



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3854

DATE FILMED 2-24-67 CAMERA NO. 4

CAMERAMAN JMN

9704374169

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
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CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

Angelo Parisi

Respondent,

COMPLAINT

MUR 3894

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

GROUND S FOR COMPLAINT

5. According to FEC records, respondent Angelo Parisi made contributions subject to FECA, and attributable to 1992, in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent Angelo Parisi made contributions attributed to the 1992 calendar year in the amount of \$66,262. These contributions exceeded by \$41,262 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

7. According to FEC records, respondent Angelo Parisi made contributions subject to FECA, and attributable to 1991, in the amounts and to the persons identified in the list attached to this complaint as Exhibit 3. Attached as Exhibit 4 are copies of the FEC records for each contribution listed in Exhibit 3. All exhibits reflect the records on file at the FEC as of December 15, 1993.

8. On information and belief, respondent Angelo Parisi made contributions attributed to the 1991 calendar year in the amount of \$33,742. These contributions exceeded by \$8,742 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

RELIEF

9. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,

Ellen S. Miller

Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

Date: January 14, 1994

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97043174173

Ellen S. Miller
Ellen S. Miller

Subscribed and sworn before me this 14th day of January, 1994.

My Commission Expires: _____

Phyllis Landan
Notary Public District of Columbia
My Commission Expires May 14, 1998

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
National Republican Congressional Cmte	\$15,000	12/08/92	93HSE/491/5107
National Republican Congressional Cmte	\$5,000	12/09/92	93HSE/491/5107
National Republican Senatorial Cmte	\$6,000	02/21/92	92SEN/007/0641
National Republican Senatorial Cmte	\$6,000	09/14/92	92SEN/025/2361
National Republican Senatorial Cmte	\$3,000	10/02/92	92SEN/027/0683
National Republican Senatorial Cmte	\$2,000	09/21/92	92SEN/025/2361
National Republican Senatorial Cmte	\$1,500	07/28/92	92SEN/018/4012
National Republican Senatorial Cmte	\$1,000	10/19/92	92SEN/028/4486
National Republican Senatorial Cmte	\$1,000	03/16/92	92SEN/009/3808
National Republican Senatorial Cmte	\$750	07/27/92	92SEN/018/4012
National Republican Senatorial Cmte	\$750	09/14/92	92SEN/025/2361
National Republican Senatorial Cmte	\$670	02/13/92	92SEN/007/0641
National Republican Senatorial Cmte	\$500	03/26/92	92SEN/009/3808
National Republican Senatorial Cmte	\$500	10/19/92	92SEN/028/4486
National Republican Senatorial Cmte	\$325	03/16/92	92SEN/009/3808
National Republican Senatorial Cmte	\$-63	10/21/92	92SEN/028/5325
National Republican Senatorial Cmte	\$-1,540	12/31/92	93SEN/001/3903
National Republican Senatorial Cmte	\$-3,130	10/27/92	92SEN/028/5326
New York Republican Campaign Cmte	\$5,000	03/20/92	92FEC/747/1964
Presidential Victory Committee	\$1,000	10/02/92	92FEC/797/3828
Republican National Candidate Trust	\$5,500	10/14/92	92FEC/795/5323
Republican National Candidate Trust	\$5,500	11/02/92	92FEC/806/4314
Republican National Candidate Trust	\$5,000	10/14/92	92FEC/795/5323
Republican National Cmte	\$5,000	09/29/92	92FEC/792/4203

Total Contributions Attributed to 1992: \$66,262

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Amer Citizens for Pol Action	\$4,000	10/28/91	92FEC/730/1717
Amer Citizens for Pol Action	\$2,000	10/31/91	92SEN/002/4258
National Republican Congressional Cmte	\$467	04/16/91	91HSE/432/2068
National Republican Congressional Cmte	\$2,500	10/28/91	92HSE/438/0781
National Republican Congressional Cmte	\$5,000	11/01/91	92HSE/438/0781
National Republican Congressional Cmte	\$1,000	12/12/91	92HSE/438/0781
National Republican Senatorial Cmte	\$315	04/15/91	91SEN/006/2458
National Republican Senatorial Cmte	\$1,000	10/25/91	92SEN/002/4258
National Republican Senatorial Cmte	\$4,000	10/29/91	92SEN/002/4258
National Republican Senatorial Cmte	\$2,000	10/31/91	92SEN/002/4258
National Republican Senatorial Cmte	\$500	12/13/91	92SEN/002/4258
National Republican Senatorial Cmte	\$3,000	12/13/91	92SEN/002/4258
National Republican Senatorial Cmte	\$335	12/30/91	92SEN/002/4258
Republican National Cmte	\$275	02/21/91	91FEC/690/4341
Republican National Cmte	\$350	06/21/91	91FEC/702/3600
Republican National Cmte	\$7,000	10/24/91	91FEC/720/2452

Total Contributions Attributed to 1991: \$33,742

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Angelo Parisi
Exhibit 4

97043774176

NAME OF COMMITTEE

PERIOD RUN: 07/01/1991

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NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT INFORMATION DATE	AMOUNT
10708SVNHO01E20 SVENNINGSEN, ELVERA 1 BROOKLANDS BRONXVILLE NY 10708	RETIRED	08/15/91 08/16/91 08/26/91	30.00 50.00 75.00
() PRI () GEN () OTHER	AGGREGATE YTD		355.00
10804PRST005A10 PARISI, ANGELA 5 GLADSTONE RD NEW ROCHELLE NY 10804	RETIRED	10/28/91 10/31/91	4,000.00 2,000.00
() PRI () GEN () OTHER	AGGREGATE YTD		6,200.00
10950CRNV610C20 CURNOW, CORAL 610 STAGE RD MONROE NY 10950	RETIRED	07/15/91 08/05/91 08/07/91 08/13/91 08/18/91 08/26/91 08/28/91 09/17/91 09/23/91 09/30/91 10/03/91 10/10/91 10/10/91 10/14/91 10/18/91 10/25/91 10/29/91 11/04/91 11/05/91 11/11/91 11/12/91 11/21/91 11/29/91 12/11/91 12/12/91 12/13/91 12/13/91 12/14/91 12/14/91	400.00 25.00 25.00 100.00 50.00 60.00 20.00 40.00 15.00 15.00 10.00 15.00 15.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00 10.00
() PRI () GEN () OTHER	AGGREGATE YTD		2,572.00

SUBTOTAL OF RECEIPTS THIS PAGE

RECEIPTS AMOUNT

2,572.00

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REPORT COVERING PERIOD FROM 1/ 1/91 THRU 6/30/91 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. ANGELO PARISI 5 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$610.00
RETIRE	1/ 4/91	\$30.00	
	1/ 5/91	\$11.00	
	1/18/91	\$10.00	
	2/ 5/91	\$30.00	
	2/ 5/91	\$11.00	
	2/20/91	\$10.00	
	3/ 5/91	\$30.00	
	3/ 5/91	\$11.00	
	3/20/91	\$10.00	
	4/ 5/91	\$30.00	
	4/ 5/91	\$11.00	
	4/15/91	\$315.00	
	4/19/91	\$10.00	
	5/ 3/91	\$30.00	
	5/ 6/91	\$11.00	
	5/20/91	\$10.00	
	6/ 5/91	\$30.00	
	6/20/91	\$10.00	
MR. ARTHUR L. PARK 400 N SALTAIR AVE LOS ANGELES, CA 90049			\$810.34
RETIRE	4/ 1/91	\$105.00	
	4/15/91	\$500.00	
	5/17/91	\$205.34	
MR. BYOUNGUN PARK 6 THACKERAY PLACE DURHAM, NC 27707			\$245.00
BUSINESS OWNER	3/15/91	\$245.00	
BYOUNGUN PARK 6 THACKERAY PLACE DURHAM, NC 27707			\$1000.00
INFORMATION REQUESTED	3/15/91	\$1000.00	
MRS. ALICE S. PARKER 1579 MC HENRY COVE GERMANTOWN, TN 38138			\$320.57
HOUSEWIFE	1/ 8/91	\$70.00	
	2/20/91	\$55.00	
	5/21/91	\$55.00	
	5/21/91	\$70.00	
	6/ 5/91	\$70.57	

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ITEMIZED REPORT COVERING PERIOD FROM 2/01/91 TO 2/28/91 OVER \$200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD 12-TO-012	
Mr. & Mrs. Bruce C. Palmer Apartment 318 401 E. Linden Blvd. Delray Beach FL 33488	Retired	02/11/91	\$200.00	\$200.00
Mr. Marta E. Palano 5725 Micheliangala St. Coral Gables FL 33146	Corporate Executive Galliano Medical Center	02/08/91 02/28/91	\$100.00 \$100.00	\$400.00
Mr. Vincent J. Pansino Apartment 1108 1 O'Connor Place Victoria TX 77901	General Manager G. H. Brown Enterprises	02/19/91	\$175.00	\$175.00
Miss Rose E. Pasowski 617 Sunset Avenue SW Warrington FL 32687	Retired	02/28/91	\$225.00	\$225.00
Mr. Angelo Parisi 5 Gladstone Road New Rochelle NY 10804	Retired	02/19/91 02/01/91	\$40.00 \$275.00	\$300.00
Mr. B. F. Parker 1608 St. Andrews Road Greensboro NC 27408	Investment Banking Grissom Capital Company	02/07/91	\$300.00	\$300.00
Mr. & Mrs. James G. Parnal 22 Taylor Avenue Bethel CT 06801	Personnel Director I. B. M. Corporation	02/07/91	\$200.00	\$200.00
Mr. John H. Parker Suite 620 1100 Connecticut Avenue Washington DC 20036	Attorney Mobil Oil	02/04/91	\$5,000.00	\$5,000.00
Mr. Louis W. Parker 2040 W. Dixie Highway Fort Lauderdale FL 33305	INFORMATION REQUESTED 02/27/91	02/15/91 02/27/91	\$100.00 \$25.00	\$225.00

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REPUBLICAN NATIONAL COMMITTEE

PAGE 242

ITINERARY REPORT COVERING PERIOD FROM 10/01/91 THRU 10/31/91 OVER \$800.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD 10-10-91	10-10-91
Mr. Anthony Palano 846 Oregon Avenue Palo Alto CA 94308	Real Estate Sales & Rentals Ocean Pacific Company	10/18/91	\$75.00	\$325.00
Mr. T. M. Pennell 1359 McAllister Street San Francisco CA 94115	Retired Self-employed	10/22/91	\$350.00	\$800.00
Mr. Peter Perdini 24 Watson Drive Daly City CA 94014	Retired	10/10/91 10/23/91 10/31/91	\$100.00 \$300.00 \$100.00	\$700.00
Mr. Roland W. Perdue 708 Wellerburn Road Severna Park MD 21766	Retired Self-employed	10/07/91	\$300.00	\$300.00
Mr. Elmer J. Perout Jr. Apartment 2126 4763 Norstar Blvd. 212 Liverpool NY 13088	INFORMATION REQUESTED 10/21/91	10/21/91	\$15.00	\$215.00
Mr. Angelo Perini 5 Glendale Road New Rochelle NY 10804	Retired	10/03/91 10/24/91	\$40.00 \$7,000.00	\$8,025.00
Mr. & Mrs. Thomas C. Perini 9510 E. Revere Avenue Kansas City MO 64114	Owner Schulz's Unlimited	10/08/91	\$50.00	\$250.00
Mr. Ben S. Parker 262 Olympus Drive Port Ludlow WA 98365	RETIRED	10/09/91	\$25.00	\$211.00
Mr. D. F. Parker 1608 St. Andrews Road Greensboro NC 27408	Investment Banking Self-employed	10/03/91	\$250.00	\$650.00
Mrs. Doryce Parker Apartment 2 7350 Graceland Drive Omaha NE 68134	INFORMATION REQUESTED 10/28/91	10/28/91	\$50.00	\$250.00

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ITEMIZED REPORT COVERING PERIOD FROM 6/01/91 THRU 6/30/91 OVER \$300.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD YR-TO-DATE
Mr. R. L. Palmer The Highlands Street Seattle WA 98177	Attorney Self-employed	06/12/91 06/24/91	\$350.00 \$150.00 \$725.00
Mr. Vincent J. Panloto Apartment 1100 1 O'Connor Plaza Victoria TX 77901	General Manager D. H. Brown Enterprises	06/26/91	\$100.00 \$925.00
Miss Rose E. Panowski 617 Sunset Avenue SW Harrington FL 32507	Retired	06/12/91	\$350.00 \$575.00
Mr. Angelo Parisi 5 Gladstone Road New Rochelle NY 10804	Retired	06/12/91 06/21/91	\$40.00 \$350.00 \$865.00
Ms. Evelyn B. Parker P. O. Box 127 Arvonia VA 23004	Retired	06/06/91 06/11/91	\$100.00 \$1,000.00 \$1,200.00
c/o Mrs. James R. Parker Parker's Garage 2827 W. 23rd Street Erie PA 16506	Auto & Truck Repair Parker's Garage	06/10/91	\$250.00 \$250.00
Mr. Richard S. Parker 2717 Minnetonka Cedar Falls IA 50613	EXEC. V.P.	06/13/91 06/24/91	\$75.00 \$75.00 \$225.00
Dr. John L. Parnes P. O. Box 5620 San Angelo TX 76902	Ophthalmologist Self-employed	06/19/91	\$100.00 \$250.00
c/o Mr. Roger B. Parsons Elgin Sweeper Company 1310 W. Bartlett Road Elgin IL 60120	President Elgin Sweeper Company	06/11/91	\$350.00 \$350.00

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WDCO FDC REPORT

NAME, MAILING ADDRESS AND ZIP CODE DATE AMOUNT OF
NAME OF EMPLOYER EACH RECEIPT
OCCUPATION AGGREGATE YTD THIS PERIOD

✓ MR. ANGELO PARISI 04/16/91 467.76
5 CLADSTONE RD AGGREGATE YTD 467.76
NEW ROCHELLE, NY 10804
RETIRED

MS. ALICE KAN-CHUN CHAN 01/21/91 38.00
2033 65TH ST 03/14/91 28.00
BROOKLYN, NY 11204 05/04/91 88.00
REQUESTED/NOT PROVIDED 06/22/91 38.00
REQUESTED/NOT PROVIDED 05/22/91 36.00
06/24/91 36.00
AGGREGATE YTD 216.00

MR. ANIELLO TOSLINOSKI 01/26/91 100.00
16028 87TH ST 03/22/91 100.00
JAMAICA, NY 11414 03/24/91 100.00
RETIRED 06/19/91 100.00
AGGREGATE YTD 400.00

MR. AL DE METTIS 02/14/91 2500.00
1948 131ST ST AGGREGATE YTD 2500.00
BELL HARBOR, NY 11604
LEON D DEMETTIS CONST CORP
CONSTRUCTION Supt

MR. ANTHONY ANTONIATIS 02/11/91 250.00
454 HERSON RD 03/28/91 150.00
KINGS PARK, NY 11754 AGGREGATE YTD 400.00
REQUESTED/NOT PROVIDED
REQUESTED/NOT PROVIDED

MRS. ALAN L. SLOAN 01/04/91 35.00
1126 MINERAL RD 01/16/91 35.00
CHARLESTON, WV 25314 02/05/91 35.00
REQUESTED/NOT PROVIDED 04/10/91 25.00
REQUESTED/NOT PROVIDED 05/22/91 35.00
06/13/91 35.00
06/21/91 35.00
AGGREGATE YTD 215.00

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NATL REPUBLICAN SENATORIAL COMMITTEE-CONTRIBUTIONS

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LINE 11 8

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REPORT COVERING PERIOD FROM 7/ 1/91 THRU 12/31/91 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. ANGELC PARISI 5 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$12006.00
RETIREED	7/ 5/91	\$10.00	
	7/ 5/91	\$11.00	
	7/19/91	\$10.00	
	8/ 5/91	\$10.00	
	8/20/91	\$10.00	
	9/ 5/91	\$10.00	
	9/20/91	\$10.00	
	10/ 4/91	\$10.00	
	10/19/91	\$10.00	
	10/25/91	\$1000.00	
	10/29/91	\$0000.00	
	10/31/91	\$120.00	
	10/31/91	\$2000.00	
	11/ 5/91	\$30.00	
	11/19/91	\$120.00	
	11/29/91	\$70.00	
	11/29/91	\$10.00	
	12/ 5/91	\$10.00	
	12/13/91	\$500.00	
	12/13/91	\$1000.00	
	12/20/91	\$10.00	
	12/30/91	\$335.00	
MR. ARTHUR L. PARK 800 N SALT AIR AVE LOS ANGELES, CA 90049			\$11465.34
RETIREED	8/ 7/91	\$500.00	
	12/ 2/91	\$35.00	
	12/17/91	\$120.00	
DR. CHARLES W. PARK 5625 NORTH CAMINO DEL SOL TUCSON, AZ 85718			\$1297.00
PHYSICIAN	10/15/91	\$1000.00	
	10/15/91	\$297.00	
MS. JEAN PARK 769 PAULANING AVE. COSTA MESA, CA 92626			\$120.00
OWNER OF SCHOOL	6/10/91	\$120.00	
	6/23/91	\$100.00	

Angelo Parisi
Exhibit 2

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NATIONAL REPUBLICAN SENATORIAL COMMITTEE

1/1/92

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REPORT COVERING PERIOD FROM 3/ 1/92 THRU 3/31/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALNDAR YR-TO-DATE
MR. PETER PARDINI 24 MATCO AVENUE DALY CITY, CA 94014-2406			\$ 2023.44
RETIRED	3/ 2/92	\$100.00	
	3/ 2/92	\$15.00	
	3/ 5/92	\$7.00	
	3/ 5/92	\$15.00	
	3/12/92	\$900.00	
	3/16/92	\$15.00	
	3/17/92	\$260.44	
	3/19/92	\$25.00	
	3/20/92	\$15.00	
	3/23/92	\$120.00	
	3/23/92	\$15.00	
	3/26/92	\$20.00	
	3/30/92	\$200.00	
	3/31/92	\$60.00	
	3/31/92	\$15.00	
	3/ 3/92	\$25.00	
	3/ 6/92	\$100.00	
	3/26/92	\$100.00	
MR. ANGELO PARISI 56 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$8637.44
RETIRED	3/ 5/92	\$30.00	
	3/ 5/92	\$11.00	
	3/16/92	\$100.00	
	3/16/92	\$120.00	
	3/20/92	\$15.00	
	3/26/92	\$100.00	
MR. ARTHUR L. PARK 400 NORTH SALT AIR AVENUE LOS ANGELES, CA 90049-2026			\$236.00
RETIRED	3/16/92	\$236.00	
MR. PETER H. PARK 900 OAK LANE AVENUE PHILADELPHIA, PA 19126			\$575.00
INFORMATION REQUESTED	3/18/92	\$190.00	
	3/18/92	\$60.00	
	3/25/92	\$15.00	

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 1123 OF 1654
LINE 11 A

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REPORT COVERING PERIOD FROM 9/ 1/92 THRU 9/30/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. PETER PARDINI 24 MATEO AVENUE DALY CITY, CA 94014-2406			\$10982.79
RETIRED	9/ 3/92	\$125.00	
	9/ 4/92	\$60.00	
	9/ 8/92	\$9.00	
	9/23/92	\$15.00	
	9/24/92	\$25.00	
MR. DAVID WILLIAM PARDONER 497 DUNE POINT DRIVE GULF BREEZE, FL 32561-4940			\$300.00
CABLE TV ADMIN.	9/ 2/92	\$125.00	
MRS. GERHARDT PARKHURST 7993 146TH STREET N. NORCO, MN 55038-9447			\$208.00
INFORMATION REQUESTED	9/ 2/92	\$35.00	
	9/ 3/92	\$15.00	
	9/11/92	\$38.00	
	9/17/92	\$15.00	
MR. ANGELO PARISI 3 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$20063.44
RETIRED	9/ 4/92	\$30.00	
	9/ 8/92	\$11.00	
	9/14/92	\$6000.00	
	9/14/92	\$750.00	
	9/18/92	\$10.00	
	9/21/92	\$2000.00	
	9/25/92	\$120.00	
MRS. E. EARL PARK 232 GREENWOOD ST. CANTON LAKE, TX 78133			\$466.25
BEAUTY SHOP OWNER	9/10/92	\$40.00	
	9/14/92	\$50.00	
	9/18/92	\$30.00	
MRS. LAVINIA M. PARKHURST BOX 205 BAYVIEW, PR 00619			\$360.35
INFORMATION REQUESTED	9/ 2/92	\$50.00	

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 5
Line Number 28ANAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEEAny information copied from such Reports and Statements may not be sold or
used by any person for the purpose of soliciting contributions or for com-
mercial purposes, other than using the name and address of any political
committee to solicit contributions from such committee.

NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
DR. WALTER MOORE HART 1700 S CASHUA DR, 012-D FLORENCE SC 29501	REFUND DISBURSEMENT FOR:	10/27/92	490.25
MR. ANGELO PARISZ 5 GLADSTONE ROAD NEW ROCHELLE NY 10604	REFUND DISBURSEMENT FOR:	10/27/92	3130.00
MRS. ELEANOR P. PUFF 3034 HEMPFOREST DR. #5200 SAN ANTONIO TX 78129	REFUND DISBURSEMENT FOR:	10/27/92	3030.00
MISS JARREL A. REED 3516 7TH AVE. EAST, 00 TUSCALOOSA AL 35405	REFUND DISBURSEMENT FOR:	10/27/92	426.00
MISS JARREL A. REED 3516 7TH AVE. EAST, 00 TUSCALOOSA AL 35405	REFUND DISBURSEMENT FOR:	10/27/92	65.00
MR. CHRISTOPHER R. P. RODGERS 1001 NORTH OCEAN BLVD. DELRAY FL 33444	REFUND DISBURSEMENT FOR:	10/27/92	500.00
MR. CHARLES WHITE 1600 PALM AVENUE SAN DIEGO CA 92154	REFUND DISBURSEMENT FOR:	10/27/92	30.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			7,471.25
TOTAL THIS PERIOD (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 5
Line Number 28A

NAME OF COMMITTEE

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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.

		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
RICHARD LAYNE	VOICED CHECK	10/15/92	25.00-
7326 UNIT 6 LOT 1	DISBURSEMENT FOR:		
MICHAEL GILEAD CH 43338			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. ANGELO PARISI	REFUND	10/21/92	63.44
15 GLAGSTONE ROAD	DISBURSEMENT FOR:		
LAKE ROCHELLE NV 10004			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MRS. ELEANOR P. PUFF	REFUND	10/21/92	5.00
18034 NEWFREST DR. 05208	DISBURSEMENT FOR:		
SAN ANTONIO TX 78229			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. CHRISTOPHER R. P. ROGERS	REFUND	10/21/92	1560.00
1801 NORTH OCEAL BLVD.	DISBURSEMENT FOR:		
DELRAY FL 33444			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. CHARLES WHITE	REFUND	10/21/92	6726.30
1400 PALM AVENUE	DISBURSEMENT FOR:		
SAN DIEGO CA 92154			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
JOHN GERMANI	REFUND	10/27/92	60.00
1010 FLEET NATL BANK BLD	DISBURSEMENT FOR:		
PROVIDENCE RI 02903			
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. WALTER MOORE HART	REFUND	10/27/92	707.35
1700 S CASHUA DR. 012-0	DISBURSEMENT FOR:		
PROVIDENCE SC 29501			
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			9,097.05
TOTAL THIS PERIOD (last page this line number only)			

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 681 OF 956
LINE 11 A

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REPORT COVERING PERIOD FROM 10/ 1/92 THRU 10/14/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MS. HELEN PARCELS 220 NORTH BAKER AVENUE LANCASTER, OH 43130	10/ 1/92	\$19.92	\$219.92
RETIRED			
MR. HARVEY PARCHER 27192 OLD RAINIER ROAD RAINIER, OR 97048-2920	10/ 9/92	\$70.00	\$1203.00
INFORMATION REQUESTED			
MS. IDA M. PARDUE 38016 CARLISLE WAYNE, MI 48184	10/ 5/92	\$25.00	\$400.00
PAINT SPRAYER	10/ 5/92	\$10.00	
MR. PETER PARDINI 24 MATEO AVENUE DAILY CITY, CA 94014-2406	10/ 6/92	\$100.00	\$11492.79
RETIRED	10/ 6/92	\$30.00	
	10/ 6/92	\$120.00	
	10/ 6/92	\$45.00	
	10/ 7/92	\$100.00	
	10/ 7/92	\$25.00	
MR. ROLAND PARDOS 708 WELLSBURN AVENUE SEVERNA PARK, MD 21146	10/ 8/92	\$225.00	\$450.00
INFORMATION REQUESTED			
MR. ANGELO PARISI 5 GLADSTONE RD. NEW ROCKELLE, NY 10804	10/ 2/92	\$3000.00	\$23,130.00
RETIRED	10/ 5/92	\$30.00	\$23,130.00
	10/ 7/92	\$100.00	
MRS. H. EARL PARK 232 GREENWOOD ST. CANYON LAKE, TX 76133	10/ 9/92	\$20.00	\$486.25
BEAUTY SHOP OWNER			

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NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	DATE	RECEIPT AMOUNT
PANIOTO, MR VINCENT ONE O CONNOR PLAZA #1100 VICTORIA TX 77901	D H BRAMAN ENT MANAGER	11/30/92	250.00
	AGGREGATE YTD 1,100.00		
PAPAIYA, MR NARENDRA 485 TAPPAN RD NORTHVALE NJ 07647	INFORMATION REQUESTED	12/22/92	25.00
	AGGREGATE YTD 225.00		
PASAVAZIAN, MR KEVORK 1712 PLANT ST OAKBURN NY 11375	RETIRED	12/04/92	50.00
	AGGREGATE YTD 250.00		
PARDINI, MR PETER 11 BAYVIEW AVE DALY CITY CA 94014	RETIRED	11/10/92	100.00
	AGGREGATE YTD 775.00		
PARISI, MR ANGELO 1 CLADSTONE RD NEW ROCKELLE NY 10804	RETIRED	11/09/92	14,000.00
	AGGREGATE YTD 20,000.00		
PARISI, MR THOMAS 2810 P REVEREND AVE KANSAS CITY MO 64154	INFORMATION REQUESTED	12/07/92	50.00
	AGGREGATE YTD 215.00		
PART, MR SEUNG K 1414 BAYVIEW AVE KATY TX 77450	INFORMATION REQUESTED	11/20/92	30.00
	AGGREGATE YTD 245.00		

SUBTOTAL OF RECEIPTS THIS PAGE 20,605.00
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NAME OF COMMITTEE

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. ADRIAN ROSE	REFUND	12/15/92	12.50
104 CUSHWA DRIVE CENTERVILLE OH 45459	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. JAMES GATTG	REFUND	12/17/92	100.00
120 DOWNES AVENUE STAMFORD CT 06902	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
FRANK DONATELLI	REFUND	12/31/92	130.00
8000 DONATELLI, INC. 6414 PRINCE STREET, #300 ALEXANDRIA VA 22314	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
LISA G. DUPEZIER	REFUND	12/31/92	1000.00
SUITE 34 WASHINGTON DC 20009	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. FUMITAKA OMISHI	REFUND	12/31/92	1776.00
1230 NORTH HORN AVENUE LOS ANGELES CA 90049	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MR. ANGELO PARISI	REFUND	12/31/92	1540.00
15 GLADSTONE ROAD NEW ROCHELLE NY 10804	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
MRS. CLIFFORD L. HEAVER	REFUND	12/31/92	1266.00
144 WOODSTOCK KENILWORTH IL 60043	DISBURSEMENT FOR:		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			5,824.50
TOTAL THIS PERIOD (last page this line number only)			9,321.50

REPUBLICAN NATIONAL COMMITTEE

PAGE 609

TURNING UNDER COVERING PERIOD FROM 8/01/92 TO 8/31/92 OVER \$200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD 12-TO-012	
Mr. Angelo Pappas 11 Arden Road Trumbull CT 06611	Retired	09/17/92 09/17/92 09/28/92	\$50.00 \$50.00 \$50.00	\$200.00
Mr. John J. Pappas 38 Mallard Lane Lake Forest IL 60046	INFORMATION REQUESTED 09/28/92	09/28/92	\$100.00	\$300.00
Mrs. Earl T. Paros 2857 Fairfax St. Denver CO 80207	RETIRED	09/03/92 09/17/92	\$35.00 \$40.00	\$205.00
Mr. Harvey L. Parham 27492 Old Rainier Road Rainier OR 97048	INFORMATION REQUESTED 09/28/92	09/01/92 09/28/92	\$50.00 \$100.00	\$450.00
Mr. Peter Parham 24 Gates Avenue Baldy City CA 94004	Retired	09/01/92 09/17/92	\$50.00 \$25.00	\$1,175.00
Mr. Roland E. Parham 700 Hollister Road Stevens Park ID 81906	Self-employed	09/11/92	\$200.00	\$1,075.00
Mr. Willie B. Parham 405 Bell Avenue Bartsville TN 37006	INFORMATION REQUESTED 09/22/92	09/22/92	\$300.00	\$300.00
Mr. Angelo Parisi 5 Gladstone Road New Rochelle NY 10804	Retired	09/04/92 09/28/92	\$40.00 \$5,000.00	\$5,360.00
Mr. & Mrs. Thomas C. Parisi 9610 N. Revere Avenue Kansas City MO 64154	Owner Rebuilds Unlimited	09/08/92 09/29/92	\$50.00 \$50.00	\$250.00
Mr. Brooks Park Box 860 Hwy. 395 South Gardnerville NV 89410	Rancher Self-employed	09/09/92	\$500.00	\$500.00



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DUAL A

ITEMIZED RECEIPTS

Continuation of the
Candidate Summary Page

7/1/82
FOR LINE 11-12

Information reported from such Receipts and Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial use, other than using the name and address of any political committee to solicit contributions from such contributors.

NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE

NEW YORK REPUBLICAN FEDERAL CAMPAIGN COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Angelo Parisi 5 Gladstone Rd. New Rochelle NY 10804	n/a	MAR 20 1982	5000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: <u>retired</u>	Aggregate Year-to-Date: <u>0</u>	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bruce S. Gelb 1060 Fifth Ave NY NY 10028		MAR 23 1982	2000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation:	Aggregate Year-to-Date: <u>0</u>	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Wm. Brian Little 767 Fifth Ave NY NY 10153	Foremann Little & Co	MAR 24 1982	5000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: <u>general Partner</u>	Aggregate Year-to-Date: <u>0</u>	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Deane F. Johnson 75 Rockefeller Plaza NY NY 10019	Time Warner Commun.	MAR 26 1982	500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: <u>Executive</u>	Aggregate Year-to-Date: <u>0</u>	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard G. Clark RD 4 Cazenovia NY 13035	Clark Petroleum Svcs. Inc	MAR 26 1982	300.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: <u>business management</u>	Aggregate Year-to-Date: <u>0</u>	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John S Chalsty 24 Taylor Rd. Short Hills NJ		MAR 26 1982	500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation:	Aggregate Year-to-Date: <u>0</u>	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Herman E. Muller, Jr. PO Box 102 Diamond Point NY 12824	Parnell Kerr Foster	MAR 26 1982	1000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation: <u>C.P.A.</u>	Aggregate Year-to-Date: <u>0</u>	

SUBTOTAL of Receipts This Page (optional)

14300.00

TOTAL This Period (last page this line number only)

8303A3774104

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 800 OF 1182
LINE 11 A

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REPORT COVERING PERIOD FROM 7/ 1/92 THRU 7/31/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR TO-DATE
MR. PETER PARDINI 24 MATEO AVENUE DALY CITY, CA 94014-2406			\$4409.79
RETIRED	7/ 6/92	\$15.00	
	7/ 6/92	\$9.00	
	7/ 6/92	\$15.00	
	7/ 8/92	\$25.00	
	7/ 8/92	\$15.00	
	7/13/92	\$60.00	
	7/23/92	\$25.00	
MRS. DOROTHY NIELSEN PARNAM 2851 BLISS DRIVE LOS ALAMITOS, CA 90720			\$245.00
RETIRED	7/20/92	\$105.00	
MR. ANGELO PARISI 5 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$11091.44
RETIRED	7/ 3/92	\$30.00	
	7/ 6/92	\$11.00	
	7/20/92	\$10.00	
	7/27/92	\$750.00	
	7/28/92	\$1500.00	
MR. ARTHUR L. PARK 464 NORTH SALT AIR AVENUE LOS ANGELES, CA 90049-2026			\$331.00
RETIRED	7/22/92	\$60.00	
MRS. H. EARL PARK 232 GREENWOOD ST. CANYON LAKE, TX 76133			\$286.00
BEAUTY SHOP OWNER	7/17/92	\$50.00	
	7/22/92	\$60.00	
	7/22/92	\$30.00	
	7/28/92	\$28.00	
MR. PETER H. PARK 900 OAK LAKE AVENUE PHILADELPHIA, PA 19126			\$2891.00
INFORMATION REQUESTED	7/ 8/92	\$80.00	
	7/13/92	\$190.00	
	7/27/92	\$1000.00	
	7/27/92	\$426.00	

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NATIONAL REPUBLICAN POLITICAL COMMITTEE

PAGE 141 OF 148
LINE 11 A

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REPORT COVERING PERIOD FROM 2/ 1/92 THRU 2/29/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. P. J. PAPARAVA BOX 1750 GREENSBURG-INDIANFIELD GREENSBURG, PA 15601			\$200.00
PRESIDENT	2/13/92	\$100.00	
	2/13/92	\$100.00	
	2/14/92	\$100.00	
MRS. SANDY V. PARAIKO 5 GILBERTSLEAVE DRIVE COBALT, CT 06614			\$735.00
SECRETARY	2/ 3/92	\$120.00	
	2/14/92	\$85.00	
	2/14/92	\$160.00	
	2/18/92	\$25.00	
	2/25/92	\$80.00	
	2/27/92	\$105.00	
MR. PETER PARDINI 24 MATRO AVENUE DALY CITY, CA 94014-2406			\$1624.00
RETIRED	2/10/92	\$15.00	
	2/10/92	\$15.00	
	2/13/92	\$15.00	
	2/12/92	\$100.00	
	2/19/92	\$200.00	
	2/19/92	\$15.00	
	2/24/92	\$75.00	
	2/27/92	\$600.00	
	2/28/92	\$100.00	
MR. ANGELO PARISI 5 GLADSTONE RD. NEW ROCHELLE, NY 10804			\$6761.00
RETIRED	2/ 5/92	\$30.00	
	2/13/92	\$670.00	
	2/20/92	\$10.00	
	2/21/92	\$6000.00	
MR. PETER M. PARK 900 OAK LANE AVENUE PHILADELPHIA, PA 19126			\$310.00
INFORMATION REQUESTED	2/20/92	\$120.00	
	2/20/92	\$190.00	
MR. CALVIN PARKER 204 VIA CARISMA BAKERSFIELD, CA 93309			\$810.00
INFORMATION REQUESTED	2/11/92	\$760.00	

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RULE A

ITEMIZED RECEIPTS

Line Number 11A

Statement Covers Period From 10/01/92 through 10/14/92

of Committee: PRESIDENTIAL VICTORY COMMITTEE

Employer	Date	Amount
OSTLER 7 WILTON WAY T LAKE CITY UT 841082548 Receipt For: Primary Occupation: Aggregate YTD: \$ 300.00	10/12/92	\$ 200.00
JOB J. OVEN BOX 1406 ID OK 737021466 Receipt For: Primary Occupation: Aggregate YTD: \$ 785.00	10/08/92	\$ 100.00
JOY L. PARREY 129 E ATLANTIC AVE BAY BEACH FL 334836913 Receipt For: Primary Occupation: RETIRED Aggregate YTD: \$ 200.00	10/02/92	\$ 50.00
ROD V. PAINTER S BOX 308 VA 228359110 Receipt For: Primary Occupation: RETIRED Aggregate YTD: \$ 500.00	10/03/92	\$ 150.00
B. PALMER LARGE ROAD CHESTER NY 10918 Receipt For: Primary Occupation: SALESMAN Aggregate YTD: \$ 401.00	10/06/92	\$ 400.00
DEANE PALMER PO BOX 475 OSTERVILLE MA 026550475 Receipt For: Primary Occupation: Aggregate YTD: \$ 675.00	10/05/92	\$ 100.00
JOSE E. PARAS 1681 EL DAYO DRIVE CARMICHAEL CA 95608 Receipt For: Primary Occupation: SELF-EMPLOYED Aggregate YTD: \$ 500.00	10/05/92	\$ 500.00
ANGELO PARISI 5 GLADSTONE RD NEW ROCHELLE NY 108041212 Receipt For: Primary Occupation: RETIRED Aggregate YTD: \$ 1,000.00	10/02/92	\$ 1,000.00

SUBTOTAL of Receipts This Page..... \$ 2,500.00

SCHEDULE A
STATE OF CONNECTICUT - JUDICIAL ELECTIONS
PERIOD FROM 10/01/92 TO 10/10/92

LINE NUMBER 33 OF 62

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 COMMERCIAL PURPOSES. OTHER THAN FOR THE NAME AND ADDRESS OF ANY POLITICAL
 COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	AMOUNT
NICHOLS, MR E. MARSHALL JR PO BOX 207 WESTON VT 05161	RETIRED	10/09/92	300.00
	AGGREGATE YTD 300.00		
CHANDLER, MRS BEVERLY 7131 E. BATHURST AVE SCOTTSDALE AZ 85258	INFORMATION REQUESTED	10/09/92	300.00
	AGGREGATE YTD 300.00		
OLSON, MR GERALD W. 111 E. BATHURST ST TRAVERSE CITY MI 49684	INFORMATION REQUESTED	10/10/92	300.00
	AGGREGATE YTD 300.00		
OLSON, MRS GRACE L 801 E. 21A SALTVILLE VA 24370	INFORMATION REQUESTED	10/08/92	335.00
	AGGREGATE YTD 335.00		
PALMER, MISS FLORENCE B. 114 N. SPRING STREET ELGIN IL 60120	INFORMATION REQUESTED	10/01/92	400.00
	AGGREGATE YTD 400.00		
PANOTO, MR VINCENT ONE O'CONNOR PLAZA #1100 VICTORIA TX 77901	D H BRAMAN INT GENERAL MANAGER	10/01/92	550.00
	AGGREGATE YTD 550.00		
PARISI, MR ANGELO 5 CLARKSON RD NEW ROCHELLE NY 10804	RETIRED	10/10/92	10,500.00
	AGGREGATE YTD 10,500.00		

