyers Address 580 Muttontown Rd. Syosset NY 11791 Employer same Occupation self	8/12/90		10		✓	✓	✓	✓		✓
Name George W. Burkert Address 6 Scott Dr. Melville 11747 Employer Occupation retired	8/12/90		50		✓	✓	✓	✓		✓
Name Donald C. Sammers Address 10 Bartel Dr. Greenvale NY 11740 Employer NYS Hempstead Supreme Ct Hempstead 11787 Occupation	8/12/90		10		✓	✓		✓		
Name T.G.N. Chin Address 155 Highline Trl. Stamford Ct 06102 Employer Occupation	8/12/90		500		✓			✓		
Name Linda Galvin Address 15 Essex Ct Rt Wash. 11050 Employer Occupation	8/12/90		10		✓			✓		
Name Kenneth Birch Address 39 Rumpford Rd Kings Park 11754 Employer K. Birch & Son 525 W. Jericho Tpke Smithtown 11787 Occupation self	8/12/90		25		✓	✓	✓	✓		✓
Name Address Employer Occupation										
Name Address Employer Occupation										
Name Address Employer Occupation										

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CDD: Check Deposit Date

**ROBERT
PREVIDI
FOR CONGRESS**

EXHIBIT C

CONTRIBUTION FIX

THIS FORM TO BE USED WHEN ONLY EMPLOYER ADDRESS IS PROVIDED

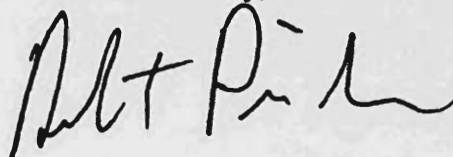
Thank you for your campaign contribution. As a contributor to my campaign, federal election law requires that I have on file the complete form below.

If you could take just a moment to fill in any blanks and make any necessary changes, it would be greatly appreciated.

For your convenience, we have enclosed a postage paid envelope that you can use to return this form.

Again, thank you for your support.

Sincerely,



Robert Previdi

CTFX

Please fill in information below and return in the envelope provided. Thank you.

Name: _____

Home Address: _____

Occupation: _____

City: _____ State: _____ Zip: _____

This information is required by law by the Federal Election Commission for all contributors.
Paid for by Robert Previdi for Congress. Contributions are not tax deductible.

P.O. Box 1044, Manhasset, N.Y. 11030 or P.O. Box 573, Commack, N.Y. 11725

21040330

ROBERT PREVIDI FOR CONGRESS

THIS FORM TO BE USED WHEN REQUESTING EMPLOYMENT INFORMATION

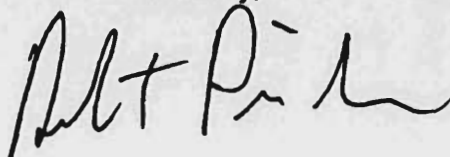
Thank you for your campaign contribution. As a contributor to my campaign, federal election law requires that I have on file the complete form below.

If you could take just a moment to fill in any blanks and make any necessary changes, it would be greatly appreciated.

For your convenience, we have enclosed a postage paid envelope that you can use to return this form.

Again, thank you for your support.

Sincerely,



Robert Previdi

CTFX

Please fill in information below and return in the envelope provided. Thank you.

Occupation: _____

Employer Name: _____

This information is required by law by the Federal Election Commission for all contributors.
Paid for by Robert Previdi for Congress. Contributions are not tax deductible.

P.O. Box 1044, Manhasset, N.Y. 11030 or P.O. Box 573, Commack, N.Y. 11725

AFFIDAVIT OF PAUL HIROMURA

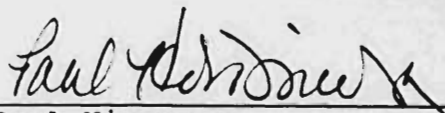
TREASURER

PREVIDI FOR CONGRESS

Every contributor since January 1989 (to date: 269) was sent a contribution acknowledgement letter along with a card requesting necessary contributor information by the Assistant Treasurer.

For non-compliers, a follow-up, pre-postage paid card is mailed requesting missing contributor information. As appropriate, a telephone call is placed urging compliance.

We believe this procedure constitutes "best efforts" as specified by the Federal Election Campaign Act of 1971.



Paul Hiromura
Treasurer, Previdi For Congress

Subscribed and Sworn To Before Me This 12th day of September, 1990.


Notary Public

My Commission Expires:

KENNETH S. COHEN
Notary Public, State of New York
No. 31-4824008
Qualified in New York County
Commission Expires December 20, 1992

91 JAN 11 AM 11:36

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR #3114
DATE COMPLAINT RECEIVED
BY OGC: August 23, 1990
DATE OF NOTIFICATION TO
RESPONDENTS: August 28, 1990
STAFF MEMBER: Tamara Kapper

COMPLAINANT: Richard Bates

RESPONDENTS: Previdi for Congress and Paul Hiromura, as
treasurer
Robert Previdi

RELEVANT STATUTES: 2 U.S.C. § 432(i)
2 U.S.C. § 434(b)(2)(A)
2 U.S.C. § 434(b)(3)(A)
11 C.F.R. § 104.7

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On August 21, 1990, Mr. Richard Bates filed a complaint with the Commission against Previdi for Congress and Paul Hiromura, as treasurer (the "Committee"), and the candidate, Robert Previdi. The complainant asserts that respondents have failed to accurately disclose all contributor information during the 1989-1990 election cycle as required by 2 U.S.C.

§ 434(b)(3)(A).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that the treasurer of a political

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committee file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Pursuant to 2 U.S.C. § 434(b)(2), each report shall disclose the total amount of all receipts and disbursements for the reporting period and the calendar year. In addition, the report shall disclose the identification of each person that makes a contribution to the reporting committee in excess of \$200 either in value or aggregate. 2 U.S.C. § 434(b)(3)(A). Pursuant to 2 U.S.C. § 431(11), a "person" is defined as including an individual, partnership, committee, association, corporation, labor organization or group of persons. Identification of an individual includes the name, the mailing address, the occupation of the individual and the name of their employer. 2 U.S.C. § 431(13).

In cases where the treasurer of the committee can show that best efforts have been used to obtain, maintain and submit the information required by 2 U.S.C. § 431(13), any report or any records of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(i).

According to the reports filed with the Commission, the Previdi for Congress Committee inserts the phrase "Best Efforts Satisfied" in the identification blocks of its Schedule A's wherever the information is not provided. The Reports Analysis Division has sent the Committee four (4) requests for additional information regarding the insufficient contributor information on four (4) separate reports.

On September 13, 1990, this Office received a written response to the complaint from Mr. Previdi. Attachment 1. In

21040334

that response, Mr. Previdi contends that,

Every mailing sent has a return card which requests name, address, city, state, zip code, phone, employers name, and occupation.... Further, a record is kept of every contributor and whether he or she has provided the information requested.... If all of the identification information required by law has not been gathered, then a mailing entitled "Contribution Fix" is sent.... This mailing consists of a letter and a postage paid envelope requesting any additional identification information required by law. Every contributor who's (sic) identification file was not complete was contacted by the Respondents....

5 Id. (Emphasis in original.)

3 Respondents contend that they "have been diligent in their
3 attempts to comply with the disclosure regulations."

2 Respondents assert that, "[c]opious records have been kept of
3 the identity information on the additional information that was
3 required." They also firmly contend that because they made at
4 least one effort to obtain additional contributor information,
5 they have "met the best efforts standard of 11 CFR 104.7."

1 To support their contentions, Respondents submitted a
2 signed and sworn affidavit by the treasurer, Paul Hiromura. In
the affidavit, Mr. Hiromura restates the procedures used by the
Committee to collect contributor information as outlined
by Mr. Previdi.

The response provided a sample copy of a contribution solicitation and a "return card" requesting the contributor's name, address, city, state, zip code, telephone number, employer's name and occupation. Respondents also submitted copies of their contributor records from January 1, 1990 to

August 12, 1990 listing the actions taken with respect to each contributor. In addition, Respondents provided a sample copy of the "Contribution Fix" letter that they send to contributors when they fail to provide the Committee with all of the required information.

Upon examination of the contributor records submitted by the Committee, this Office found a number of discrepancies in both the records and the Committee's reports. The Committee claims to have kept "copious records" of the contributor information but the Committee's records reveal instances where a contribution was either misreported or not reported at all on the disclosure reports filed with the Commission. For example, in the Committee's records there were two (2) contributions in excess of \$200 that appear to have been deposited on July 5, 1989,¹ but the contributions were not disclosed in the Committee's reports filed with the Commission.

There are also instances where contributors were reported on the reports but were not listed in the Committee's records. On the 1990 12 Day Pre-Primary Report, the Committee disclosed three (3) contributions in excess of \$200 from three (3) individuals but these individuals were not listed in their contributor records. In addition, there are instances where the contributor information was reported on the disclosure reports but was not in the records and vice versa. For example, on the

1. The Committee's records do not list the date that the contributions are received but rather the date that the Committee deposited the check.

1989 Year End Report the Committee disclosed an individual's occupation as being "president" but in the Committee's records the same individual's occupation was blank.

As already noted, respondents assert they have satisfied the best efforts requirement pursuant to 11 C.F.R. § 104.7 because, "[i]n each and every case, there was at least one effort to obtain the additional information." However, in instances when the Committee has amended its reports they failed to disclose any newly received contributor information. The lack of amendments to the reports that disclose additional contributor information gives rise to the question of whether the Respondents are amending their reports when they receive additional contributor information. As previously stated, there are also a number of discrepancies in the Committee's records. Thus, it appears that the Committee may not be properly disclosing the contributor information it receives on their original reports. Therefore, this Office recommends that the Commission find reason to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

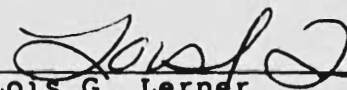
Since the violations appear to be related solely to the Committee's record keeping and disclosure of the contributors and there does not appear to be any personal involvement by the candidate in regard to the reporting problems, this Office recommends that the Commission find no reason to believe that the candidate, Robert Previdi, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

III. RECOMMENDATIONS

1. Find reason to believe that Previdi for Congress and Paul Hiromura, as treasurer violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).
2. Find no reason to believe that Robert Previdi violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).
3. Approve the attached Factual and Legal Analysis and send the appropriate letters.

Lawrence M. Noble
General Counsel

210405333
Date 1/10/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Response from Mr. Previdi, dated 9/12/90
2. Proposed Factual and Legal Analysis



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DELORES HARRIS *DK*
COMMISSION SECRETARY

DATE: JANUARY 14, 1991

SUBJECT: MUR 3114 - FIRST GENERAL COUNSEL'S REPORT
DATED JANUARY 10, 1991.

The above-captioned document was circulated to the
Commission on Friday, January 11, 1991 at 2:00 P.M..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	XXXX
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for TUESDAY, JANUARY 29, 1991.

Please notify us who will represent your Division before the
Commission on this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Previdi for Congress and Paul Hiromura,
as treasurer;
Robert Previdi.

)
) MUR 3114
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
January 29, 1991, do hereby certify that the Commission
decided by a vote of 4-1 to take the following actions
in MUR 3114:

1. Find reason to believe that Previdi for
Congress and Paul Hiromura, as treasurer,
violated 2 U.S.C. §§ 434(b)(2)(A) and
434(b)(3)(A).
2. Find no reason to believe that Robert
Previdi violated 2 U.S.C. §§ 434(b)(2)(A)
and 434(b)(3)(A).
3. Approve the Factual and Legal Analysis and
send the appropriate letter as recommended
in the General Counsel's report dated
January 10, 1991.

Commissioners Aikens, McDonald, McGarry, and Thomas
voted affirmatively for the decision; Commissioner
Elliott dissented; Commissioner Josefiak was not present.

Attest:

Jan 31, 1991
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 21, 1991

Paul Hiromura, Treasurer
Previdi for Congress
P.O. Box 1044
Manhasset, NY 11030

RE: MUR 3114
Previdi for Congress and
Paul Hiromura, as treasurer

Dear Mr. Hiromura:

On August 28, 1990, the Federal Election Commission notified Previdi for Congress ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on January 29, 1991, found that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A), provisions of the Act. The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the 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

Paul Hiromura
Page 2

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

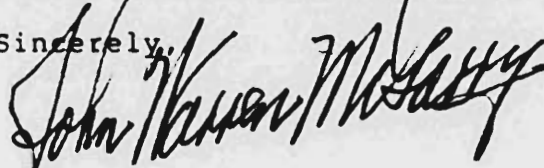
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



John Warren McGarry
Chairman

Enclosures
Questions
Designation of Counsel Form
Factual & Legal Analysis

2104035372

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Previdi for Congress and Paul) MUR 3114
Hiromura, as treasurer)

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Mr. Paul Hiromura, Treasurer
Previdi for Congress
P.O. Box 1044
Manhasset, NY 11030

3
2
1
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3
In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1989 to December 31, 1990.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

Paul Hiromura
Page 4

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3114

Questions to Previdi for Congress and Paul Hiromura, as
treasurer

In regard to the recordkeeping and reporting of
contributions by Previdi for Congress, please answer the
following questions:

1. Please explain, in detail, the procedures used by the
Committee for collecting contributions.
2. Please explain, in detail, the procedures used by the
Committee for recording the contributions received by the
Committee.
3. Please identify all persons responsible for collecting
and recording contributions to the Committee.
4. If the Committee receives a contribution from an
individual and the contributor information is incomplete, please
explain, in detail, what steps are taken to obtain the missing
contributor information.
5. If new information is received by the Committee
regarding a contributor, are the Committee's records updated?
If so, please state how often the records are updated and
identify the persons responsible for recording the new
information into the Committee's records.
6. If new information regarding a contributor is received
by the Committee, are the Committee's disclosure reports
amended? If so, please state how often the disclosure reports
are amended to reflect the new information and identify the
persons responsible for amending the reports.