SUBTOTAL OF RECEIPTS THIS PAGE 12,575.00
 CONTRIBUTION TO THE CANDIDATE'S TRUST RECEIPT AMOUNT

SCHEDULE A
 NAME OF COMMITTEE - **CANDIDATE'S TRUST**
 PERIOD RUN 10/13/92 THRU 11/23/92

LINE **000001** 11 97 00

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NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
OLIVERA, MISS GABRIELA 1102 EVERGREEN DR GREENVILLE NC 27858	RETIRED	10/18/92	125.00
	AGGREGATE YTD 325.00		
OLSSON, MRS GRACE L RR 1 BOX 63A SALTVILLE VA 24370	INFORMATION REQUESTED	10/19/92	10.00
	AGGREGATE YTD 345.00		
ORTNER, MR. ANTHONY 780 LIVE OAK STREET WATLAND FL 32751	SELF EMPLOYED	11/23/92	100.00
	AGGREGATE YTD 300.00		
DRENN, MRS. P. A. 577 FERN WALK LANE OSPREY FL 34229	HOUSEWIFE	10/16/92	300.00
	AGGREGATE YTD 300.00		
PAINTER, MR. MILTON 202 CATALPA CLARKSDALE MS 38614	RETIRED	10/19/92	65.00
	AGGREGATE YTD 415.00		
PARISI, MR ANGELO 5 GLADSTONE RD NEW ROCHELLE NY 10804	RETIRED	11/02/92	5,500.00
	AGGREGATE YTD 16,000.00		
PATISON, MRS NAMIE M. 4228 W 162ND ST LAWDALE CA 90260	NAV COM DEFENSE ELECTRONI SILK SCREENER OPERATOR	10/19/92 10/26/92 10/26/92	400.00 100.00 300.00
	AGGREGATE YTD 1,300.00		

SUBTOTAL OF RECEIPTS THIS PAGE
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RECEIPT AMOUNT

7,100.00

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 1244 OF 1852
LINE 11 A

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REPORT COVERING PERIOD FROM 10/15/92 THRU 11/23/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR TO DATE
MS. IDA M. PARDEE 31516 CARLISLE WAYNE, MI 48184			\$435.00
PAINT SPRAYER	11/ 5/92	\$25.00	
	11/ 5/92	\$10.00	
MR. W. K. PARDEE 3846 SOUTH GRAND AVENUE LOS ANGELES, CA 90037			\$220.00
INFORMATION REQUESTED	10/21/92	\$10.00	
	11/16/92	\$60.00	
	11/23/92	\$10.00	
MRS. ELIZABETH S. PARDO 908 ARLINGTON DR. WACO, TX 76710			\$500.00
PRESIDENT	10/16/92	\$500.00	
MR. GERHARDT PARIGAT 7093 140TH STREET W. HUGO, MN 55038-9447			\$318.00
INFORMATION REQUESTED	10/15/92	\$50.00	
	10/26/92	\$45.00	
	10/30/92	\$15.00	
MRS. DOROTHY NIELSEN PARNUM 2451 BLUME DRIVE LOS ALAMITOS, CA 90720			\$445.00
RETIRED	10/22/92	\$100.00	
MR. ANGELO PARISI 5 GLADSTONE ROAD NEW ROCHELLE, NY 10804			\$24744.44
RETIRED	10/19/92	\$500.00	
	10/19/92	\$1000.00	
	10/20/92	\$10.00	
	11/ 5/92	\$30.00	
MR. ARTHUR L. PARK 400 NORTH SALT AIR AVENUE LOS ANGELES, CA 90049-2026			\$831.00
RETIRED	10/19/92	\$500.00	



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3894

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Angelo Parisi, the National Republican Senatorial Committee, Sonya Vasquez, as treasurer, and American Citizens for Political Action and Robert E. Dolan, 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 3894. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

9704374201



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

January 28, 1994

Angelo Parisi
5 Gladstone Road
New Rochelle, NY 10804

RE: MUR 3894

Dear Mr. Parisi:

The Federal Election Commission received a complaint which indicates 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 3894. 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 § 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.

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Angelo Parisi
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

977043774203



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

January 28, 1994

**Sonya Vasquez, Treasurer
National Republican Senatorial Committee
425 Second Street, NE
Washington, DC 20002**

RE: MUR 3894

Dear Ms. Vasquez:

The Federal Election Commission received a complaint which indicates that the National Republican Senatorial Committee ("NRSC") 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 3894. 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 the NRSC 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.

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Sonya Vasquez, Treasurer
National Republican Senatorial Committee
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

January 28, 1994

**Robert E. Dolan, Treasurer
American Citizens for Political Action
2700 Virginia Avenue, NW #404
Washington, DC 20037**

RE: MUR 3894

Dear Mr. Dolan:

The Federal Election Commission received a complaint which indicates that American Citizens for Political Action 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 3894. 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 the American Citizens for Political Action 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.

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Robert E. Dolan, Treasurer
American Citizens for Political Action
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

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February 8, 1994

Ms. Mary L. Taksar
Federal Election Commission
Washington, DC 20463

Re: MUR 3894

Dear Ms. Taksar:

I am in receipt of your letter dated January 29, 1994.

American Citizens for Political Action, Inc. (ACPA) apparently did receive contributions from Mr. Angelo Parisi during 1991. On October 28 and 31, 1991, ACPA received contributions of \$4000 and \$2000, respectively. These contributions caused the aggregate amount of yearly contributions to ACPA to be, as of October 31, 1991, \$6200.

Accordingly, \$1200 was withdrawn from ACPA's account within 60 days of the receipt of the last contribution. Said \$1200 disbursement to the non-federal account occurred on November 13, 1991. Appropriate notice was accorded Mr. Parisi to object to said \$1200 disbursement.

Also, at that time, ACPA and I caused Mr. Parisi's name to be taken off ACPA's fund-raising list. To our knowledge, no other contribution was received by ACPA from Mr. Parisi during 1991.

As regards the matter of other contributions made by Mr. Parisi to other committees please take note of the fact that ACPA nor I had any knowledge of his contribution pattern or amount thereof to other committees.

I believe the record is clear that as regards this MUR, ACPA and I fully and completely complied with the Federal Election Campaign Act.

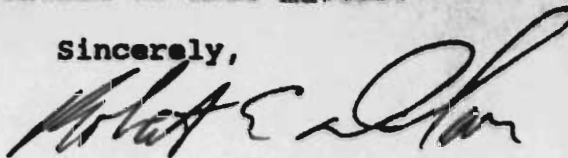
Accordingly, the below signed prays that you and your office find no reason to believe that a violation occurred and close your file as regards ACPA.

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Ms. Mary L. Taksar
February 8, 1994
Page 2

Thank you for your attention to this matter.

Sincerely,



Robert E. Dolan
Treasurer

cc: Ken Gross

97043774209

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

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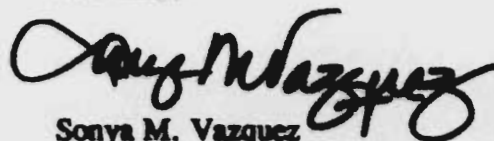
February 18, 1994

Mary L. Taksar
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Taksar:

I am in receipt of your letter of January 28, 1994, regarding Mr. Parisi and titled MUR 3894. Please direct all future correspondence to our counsel, Jan Baran, at Wiley, Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20006.

Sincerely,



Sonya M. Vazquez
Treasurer

cc: Jan Baran

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

PRE-MUR 294 and
MUR 3894

DATE COMPLAINT FILED: 1/21/94

DATE OF NOTIFICATION: 1/28/94

DATE ACTIVATED: 1/24/94

STAFF ATTORNEY: Holly Quate

PRE-MUR 294: I N T E R N A L L Y G E N E R A T E D

MUR 3894: E X T E R N A L L Y G E N E R A T E D

COMPLAINANT: Center for Responsive Politics

RESPONDENTS: Angelo Parisi

National Republican Senatorial Committee
and Stan Huckaby, as Treasurer

American Citizens for Political Action
and Robert E. Dolan, as Treasurer

RELEVANT STATUTES
AND REGULATIONS:

2 U.S.C. § 434(b)(2)(A)
2 U.S.C. § 441a(a)(1)(B)
2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(f)
11 C.F.R. § 102.5(a)(1)
11 C.F.R. § 102.5(a)(1)(i)
11 C.F.R. § 102.5(a)(1)(ii)
11 C.F.R. § 103.3(b)(3)
11 C.F.R. § 104.3(a)(2)(i)(A)
11 C.F.R. § 104.3(a)(2)(i)(C)
11 C.F.R. § 106.5(g)
11 C.F.R. § 106.6(e)
11 C.F.R. § 110.1(c)(1)
11 C.F.R. § 110.1(d)(1)
11 C.F.R. § 110.1(k)
11 C.F.R. § 110.5(b)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

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I. GENERATION OF MATTER

These cases concern Angelo Parisi, an individual who apparently made contributions in excess of the \$25,000 statutory maximum in 1991, 1992, and 1993, in violation 2 U.S.C. § 441a(a)(3). Because these cases concern the same issue, they are treated in one report.

In Pre-MUR 294, the Commission directed this office to review the aggregate contributions made by Angelo Parisi. Additionally, the Center for Responsive Politics filed the instant complaint, MUR 3894, alleging that in 1991 and 1992, Mr. Parisi made contributions in excess of the \$25,000 maximum. (Attachment 1). Upon receipt of the complaint, this Office notified Mr. Parisi in writing that he was named as a Respondent in the complaint. Based on the allegations of the complaint, it also appears that Mr. Parisi made excessive contributions to a political action committee known as American Citizens for Political Action ("ACPA") in 1991, and to the National Republican Senatorial Committee ("NRSC") in 1992. Therefore, this Office also notified ACPA, the NRSC, and the committees' treasurers, that they are Respondents in MUR 3894.

Mr. Parisi did not file a response within 15 days of his receipt of the complaint. In an effort to ascertain his intentions, this Office obtained Mr. Parisi's telephone number from directory assistance. The staff attorney assigned to the case called the number on two different occasions and left a message for Mr. Parisi to return the call. To date, Mr. Parisi has neither returned the phone calls nor submitted anything in

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response to the complaint. The other two Respondents have responded in some way. ACPA submitted a timely, substantive response. (Attachment 2). The NRSC sent a letter on February 18, 1994, acknowledging receipt of the complaint and advising this Office to direct all further correspondence to its attorney. (Attachment 3). Apart from that letter, however, neither the NRSC nor its treasurer has submitted anything in response to the complaint.

Based on a thorough review of the complaint, ACPA's response, and the relevant disclosure reports, there is reason to believe that Mr. Parisi exceeded the statutory contribution limit by \$8,942 in 1991; by \$41,262 in 1992; and by \$24,630 in 1993. It also appears that Mr. Parisi gave excessive contributions to not two, but three committees. First, it appears that Mr. Parisi made \$7,262 in excessive contributions to the NRSC in 1992, and \$13,880 in excessive contributions to the NRSC in 1993. It also appears that Mr. Parisi made \$1,200 in excessive contributions to ACPA in 1991. Finally, based on the relevant disclosure reports, it appears that Mr. Parisi made \$2,750 in excessive contributions to the National Republican Congressional Committee ("NRCC") in 1992. Accordingly, this Office recommends that the NRCC and its treasurer be named as Respondents. This Office further recommends that the Commission find reason to believe that the NRSC, ACPA, and the NRCC accepted excessive contributions from Mr. Parisi. Because of the amounts involved with ACPA and the NRCC, however, this Office recommends that the Commission take no further action

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against these Committees, but send both Committees an admonishment letter.

II. FACTUAL AND LEGAL ANALYSIS

A. The Act

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1). Furthermore, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a governing the limitations on contributions and expenditures. 2 U.S.C. § 441a(f). In addition, each treasurer of a political committee shall file periodic reports of receipts and

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disbursements which must disclose, among other things, the total amount of all contributions from persons other than political committees. 2 U.S.C. § 434(b)(2)(A). See also 11 C.F.R. § 104.3(a)(2)(i)(A) (requiring disclosure of itemized contributions from persons, other than any committees, including contributions from individuals received during the relevant reporting period); § 104.3(a)(2)(i)(C) (requiring disclosure of total contributions from individuals received during the relevant reporting period).

Next, political committees must segregate contributions subject to the limitations of the Act from contributions made for non-federal elections. Specifically, political committees which finance political activity in connection with both federal and non-federal elections must elect to either: (1) establish a separate federal account in a depository in accordance with 11 C.F.R. § 103; or (2) establish a political committee which can receive only contributions subject to the prohibitions and limitations of the Act, regardless of whether such contributions are for use in connection with federal or non-federal elections. 11 C.F.R. § 102.5(a)(1)(i) and (ii). If the political committee establishes a separate federal account, only funds subject to the prohibitions and limitations of the Act can be deposited into the federal account. No transfers can be made to the federal account(s) from any other account maintained by the political committee for the purpose of financing activity in connection with non-federal elections, except as provided in sections 106.5(g) and

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106.6(e) (governing the payment of expenses for joint federal and non-federal activity by party committees and non-connected committees, respectively). 11 C.F.R. § 102.5(a)(1)(i).

Furthermore, separate regulations govern the treatment of excessive contributions by political committees other than a candidate's authorized committee. In general, contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

B. The Facts

The relevant disclosure reports reflect that Mr. Parisi made the following contributions. Each calendar year will be discussed in turn.

DATE	1. <u>1991 CONTRIBUTIONS</u> COMMITTEE	AMOUNT	TOTALS
10/28/91	AMERICAN CITIZENS FOR POLITICAL ACTION	\$4000	
10/31/91	AMERICAN CITIZENS FOR POLITICAL ACTION	2000 ¹	
unknown	AMERICAN CITIZENS FOR POLITICAL ACTION	200 ¹	
	Subtotal		\$ 6,200
04/16/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	467	
10/28/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	2500	
11/01/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000	
12/12/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	1000 ¹	

1. The date of this contribution is not known because ACFA did not itemize it in its disclosure reports because the contribution did not exceed \$200. It did, however, report that Mr. Parisi's aggregate contributions for 1991 totalled \$6,200.

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Subtotal		\$ 8,967
04/15/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	315
10/25/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000
10/29/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	4000
10/31/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000
12/30/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	<u>335</u>
Subtotal		\$11,150
02/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	275
06/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	350
10/24/91	REPUBLICAN NAT'L COMMITTEE - RNC	<u>7000</u>
Subtotal		\$ 7,625
GRAND TOTAL -- 1991		<u>\$33,942</u>

In sum, Mr. Parisi contributed \$33,942 in 1991, which exceeds by \$8,942 the statutory annual limit. Therefore, there is reason to believe that Mr. Parisi violated 2 U.S.C. § 441a(a)(3) in 1991. In addition, Mr. Parisi contributed more than \$5,000 to American Citizens for Political Action in 1991, in violation of 2 U.S.C. § 441a(a)(1)(C).

Correspondingly, it appears that ACPA knowingly accepted those excessive contributions from Mr. Parisi in 1991. The disclosure reports reveal that Mr. Parisi contributed, in the aggregate, \$6,200 to ACPA, which exceeds by \$1,200 the annual limit on contributions to a committee other than a national party committee. 2 U.S.C. § 441a(a)(1)(C). In response to the complaint, ACPA's treasurer, Robert E. Dolan, sent a letter acknowledging that on October 28 and 31, 1991, Mr. Parisi made contributions to ACPA in the amounts of \$4,000 and \$2,000, respectively. (Attachment 1, p. 1). The response further states that as of October 31, 1991, ACPA's records showed that Mr. Parisi

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had contributed a total of \$6,200 to ACPA in 1991. ACPA proffers that:

Accordingly, \$1,200 was withdrawn from ACPA's account within 60 days of the receipt of the last contribution. Said \$1,200 disbursement to the non-federal account occurred on November 13, 1991. Appropriate notice was accorded to Mr. Parisi to object to said \$1,200 disbursement.

Id.

Based on this response, it appears that after giving Mr. Parisi an opportunity to "object," ACPA withdrew \$1,200 from its federal account, and deposited that money into its non-federal account. It does not appear that ACPA either obtained a proper reattribution or refunded the excessive portion of Mr. Parisi's contributions as required by 11 C.F.R. § 103.3(b)(3). In fact, ACPA submitted nothing to support its assertion that the Committee properly cured the excessive contribution within sixty days. Further, the Committee never amended its disclosure report to reflect that the aggregate amount of Mr. Parisi's federal contributions was \$5,000, as it now contends. Therefore, it appears that ACPA failed to accurately report the aggregate amount of contributions received from Mr. Parisi in 1991, as required by 2 U.S.C. § 434(b)(2)(A). See also 11 C.F.R. §§ 104.3(a)(2)(i)(A); 104.3(a)(2)(i)(C).

Consequently, because the Committee has failed to document its handling of the excessive portion of Mr. Parisi's 1991 contributions, as required by 11 C.F.R. § 103.3(b)(3), this Office recommends that the Commission find reason to believe that the Committee accepted excessive contributions, in violation of

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2 U.S.C. § 441a(f). Furthermore, because ACPA failed to accurately report the aggregate amount of Mr. Parisi's 1991 contributions, this Office recommends that the Commission find reason to believe that the Committee violated the reporting requirements set forth in 2 U.S.C. § 434(b)(2)(A). In light of the small amount involved, however, this Office further recommends that the Commission take no further action against ACPA and send an admonishment letter cautioning ACPA that excessive contributions that are not properly reattributed within 60 days of receipt must be refunded to the contributor and cannot be unilaterally transferred to another account. Finally, this Office recommends that the Commission find reason to believe that Mr. Parisi violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(C) in 1991.

2. 1992 CONTRIBUTIONS

DATE	COMMITTEE NAME	AMOUNT	TOTALS
12/08/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	\$15000	
12/09/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000 ²	
11/02/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	2750 ²	
	Subtotal		\$22,750
02/13/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	670	
02/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	325	
03/26/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
07/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
07/28/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1500	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
09/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
10/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	

2. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the NRSC and the NRCC.

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10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ³	
10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2500 ⁴	
11/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ⁵	
	Subtotal		\$31,995
10/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-63	
10/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-3130	
12/31/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-1540	
	Less Refunds	-4733	
	Subtotal -- NRSC		\$27,262
03/20/92	NEW YORK REPUBLICAN FED'L CAMPAIGN COM	5000	
	Subtotal		5,000
10/2/92	PRESIDENTIAL VICTORY COMMITTEE	1000	
	Subtotal		\$ 1,000
11/02/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	5000	
	Subtotal		\$16,000
09/29/92	REPUBLICAN NAT'L COMMITTEE - RNC	5000	
	Subtotal		\$ 5,000
	TOTAL		\$77,012
	Less NRSC and NRCC Percentages from Joint Contributions	-10,750 ⁶	
	GRAND TOTAL -- 1992		\$66,262

Thus, in 1992, Mr. Parisi made \$66,262 in federal contributions, which exceeds by \$41,262 the limit set forth in 2 U.S.C. § 441a(a)(3). The reports also reflect that Mr. Parisi contributed \$27,262 to the NRSC in 1992, an amount which exceeds the statutory maximum for contributions to a national party committee by \$7,262, in violation of 2 U.S.C. § 441a(a)(1)(B).