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Previdi for Congress
and Paul Hiromura, as
treasurer

MUR 3114

SUMMARY OF ALLEGATIONS

It is alleged that Previdi for Congress and Paul Hiromura, as treasurer (the "Committee"), failed to accurately disclose all contributor information as required by 2 U.S.C. § 434(b)(3)(A) during the 1989-1990 election cycle.

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that the treasurer of a political committee file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Pursuant to 2 U.S.C. § 434(b)(2), each report shall disclose the total amount of all receipts and disbursements for the reporting period and the calendar year. In addition, the report shall disclose the identification of each person that makes a contribution to the reporting committee in excess of \$200 either in value or aggregate. 2 U.S.C. § 434(b)(3)(A). Pursuant to 2 U.S.C. § 431(11), a "person" is defined as including an individual, partnership, committee, association, corporation, labor organization or group of persons. Identification of an individual includes the name, the mailing address, the occupation of the individual and the name of their employer. 2 U.S.C. § 431(13).

In cases where the treasurer of the committee can show that

best efforts have been used to obtain, maintain and submit the information required by 2 U.S.C. § 431(13), any report or any records of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(1).

According to the reports filed with the Commission, the Committee inserts the phrase "Best Efforts Satisfied" in the identification blocks of its Schedule A's wherever the information is not provided. The Reports Analysis Division has sent the Committee four (4) requests for additional information regarding the insufficient contributor information on four (4) separate reports.

Therefore, there is reason to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

2104035

**ROBERT
PREVIDI
FOR CONGRESS**

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 MAR -5 AM11:44

91 MAR -5 PM12:40

February 27, 1991

Ms. Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

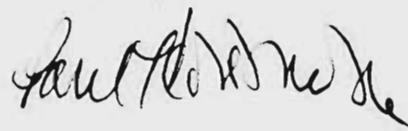
Dear Ms. Kapper:

RE: MUR 3114 PREVIDI FOR CONGRESS AND PAUL HIROMURA AS TREASURER

Pursuant to your letter of February 21, 1991 on the above subject,
please find our responses to the six questions you posed on
Page 4.

We hope this is the information you need to close this matter.

Sincerely,



Paul Hiromura

PH:lf
Attachments

Questions to Previdi for Congress and Paul Hiromura,
as Treasurer

1. Please explain, in detail, the procedures used by the Committee for collecting contributions:

We used several methods to collect contributions to the Previdi for Congress campaign:

- o Particularly at the beginning of the campaign, the candidate spent a great deal of time calling all his friends and acquaintances and their friends asking for contributions.
- o Once operations funds were available through the initial contribution solicitations, direct mail was used where an attached mail-in contributor form was to be submitted (see Exhibit I).
- o Two fund raisers were also held, where a contributor information cards was to be completed by the contributor (see Exhibit II).

The received contributions were deposited in the Committee's bank account as appropriate, or approximately once a week.

2104035100

2. Please explain, in detail the procedures used by the Committee for recording the contributions received by the Committee:

The procedures for recording contributions have undergone revision, with a second and final procedure which, we believe, provided the most detail and served as an excellent system for tracking and following up contributors.

The first procedure (see Exhibit III) entailed, that when a contribution was received, required contributor information was entered along with a notation of missing contributor information, and a follow-up status.

The second procedure (see Exhibit IV) included important contribution information as well as all of the required contributor information in a far more user-friendly form.

3. Please identify all persons responsible for collecting and recording contributions to the Committee.

Paul Hiromura (Treasurer - 1989-1990)
Lori Faller (Assistant Treasurer - 1989)
Yvonne Bonder (Assistant Treasurer - July, 1989-Aug., 1990)
Taimi Previdi (Assistant Treasurer - after Aug. 1990)

Paul Hiromura provided oversight on the activities of the Assistant Treasurer who had the responsibility of collecting and recording the campaign contributions.

4. If the Committee receives a contribution from an individual and the contributor information is incomplete, please explain, in detail, what steps are taken to obtain the missing contributor information:

However a contribution was received, a Thank You letter was immediately sent to the contributor. If information was incomplete, a card was inserted asking the contributor for the missing information (see Exhibit V). To increase the number of replies, a postage-paid envelope was included. If the contributor still did not provide the required missing information, a telephone call was made to urge compliance of missing contributor information. In many cases, the only telephone number available was a business number; ergo, the compliance request had to be made through the contributor's secretary.

Beginning July 1990, with incomplete contributor information remaining at uncomfortably high levels and despite the best efforts by the Committee, the candidate himself personally telephoned every contributor (where a telephone number was available) for the missing contributor information.

There was no question that having the candidate call got us a great deal of information which we could not have gotten in any other way but it did take valuable time away from the candidate for campaigning.

5. If new information is received by the Committee regarding a contributor, are the Committee's records updated? If so, please state how often the records are updated and identify the persons responsible for recording the new information into the Committee's records:

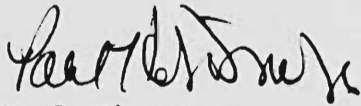
Through August 1990, Yvonne Bonder used the Contributor Information form referred to earlier to keep track of contributions (see Exhibit III).

Starting in September 1990, Taimi Previdi took over and used a different system for keeping track of the records (see Exhibit IV). Extremely accurate records were kept with information updated regularly, usually within two weeks after receipt of such information.