3. Id.

4. Id.

5. Id.

6. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

For this reason, this Office recommends that the Commission find that there is reason to believe that in 1992, the NRSC accepted excessive contributions, in violation of section 441a(f).

In addition, it appears that Mr. Parisi contributed \$22,750 to the National Republican Congressional Committee, which exceeds by \$2,750 the \$20,000 annual limit for contributions to a national political party, in violation of 2 U.S.C. § 441a(a)(1)(B). On April 23, 1993, the NRCC refunded \$8,000 to Mr. Parisi, \$7,000 of which was for Mr. Parisi's 1992 contributions. The \$7,000 refund for 1992 contributions, however, did not occur within 60 days of the treasurer's receipt of any of Mr. Parisi's 1992 contributions. Therefore, this amount is still included in the total amount of excessive contributions to the NRCC.

Consequently, with regard to Mr. Parisi's 1992 contributions, this Office also recommends that the Commission find that there is reason to believe that: (1) Mr. Parisi violated 2 U.S.C. § 441a(a)(3) and 441a(a)(1)(B); and (2) the NRCC accepted \$2,750 in excessive contributions from Mr. Parisi, in violation of 2 U.S.C. § 441a(f). Because of the amount of the violation, this Office further recommends that the Commission take no further action against the NRCC and send an admonishment letter.

3. 1993 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
11/15/93	GRAMM '96 COMMITTEE	1000 ⁷	

7. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

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11/15/93	GRAMM '96 COMMITTEE	1000 ⁸
05/20/93	KAY BAILEY HUTCHISON FOR SENATE COMMITTEE	600 ⁹
3/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	1000 ¹⁰ (Refunded)
04/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	-8000 ¹⁰
02/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹¹
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
03/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹²
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹³
04/26/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	680
04/27/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000
04/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
05/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000
05/12/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225
05/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2750 ¹⁴
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500 ¹⁵
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
07/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000
07/28/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000
07/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
06/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
06/08/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
06/30/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000
08/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000

8. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

9. Excluded from 1993 total. Attributable to 1994 contribution limit. 2 U.S.C. § 441a(a)(3).

10. Only \$1,000 of this amount was refunded within 60 days of any of Mr. Parisi's contributions to the NRCC. That \$1,000, therefore, is not included in the total.

11. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the NRSC and the NRCC.

12. Id.

13. Id.

14. Id.

15. Id.

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09/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
11/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
11/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
12/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
12/22/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
	Subtotal		\$33,880
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
	Subtotal		2,000
03/01/93	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COM	1000	
	Subtotal		1,000
03/23/93	PRESIDENTS' DINNER/AKA 1993 REPUBLICANS	2000	
	Subtotal		2,000
03/01/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
05/17/93	REPUBLICAN NATIONAL CANDIDATE TRUST	5500	
05/19/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
12/25/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
	Subtotal		8,500
02/17/93	REPUBLICAN NATIONAL COMMITTEE - RNC	5000	
06/08/93	REPUBLICAN NATIONAL COMMITTEE - RNC	1000	
06/18/93	REPUBLICAN NATIONAL COMMITTEE - RNC	2500	
	Subtotal		8,500
		<u>TOTAL</u>	<u>\$55,880</u>
Less NRSC Percentages from Joint Contributions			\$ 6,250 ¹⁶
GRAND TOTAL -- 1993			<u>\$49,630</u>

In 1993, therefore, it appears that Mr. Parisi made \$49,630 in federal contributions, which exceeded by \$24,630 the annual limit set forth in 2 U.S.C. § 441a(a)(3). It also appears that he contributed \$33,880 to the NRSC, which exceeded the statutory limit for contributions to a national party committee by \$13,880, in violation of 2 U.S.C. § 441a(a)(1)(B). Accordingly, this Office recommends that the Commission find reason to believe that

16. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

in 1993, Mr. Parisi violated 2 U.S.C. §§ 441a(a)(3) and 441a(a)(1)(B).

Moreover, it also appears that in 1993, the NRSC knowingly accepted excessive contributions from Mr. Parisi. Therefore, this Office further recommends that the Commission find reason to believe that in 1993 the NRSC violated 2 U.S.C. § 441a(f).

IV. PROPOSED CONCILIATION AGREEMENTS AND CIVIL PENALTIES

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V. MERGER OF PRE-MUR AND MUR

Because these cases concern the same issue, this Office recommends that the Commission open a MUR in Pre-MUR 294, merge this matter into MUR 3894, and hereafter refer to the entire matter as MUR 3894.

VI. RECOMMENDATIONS

A. Pre-Mur 294

1. Open a MUR.
2. Merge this matter into MUR 3894, and hereafter refer to this matter as MUR 3894.

B. MUR 3894

1. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993.
2. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991.
3. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992.
4. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee in

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1992 and 1993.

5. Enter into conciliation with Angelo Parisi prior to a finding of probable cause to believe.

6. Find reason to believe that American Citizens for Political Action and Robert E. Dolan, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(2)(A) in 1991, but take no further action, send an admonishment letter, and close the file as to these Respondents.

7. Find reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f) in 1992, but take no further action, send an admonishment letter, and close the file as to these Respondents.

8. Find reason to believe that in 1992 and 1993, the National Republican Senatorial Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Angelo Parisi, and enter into conciliation prior to a finding of probable cause to believe.

9. Approve the attached Factual and Legal Analyses and Conciliation Agreements.

10. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

97043174227
Date August 5, 1994

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments: 1. Complaint
2. ACPA's Response
3. NRSC's letter dated February 18, 1994
4. Factual & Legal Analysis for Angelo Parisi
5. Conciliation Agreement for Angelo Parisi
6. Factual & Legal Analysis for the National Republican Senatorial Committee, and Stan Huckaby, as treasurer
7. Conciliation Agreement for the National Republican Senatorial Committee, and Stan Huckaby, as treasurer
8. Factual & Legal Analysis for the National Republican Congressional Committee and Donna Singleton, as treasurer

9. Factual & Legal Analysis for the American Citizens for Political Action and Robert E. Dolan, as treasurer

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS 
COMMISSION SECRETARY

DATE: AUGUST 11, 1994

SUBJECT: PRE-MUR 294/MUR 3894 - FIRST GENERAL COUNSEL'S REPORT
DATED AUGUST 5, 1994.

The above-captioned document was circulated to the
Commission on Monday, August 8, 1994 at 11:00 a.m.

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

Commissioner Aikens	<u>XXX</u>	<u>FOR THE RECORD ONLY</u>
Commissioner Elliott	<u> </u>	
Commissioner McDonald	<u> </u>	
Commissioner McGarry	<u> </u>	
Commissioner Potter	<u> </u>	
Commissioner Thomas	<u> </u>	

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/MICHAEL C. KENNEY ^{2.1.4}
COMMISSION SECRETARY

DATE: AUGUST 11, 1994

SUBJECT: PRE-MUR 294/MUR 3894 - FIRST GENERAL COUNSEL'S
REPORT DATED AUGUST 5, 1994.

The above-captioned document was circulated to the
Commission on Monday, August 8, 1994 at 11:00.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	<u>XXX</u>
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for Tuesday, August 16, 1994.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Angelo Parisi;) Pre-MUR 294
National Republican Senatorial) and
Committee and Stan Huckaby, as) MUR 3894
Treasurer;)
American Citizens for Political)
Action and Robert E. Dolan, as)
Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 16, 1994, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions with respect to the above-captioned matters:

A. Pre-MUR 294

1. Open a MUR.
2. Merge this matter into MUR 3894, and hereafter refer to this matter as MUR 3894.

B. MUR 3894

1. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993.

(continued)

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Federal Election Commission
Certification for Pre-MUR 294
and MUR 3894
August 16, 1994

Page 2

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2. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991.
 3. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992.
 4. Find reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee in 1992 and 1993.
 5. Enter into conciliation with Angelo Parisi prior to a finding of probable cause to believe.
 6. Find reason to believe that American Citizens for Political Action and Robert E. Dolan, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(2)(A) in 1991, but take no further action, send an admonishment letter, and close the file as to these Respondents.

(continued)

Federal Election Commission
Certification for Pre-NUR 294
and NUR 3894
August 16, 1994

Page 3

- 9704374233
7. Find reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f) in 1992, but take no further action, send an admonishment letter, and close the file as to these Respondents.
 8. Find reason to believe that in 1992 and 1993, the National Republican Senatorial Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Angelo Parisi, and enter into conciliation prior to a finding of probable cause to believe.
 9. Approve the Factual and Legal Analyses and Conciliation Agreements as recommended in the General Counsel's report dated August 5, 1994.
 10. Approve the appropriate letters as recommended in the General Counsel's report dated August 5, 1994.

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

Attest:

8-17-94
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 25, 1994

Jan Baran, Esquire
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3894
National Republican
Senatorial Committee;
Stan Huckaby, treasurer

Dear Mr. Baran:

On January 28, 1994, the Federal Election Commission ("the Commission") notified the National Republican Senatorial Committee ("the Committee") and its then-treasurer, Sonya M. Vazquez, your clients, of a complaint filed on January 21, 1994, by the Center for Responsive Politics 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 the treasurer at that time. In the response, the treasurer stated that all future correspondence should be directed to you, but did not submit any other information regarding the complaint.

Upon further review of the allegations contained in the complaint, the Commission, on August 16, 1994, found that there is reason to believe the National Republican Senatorial Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

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Jan Baran, Esquire
Page 2

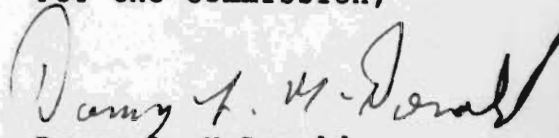
If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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.

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 investigation to be made public.

If you have any questions, please contact Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

For the Commission,


Danny L. McDonald
Vice Chairman

Enclosures
Factual and Legal Analysis
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: The National Republican
Senatorial Committee and
Stan Huckaby, as treasurer

MUR: 3894

I. GENERATION OF MATTER

This matter was generated by a complaint filed with the Federal Election Commission (the "Commission") by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1). The complaint alleges that in 1991 and 1992, Angelo Parisi made political contributions in excess of the \$25,000 maximum set forth in 2 U.S.C. § 441a(a)(3).

Based on the allegations of the complaint, it appeared that Mr. Parisi made excessive contributions to the National Republican Senatorial Committee ("NRSC") in 1992. Therefore, upon receipt of the complaint, this Office notified the NRSC and its treasurer that they are Respondents in this matter. The NRSC's treasurer sent a letter to the Commission on February 18, 1994 acknowledging receipt of the complaint and advising the Office of General Counsel to direct all further correspondence to the NRSC's attorney. Apart from that letter, however, neither the NRSC nor its treasurer has submitted anything in response to the complaint, and the 15-day time limit within which to do so has long since passed. See 2 U.S.C. § 437g(a)(1).

Based on a thorough review of the complaint and the NRSC's disclosure reports, there is reason to believe that Mr. Parisi made \$7,262 in excessive contributions to the NRSC in 1992, and

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he made \$13,880 in excessive contributions to the NRSC in 1993. Correspondingly, there is reason to believe that the NRSC accepted these excessive contributions, in violation of 2 U.S.C. § 441a(f).

II. FACTUAL AND LEGAL ANALYSIS

A. The Act

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1). Furthermore, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the the provisions of this section. 2 U.S.C. § 441a(f).

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Finally, separate regulations govern the treatment of excessive contributions by committees other than a candidate's authorized committee. Specifically, contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

B. The Facts

In this case, the relevant disclosure reports reflect that Angelo Parisi made contributions to the NRSC as set forth below.

1992 CONTRIBUTIONS

<u>DATE</u>	<u>COMMITTEE NAME</u>	<u>AMOUNT</u>	<u>TOTALS</u>
02/13/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	670	
02/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	325	
03/26/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
07/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
07/28/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1500	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
09/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
10/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000 ¹	
10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ¹	

1. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the NRSC and the National Republican Congressional Committee.

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10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2500 ²	
11/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ³	
	Subtotal		\$31,995
10/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-63	
10/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-3130	
12/31/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-1540	
	Less Refunds		-4,733
	GRAND TOTAL		\$27,262

1993 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
02/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ⁴	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
03/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ⁵	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ⁶	
04/26/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	680	
04/27/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
04/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
05/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
05/12/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
05/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2750 ⁷	
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500 ⁸	
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
07/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
07/28/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	
07/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/08/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/30/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	

2. Id.

3. Id.

4. Id.

5. Id.

6. Id.

7. Id.

8. Id.

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08/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000
09/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000
11/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
11/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500
12/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750
12/22/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000

GRAND TOTAL

\$33,880

Thus, Mr. Parisi made contributions to the NRSC in excess of the \$20,000 statutory maximum by \$7,262 in 1992, and by \$13,880 in 1993. See 2 U.S.C. § 441a(a)(1)(B). No portion of these excessive contributions has been refunded to Mr. Parisi. Therefore, there is reason to believe that the National Republican Senatorial Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) in 1992 and in 1993.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 25, 1994

Robert E. Dolan, Treasurer
American Citizens for Political Action
2700 Virginia Avenue, N.W. #404
Washington, D.C. 20037

RE: MUR 3894
American Citizens for
Political Action;
Robert E. Dolan,
treasurer

Dear Mr. Dolan:

On August 16, 1994, the Federal Election Commission ("the Commission") found reason to believe that the American Citizens for Political Action ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(2)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to the Committee and you, as treasurer. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that it is a violation of 2 U.S.C. § 441a(f) for a political committee to accept any contribution in excess of the Act's limitations. Further, excessive contributions that are not properly reattributed or redesignated within 60 days of receipt must be refunded to the contributor and cannot be unilaterally transferred to another account. See 11 C.F.R. § 103.3(b)(3). You should take steps to ensure that this activity does not reoccur in the future.

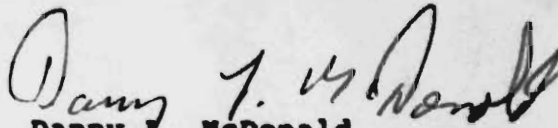
The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

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Robert E. Dolan, treasurer
Page 2

If you have any questions, please contact Dominique
Dillenseger, the attorney assigned to this matter, at (202)
219-3690.

For the Commission,


Danny L. McDonald
Vice Chairman

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: American Citizens for
Political Action and
Robert E. Dolan, as treasurer

MUR: 3894

I. GENERATION OF MATTER

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This matter was generated by a complaint filed with the Federal Election Commission (the "Commission") by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1). The complaint alleges that in 1991 and 1992, Angelo Parisi made federal contributions in excess of the \$25,000 maximum set forth in 2 U.S.C. § 441a(a)(3). Based on the allegations in the complaint, it appeared that Mr. Parisi made excessive contributions to a political action committee known as American Citizens for Political Action ("ACPA") in 1991. Therefore, upon receipt of the complaint, this Office notified American Citizens for Political Action and Robert E. Dolan, as treasurer, that they are respondents in this matter. ACPA submitted a timely, substantive response to the complaint on February 8, 1994.

Based on a thorough review of the complaint, ACPA's response, and the relevant disclosure reports, there is reason to believe that Mr. Parisi made \$1,200 in excessive contributions to ACPA in 1991. Furthermore, because ACPA failed to either obtain a proper reattribution or refund the excessive portion of Mr. Parisi's contributions as required by 11 C.F.R. § 103.3(b)(3), there is reason to believe that in 1991, ACPA accepted excessive contributions, in violation of 441a(f). Finally, because ACPA

failed to report accurately the aggregate amount of Mr. Parisi's 1991 contributions, there is reason to believe that ACPA violated the reporting requirements set forth in 2 U.S.C. § 434(b)(2)(A).

II. FACTUAL AND LEGAL ANALYSIS

A. The Act

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the the provisions of this section. 2 U.S.C. § 441a(f). In addition, each treasurer of a political committee shall file periodic reports of receipts and disbursements which must disclose, among other things, the total amount of all contributions from persons other than political committees. 2 U.S.C. § 434(b)(2)(A). See also 11 C.F.R. § 104.3(a)(2)(i)(A) (requiring disclosure of itemized contributions from persons, other than any committees, including

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contributions from individuals received during the relevant reporting period); § 104.3(a)(2)(i)(C) (requiring disclosure of total contributions from individuals received during the relevant reporting period).

Next, political committees must segregate contributions subject to the limitations of the Act from contributions made for non-federal elections. 11 C.F.R. § 102.5(a)(1) provides that political committees which finance political activity in connection with both federal and non-federal elections must elect to either: (1) establish a separate federal account in a depository in accordance with 11 C.F.R. § 103; or (2) establish a political committee which can receive only contributions subject to the prohibitions and limitations of the Act, regardless of whether such contributions are for use in connection with federal or non-federal elections. 11 C.F.R. § 102.5(a)(1)(i) and (ii). If the political committee establishes a separate federal account, only funds subject to the prohibitions and limitations of the Act shall be deposited into the federal account. No transfers can be made to the federal account(s) from any other account maintained by the political committee for the purpose of financing activity in connection with non-federal elections, except as provided in sections 106.5(g) and 106.6(e) (governing the payment of expenses for joint federal and non-federal activity by party committees and non-connected committees, respectively). 11 C.F.R. § 102.5(a)(1)(i).

Furthermore, separate regulations govern the treatment of excessive contributions by committees other than a candidate's

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authorized committee. Specifically, contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

B. The Facts

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In this case, ACPA's disclosure reports reflect that Mr. Parisi contributed to ACPA, in the aggregate, \$6,200 in 1991, which exceeds by \$1,200 the annual limit set forth in 2 U.S.C. § 441a(a)(1)(C). In response to the complaint, ACPA's treasurer, Robert E. Dolan, sent a letter acknowledging that on October 28 and 31, 1991, Mr. Parisi made contributions to ACPA in the amounts of \$4,000 and \$2,000, respectively. Response of ACPA ("Response") at 1. The Response further states that as of October 31, 1991, ACPA's records showed that Mr. Parisi had contributed a total of \$6,200 to ACPA in 1991. ACPA proffers that:

Accordingly, \$1,200 was withdrawn from ACPA's account within 60 days of the receipt of the last contribution. Said \$1,200 disbursement to the non-federal account occurred on November 13, 1991. Appropriate notice was accorded to Mr. Parisi to object to said \$1,200 disbursement.

Id.

Based on this response, it appears that after giving Mr. Parisi an opportunity to "object," ACPA withdrew \$1,200 from its

federal account, and deposited that money into its non-federal account. It does not appear that ACPA either obtained a proper reattribution or refunded the excessive portion of Mr. Parisi's contributions as required by 11 C.F.R. § 103.3(b)(3). In fact, ACPA submitted nothing to support its assertion that the Committee properly cured the excessive contribution within sixty days. Further, the Committee never amended its disclosure report to reflect that the aggregate amount of Mr. Parisi's federal contributions was \$5,000 in 1991, as it now contends.

In summary, because the Committee has failed to document its handling of the excessive portion of Mr. Parisi's 1991 contributions, as required by 11 C.F.R. § 103.3(b)(3), there is reason to believe that in 1991, American Citizens for Political Action and Robert E. Dolan, as treasurer, accepted excessive contributions from Mr. Parisi, in violation of 2 U.S.C. § 441a(f). In addition, there is reason to believe that the Respondents failed to accurately report the aggregate amount of contributions received from Mr. Parisi in 1991, in violation of 2 U.S.C. § 434(b)(2)(A).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 25, 1994

Donna Singleton, Treasurer
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3894
National Republican
Congressional Committee;
Donna Singleton, treasurer

Dear Ms. Singleton:

On August 16, 1994, the Federal Election Commission ("the Commission") found reason to believe that the National Republican Congressional Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to the Committee and you, as treasurer. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that it is a violation of 2 U.S.C. § 441a(f) for a political committee to accept any contribution in excess of the Act's limitations. In order to be in compliance with the Act, a committee must redesignate, reattribute, or refund all excessive amounts within sixty days of the treasurer's receipt of the contribution. See 11 C.F.R. § 103.3(b)(3). You should take steps to ensure that this activity does not reoccur in the future.

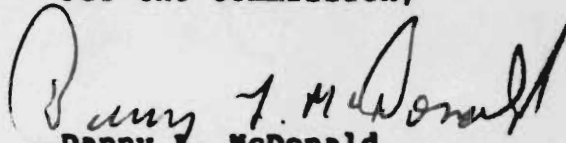
The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

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Donna Singleton, treasurer
Page 2

If you have any questions, please contact Dominique
Dillenseger, the attorney assigned to this matter, at (202)
219-3690.

For the Commission,

A handwritten signature in dark ink, appearing to read "Danny L. McDonald". The signature is fluid and cursive, with a large initial "D" and a stylized "M".

Danny L. McDonald
Vice Chairman

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: The National Republican Congressional Committee and Donna Singleton, as treasurer **NUR: 3894**

I. GENERATION OF MATTER

This matter was generated by a complaint filed with the Federal Election Commission (the "Commission") by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1). The complaint alleges that in 1991 and 1992, Angelo Parisi made political contributions in excess of the \$25,000 maximum set forth in 2 U.S.C. § 441a(a)(3).

Based on the information ascertained by the Commission during the course of reviewing the allegations of the complaint, it appears that Mr. Parisi made \$2,750 in excessive contributions to the National Republican Congressional Committee ("NRCC") in 1992, which were not refunded within 60 days, as required by 11 C.F.R. § 103.3(b)(3). Correspondingly, there is reason to believe that the NRCC knowingly accepted these excessive contributions, in violation of 2 U.S.C. § 441a(f).

II. FACTUAL AND LEGAL ANALYSIS

A. The Act

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees

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in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1). Furthermore, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the the provisions of this section. 2 U.S.C. § 441a(f).

Finally, separate regulations govern the treatment of excessive contributions by committees other than a candidate's authorized committee. Specifically, contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of

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the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

B. The Facts

In this case, the relevant disclosure reports reflect that Angelo Parisi made the following contributions to the NRCC in 1992.

DATE	COMMITTEE NAME	AMOUNT	TOTAL
12/08/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	\$15,000	
12/09/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5,000 ¹	
11/02/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	<u>2,750</u>	
GRAND TOTAL			\$22,750

Thus, in 1992, Mr. Parisi contributed \$22,750 to the NRCC, which exceeds by \$2,750 the \$20,000 annual limit for contributions to a national political party, in violation of 2 U.S.C. § 441a(a)(1)(B). On April 23, 1993, the NRCC refunded \$8,000 to Mr. Parisi, \$7,000 of which was for Mr. Parisi's 1992 contributions. The \$7,000 refund for the 1992 contributions, however, did not occur within 60 days of the treasurer's receipt of any of Mr. Parisi's 1992 contributions, as required by 11 C.F.R. § 103.3(b)(3). Accordingly, this amount is still included in the total amount of excessive contributions to the NRCC in 1992. Therefore, there is reason to believe that the National Republic Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f) in 1992.

1. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the the NRCC and the National Republican Senatorial Committee.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 25, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angelo Parisi
5 Gladstone Road
New Rochelle, NY 10804

RE: MUR 3894

Dear Mr. Parisi:

On January 28, 1994, the Federal Election Commission notified you 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 and you were provided the opportunity to respond within 15 days of your receipt of the complaint. To date, you have failed to respond.

Upon further review of the allegations contained in the complaint, the Commission, on August 16, 1994, found that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B), and 441a(a)(1)(C), provisions of the Act. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

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 within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

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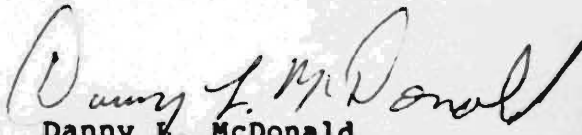
Angelo Parisi
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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.

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 investigation to be made public. If you have any questions, please contact Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

For the Commission,


Danny L. McDonald
Vice Chairman

Enclosures

Factual and Legal Analysis
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Angelo Parisi

MUR: 3894

I. GENERATION OF MATTER

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These matters were generated based on information ascertained by the Federal Election Commission (the "Commission") in the normal course of carrying out its supervisory responsibilities and by a complaint filed with the Commission by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1). The complaint alleges that in 1991 and 1992, Angelo Parisi made federal contributions in excess of the \$25,000 maximum set forth in 2 U.S.C. § 441a(a)(3). Upon receipt of the complaint, this Office notified Mr. Parisi in writing that he was named as a respondent in the complaint. Based on the allegations of the complaint, it also appears that Mr. Parisi made excessive contributions to a political action committee known as American Citizens for Political Action ("ACPA") in 1991, and to the National Republican Senatorial Committee ("NRSC") in 1992. Mr. Parisi did not file a response within 15 days of his receipt of the complaint, nor has he returned telephone calls from the Office of General Counsel.

Based on a thorough review of the complaint, ACPA's response, and the relevant disclosure reports, there is reason to believe that Mr. Parisi exceeded the statutory contribution limit by \$8,942 in 1991; by \$41,262 in 1992; and by \$24,630 in 1993. It also appears that Mr. Parisi gave excessive contributions to not

two, but three committees. First, it appears that Mr. Parisi made \$7,262 in excessive contributions to the NRSC in 1992, and \$13,880 in excessive contributions to the NRSC in 1993. Further, it appears that Mr. Parisi made \$1,200 in excessive contributions to ACPA in 1991, and \$2,750 in excessive contributions to the National Republican Congressional Committee ("NRCC") in 1992.

II. FACTUAL AND LEGAL ANALYSIS

A. The Act

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1). Furthermore, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or

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make any expenditure in violation of the provisions of 2 U.S.C. § 441a governing the limitations on contributions and expenditures. 2 U.S.C. § 441a(f).

Separate regulations govern the treatment of excessive contributions by committees other than a candidate's authorized committee. In general, contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

B. The Facts

In this case, the relevant disclosure reports reflect that Angelo Parisi made the contributions set forth below. Each calendar year will be discussed in turn.

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1. 1991 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
10/28/91	AMERICAN CITIZENS FOR POLITICAL ACTION	\$4000	
10/31/91	AMERICAN CITIZENS FOR POLITICAL ACTION	2000 ¹	
unknown	AMERICAN CITIZENS FOR POLITICAL ACTION	200 ¹	
	Subtotal		\$ 6,200
04/16/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	467	
10/28/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	2500	
11/01/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000	
12/12/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	1000	
	Subtotal		\$ 8,967
04/15/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	315	
10/25/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
10/29/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	4000	
10/31/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
12/30/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	335	
	Subtotal		\$11,150
02/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	275	
06/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	350	
10/24/91	REPUBLICAN NAT'L COMMITTEE - RNC	7000	
	Subtotal		\$ 7,625
	GRAND TOTAL -- 1991		<u>\$33,942</u>

In sum, Mr. Parisi contributed \$33,942 in 1991, which exceeds by \$8,942 the statutory annual limit. Therefore, there is reason to believe that Mr. Parisi violated 2 U.S.C. § 441a(a)(3) in 1991. In addition, Mr. Parisi contributed \$6,200 to American Citizens for Political Action, which exceeds by \$1,200 the \$5,000 limit for contributions to political committees set forth in 2 U.S.C. § 441a(a)(1)(C). It does not appear that ACPA either obtained a proper reattribution or refunded the excessive

1. The date of this contribution is not known because ACPA did not itemize it in its disclosure reports because the contribution did not exceed \$200. It did, however, report that Mr. Parisi's aggregate contributions for 1991 totalled \$6,200.

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portion of Mr. Parisi's contribution within 60 days.

2. 1992 CONTRIBUTIONS

DATE	COMMITTEE NAME	AMOUNT	TOTALS
12/08/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	\$15000	
12/09/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000	
11/02/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	2750 ²	
	Subtotal		\$22,750
02/13/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	670	
02/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	325	
03/26/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
07/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
07/28/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1500	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
09/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
10/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ³	
10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2500 ⁴	
11/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ⁵	
	Subtotal		\$31,995
10/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-63	
10/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-3130	
12/31/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-1540	
	Less Refunds	-4733	
	Subtotal -- NRSC		\$27,262
03/20/92	NEW YORK REPUBLICAN FED'L CAMPAIGN COM	5000	
	Subtotal		5,000
10/2/92	PRESIDENTIAL VICTORY COMMITTEE	1000	
	Subtotal		\$ 1,000

2. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the National Republican Senatorial Committee and the National Republican Congressional Committee.

3. Id.

4. Id.

5. Id.

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11/02/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	<u>5000</u>	
	Subtotal		\$16,000
09/29/92	REPUBLICAN NAT'L COMMITTEE - RNC	5000	
	Subtotal		\$ <u>5,000</u>
	TOTAL		\$77,012
	Less NRSC and NRCC Percentages from Joint Contributions		<u>-10,750</u> ⁶
	GRAND TOTAL -- 1992		<u>\$66,262</u>

Thus, in 1992, Mr. Parisi made \$66,262 in federal contributions, which exceeds by \$41,262 the annual limit set forth in 2 U.S.C. § 441a(a)(3). The reports also reflect that Mr. Parisi contributed \$27,262 to the NRSC in 1992, an amount which exceeds the statutory maximum for contributions to a national party committee by \$7,262, in violation of 2 U.S.C. § 441a(a)(1)(B). In addition, it appears that Mr. Parisi contributed \$22,750 to the NRCC, which exceeds by \$2,750 the \$20,000 annual limit for contributions to a national political party, in violation of 2 U.S.C. § 441a(a)(1)(B). On April 23, 1993, the NRCC refunded \$8,000 to Mr. Parisi, \$7,000 of which was for Mr. Parisi's 1992 contributions. The \$7,000 refund for 1992 contributions, however, did not occur within 60 days of the treasurer's receipt of any of Mr. Parisi's 1992 contributions. Therefore, this amount is still included in the total amount of excessive contributions to the NRCC.

6. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

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3. 1993 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
11/15/93	GRAMM '96 COMMITTEE	1000 ⁷	
11/15/93	GRAMM '96 COMMITTEE	1000 ⁸	
05/20/93	KAY BAILEY HUTCHISON FOR SENATE COMMITTEE	600 ⁹	
03/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	1000 ¹⁰	(Refunded)
04/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	-8000	
02/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹¹	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
03/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹²	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹³	
04/26/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	680	
04/27/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
04/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
05/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
05/12/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
05/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2750 ¹⁴	
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500 ¹⁵	

7. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

8. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

9. Excluded from 1993 total. Attributable to 1994 contribution limit. 2 U.S.C. § 441a(a)(3).

10. Only \$1,000 of this amount was refunded within 60 days of any of Mr. Parisi's contributions to the NRCC. That \$1,000, therefore, is not included in the total.

11. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the National Republican Senatorial Committee and the National Republican Congressional Committee.

12. Id.

13. Id.

14. Id.

15. Id.

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05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
07/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
07/26/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	
07/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/08/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/30/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	
08/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
09/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
11/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
11/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
12/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
12/22/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
	Subtotal		\$33,880
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
	Subtotal		2,000
03/01/93	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COM	1000	
	Subtotal		1,000
03/23/93	PRESIDENTS' DINNER/AKA 1993 REPUBLICANS	2000	
	Subtotal		2,000
03/01/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
05/17/93	REPUBLICAN NATIONAL CANDIDATE TRUST	5500	
05/19/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
12/25/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
	Subtotal		8,500
02/17/93	REPUBLICAN NATIONAL COMMITTEE - RNC	5000	
06/08/93	REPUBLICAN NATIONAL COMMITTEE - RNC	1000	
06/18/93	REPUBLICAN NATIONAL COMMITTEE - RNC	2500	
	Subtotal		8,500
	TOTAL		\$55,880
	Less NRSC Percentages from Joint Contributions		\$ 6,250 ¹⁶
	GRAND TOTAL -- 1993		\$49,630

In 1993, therefore, it appears that Mr. Parisi made \$49,630 in federal contributions, which exceeded by \$24,630 the annual

16. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

limit set forth in 2 U.S.C. § 441a(a)(3). It also appears that he contributed \$33,880 to the NRSC, which exceeded the statutory limit for contributions to a national party committee by \$13,880, in violation of 2 U.S.C. § 441a(a)(1)(B). No portion of Parisi's excessive contributions was refunded by the NRSC.

Therefore, there is reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(3) with respect to his total federal contributions in 1991, 1992, and 1993. There is also reason to believe that he violated 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991. Furthermore, there is reason to believe that he violated 2 U.S.C. § 441a(a)(1)(B) with respect to his contributions to the National Republican Congressional Committee in 1992. Finally, there is reason to believe that Angelo Parisi violated 2 U.S.C. § 441a(a)(1)(B) with respect to his contributions to the National Republican Senatorial Committee in 1992 and 1993.

III. MERGER OF PRE-MUR AND MUR

After finding reason to believe that violations occurred in Pre-MUR 294 and MUR 3894, the Commission voted to merge what was previously Pre-MUR 294 into MUR 3894, and to hereafter refer to the entire matter as MUR 3894.

97043774263

National Republican Senatorial Committee

SENATOR PAUL GRAMM
CHAIRMAN

WILLIAM S. MARSH
EXECUTIVE DIRECTOR

September 9, 1994

Dominique Dillmeyer
Associate General Counsel
Federal Election Commission
999 E St. NW
Washington, DC

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 9 3 53 PM '94

RE: MUR 3894

By this letter, I am naming Edwin Rogers as counsel representing the National Republican Senatorial Committee regarding MUR 3894, in addition to Jan Baran as authorized previously.

David Coray

David Coray
Assistant Treasurer

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

97043774264

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

WILLIAM D. HARRIS
EXECUTIVE DIRECTOR

October 3, 1994

OCT 5 4 00 PM '94

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dominique Dillenseger
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3894 - National Republican Senatorial Committee
Stan Huckaby, Treasurer (Parisi)

Dear Ms. Dillenseger:

This response is submitted on behalf of the National Republican Senatorial Committee (NRSC) and its Treasurer in reply to the Federal Election Commission's (FEC) vote on August 16, 1994 finding reason to believe the NRSC violated the Federal Election Campaign Act of 1971, as amended (the "Act").

In summation, we request that the Commission take the following mitigation information into consideration: (1) the NRSC had an undetected computer problem in 1992 and 1993 that prevented proceeds from joint fundraising committees to be aggregated with those given directly to the NRSC; (2) contributions received over the

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limit were without knowledge due to the computer malfunction; (3) there were numerous timely redesignations during 1993 listed on FEC reports; (4) the computer mistake, surrounding joint fundraising contributions, compounded, therefore preventing the NRSC from detecting later overages; and (5) all contributions over the legal limit have been refunded.

I. RESPONSE TO THE FEC FACTUAL AND LEGAL ANALYSIS

A. Undetected Computer Problem Prevented Proceeds From Joint Fundraising Committees To Be Aggregated With Those Given Directly To The NRSC

The NRSC had an undetected computer problem in 1992 and 1993 that prevented proceeds from joint fundraising committees to be aggregated with those given directly to the NRSC. The NRSC was not aware of this computer problem which caused proceeds from joint fundraisers to not be aggregated with contributions directly to the NRSC.

More specifically, during 1992 and 1993, when proceeds from joint fundraising committees were transferred to the NRSC, the detailed memo schedules for these transfers were not aggregated into the computer data base of contributor files of the NRSC with the result that some contributors who gave both to the NRSC directly and to joint fundraising committees of which the NRSC was a participant were not reported with complete aggregate contribution totals.

B. The Act Expressly Requires Knowledge Of Excessive Contributions -

NRSC Took Reasonable Steps To Detect Problems

The FEC states in its Factual and Legal Analysis that Mr. Parisi made \$7,262 in excessive contributions to the NRSC in 1992, and \$13,880 in excessive contributions to the NRSC in 1993 in violation of 2 U.S.C. 441a(f). This section of the statute states that "no officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section." It is evident from the Act that knowledge is a key element to be explored by the Commission.

In the past, the Commission has considered knowledge as a factor in determining if a violation occurred. See Exhibit 8 for relevant parts of MUR 530. In this MUR, the Democratic National Committee and the Democratic Finance Committee were found to have not violated 2 U.S.C. 441a(f) because they did not "knowingly" accept a contribution in excess of the \$20,000 limit because of computer backups and other complications.

Our computer malfunction has been remedied by obtaining computer data tapes from joint fundraising committees which are cross referenced with our contributor file to update aggregate totals.

C. There Were Certain Timely Redesignations During 1993 Listed On FEC Reports

In 1993, contributions made by Mr. Parisi to joint fundraising committees were not aggregated to his total direct contribution to the NRSC. After extensive research, the final excessive contribution not previously refunded or redesignated due to our undetected aggregation problem was refunded in September of 1994. The amount of this September 1994 refund is \$4,085. See Exhibit 1 - check no. 2647, dated September 14, 1994. All direct contributions (not received through joint fundraisers) to the NRSC in 1993 which exceeded the annual limit were redesignated to a non-federal account in a timely manner, and were reported as redesignations on line 29 of monthly FEC reports. See (1) Exhibit 2 for a comprehensive 1993 contribution history chart, (2) Exhibit 3 for FEC report pages (Schedule B Line Number 29) with 1993 Parisi redesignations highlighted, and (3) Exhibit 4 for check authorization forms and duplicate checks for Parisi redesignations from the NRSC federal to its non-federal account.

Although all redesignations were reported, amended pages for line 29 were filed on September 14 for some of the reports in order to correct errors and omissions. See Exhibit 5 for amended FEC reports. After Mr. Parisi's aggregate total, as it was thought to be at the time, exceeded \$20,000 and he continued to contribute, each new contribution was redesignated to a non-federal account in a timely manner. See Exhibit 2 for the comprehensive 1993 contribution history chart. In particular, see the "# Days" column for

the number of days between receipt of contribution and date of redesignation. These days range from 27 to 43, well below the required 60 day time limit.

D. The Initial Computer Mistake Prevented The NRSC From Knowing About Further Overages

In 1992 and 1993, Mr. Parisi's contributions to joint fundraising committees were not properly aggregated with his direct contribution totals to the NRSC. Since the NRSC became aware of this problem, additional safeguards have been put in place to prevent this, including obtaining data tapes from joint fundraising committees at regular intervals to cross reference with tapes of our donor base to prevent excessive contributions. We request that the Commission take into consideration the compounding effect these early joint fundraising contributions caused to the timely redesignations.