6. If new information regarding a contributor is received by the Committee, are the Committee's disclosure reports amended? If so, please state how often the disclosure reports are amended to reflect the new information and identify the persons responsible for amending the reports:

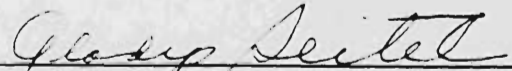
As evidenced in our amendment of the July 15, 1990 Quarterly Report (see Exhibit VI), we added contributor information missing from the original submission. From that point forward, the candidate himself took time off to personally contact every contributor who had not provided the required contributor information (see Point 4 above); therefore, each Receipts and Disbursements Report up to and including the 1990 year-end report is as complete as could be achieved. The new contributor information was forwarded to the Treasurer who prepared the amending reports.

Prior to the July 15, 1990 Quarterly Report, the Committee did not further pursue nor receive new contributor information despite the best efforts as stated in Point 4 above.



Paul Hiromura
Treasurer
Previdi for Congress

Subscribed and Sworn To Before Me This 28th day of February, 1991.



Notary Public

GLADYS SEITEL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 14, 1993

My Commission Expires: _____

21040352304

ROBERT PREVIDI FOR CONGRESS

August 29, 1990

CAR-RT SORT **CR17
Ms. Ellen M Brusca
15 Garfield Place
East Northport, NY 11731

SAMPLE

Did you know, present
Hollywood fund raising, your
current Congressman received
over \$100,000 in campaign
contributions from famous
movie stars?

EXHIBIT I

Not one of them lives in our
district. Not one of them has
demonstrated any special
concern about the problems we
face right here on Long Island.

Don't you wonder why they
contributed to his campaign?

Dear Ms. Brusca:

My name is Robert Previdi. I am running as the Republican candidate from our Third Congressional District because questions like these bother me.

Your current representative, Mr. Mrazek, states confidently that *"One of the wonderful parts of my job is being able to look at issues that don't have a direct impact on Long Island."* (New York Times, May 29, 1988). He has spent countless hours of his time, and taxpayer dollars, on the issue of colorization of film.

Clearly, his efforts have not gone unrewarded. Over \$100,000 (about 25% of his current campaign funds) have been donated by these movie stars. His cause may be honorable but, don't you wonder how these efforts could help us on Long Island? Aren't we the people whose interests he was elected to represent?

Today we face critical problems in our district: over-taxation, a dramatic loss of jobs and a dying Long Island Sound just to name a few. Long Island has been a wonderful place to live. But how long will it remain so if our problems are consistently ignored?

I have lived in this district for many years and appreciate the quality of life we have here. As an Italian-American kid who grew up in the Bronx and who worked hard to get here, I want to preserve that quality of life. I will work to solve the problems that affect us so we may continue to enjoy the benefits of Long Island. I will never take my constituents for granted by devoting my time to personal projects.

So the real issue is up to you. Do you want a Congressman who chooses the issues that best serve his interests -- such as the colorization of film and votes against a proposal to protect the flag...against a balanced budget...even against a mild reprimand of Barney Frank -- or someone who serves your interests?

(over)

Dear Bob:

YES! You can count on me.Enclosed is my contribution of: ☐ \$20 ☐ \$50 ☐ \$100 ☐ Other: _____

Please make check payable to "Previdi for Congress". Make any changes to your name and address information below and mail your contributions in the envelope provided. Thank you.

IRI

Employer Name: _____

Ms. Ellen M Brusca
15 Garfield Place
East Northport, NY 11731

Occupation: _____

Phone: (____) _____

This information is required by law by the Federal Election Commission for all contributors.
Paid for by Robert Previdi for Congress. Contributions are not tax deductible.

P.O. Box 1044, Manhasset, N.Y. 11030 or P.O. Box 573, Commack, N.Y. 11725

2104033000

**ROBERT
PREVIDI
FOR CONGRESS**

P.O. Box 1044, Manhasset
New York, 11030

EXHIBIT II

The Federal Election Committee requires us to submit your name, address and your employer's name and your occupation. We would appreciate your filling out the information and returning it to us quickly.

Name _____

Address _____

City _____

State _____ Zip _____ Phone _____

Employer's name _____

Your occupation _____

Paid for by Robert Previdi for Congress

31040352906

PREVIDI FOR CONGRESS - CONTRIBUTOR INFORMATION

YEAR:

[illegible]

CDD: Check Deposit Date

THE

91540351933

PROVIDE FOR CONGRESS 1990 CONTRIBUTIONS

PAGE

		AMOUNT	PAID DEPOSITED	PAID THANK YOU	TELEPHONE
10/22	PAUL D WHITEHEAD 801 RIDGE PLACE FALLS CHURCH, VA 22046	70	30	10/22	11/51 703 538-5055
10/22	IRA WEINSTOCK 771 CARROLL STREET BROOKLYN, NY 11415	70	25	10/22	9/10
10/22	HELEN D. KEEGAN 14 CROFT PL. HUNTINGTON, NY 11743	70	15	10/22	11/31
10/22	JOHN TRAINOR 16 AMBROSE LANE NORTHPORT NY 11768	71	15	10/22	11/31
10/22	RUDOLF H. HERTZ 32 COLONY LANE ROSLYN HEIGHTS, N.Y. 11577	71	100	10/22	11/31
10/22	MRS. MARITA DEMENUS 24 WOODLAND RD FLOWER HILL ROSLYN H. 11576 ROSLYN HEIGHTS, NY	71	100	10/22	11/3

91540362909

PREVIDI FOR CONGRESS CONTRIBUTIONS 1990

PAGE 11

		AMOUNT	DATE DEPOSITED	DATE THANK YOU	2ND NOTICE	TELEPHONE
10/15	MRS. HELEN E. COOPER 64 91 TULIP AVE. RD 2 FLORAL PARK NY 11001 RETIRED	10	10/15	10/15		
10/15	JOHN B. TORANO 64 95 ABBEY ROAD MANHASSET NY 11030 SELF EMPLOYED ATTORNEY	30	10/15	10/15		576 627-5352
10/15	NON PARTISAN POLITICAL 62 SUPPORT COMMITTEE FOR GENERAL ELECTRIC COMPANY EMPLOYEES FAIRFIELD CT 06431	1000	10/15	—		
THANK YOU TO	MR EUGENE F. MURPHY SENIOR VICE PRESIDENT GE COMMUNICATIONS AND SERVICES GENERAL ELECTRIC COMPANY 570 LEXINGTON AVE. NY, N.Y. 10022			THANK YOU SENT ALREADY 10/25		
10/22	STANLEY KREISER 70 2 HENHAWK LANE HUNTINGTON, N.Y. 11743 OYSTER BAY LIQUORS OWNER	500	10/22	10/22		
10/22	WILLIAM G. TOMPKINS JR 60 1354 G STREET S.E. WASHINGTON, D.C. 20003 WASHINGTON POST ADVERTISING	50	10/22	11/5		

CONTRIBUTION FIX LETTER

September 27, 1990

1?~ 2?~ 3?~
 4?~
 5?~

Dear 1?~ 3?~:

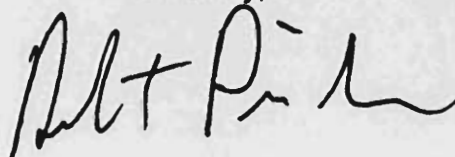
Thank you for your campaign contribution. As a contributor to my campaign, federal election law requires that I have on file the complete form below.