E. All Contributions Over The Legal Limit Have Been Refunded.

In 1992, refunds totaling \$4,733 were issued to Mr. Parisi. These refunds were issued when Mr. Parisi's aggregate contribution to the NRSC (as the NRSC knew it to be at that time) exceeded \$20,000. See Exhibit 6 for the 1992 comprehensive contribution history chart. After exceeding the limit, Mr. Parisi continued to contribute, and each contribution was refunded in a timely manner, but again, this was based on an aggregate total which did not include contributions to joint committees. When the NRSC became aware of the excess due to contributions to joint committees, a refund of \$4,750 was issued in March of 1994, and a final refund of \$2,512 was issued in September of 1994.

See Exhibit 7 for the March 1994 refund of \$4,750 and Exhibit 1 for the September 1994 refund of \$2,512. Total untimely refunds were \$7,262 for 1992 and \$4,085 for 1993.

Sincerely,

Edwina Rogers

Edwina Rogers
General Counsel
National Republican Senatorial Committee

9704317427C

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVTO-4 V-2

2

DATE	DESCRIPTION	AMOUNT
9/14/94	REFUND - EXCESSIVE CONTRIBUTIONS FROM 1992 (2,512.00) 1993 (4,085.23) 01-4190J11	6,597.23

V2

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

425 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
ACH PAY 09/10/94
Arlington, VA Virginia

2647

SEPTEMBER 14 1994

00-408/580 1475

PAY **SIX THOUSAND FIVE HUNDRED NINETY SEVEN AND 23/100***** DOLLARS \$ **6,597.23**

TO
THE
ORDER
OF

ANGELO PARISI
5 GLADSTONE ROAD
NEW ROCHELLE, NY 10804

[Handwritten Signature]

⑈00002647⑈ ⑆056004089⑆ 651007172927⑈

97704377427

A. Parisi Contribution History

2

DATE	Contribution	Cumulative	Refund	Note	Redesignation	#Days	
2/18/93	1,000	1,000					Joint F/R
3/1/93	500	1,500					
3/1/93	750	2,250					
3/17/93	500	2,750					
3/23/93	1,000	3,750					Joint F/R
3/23/93	1,000	4,750					Joint F/R
4/26/93	680	5,430					
4/27/93	1,000	6,430					
4/29/93	750	7,180					
5/7/93	2,000	9,180					
5/12/93	225	9,405					
5/17/93	2,750	12,155					Joint F/R
5/19/93	500	12,655					Joint F/R
5/19/93	750	13,405					
6/7/93	750	14,155					
6/8/93	225	14,380					
6/16/93	1,000	15,380					
6/16/93	750	16,130					
6/30/93	5,000	21,130					
7/19/93	1,000	22,130					
7/28/93	5,000	27,130		1		39	
7/29/93	750	27,880		2		38	
8/17/93	1,000	28,880		3		34	
1. 9/7/93		28,313			-2567.44		
2. 9/7/93		25,563			-750		
3. 9/21/93		24,563			-1000		
9/21/93		24,410			-153		
9/29/93	2,000	26,410		4		27	
4. 10/26/93		24,410			-2000		
10/26/93		24,359			-51		
11/15/93	750	25,109		5		36	
11/23/93		25,058			-51	43	
11/29/93	500	25,558		6		22	
12/15/93	750	26,308		7		41	
5. 12/21/93		25,558			-750		
6. 12/21/93		25,058			-500		
12/21/93		24,938			-120		
12/21/93		24,887			-51		
12/22/93	1,000	25,887		7		34	
7. 1/25/94		24,086			-1801		
9/14/94		20,000	-4,085				
TOTAL	33,880		-4,085		-9,795		

97043174272

September 1993 Redesignations

3

SCHEDULE B

ITEM DISBURSEMENTS

Page 1 of 3
Line Number 29

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

(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.)

		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	500.33
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. CHARLES WHITE		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	(1600.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Paris</i> MR. CHARLES WHITE <i>Should be Paris</i>		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	(102.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	(30.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	(11.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	(10.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	09/21/93	50.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MARTY'S VALLEY INN		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			1,703.33
TOTAL THIS PERIOD (last page this line number only)			

Sept 1993

SCHEDULE B

ITEM DISBURSEMENTS

Page 2 of 3
Line Number 29

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	09/21/93	70.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MARTY'S VALLEY INN		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	09/21/93	102.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MARTY'S VALLEY INN		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	09/07/93	(2567.44)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	09/07/93	(750.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. ANGELO PARISI		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATIONS	09/07/93	130.01
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. CHARLES WHITE		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATIONS	09/07/93	1000.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MR. CHARLES WHITE		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATIONS	09/07/93	1000.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MERCANTILE BANK		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			5,619.45
TOTAL THIS PERIOD (last page this line number only)			

NAME OF COMMITTEE
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DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
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NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. CHARLES WHITE	10/26/93	25.00
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NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	10/26/93	(30.00)
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NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	10/26/93	(11.00)
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NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	10/26/93	(10.00)
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NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	10/26/93	(2000.00)
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NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
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NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
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SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)	2,076.00
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TOTAL THIS PERIOD (last page this line number only)	5,772.00
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97043774275

November 1993 Redesignations

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 2
Line Number 29

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	250.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	95.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION <i>See Exhibit 5 - Amendment</i>	11/23/93	(30.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Parisi</i>		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	(11.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Parisi</i>		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	(10.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Parisi</i>		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	751.07
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT	PURPOSE OF DISBURSEMENT REDESIGNATION	11/23/93	751.07
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		

SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional) 1,898.14

TOTAL THIS PERIOD (last page this line number only)

97043174276

December 1993 Redesignations

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 2
Line Number 29

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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mercial purposes, other than using the name and address of any political
committee to solicit contributions from such committee.

		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/14/93	3250.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	75.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	25.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	30.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Paris</i>		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	11.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Paris</i>		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	750.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Paris</i>		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	10.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: <i>Paris</i>		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			4,151.00
TOTAL THIS PERIOD (last page this line number only)			

See Exhibits for Amendments
Paris

Dec. 1993

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 2
Line Number 29

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	(500.33)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Parisi		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	(120.00)
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Parisi		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			520.33
TOTAL THIS PERIOD (last page this line number only)			4,771.33

97043174278

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	01/13/94	7000.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: TORCHMARK CORP./BIRM., AL		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	01/25/94	1801.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: A. PARISI/NEW ROCHELLE, TX		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	01/25/94	73.50
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: C. WHITE/SAN DIEGO, CA		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	01/25/94	2720.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: MEDICAL ASSOC OF AMERICA		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	01/25/94	737.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: R. TRUE, MD, PA/ARLINGT., TX		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			12,331.50
TOTAL THIS PERIOD (last page this line number only)			12,331.50

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CHECK AUTHORIZATION FORM

Vendor Name & Address

NRSC Non-Federal

Division:

Accounting

Contact Person:

Dore Todd

Date:

8/12/93

Due Date:

next run

Telephone No.:

P.O. Number:

Amount:

3317.44

Account No.:

Purpose:

Redesignation - Angelo Parisi

(Exceeded \$20,000 Contribution limit)



IN BUDGET

The amount should be charged to the _____

line(s) on my budget

_____ line(s) on my budget

AUTHORIZED FOR PAYMENT

SMU

Division Director

Executive Director

Deputy Executive
Director

Controller

FOR ACCOUNTING PURPOSES ONLY

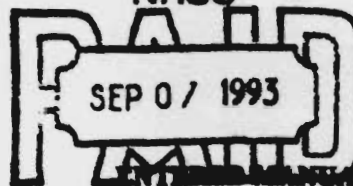


P.O. (FULL PAYMENT)



P.O. (PARTIAL PAYMENT)

NRSC



VENDOR #:

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
			01-4120-K41-750			
			01-4120-K41-750		2,567.44	
			01-4140-Q51-750			
TOTAL						

☐ Mail to Vendor

9704374230

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**NATIONAL REPUBLICAN
SENATORIAL COMMITTEE**

62028

REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
00003	REDESIGNATION	/ /	2,507.44	2,507.44	.00	
00001	REDESIGNATION	/ /	750.00	750.00	.00	
00025	REDESIGNATIONS	/ /	130.01	130.01	.00	
00026	REDESIGNATIONS	/ /	1,000.00	1,000.00	.00	
00028	REDESIGNATIONS	/ /	2,000.00	2,000.00	.00	
00029	REDESIGNATIONS	/ /	300.00	300.00	.00	
- BRSJNHF E-002088 09/07/93 8,747.45						

**NATIONAL REPUBLICAN
SENATORIAL COMMITTEE**

455 SECOND STREET, NE.
WASHINGTON, DC 20002-4697

01-NRSCNUNF

**MONET BANK VIRGINIA
VIENNA, VA
80-482/568**

62082

DATE	DESCRIPTION	AMOUNT
03/07/93	002088	*****\$0,747.45

金幣金銀共計 0.747 DOLLARS AND 40 CENTS

NRS- NON-FEDERAL ACCOUNT
425 SECOND ST. NE
WASHINGTON DC

NOT NEGOTIABLE

0001 10001 1052004009: 251071729270

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CHECK AUTHORIZATION FORM**

1011
1012

Vendor Name & Address:

NRSC Non-Federal

Division:

Acota
Dore

Contact Person:

Date:

9/21

Due Date:

Telephone No.:

P.O. Number:

Amount:

\$1,653.33

Account No.:

Purpose:

Over \$20,000 - Charles White - 500.33

Angelo Parisi - 1,153.00



IN BUDGET

The amount should be charged to the _____

line(s) on my budget

_____ line(s) on my budget

AUTHORIZED FOR PAYMENT

Division Director

Executive Director

Deputy Executive
Director

SMV

Controller

FOR ACCOUNTING PURPOSES ONLY



P.O. (FULL PAYMENT)



P.O. (PARTIAL PAYMENT)

PAID
SEP 21 1993

VENDOR #:

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
		<u>White</u>	<u>4100-A36</u>	<u>500.33</u>		
			<u>4100-A41</u>	<u>1,000.00</u>		
		<u>Parisi</u>	<u>4120-X42</u>	<u>102.00</u>		
			<u>4170-H11</u>	<u>30.00</u>		
			<u>4180-I11</u>	<u>11.00</u>		
			<u>4230-M10</u>	<u>10.00</u>		
TOTAL						

☐ Mail to Vendor

97043774282

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM WVTO-4 V-2

DATE	DESCRIPTION	AMOUNT
9/21/93	REDESIGNATION 01-4100-A36 — 5 500.33 01-4100-A41 — 1,000.00 01-4120-X42 — 10202.00 01-4170-H11 — 30.00 01-4180-I11 — 11.00 01-4230-M10 — 10.00	\$1,653.33.

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
425 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
ACH DEPOSIT SERVICES
Arlington, VA Virginia

2414

SEPTEMBER 21 1993

88-408/560 1475

PAY ONE THOUSAND SIX HUNDRED FIFTY THREE AND 33/100 DOLLARS \$1,653.33

TO
THE
ORDER
OF

NRSC NON-FEDERAL ACCOUNT
425 SECOND STREET, N.E.
WASHINGTON, D.C. 20002

NOT NEGOTIABLE

⑈00002414⑈ ⑆056004089⑆ 651-7172927⑈

97043174283

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CHECK AUTHORIZATION FORM**

Vendor Name & Address:

NRSC Non-Federal

Division: Acct

Contact Person: Dave

Date: 10/20/93

Due Date: _____

Telephone No.: _____

P.O. Number: _____

Amount: \$2051.00

Account No.: _____

Purpose: Exceeded \$20,000 limit - Mr. Angelo Parisi



IN BUDGET

The amount should be charged to the _____ line(s) on my budget
_____ line(s) on my budget

AUTHORIZED FOR PAYMENT

Division Director

Executive Director

Deputy Executive
Director

DMU
10/25/93

FOR ACCOUNTING PURPOSES ONLY



P.O. (FULL PAYMENT)



P.O. (PARTIAL PAYMENT)



VENDOR #: _____

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
				01-4120-III	30.00	
				01-4120-MID	11.00	
				01-4120-HII	10.00	
				01-4120-XIV	2,000.00	
TOTAL					2,051.00	

☐ Mail to Vendor

97043174284

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00008	REDESIGNATION	/ /	1,000.00	1,000.00	.00
00009	REDESIGNATION	/ /	1,000.00	1,000.00	.00
00010	REDESIGNATION	/ /	1,000.00	1,000.00	.00
00011	REDESIGNATION	/ /	480.00	480.00	.00
00012	REDESIGNATION	/ /	16.00	16.00	.00
00013	REDESIGNATION	/ /	100.00	100.00	.00
00014	REDESIGNATION	/ /	100.00	100.00	.00
-NRSCNONF	DE-062541	10/26/93			3,696.00

NATIONAL REPUBLICAN SENATORIAL COMMITTEE						62542
REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
00015	REDESIGNATION	/ /	25.00	25.00	.00	
00016	REDESIGNATION	/ /	30.00	30.00	.00	
00017	REDESIGNATION	/ /	11.00	11.00	.00	
00018	REDESIGNATION	/ /	10.00	10.00	.00	
00019	REDESIGNATION	/ /	2,000.00	2,000.00	.00	
-NRSCNONF	DE-062542	10/26/93				2,076.00

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
425 SECOND STREET, NE.
WASHINGTON, DC 20002-4967

01-NRSCNONF

SENET BANK VIRGINIA
VIENNA, VA
88-408/800

62542

DATE: 10/26/93 CONTRACT NO. 062542 AMOUNT *****\$5,772.00

PAY *****5,772 DOLLARS AND 00 CENTS

ORDER OF
NRSC NON-FEDERAL ACCOUNT
425 SECOND ST. NE
WASHINGTON DC 20002

NOT NEGOTIABLE

0001254 20 05580840890 651-71729270

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CHECK AUTHORIZATION FORM**

Vendor Name & Address:

NRSC Non-Federal

Division: Acct

Contact Person: Dave

Date: 11/18/93

Due Date: _____

Telephone No.: _____

P.O. Number: _____

Amount: \$510

Account No.: _____

Purpose: Redesignation - Angelo Ponisi - exceeded his \$20,000 limit to federal accounts

☐

IN BUDGET

The amount should be charged to the _____ line(s) on my budget
_____ line(s) on my budget

AUTHORIZED FOR PAYMENT

Division Director

Executive Director

Deputy Executive
Director

Sur
u/19
Controller

FOR ACCOUNTING PURPOSES ONLY

☐

P.O. (FULL PAYMENT)

☐

P.O. (PARTIAL PAYMENT)

VENDOR #: _____

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
				01-4180-121	30.00	
				01-4220-M10	11.00	
				01-4170-H11	10.00	
					<u>51.00</u>	
					(51.00)	
TOTAL						

NRSC
PAID
NOV 23 1993

☐ Mail to Vendor

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NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DELUXE - FORM WFTG-4 V-6

DATE	DESCRIPTION	AMOUNT
11/23/93	REDEMPTION 01-4150-726 — 250.00	1,983.14
	01-4140-046 — 95.00	
	01-4180-111 — 30.00	
	01-4230-110 — 11.00	
	01-4170-111 — 10.00	
	01-4300-000 — 751.07	
	01-4300-000 — 751.07	
	01-4300-000 — 83.00	

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
405 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
ACH NET DEPOSIT
Arbitrage, VA

2485

NOVEMBER 23 1993

00-000/000 1475

PAY ONE THOUSAND NINE HUNDRED EIGHTY THREE AND 14/100 DOLLARS \$ 1,983.14

TO
THE
ORDER
OF

NESC INDUSTRIAL ACCOUNT
425 SECOND STREET NE
WASHINGTON, DC 20002

NOT NEGOTIABLE

⑈00002485⑈ ⑆056004089⑆ 651-7172927⑈

**NATIONAL REPUBLICAN SENATORIAL COMMITTEE
CHECK AUTHORIZATION FORM**

Vendor Name & Address:

NRSC Non-Federal

Division:

Acct

Contact Person:

Dave

Date:

12/21/93

Due Date:

Telephone No.:

P.O. Number:

Amount:

1421.33

Account No.:

Purpose:

Exceeded Contrib. limit - Angelo Parisi



IN BUDGET

The amount should be charged to the _____

line(s) on my budget

_____ line(s) on my budget

AUTHORIZED FOR PAYMENT

Division Director

Executive Director

Deputy Executive
Director

SMW
Controller

FOR ACCOUNTING PURPOSES ONLY



P.O. (FULL PAYMENT)



P.O. (PARTIAL PAYMENT)

VENDOR #:

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	G/L Code	FEC Code	Amount	PO #
			01-4180	J11 30 ^c		
			01-4230	M10 11 ²		
			01-4120	X46 750 ²		
			01-4170	H11 10 ²		
			01-4100	A50 500.33		
			01-4120	X48 120.00		
TOTAL					<u>1421.33</u>	

☐ Mail to Vendor

9704374238

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) National Republican Senatorial Committee		2. FEC IDENTIFICATION NUMBER C00027466
ADDRESS (number and street) ☐ Check if different than previously reported 425 Second St. NE		
CITY, STATE and ZIP CODE Washington, DC 20002		
3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☒ January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>12-1-93</u> through <u>12-31-93</u>		
6.	(a) Cash on Hand January 1, 19____		\$
	(b) Cash on Hand at Beginning of Reporting Period	\$	
	(c) Total Receipts (from Line 19)	\$	\$
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$	\$
7.	Total Disbursements (from Line 30)	\$	\$
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$	\$
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
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 David Coray, Assistant Treasurer			
Signature of Treasurer			Date 9/14/94

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/14/93	3250.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	75.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	25.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	30.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	11.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	750.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	10.00
1425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			4,151.00
TOTAL THIS PERIOD (last page this line number only)			

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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.

		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	500.33
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	12/21/93	120.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
NAME, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			520.33
TOTAL THIS PERIOD (last page this line number only)			4,771.33

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
ON
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) National Republican Senatorial Committee		2. FEC IDENTIFICATION NUMBER C00027466
ADDRESS (number and street) ☐ Check if different than previously reported 425 Second St. NE		
CITY, STATE and ZIP CODE Washington, DC 20002		
3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☒ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY

5. Covering Period <u>9-1-93</u> through <u>9-30-93</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19____		\$
(b) Cash on Hand at Beginning of Reporting Period	\$	
(c) Total Receipts (from Line 19)	\$	\$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$	\$
7. Total Disbursements (from Line 30)	\$	\$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$	\$
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-6530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
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 David Coray, Assistant Treasurer		
Signature of Treasurer		Date 9/14/94

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 3X
(revised 9/93)

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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.

		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. CHARLES WHITE	09/21/93	500.33
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: (Mr. Angelo Parisi)	09/21/93	1000.00
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	09/21/93	102.00
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	09/21/93	30.00
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	09/21/93	11.00
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MR. ANGELO PARISI	09/21/93	10.00
NAME, ADDRESS, CITY, STATE, ZIP NRSC NON-FEDERAL ACCOUNT 425 SECOND ST. NE WASHINGTON DC 20002	PURPOSE OF DISBURSEMENT REDESIGNATION DISBURSEMENT FOR: MARTY'S VALLEY INN	09/21/93	50.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			1,703.33
TOTAL THIS PERIOD (last page this line number only)			

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) National Republican Senatorial Committee		2. FEC IDENTIFICATION NUMBER C00027466	
ADDRESS (number and street) ☐ Check if different than previously reported 425 Second St. NE		3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)	
CITY, STATE and ZIP CODE Washington, DC 20002			

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Termination Report

Monthly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☒ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

- ☐ Twelfth day report preceding _____
(Type of Election)
- election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>11-1-93</u> through <u>11-30-93</u>		
6.	(a) Cash on Hand January 1, 19 _____		\$
	(b) Cash on Hand at Beginning of Reporting Period _____	\$	
	(c) Total Receipts (from Line 19) _____	\$	\$
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) _____	\$	\$
7.	Total Disbursements (from Line 30) _____	\$	\$
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) ...	\$	\$
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
<i>I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.</i>			
Type or Print Name of Treasurer David Coray, Assistant Treasurer			
Signature of Treasurer			Date 9/14/94

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 3X
(revised 9/93)

9704374204

NAME OF COMMITTEE
NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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, ADDRESS, CITY, STATE, ZIP	PURPOSE OF DISBURSEMENT	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	250.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	95.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	30.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	11.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	10.00
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR: Mr. Angelo Parisi		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	751.07
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
NRSC NON-FEDERAL ACCOUNT	REDESIGNATION	11/23/93	751.07
425 SECOND ST. NE WASHINGTON DC 20002	DISBURSEMENT FOR:		
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			1,898.14
TOTAL THIS PERIOD (last page this line number only)			

A. Parisi Contribution History

6

DATE	Contribution	Cumulative	Refund	Note	Redesignation	#Days	
2/13/92	670	670					
2/21/92	6,000	6,670					
3/16/92	1,000	7,670					
3/16/92	325	7,995					
3/26/92	500	8,495					
7/27/92	750	9,245					
7/28/92	1,500	10,745					
9/14/92	6,000	16,745					
9/14/92	750	17,495					
9/21/92	2,000	19,495					
10/2/92	3,000	22,495					
10/14/92	2,750	25,245					Joint F/R
10/14/92	2,500	27,745					Joint F/R
10/19/92	500	28,245					
10/19/92	1,000	29,245					
10/21/92		29,182	-63				
10/27/92		28,052	-3,130				
11/2/92	2,750	28,802					Joint F/R
12/31/92		27,262	-1,540				
3/24/94			-4,750				
		22,512					
9/14/94		20,000	-2,512				
TOTAL	31,995		-11,995				

9704374206

National Republican Senatorial Committee

7

SENATOR PHIL GRAMM
CHAIRMAN

March 24, 1994

Mr. Angelo Parisi
5 Gladstone Road
New Rochelle, NY 10804

Dear Mr. Parisi:

Thank you for your generous support of the National Republican Senatorial Committee, the 1992 Presidents' Dinner and the Republican National Candidate Trust (RNCT).

We recently discovered that your contributions to both the 1992 Presidents' Dinner and the RNCT put you over the NRSC limit of \$20,000.00; enclosed please find our refund check #2577 dated today. The \$4,750.00 represents one half of the contributions reported by both committees in their 1992 FEC reports.

Again, thank you for your support.

Sincerely,

Sonya M. Vazquez, CPA
Treasurer

enclosure

RONALD REAGAN REPUBLICAN CENTER

425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

9704377427

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF INCORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVTO-4 V-2

DATE	DESCRIPTION	AMOUNT
3/24/94	REFUND 4190-J11 -- 4,750.00	4,750.00

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

425 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
ACH ONLY DEPOSIT
Arlington, VA Virginia

2577

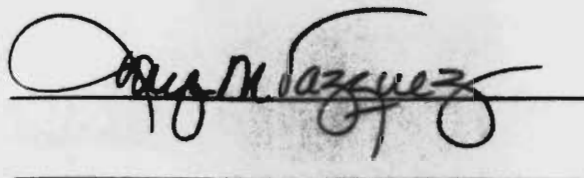
MARCH 24 19 94

00-408/580 1475

PAY ****FOUR THOUSAND SEVEN HUNDRED FIFTY AND 00/100******* DOLLARS ****4,750.00****

TO
THE
ORDER
OF

ANGELO PARISI
5 GLADSTONE ROAD
NEW ROCHELLE, NY 10804



⑈00002577⑈ ⑆056004089⑆ 651-7172927⑈

9 7 0 4 3 7 7 4 2 2 8

8

BEFORE THE FEDERAL ELECTION COMMISSION
July 17, 1978

18 AUG 14 AM 9:39

In the Matter of)

)

MUR 530 (78)

Nathan Landow)

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g(a)(5)(A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
 - A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
 - B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

FAS286

0-70-43774299

- 9704377, 439, 1
- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

9/8/78
Date

William C. Oldaker
William C. Oldaker
General Counsel
Federal Election Commission

8/9/78
Date

Nathan Landow
Nathan Landow
Respondent

970,43774301



FEDERAL ELECTION COMMISSION

1125 A STREET NW
WASHINGTON, D.C. 20003

August 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. D. Nelson, Treasurer
Democratic Finance Committee
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 530 (78)

Dear Mr. Nelson:

The Commission has determined after an investigation to close this matter as to the acceptance of excess contributions by your committee and its affiliate, the Democratic National Committee, from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). A copy of the Commissioner's certification is enclosed for your information.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", written over a horizontal line.

William C. Oldaker
General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nathan Landow) MUR 530 (78)
Democratic National Committee)
Democratic Finance Committee)

GENERAL COUNSEL'S REPORT

BACKGROUND

On April 13, 1978, the Commission found reason to believe that Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977; that Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party; and that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by knowingly accepting excess contributions from Mr. Landow.

On June 23, 1978, an Interim Report was distributed to the Commission on a 24 hour no objection basis. It was reported that it appeared that Nathan Landow did not exceed the \$20,000 contribution limitation imposed by 2 U.S.C. §441a(a)(1)(B) and that the Democratic Finance Committee (the DFC), an affiliate of the Democratic National Committee (the DNC), did not violate 2 U.S.C. §441a(f) by knowingly accepting excess contributions since there were none. It was also reported that apparently Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding his annual \$25,000 contribution limitation in 1977 in the amount of \$2,520.

ANALYSIS

Concerning Landow exceeding his \$25,000 annual contribution limit for 1977, it appears that although he did indeed exceed this contribution limit, it was by an amount less than previously thought. Section 441a(a)(3) of the Act sets forth the \$25,000 yearly contribution limitation for individuals. It also states that contributions made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, are considered to be made during the calendar year in which such election is held.

As reported earlier, a letter listing Nathan Landow's political contributions for 1977 was received by the Commission on April 26, 1978 (see Attachment I). Included in the letter were contributions made in 1977 to the principal campaign committees of candidates for the United States House of Representatives. The total of these contributions amounted to \$2100.00. It appears that these funds would not apply to Landow's contribution limit for 1977 in light of Section 441a(a)(3) of the Act. Therefore, while it was previously thought that Landow exceeded his \$25,000 annual limitation by \$2,520 in 1977, it now appears that he exceeded his yearly contribution limit by only \$420 (\$2520 minus \$2100).

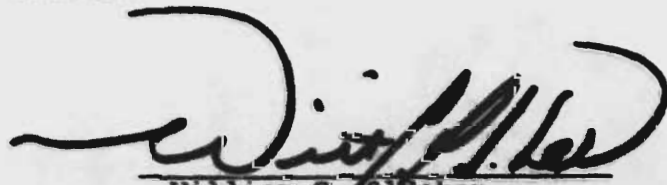
As for Landow exceeding the \$20,000 limit on contributions which he could make to the DFC, the DNC, and their affiliates, it appears that he did so in the amount of \$170.00. It was reported earlier that Landow contributed exactly \$20,000 to the DNC and its affiliates for 1977, thereby falling within the Act's contribution limitation. From the April 26, 1978 letter however, two contributions dated January 12, 1977 are listed as being made to affiliates of the DNC. They are \$70.00 to the "Corcoran Reception D.N.C." and \$100.00 to "Association of States - Demo. Ch." (Attachment I). Landow and the DNC informed the Commission in two letters dated June 26, 1978 and June 23, 1978 of a \$70.00 refund by the DNC to Landow for the Corcoran contribution. As for his \$100.00 contribution to the "Association of States - Dem. Ch.", Landow's bookkeeper, Ms. Millie Linn, confirmed in a July 13, 1978 telephone conversation that there was a check made out on that date to that party. The Association of State Democratic Chairpersons is a DNC affiliate (see Attachment II). Therefore, it appears that Landow did exceed his \$20,000 contribution limit for 1977 to the DNC and its affiliates in the amount of \$170.00.

Concerning a possible violation of 2 U.S.C. §441a(f) by the DNC and the DFC for knowingly accepting excess contributions, they claim they had no knowlege of this. A telephone conversation with Pat Whiteaker, controller at DNC headquarters on July 12, 1978, indicates that the contributions were not knowingly accepted. She stated that computer backups and other complications prevented their committees from detecting excess contributions.

RECOMMENDATIONS

1. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3).
2. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B).
3. Find no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f).
4. Approve the attached conciliation agreement with Mr. Nathan Landow.
5. Send the attached letters.

7/21/78
Date


William C. Oldaker
General Counsel

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2919764721

National Republican Senatorial Committee

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 25 11 43 AM '94

SENATOR PHIL GRAMM
CHAIRMAN

WILLIAM D. HARRIS
EXECUTIVE DIRECTOR

October 24, 1994

mup 3894

Angelo Parisi gave in excess of \$20,000 DIRECTLY to the NRSC in 1992 and in 1993. The excessive DIRECT contributions were refunded or redesignated to a non-federal account in a timely manner. The refunds were properly included in the complaint. Three redesignations were not reported correctly. Amendments were filed on 9/14/94 to correct these errors, for which we have found no explanation. Although three redesignations were originally reported incorrectly, NONE of the numerous other redesignations were taken into account in the calculations in the complaint. The NRSC became aware of these excessive contributions during the preparation of the FEC report for the month in which they occurred, and promptly refunded or redesignated the excessive amounts.

Contributions given by Mr. Parisi to joint fundraising committees of which the NRSC was a participant were not properly aggregated. The NRSC received printed memo schedules from the joint committees. These memo schedules were filed by the NRSC with its FEC reports. However, the records from these memo schedules were NOT integrated into the computerized contributor records of the NRSC. Therefore, the only way to properly update aggregate totals for anyone who gave both to the NRSC directly and to a joint fundraising committee would have been for NRSC staff to manually cross check all memo schedules against each full FEC report, which typically consist of several thousand pages of itemized contributors. This was apparently either not done, or Mr. Parisi was overlooked. The NRSC became aware of this problem when RFIA's were issued in February and March of 1994. Excessive amounts resulting from contributions which were not aggregated have been refunded since that time. The NRSC now receives computer tapes from joint fundraising committees, and merges this data with its contributor files to combine aggregate totals for those contributors who give to both the NRSC directly and to joint fundraising committees of which the NRSC is a participant.

Refund check #2696 for \$449 was issued today and mailed to Mr. Parisi. This covers small contributions that were not listed in the complaint.

When filing FEC reports and amendments, the NRSC submits a signed original and keeps unsigned copies for our files. The amendments to correct redesignation pages were filed on September 14, 1994, with the Secretary of the Senate in 232 Hart SOB.

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

97043774307

Amendments were necessary because redesignations submitted on line 29 for November and December activity in 1993 had no names. Line 29 normally contains a name for each redesignation, but due to an apparent error in preparing these 2 reports names were omitted. The NRSC has internal documentation which attributes these redesignations to specific contributors (which has been submitted previously both in response to RFIs in February and March of 1994 and in our previous response to the Parisi MUR). A report for September activity mistakenly listed Charles White rather than Angelo Parisi for one redesignation. This error has also been corrected. There is no explanation for either of these mistakes.

The errors in reporting redesignations in 3 FEC reports were discovered during a review of our records in response to the MUR concerning Mr. Parisi. Redesignations were not addressed in the MUR, but we found numerous redesignations for Mr. Parisi. Redesignations were not included in the calculations in the complaint. It was obviously not possible for redesignations that were reported incorrectly or without a name to be included in the complaint, but even those numerous redesignations which were reported correctly on line 29 were not included in the calculations in the complaint. The errors have now been corrected. I do not know why they occurred. Line 29 is now reviewed before filing to make sure that all entries contain a contributor name.

Edwina Rogers

General Counsel

202-675-6073

Supplemental Response

9704374308

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 25 11 43 AM '94

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVTO-4 V-3

DATE	DESCRIPTION	AMOUNT
10/24/94	Refund-Angelo Parisi	\$449.00

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE

485 SECOND STREET, N.E.
WASHINGTON, DC 20002

SIGNET BANK
ACH PAY SERVICES
Arlington, VA Virginia

2696

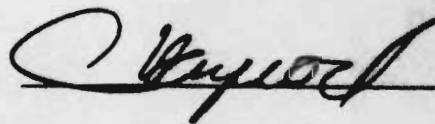
October 24 1994

88-488/580 1475

PAY Four Hundred Forty Nine and 00/100 DOLLARS \$ 449.00

TO
THE
ORDER
OF

Mr. Angelo Parisi
5 Gladstone Rd.
New Rochelle, NY 10804



⑈00002696⑈ ⑆056004089⑆ 651-7172927⑈



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1995

VIA FACSIMILE

Edwina Rogers, Esquire
Ronald Reagan Republican Center
425 Second Street, NE
Washington, D.C. 20002

RE: MUR 3894
Angelo Parisi

Dear Ms. Rogers:

In our conversation of January 6, 1995, you again advised me that you have not yet prepared a response in the above-referenced matter because of difficulties in contacting your client, Angelo Parisi. You further stated that you will attempt to contact Mr. Parisi again the week of January 9th concerning conciliation of this matter. Because you have kept us apprised of your difficulties with your client over the past several months, we have kept open the possibility of conciliating this matter at the preprobable cause stage. At this point, however, because the 30-day period for preprobable cause conciliation has long since expired and we are no further along in the process, it is necessary that this Office receives his response no later than January 18, 1995. If no response is received by that date, this Office intends to proceed to the next stage of the enforcement process. If you have any further questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

9704374310

National Republican Senatorial Committee

SENATOR ALFONSE M. DAMATO
CHAIRMAN

JOHN B. HELBUSH
EXECUTIVE DIRECTOR

January 18, 1995

Via Facsimile

Dominique Dillenschger
Attorney
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3894 Angelo Parial

Dear Ms. Dillenschger:

Due to new information obtained today, I will no longer be the counsel of record for the above mentioned matter. Mr. Warren Gould, an attorney in New York state, is familiar with Mr. Parial and has informed me that he will be Mr. Parial's counsel. As you know, I offered to assist Mr. Parial because it appeared from the record that he was not familiar with campaign finance law and was not responding to written request. This representation was on a volunteer basis and arose from a sense of obligation due to his contributions to the National Republican Senatorial Committee.

If I can be of further assistance please do not hesitate to contact me.

Best regards,

Edwina Rogers

Edwina Rogers
General Counsel

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

9704374311

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

WARREN M. GOULD

ATTORNEY & COUNSELOR AT LAW

JAN 18 5 44 PM '95

271 NORTH AVENUE, NEW ROCHELLE, N. Y. 10801-5112

SUITE 404

(914) 878-8822

FAX (914) 632-0888

OF COUNSEL
MICHAEL W. LA PRADA

JAN 18, 1995

ATTN: DOMINGUE DILLENSEGER

FAX 1-202-219-3923 (MAR 3894)

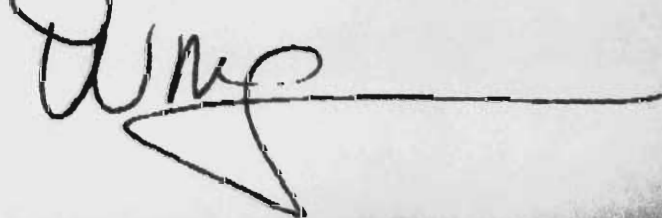
Dear Mr. Dillenseger:

I'll send letter (also for)

forwarded via Angelo's signature

designating me as his attorney.

Thank you.



97043774312

WARREN M. GOULD

ATTORNEY & COUNSELOR AT LAW

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JAN 23 9 25 AM '95

271 NORTH AVENUE, NEW ROCHELLE, N. Y. 10801-5112

SUITE 404

(914) 576-2922

FAX (914) 632-0988

OF COUNSEL

MICHAEL W. LA PENNA

January 18, 1995

Attn: Dominique Dillenseger, Esq.
Federal Election Commission
999 E. Street NW
Washington, D.C. 20463

Also Via Fax: 202-219-3923

Re: MUR 3894
Angelo Parisi

Dear Ms. Dillenseger:

Confirming our telephone conversation of January 18th, this letter is to advise you that I represent Angelo Parisi in the above referred matter and that such representation is also intended to substitute that of Edwina Rogers. By his signature, set forth below, Mr. Parisi has indicated his desire for this change and retention.

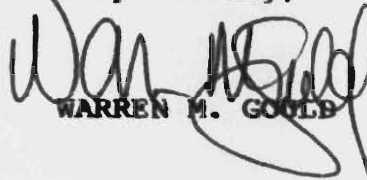
The original of this letter is being placed in the mail to you this date, with a facsimile copy sent to you at the above noted telephone number.

During the next several days, I will have a conference with Mr. Parisi's family and his physicians about this matter.

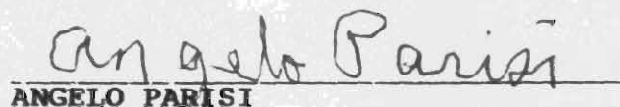
I expect that within one week I will be advising you of the direction that we will be taking in this matter.

Your cooperation and understanding in this matter is very much appreciated.

Respectfully,


WARREN M. GOULD

ABOVE HEREBY DIRECTED:


ANGELO PARISI

JAN 23 9 36 AM '95

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

97043774313



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1995

VIA FACSIMILE

Warren M. Gould, Esquire
271 North Avenue, Suite 404
New Rochelle, N.Y. 10801-5112

RE: MUR 3894
Angelo Parisi

Dear Mr. Gould:

In our telephone conversation on February 8, 1995, I informed you that the time for preprobable cause conciliation in the above-captioned matter had passed and that I had not received a response from your client, Angelo Parisi. I further stated that if you required additional time to respond, you would need to request an extension of time and explain the reasons for your request. You stated that you would send a letter the following day. On February 21, 1995, I called again to notify you that I had not received your letter. You stated that the letter had been mailed and that you would send me the copy by facsimile. On March 1, 1995, I left a message with your secretary that I had not received the original letter or the facsimile.

Although this Office is aware of the special circumstances involved in this matter, this matter cannot be held in abeyance indefinitely. If we do not receive a proposal for conciliation from you by Friday, March 10, 1995, this Office intends to proceed to the next stage of the enforcement process.

If you have any questions, please contact me at (202) 219-3690. The facsimile number for this Office is (202) 219-3923.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

9704374314

BEFORE THE FEDERAL ELECTION COMMISSION

FEB 21 5 02 PM '95

In the Matter of

National Republican Senatorial
Committee and Stan Huckaby, as
Treasurer

MUR: 3894

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Stan Huckaby, the treasurer of the National Republican Senatorial Committee.