If you could take just a moment to fill in any blanks and make any necessary changes, it would be greatly appreciated.

For your convenience, we have enclosed a postage paid envelope that you can use to return this form.

Again, thank you for your support.

Sincerely,



Robert Previdi

CTFX

Please fill in information below and return in the envelope provided. Thank you.

1?~ 2?~ 3?~
 4?~
 5?~

Occupation: _____

Employer Name: _____

9104038:210

REPORT OF RECEIPTS AND DISBURSEMENTS

EXHIBIT VI

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) PREVIDI FOR CONGRESS		2. FEC IDENTIFICATION NUMBER 128953
ADDRESS (number and street) ☐ Check if different than previously reported. P.O. Box 1044		3. IS THIS REPORT AN AMENDMENT? ☒ YES ☐ NO
CITY, STATE and ZIP CODE Manhasset, NY 11030	STATE/DISTRICT	

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>4-1-90</u> through <u>6-30-90</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	17,820	36,970
(b) Total Contribution Refunds (from Line 20(d))	-0-	3,000
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	17,820	33,970
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	17,634	23,813
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	17,634	23,813
8. Cash on Hand at Close of Reporting Period (from Line 27)	85,844	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

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

Type or Print Name of Treasurer

Paul Hiromura

Signature of Treasurer

Paul Hiromura

Date

9/17/90

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

FEC FORM 3
(revised 4/87)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for category of the
General Summary PagePAGE 1 OF 4
FOR LINE NUMBER 11a

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)

PREVIDI FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code Debra Sobel 125 Cedar Ave Hewlett Bay Park, NY 11557 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-26-90	Amount of Each Receipt this Period 1,000
B. Full Name, Mailing Address and ZIP Code Mrs. D. Hirsch 13 Leonard Dr Morganville, NJ 07751 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-26-90	Amount of Each Receipt this Period 1,000
C. Full Name, Mailing Address and ZIP Code Barbara Altheim 270 Pond Crossing Lawrence, NY 11559 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Housewife Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-26-90	Amount of Each Receipt this Period 1,000
D. Full Name, Mailing Address and ZIP Code Charles M. Cogen 18 Cobblefield Lane White Plains, NY 10605 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Crown River Display 50-25 34th St Long Island City, NY Occupation Owner Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-29-90	Amount of Each Receipt this Period 1,000
E. Full Name, Mailing Address and ZIP Code Alex Butwinski 9 Hillside Ave Mahwah, NJ 07430 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-26-90	Amount of Each Receipt this Period 1,000
F. Full Name, Mailing Address and ZIP Code Gerald Schrager 27 Danton Lane N. Lattingtown, NY 11560 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 1,000
G. Full Name, Mailing Address and ZIP Code Howard Kalka 2 Knolls Drive Old Westbury, NY 11568 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 1,000

SUBTOTAL of Receipts This Page (optional) 7,000

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use this schedule(s)
for each category of the
Detailed Summary PagePAGE 2 OF 4
FOR LINE NUMBER 11a

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)

PREVIDI FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code Charles Harris 111 E. 85 Street New York, NY 10021 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Harris & Harris Group 620 Fifth Avenue New York, NY 10020 Occupation Chairman Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 5-9-90	Amount of Each Receipt this Period 1,000
B. Full Name, Mailing Address and ZIP Code Paul Pinkus 1 Toms Point Lane Port Washington, NY 11050 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Best Efforts Satisfied Occupation Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-27-90	Amount of Each Receipt this Period 1,000
C. Full Name, Mailing Address and ZIP Code John GAIONI 327 Lakeview Ave Rockville Centre, NY 11570 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Peirez, Ackerman & Levine Occupation Lawyer Aggregate Year-to-Date > \$1,000	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 1,000
D. Full Name, Mailing Address and ZIP Code Willaim J. Boyan 14 Orchard Place Tenafly, NJ 07670 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Circle Industries 129-09 26th Ave Flushing, NY 11354 Occupation Project Manager Aggregate Year-to-Date > \$ 500	Date (month, day, year) 3-27-90	Amount of Each Receipt this Period 500
E. Full Name, Mailing Address and ZIP Code Martin Walkes 1048 Fox Meadow Court Yorktown Hts, NY 10598 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Circle Industries 129-09 26th Ave Flushing, NY 11354 Occupation President Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-27-90	Amount of Each Receipt this Period 1,000
F. Full Name, Mailing Address and ZIP Code Steve Keriakos 98 Cochrane Avenue Hastings on Hudson, NY Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Circle Industries 129-09 26th Ave Flushing, NY 11354 Occupation V.P. Sales Aggregate Year-to-Date > \$ 500	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 500
G. Full Name, Mailing Address and ZIP Code Thomas Gibson Paulding Lane Crompond, NY 10517 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Circle Industries 129-09 26th Ave Flushing, NY 11354 Occupation Manager, Collections Aggregate Year-to-Date > \$ 500	Date (month, day, year) 3-27-90	Amount of Each Receipt this Period 500

SUBTOTAL of Receipts This Page (optional)

5,500

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 3 OF 4
FOR LINE NUMBER 11a

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)
PREVIDI FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code Richard Romano 1878 Ryder St Brooklyn, NY 11234 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Circle Industries 129-09 26th Ave Flushing, NY 11354 Occupation Purchasing Mgr. Aggregate Year-to-Date > \$ 500	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 500
B. Full Name, Mailing Address and ZIP Code Helen Yungst 455 Bayberry Lane Mountainside, NJ 07092 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Self Employed Occupation Entertainer Aggregate Year-to-Date > \$ 300	Date (month, day, year) 5-22-90	Amount of Each Receipt this Period 300
C. Full Name, Mailing Address and ZIP Code Ivan Rosenstrach 2 Guion Lane Larchmont, NY 10538 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Payment Systems 106 Fulton St New York, NY 10038 Occupation Sales Aggregate Year-to-Date > \$ 200	Date (month, day, year) 5-23-90	Amount of Each Receipt this Period 200
D. Full Name, Mailing Address and ZIP Code Burhanettin Bastiyali 872 Park Ave Manhasset, NY 11030 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Tillamuck, N.V. Inc. Occupation Manager Aggregate Year-to-Date > \$ 200	Date (month, day, year) 6-1-90	Amount of Each Receipt this Period 200
E. Full Name, Mailing Address and ZIP Code Catherine E. Muir Six Lewis Lane Port Washington, N.Y. 11050 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Muir Tralongo Assoc. 121 East 17th Street New York, N.Y. 10003 Occupation Principle Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 6-20-90	Amount of Each Receipt this Period 1,000
F. Full Name, Mailing Address and ZIP Code Francis G. Rea 21 Shorewood Drive Sands Point, N.Y. 11050 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Retired Aggregate Year-to-Date > \$ 200	Date (month, day, year) 6-23-90	Amount of Each Receipt this Period 200
G. Full Name, Mailing Address and ZIP Code Frederick A. Roesch Five Settlers Trail Darien, CT. 06820 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Citibank 399 Park Avenue New York, N.Y. 10043 Occupation V.P. Banking Aggregate Year-to-Date > \$ 200	Date (month, day, year) 6-18-90	Amount of Each Receipt this Period 200

SUBTOTAL of Receipts This Page (optional)

2,600

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 4 OF 4
FOR LINE NUMBER 11A

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)

PREVIDI FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code Steven Jacobson 812 Park Avenue New York, NY 10024 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Dreyer and Traub Occupation Lawyer Aggregate Year-to-Date > \$ 1,000	Date (month, day, year) 3-28-90	Amount of Each Receipt this Period 1,000
B. Full Name, Mailing Address and ZIP Code John Cavaiuolo 21 Woodisde Lane Westport, CT 06880 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Citibank Occupation Banker Aggregate Year-to-Date > \$ 100	Date (month, day, year) 6-9-90	Amount of Each Receipt this Period 100
C. Full Name, Mailing Address and ZIP Code Earmarked thru Citicorp Savings PAC Washington, DC 20004 John Cavaiuolo (same as above) Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Citibank Occupation Banker Aggregate Year-to-Date > \$ 100	Date (month, day, year) 6-9-90	Amount of Each Receipt this Period Memo
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

1,100

TOTAL This Period (last page this line number only)

16,200

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Previdi for Congress) **MUR 3114**
and Paul Hiromura, as)
treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 29, 1991 the Commission approved this Office's recommendation that there is reason to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A). Further, the Commission found there was no reason to believe that the candidate, Robert Previdi, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

Based on the foregoing, this Office recommends that the Commission close the file in regard to Robert Previdi.

II. RECOMMENDATIONS

1. Close the file in regard to Robert Previdi.
2. Send the appropriate letter.

Lawrence M. Noble
General Counsel

February 21, 1991
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Staff Member: Tamara Kapper

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Previdi for Congress) MUR 3114
and Paul Hiromura, as)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3114:

1. Close the file in regard to Robert Previdi.
2. Send the appropriate letter, as recommended in the General Counsel's Report dated February 21, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

2-27-91
Date

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

Received in the Secretariat: Friday, Feb. 22, 1991 9:15 a.m.
Circulated to the Commission: Monday, Feb. 25, 1991 11:00 a.m.
Deadline for vote: Wednesday, Feb. 27, 1991 11:00 a.m.

dh



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1991

Mr. Robert Previdi
20 LaFarge Lane
Manhasset, NY 11030

RE: MUR 3114
Robert Previdi

Dear Mr. Previdi:

On August 28, 1990, the Federal Election Commission notified you of a complaint alleging violations 2 U.S.C. § 434(b) of the Federal Election Campaign Act of 1971, as amended.

On January 29, 1991, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe that you violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A). Accordingly, the Commission closed its file in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you 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 is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted

Robert Previdi
Page 2

to the Commission. Receipt of the waiver will be acknowledged
in writing by the Commission.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

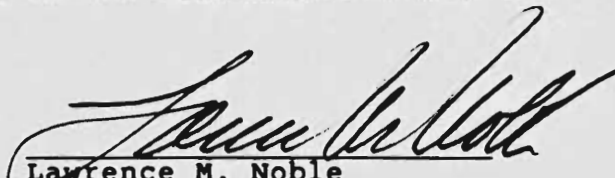
In the Matter of)
Previdi for Congress and) MUR 3114
Paul Hiromura, as treasurer)

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Previdi for Congress and Paul Hiromura, as treasurer, based on the assessment of the information presently available.

Date

3/17/91


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

June 11, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel *L*

SUBJECT: MUR 3114

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on June 11, 1991. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondent

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 11, 1991

Paul Hiromura, Treasurer
Previdi for Congress
P.O. Box 1044
Manhasset, N.Y. 11030

RE: MUR 3114
Previdi for Congress and Paul
Hiromura, as treasurer

Dear Mr. Hiromura:

Based on a complaint filed with the Federal Election Commission on August 22, 1990, and information supplied by you, the Commission, on January 29, 1991, found that there was reason to believe the Previdi for Congress ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have 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 (ten 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 has occurred.

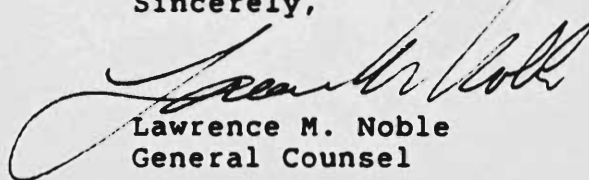
If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

Paul Hiromura
Page 2

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 a conciliation agreement.

Should you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Previdi for Congress) MUR 3114
and Paul Hiromura, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE FACTS

On August 28, 1990 the Commission received a complaint from Richard Bates, Executive Director of the Democratic Congressional Campaign Committee, alleging that Previdi for Congress and Paul Hiromura, as treasurer (the "Committee"), failed to accurately disclose all contributor information during the 1989-1990 election cycle as required by 2 U.S.C. § 434(b)(3)(A).

On January 29, 1991 the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A) for the failure to properly itemize and provide the identification of persons whose contributions totaled in excess of \$200 for the calendar year. On February 21, 1991, the Commission sent interrogatories to the Committee. The Committee subsequently submitted responses to the Commission's inquiries on March 5, 1991.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that the treasurer of a political committee file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Pursuant to 2 U.S.C. § 434(b)(2), each report shall disclose the total amount of all receipts and

disbursements for the reporting period and the calendar year.

In addition, the report shall disclose the identification of each person that makes a contribution to to the reporting committee in excess of \$200 either in value or aggregate.

2 U.S.C. § 434(b)(3)(A). Pursuant to 2 U.S.C. § 431(11), a "person" is defined as including an individual, partnership, committee, association, corporation, labor organization or group of persons. Identification of an individual includes the name, the mailing address, the occupation of the individual and the name of their employer. 2 U.S.C. § 431(13).

In cases where the treasurer of the committee can show that best efforts have been used to obtain, maintain and submit the information required by 2 U.S.C. § 431(13), any report or any records of such committee shall be considered in compliance with the Act. 2 U.S.C. § 432(i).

A review of the Committee's disclosure reports revealed a high omission rate for missing contributor information and in place of the missing information the Committee would insert the phrase "Best Efforts Satisfied" in the identification blocks of its Schedule A's. In response to the complaint, on September 13, 1990 the Committee firmly contended that they had diligently attempted to comply with the disclosure requirements and had met the best efforts provision pursuant to 11 C.F.R. § 104.7. Also included with their response were copies of some of their contributor records.

After review of their written response and contributor records, this Office discovered a few discrepancies between

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their records and their disclosure reports on file with the Commission. This Office also questioned their efforts in collecting the omitted contributor information because they contended that they had satisfied the best efforts provision of the Commission's Regulations but they never filed any amendments to their reports that included new contributor information. Thus, this Office found it unusual that none of the contributors responded to the Committee's requests for the missing information.

A. Methods Used To Collect Incomplete Contributor Information

According to their March 5, 1991 response to the Commission's reason to believe findings, respondents now contend that,

However a contribution was received, a Thank You letter was immediately sent to the contributor. If information was incomplete, a card was inserted asking the contributor for the missing information.... To increase the number of replies, a postage-paid envelope was included. If the contributor still did not provide the required information, a telephone call was made to urge compliance of the missing contributor information. In many cases, the only telephone number available was a business number; ergo, the compliance request had to be made through the contributor's secretary.

Respondents further contend that, "... with incomplete contributor information remaining at uncomfortably high levels and despite the best efforts by the Committee, the candidate, himself personally telephoned every contributor (where a telephone number was available) for the missing information."

Id. Thus, it appears that Respondents have made several

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attempts to collect the missing contributor information and appear to have satisfied the best efforts provision pursuant to 11 C.F.R. § 104.7 in order to comply with the requirements of 2 U.S.C. § 434(b)(3)(A).

B. Filing Amended Disclosure Reports

According to Commission indices, it appears that Respondents filed one amendment to a disclosure report that provided more contributor information than its original, the 1990 July Quarterly Report. Respondents contend that prior to the 1990 July Quarterly Report, the Committee did not receive new contributor information despite their best efforts as described above. Respondents further assert that the 1990 October Quarterly through the 1990 Year End Reports were as complete as possible when they were originally filed. Thus, there purportedly was no need to file any other amendments.

After further investigation of the Committee's disclosure reports it appears that the reports filed after the 1990 July Quarterly Report do in fact have lower omitted contributor information percentages. Thus, the subsequent reports are more complete than the previous reports.

Respondents assert that Yvonne Bonder, Assistant Treasurer, kept track of the contributor records through August 1990 through the use of "Contributor Information" forms created by the Committee. From September 1990 through the present, Taimi Previdi, another assistant treasurer, began keeping track of the contributor records using a different, more accurate system. The contributor records submitted by the Committee in response

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to the Commission's reason to believe findings appear to have been the ones compiled by Ms. Bonder which according to respondents were not as accurate as those kept by Mrs. Previdi. Thus, this could explain why this Office originally found a few discrepancies between the Committee's disclosure reports and their internal records which, in turn, persuaded this Office to think that maybe there were some additional reporting problems not addressed in the complaint.

As previously stated, there appeared to be a few reporting discrepancies between the Committee's disclosure and the records submitted by the Committee; however, the Committee admits that those contributor records were not as accurate as their subsequent records and since the Committee voluntarily submitted the records for the Commission's perusal this Office cannot be certain that the records were not updated at a later date. In addition, as a result of the Committee's full cooperation with regard to this matter, those reporting discrepancies have been resolved. Therefore, this Office is satisfied that the Committee did make several attempts to collect missing contributor information in order to fully comply with 2 U.S.C. § 434(b)(3)(A) and is now satisfied with the completeness of the Committee's contributor information as reported on their disclosure reports pursuant to 2 U.S.C. § 434(b)(2)(A). In addition, the Committee has been very conscientious and has been more than cooperative in its attempts to resolving this matter.

Therefore, the Office of the General Counsel recommends that the Commission find no probable cause to believe that

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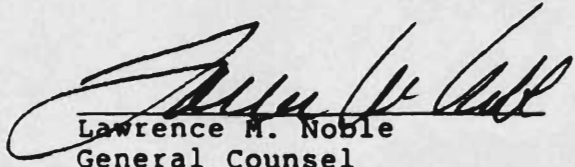
Previdi for Congress and Paul Hiromura, as treasurer, violated
2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

III. GENERAL COUNSEL'S RECOMMENDATION

Find no probable cause to believe that Previdi for Congress
and Paul Hiromura violated 2 U.S.C. §§ 434(b)(2)(A) and
434(b)(3)(A).

Date

6/10/91


Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Previdi for Congress and)
Paul Hiromura, as treasurer)

MUR 3114

EXECUTIVE SESSION

AUG 13 1991

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 28, 1990 the Commission received a complaint from Richard Bates, Executive Director of the Democratic Congressional Campaign Committee, alleging that Previdi for Congress and Paul Hiromura, as treasurer (the "Committee"), and the candidate, Robert Previdi, failed to accurately disclose all contributor information during the 1989-1990 election cycle as required by 2 U.S.C. § 434(b)(3)(A).

On January 29, 1991 the Commission found reason to believe that the Committee violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A) for the failure to properly itemize and provide the identification of persons whose contributions totaled in excess of \$200 for the calendar year. On that same date, the Commission also determined to find no reason to believe that Robert Previdi violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A) and closed the file with regard to him. On February 21, 1991, the Commission sent interrogatories to the Committee. The Committee submitted responses to the Commission's inquiries on March 5, 1991. Attachment 1.

Finally, on June 11, 1991, this Office notified the Committee, in writing, that it intended to recommend that the

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Commission find no probable cause to believe that it had violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A) and provided the Committee a General Counsel's Brief stating this Office's position on the legal and factual issues of the case. On June 17, 1991, respondents contacted staff from this Office and inquired about the necessity of responding to the General Counsel's Brief if they agreed with the recommendation. To date, the Committee has not submitted a response to the General Counsel's Brief.

II. ANALYSIS (The General Counsel's Brief is incorporated herein by reference)

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A review of the Committee's disclosure reports, cited by the complainant, revealed a high omission rate for missing contributor information and in place of the missing information the Committee would insert the phrase "Best Efforts Satisfied" in the identification blocks of its Schedule A's. In response to the complaint, on September 13, 1990 the Committee firmly contended that they had diligently attempted to comply with the disclosure requirements and had met the best efforts provision pursuant to 11 C.F.R. § 104.7. Also included with their response were copies of some of their contributor records.

After review of their written response and contributor records, this Office discovered a few discrepancies between their records and their disclosure reports on file with the Commission. This Office also questioned their efforts in collecting the omitted contributor information because they contended that they had satisfied the best efforts provision of

the Commission's Regulations but they never filed any amendments to their reports that included new contributor information. Thus, this Office found it unusual that none of the contributors responded to the Committee's requests for the missing information. As discussed in the General Counsel's Brief, respondents most recent submissions, however, answer these concerns.

According to their March 5, 1991 response to the Commission's reason to believe findings, respondents contend that, if the contributor information was incomplete the Committee inserted a card into a thank you note asking for the missing information. Respondents further assert that, "If the contributor still did not provide the required information, a telephone call was made to urge compliance of the missing contributor information." Attachment 1. In addition, respondents state that "... with incomplete contributor information remaining at uncomfortably high levels and despite the best efforts by the Committee, the candidate, himself personally telephoned every contributor (where a telephone number was available) for the missing information." Id. Thus, it appears that Respondents have made several attempts to collect the missing contributor information and appear to have satisfied the best efforts provision pursuant to 11 C.F.R. § 104.7 in order to comply with the requirements of 2 U.S.C. § 434(b)(3)(A).

Respondents contend that prior to the 1990 July Quarterly Report, the Committee did not receive new contributor

information despite their efforts as described above. Respondents further assert that the 1990 October Quarterly through the 1990 Year End Reports were as complete as possible when they were originally filed. Thus, there purportedly was no need to file any other amendments. After further investigation of the Committee's disclosure reports it appears that the reports filed after the 1990 July Quarterly Report do in fact have lower omitted contributor information percentages. The subsequent reports are more complete than the previous reports.

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As previously stated, there initially also appeared to be a few reporting discrepancies between the Committee's disclosure reports and the contributor records submitted voluntarily by the Committee in response to the Commission's reason to believe findings; however, the Committee admits that those contributor records were not as accurate as their subsequent contributor records that were the result of a new record keeping system. Since the Committee voluntarily submitted their contributor records for the Commission's perusal this Office cannot be certain that those contributor records were not updated at a later date. In addition, as a result of the Committee's full cooperation with regard to this matter, those reporting discrepancies have been resolved.

Therefore, this Office is satisfied that the Committee did make several attempts to collect missing contributor information in order to fully comply with 2 U.S.C. § 434(b)(3)(A) and is now satisfied with the completeness of the Committee's contributor information as reported on their disclosure reports pursuant to

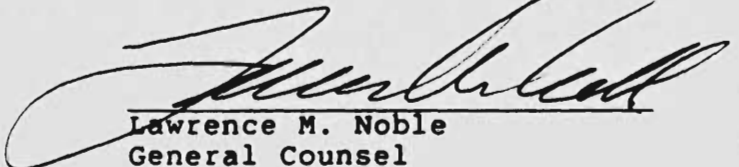
2 U.S.C. § 434(b)(2)(A). Therefore, the Office of the General Counsel recommends that the Commission find no probable cause to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).

III. RECOMMENDATIONS

1. Find no probable cause to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).
2. Approve the appropriate letters.
3. Close the entire file.

Date

7/25/91


Lawrence M. Noble
General Counsel

Attachment

Response dated 2/27/91

Staff Assigned: Tamara Kapper

21040362934

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3114
Previdi for Congress and)
Paul Hiromura, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 13, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3114:

1. Find no probable cause to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A).
2. Approve the appropriate letters as recommended in the General Counsel's report dated July 25, 1991.
3. Close the entire file.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

8-14-91
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

August 26, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard Bates, Executive Director
Democratic Congressional Campaign
Committee
430 South Capitol Street
Washington, D.C. 20003

RE: MUR 3114

Dear Mr. Bates:

This is in reference to the complaint you filed with the Federal Election Commission on August 22, 1990, concerning Robert Previdi and Previdi for Congress and Paul Hiromura, as treasurer.

Based on your complaint, on January 29, 1991, the Commission found that there was reason to believe that Previdi for Congress and Paul Hiromura, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A), provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. Further, the Commission found there was no reason to believe that Robert Previdi violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A). After an investigation was conducted and the General Counsel's brief was considered, the Commission, on August 13, 1991, found that there was no probable cause to believe that Previdi for Congress and Paul Hiromura, as treasurer violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A). Accordingly, the file in this matter was closed on August 13, 1991.

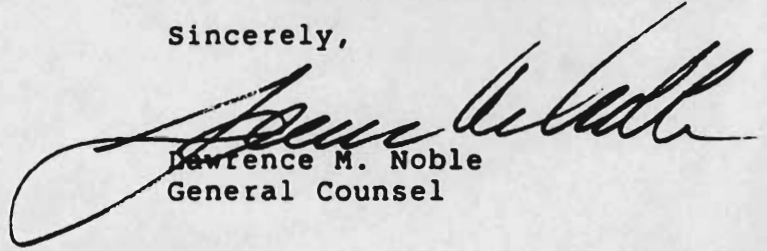
This matter will become part of the public record within 30 days. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

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Richard Bates, Executive Director
Page 2

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
General Counsel's Report

21040362937



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1991

Mr. Robert Previdi
P.O. Box 1044
Manhasset, NY 11030

RE: MUR 3114

Dear Mr. Previdi:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
by LGL

BY: Lois G. Lerner
Associate General Counsel

21040362953



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1991

Paul Hiromura, Treasurer
Previdi for Congress
P. O. Box 1044
Manhasset, NY 11030

RE: MUR 3114
Previdi for Congress and
Paul Hiromura, as treasurer

Dear Mr. Hiromura:

This is to advise you that on August 13, 1991, the Federal Election Commission found that there is no probable cause to believe that Previdi for Congress and you, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(A) and 434(b)(3)(A). Accordingly, the file in this matter has been closed.

The file will be made part of the public record within 30 days. Should 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.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3119

DATE FILMED _____ CAMERA NO. 4

CAMERAMAN AS

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