Based

upon the foregoing, this Office recommends that the Commission accept the attached, signed conciliation agreement and close the file as to these respondents.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the National Republican Senatorial Committee and Stan Huckaby, as treasurer.

2. Close the file as to these Respondents.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

2/21/95

BY:


Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Dominique Dillenseger

97043774315

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Republican Senatorial
Committee and Stan Huckaby, as
Treasurer.

)
)
) MUR 3894
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1995, the Commission decided by a vote of 6-0 to take the following actions in MUR 3894:

1. Accept the conciliation agreement with the National Republican Senatorial Committee and Stan Huckaby, as treasurer, as recommended in the General Counsel's Report dated February 21, 1995.
2. Close the file as to these Respondents.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated February 21, 1995.

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

Attest:

2/28/95
Date

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

Received in the Secretariat: Tues., Feb. 21, 1995 5:02 p.m.
Circulated to the Commission: Wed., Feb. 22, 1995 11:00 a.m.
Deadline for vote: Mon., Feb. 27, 1995 4:00 p.m.

lrd

97043774316



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 6, 1995

Stan Huckaby, Treasurer
National Republican Senatorial
Committee
425 Second Street, NE
Washington, D.C. 20002

RE: MUR 3894
National Republican Senatorial
Committee; Stan Huckaby, Treasurer

Dear Mr. Huckaby:

On February 27, 1995, the Federal Election Commission accepted the signed conciliation agreement you submitted on behalf of the National Republican Senatorial Committee in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter as it pertains to you and the National Republican Senatorial Committee.

This matter will become public within 30 days after it has been closed with respect to all other respondents involved. Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter. The Commission will notify you when the entire file has been closed.

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

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger
Dominique Dillenseger
Attorney

Enclosure
Conciliation Agreement

9704374317

BEFORE THE FEDERAL ELECTION COMMISSION

4 21 PM '95

In the Matter of)
The National Republican)
Senatorial Committee, and)
Stan Huckaby, as treasurer)

NUR: 3894

CONCILIATION AGREEMENT

This matter was initiated by a complaint filed with the Federal Election Commission (the "Commission") by the Center for Responsive Politics and based on information ascertained by the Commission in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the National Republican Senatorial Committee and Stan Huckaby, as treasurer (collectively "NRSC" or "Respondents") violated 2 U.S.C. § 441a(f) with respect to contributions made by Angelo Parisi in 1992 and 1993.

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

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

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

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

9704374318

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

1. Respondent National Republican Senatorial Committee is a political committee established and maintained by a national political party, and it is not the authorized political committee of any candidate.

2. Respondent Stan Huckaby is the treasurer of the National Republican Senatorial Committee.

3. The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year.

4. No person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1).

5. No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a governing limitations on contributions and expenditures. 2 U.S.C. § 441a(f).

6. Contributions which on their face exceed the contribution limits may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3).

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7. If any such contribution is deposited, the treasurer may request redesignation or reattribution of the contribution in accordance with 11 C.F.R. § 110.1(b) (governing the redesignation for another election of an individual's contribution to a candidate's authorized committee); § 110.1(k) (governing reattribution of joint contributions); or § 110.2(b) (governing the redesignation for another election of a multicandidate political committee's contribution to a candidate).

8. If redesignation or reattribution is not obtained, the treasurer must, within sixty days of receipt of the contribution, refund the contribution to the contributor.

11 C.F.R. § 103.3(b)(3).

V. 1. Respondents accepted \$27,262 in contributions from Angelo Parisi in 1992, which exceeded the statutory maximum by \$7,262, in violation of 2 U.S.C. § 441a(f). Respondents contend that this violation was due to a computer error which failed to aggregate properly joint fundraising contributions with direct contributions. The excessive contribution of \$7,262 was refunded by the Respondents; \$4,750 was refunded on March 24, 1994, and \$2,512 was refunded on September 14, 1994. The refunds of excessive contributions were not made within 60 days.

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2. Respondents accepted \$24,655 in contributions from Angelo Parisi in 1993, which exceeded the statutory maximum by \$4,655, in violation of 2 U.S.C. § 441a(f). Respondents contend that this violation was due to a computer error which failed to aggregate properly joint fundraising contributions with direct contributions. Respondents refunded \$4,085 on September 14, 1994, and \$449 on October 24, 1994. The refunds of excessive contributions were not made within 60 days.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Six Thousand Dollars (\$6,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Date

3/3/95

FOR THE RESPONDENTS:

John H. Treanor
(Name)
(Position)

Date

2/15/95

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COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Angelo Parisi

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) **MUR 3894**
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GENERAL COUNSEL'S REPORT

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The Federal Election Commission ("the Commission") found reason to believe that Angelo Parisi violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee ("NRSC") in 1992 and 1993. At the same time, the Commission determined to offer to enter into preprobable cause conciliation with the Respondent

The purpose of this report is to advise the Commission of the status of this matter concerning the Respondent, Angelo Parisi.

On August 25, 1994, the Respondent was notified of the Commission's action by certified mail, return receipt requested. The Respondent acknowledged receipt of the notification, but did not submit a response.¹ In an effort to ascertain the Respondent's intentions, this Office called the Respondent's telephone number several times but there was no answer.

1. The Respondent did not submit anything in response to the complaint.

Subsequently, counsel for the NRSC, another respondent in this matter, provided this Office with a designation of counsel form from the Respondent. Counsel stated that she had offered to represent the Respondent on a volunteer basis because of his contributions to the NRSC and because he did not appear to understand the nature of the proceedings and was not responding to written requests.

For several months, counsel attempted to resolve this matter with the Respondent by telephone. Counsel then informed this Office that no progress had been made

Counsel also informed this Office that the Respondent is elderly and lives alone.

Counsel eventually managed to obtain the name and telephone number of the Respondent's family counsel. By letter dated January 18, 1995, the new counsel informed this Office that the Respondent had agreed to the change in the counsel of record; that he would be meeting with the Respondent's family and physicians about this matter very shortly; and, that he would be advising us of their plan.

On February 8, 1995, this Office informed the new counsel that because the time for preprobable cause conciliation had long since passed without a response from the Respondent, counsel would have to submit a request for an extension of time and the reasons for the request if additional time was required to respond.

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After receiving nothing from counsel, on February 21, 1995, this Office again notified Mr. Parisi's counsel. Counsel stated that the letter had been mailed and that a copy would be sent by facsimile. On March 1, 1995, this Office left a message with counsel's secretary that neither the letter nor the facsimile had been received.

By letter dated March 2, 1995, this Office informed counsel that although we were aware of the special circumstances involved in this case, the matter could not be held in abeyance indefinitely. We further stated that we intended to proceed to the next stage of the enforcement process if no response was received by March 10, 1995. To date, counsel has failed to respond.

Given that the time for preprobable cause has long since elapsed and efforts to obtain a response from the Respondent have failed, this Office intends to proceed to the next stage of the enforcement process.

Lawrence M. Noble
General Counsel

4/3/95
Date

BY:


Lois G. Lerner
Associate General Counsel

Staff Assigned: Dominique Dillenseger

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 28, 1995

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Warren M. Gould, Esquire
271 North Avenue, Suite 404
New Rochelle, N.Y. 10801-5112

RE: MUR 3894
Angelo Parisi

Dear Mr. Gould:

Based on a complaint filed with the Federal Election Commission on January 14, 1994, the Commission, on August 16, 1994, found that there was reason to believe that your client, Angelo Parisi, violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B), and 441a(a)(1)(C), and instituted an investigation of this matter. Your client was notified of the Commission's action on August 25, 1995, and provided with the opportunity to respond. To date, Mr. Parisi has failed to respond.

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

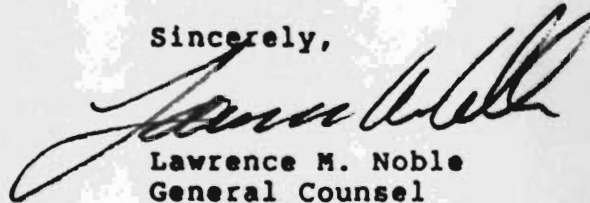
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Warren M. Gould, Esq.
Page 2

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 Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

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

Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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HUR 3894

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Angelo Parisi

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

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This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities and by a complaint filed with the Commission by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1). On August 16, 1994, the Commission found reason to believe that Angelo Parisi ("the Respondent") violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action ("ACPA") in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee ("NRCC") in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee ("NRSC") in 1992 and 1993.

The Respondent was notified of the Commission's action on August 25, 1994, and provided the opportunity to respond. The Respondent has failed to respond.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, (the "Act") establishes various dollar limits on the amount an individual may contribute to candidates and political committees in a given year. First, no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. § 441a(a)(3). Contributions made to a candidate in a non-election year are considered to be made during the year in which the election is held. 2 U.S.C. § 441a(a)(3). See also 11 C.F.R. § 110.5(b).

In addition, no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B). See also 11 C.F.R. § 110.1(c)(1). Furthermore, no person shall make contributions to any other political committee in any calendar year which, in the aggregate, exceed \$5,000. 2 U.S.C. § 441a(a)(1)(C). See also 11 C.F.R. § 110.1(d)(1). The Act also provides that no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a governing the limitations on contributions and expenditures. 2 U.S.C. § 441a(f).

Separate regulations govern the treatment of excessive contributions by committees other than a candidate's authorized committee. In general, contributions which on their face exceed the contribution limits may be either deposited into a campaign

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depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request reattribution of the contribution in accordance with 11 C.F.R. § 110.1(k). If reattribution is not properly obtained, within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(3).

In this case, the relevant disclosure reports reflect that the Respondent made the contributions set forth below. Each calendar year will be discussed in turn.

1. 1991 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
10/28/91	AMERICAN CITIZENS FOR POLITICAL ACTION	\$4000	
10/31/91	AMERICAN CITIZENS FOR POLITICAL ACTION	2000 ¹	
unknown	AMERICAN CITIZENS FOR POLITICAL ACTION	200 ¹	
	Subtotal		\$ 6,200
04/16/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	467	
10/28/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	2500	
11/01/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000	
12/12/91	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	1000	
	Subtotal		\$ 8,967
04/15/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	315	
10/25/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
10/29/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	4000	
10/31/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
12/13/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
12/30/91	NAT'L REPUBLICAN SENATORIAL COMMITTEE	335	
	Subtotal		\$11,150

1. The date of this contribution is not known because ACPA did not itemize it in its disclosure reports because the contribution did not exceed \$200. It did, however, report that the Respondent's aggregate contributions for 1991 totaled \$6,200.

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02/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	275	
06/21/91	REPUBLICAN NAT'L COMMITTEE - RNC	350	
10/24/91	REPUBLICAN NAT'L COMMITTEE - RNC	<u>7000</u>	
	Subtotal		\$ <u>7,625</u>
GRAND TOTAL -- 1991			<u>\$33,942</u>

In sum, the Respondent contributed \$33,942 in 1991, which exceeds by \$8,942 the statutory annual limit. In addition, the Respondent contributed \$6,200 to American Citizens for Political Action, which exceeds by \$1,200 the \$5,000 limit for contributions to political committees set forth in 2 U.S.C. § 441a(a)(1)(C). ACPA did not obtain a proper reattribution or refund the excessive portion of the Respondent's contribution within 60 days.

2. 1992 CONTRIBUTIONS

DATE	COMMITTEE NAME	AMOUNT	TOTALS
12/08/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	\$15000	
12/09/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	5000 ²	
11/02/92	NAT'L REPUBLICAN CONGRESSIONAL COMMIT	<u>2750</u>	
	Subtotal		\$22,750
02/13/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	670	
02/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	
03/16/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	325	
03/26/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
07/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
07/28/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1500	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	6000	
09/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	750	
09/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2000	
10/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	3000	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	500	
10/19/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	1000	

2. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the National Republican Senatorial Committee and the National Republican Congressional Committee.

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10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ³	
10/14/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2500 ⁴	
11/02/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	2750 ⁵	
	Subtotal		\$31,995
10/21/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-63	
10/27/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-3130	
12/31/92	NAT'L REPUBLICAN SENATORIAL COMMITTEE	-1540	
	Less Refunds	-4733	
	Subtotal -- NRSC		\$27,262
03/20/92	NEW YORK REPUBLICAN FED'L CAMPAIGN COM	5000	
	Subtotal		5,000
10/2/92	PRESIDENTIAL VICTORY COMMITTEE	1000	
	Subtotal		\$ 1,000
11/02/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	5500	
10/14/92	REPUBLICAN NAT'L CANDIDATE TRUST	5000	
	Subtotal		\$16,000
09/29/92	REPUBLICAN NAT'L COMMITTEE - RNC	5000	
	Subtotal		\$ 5,000
	TOTAL		\$77,012
	Less NRSC and NRCC Percentages from Joint Contributions	-10,750 ⁶	
	GRAND TOTAL -- 1992		<u>\$66,262</u>

Thus, in 1992, the Respondent made \$66,262 in federal contributions, which exceeds by \$41,262 the annual limit set forth in 2 U.S.C. § 441a(a)(3). The reports also reflect that the Respondent contributed \$27,262 to the NRSC in 1992, an amount which exceeds the statutory maximum for contributions to a national party committee by \$7,262, in violation of 2 U.S.C.

3. Id.

4. Id.

5. Id.

6. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

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§ 441a(a)(1)(B).⁷ In addition, the Respondent contributed \$22,750 to the NRCC, which exceeds by \$2,750 the \$20,000 annual limit for contributions to a national political party, in violation of 2 U.S.C. § 441a(a)(1)(B). On April 23, 1993, the NRCC refunded \$8,000 to the Respondent, \$7,000 of which was for the Respondent's 1992 contributions. The \$7,000 refund for 1992 contributions, however, did not occur within 60 days of the treasurer's receipt of any of the Respondent's 1992 contributions. Therefore, this amount is still included in the total amount of excessive contributions to the NRCC.

3. 1993 CONTRIBUTIONS

DATE	COMMITTEE	AMOUNT	TOTALS
11/15/93	GRAMM '96 COMMITTEE	1000 ⁸	
11/15/93	GRAMM '96 COMMITTEE	1000 ⁹	
05/20/93	KAY BAILEY HUTCHISON FOR SENATE COMMITTEE	600 ¹⁰	
03/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	1000 ¹¹	(Refunded)
04/23/93	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE	-8000	

7. The excessive contribution of \$7,262 has been refunded by the NRSC; \$4,750 was refunded on March 24, 1994, and \$2,512 was refunded on September 14, 1994. The refunds of excessive contributions were not made within 60 days.

8. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

9. Excluded from 1993 total. Attributable to 1996 contribution limit. 2 U.S.C. § 441a(a)(3).

10. Excluded from 1993 total. Attributable to 1994 contribution limit. 2 U.S.C. § 441a(a)(3).

11. Only \$1,000 of this amount was refunded within 60 days of any of the Respondent's contributions to the NRCC. That \$1,000, therefore, is not included in the total.

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02/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹²	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/01/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
03/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹³	
03/23/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000 ¹⁴	
04/26/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	680	
04/27/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
04/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
05/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
05/12/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
05/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2750 ¹⁵	
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500 ¹⁶	
05/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
07/19/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
07/28/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	
07/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/07/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/08/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	225	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
06/16/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
06/30/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	5000	
08/17/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
09/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	2000	
11/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
11/29/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	500	
12/15/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	750	
12/22/93	NATIONAL REPUBLICAN SENATORIAL COMMITTEE	1000	
	Subtotal		\$34,329 ¹⁷
	Less timely transfers to nonfederal account	-9674	
	Subtotal -- NRSC		\$24,655
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
08/31/93	NEW JERSEY REPUBLICAN STATE COMMITTEE	1000	
	Subtotal		2,000

12. This is a percentage of a contribution made at a joint fundraiser conducted by the Republican National Candidate Trust, a joint fundraising organization associated with the National Republican Senatorial Committee and the National Republican Congressional Committee.

13. Id.

14. Id.

15. Id.

16. Id.

17. This amount also includes \$449 in aggregate smaller NRSC contributions (under \$200) which are not listed above.

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03/01/93	NEW YORK REPUBLICAN FEDERAL CAMPAIGN COM	1000	
	Subtotal		1,000
03/23/93	PRESIDENTS' DINNER/AKA 1993 REPUBLICANS	2000	
	Subtotal		2,000
03/01/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
05/17/93	REPUBLICAN NATIONAL CANDIDATE TRUST	5500	
05/19/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
12/25/93	REPUBLICAN NATIONAL CANDIDATE TRUST	1000	
	Subtotal		8,500
02/17/93	REPUBLICAN NATIONAL COMMITTEE - RNC	5000	
06/08/93	REPUBLICAN NATIONAL COMMITTEE - RNC	1000	
06/18/93	REPUBLICAN NATIONAL COMMITTEE - RNC	2500	
	Subtotal		8,500
		<u>TOTAL</u>	<u>\$46,655</u>
	Less NRSC Percentages from Joint Contributions		\$ 6,250 ¹⁸
	GRAND TOTAL -- 1993		<u>\$40,405</u>

In 1993, therefore, the Respondent made \$40,405 in federal contributions, which exceeded by \$15,405 the annual limit set forth in 2 U.S.C. § 441a(a)(3). He also contributed \$24,655 to the NRSC, which exceeded the statutory limit for contributions to a national party committee by \$4,655, in violation of 2 U.S.C. § 441a(a)(1)(B).¹⁹

For the foregoing reasons, this Office recommends that the Commission find there is probable cause to believe that Angelo Parisi violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions in 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to

18. To avoid counting this amount twice, the proceeds from joint fundraisers are deducted from the contributor's annual aggregate total.

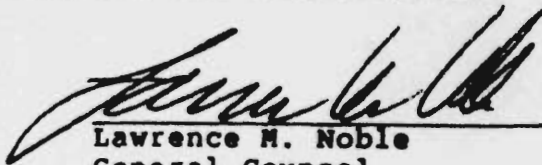
19. The NRSC refunded \$4,085 on September 14, 1994, and \$449 on October 24, 1994. These refunds of excessive contributions were not made within 60 days.

American Citizens for Political Action in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee in 1992 and 1993.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Angelo Parisi violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B), and 441a(a)(1)(C).

4/28/95
Date


Lawrence M. Noble
General Counsel

Staff assigned: Dominique Dillenseger

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

JUN 16 9 50 AM '95

In the Matter of

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) HUR 3894

Angelo Parisi

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SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Federal Election Commission ("the Commission") found reason to believe that Angelo Parisi ("the Respondent") violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee ("NRSC") in 1992 and 1993. At the same time, the Commission determined to offer to enter into preprobable cause conciliation with the Respondent and approved a conciliation agreement

The Respondent did not submit anything in response to the complaint and to the reason to believe notification. The difficulties encountered in contacting the Respondent regarding this matter are detailed in the General Counsel's Report, dated April 4, 1995.

The General Counsel's probable cause brief was forwarded to the Respondent's counsel on April 28, 1995. When this Office contacted counsel after the deadline to respond had passed,

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counsel belatedly requested additional time to gather medical and financial information and to arrange a meeting. Attachment 1. In light of the history of our dealings with counsel and counsel's delay in requesting an extension, this Office informed counsel that we could only grant a limited extension of time for him to respond before we would be making our recommendation to the Commission. Attachment 2. Counsel was given a week's extension until June 2, 1995. As of June 9, 1995, counsel had neither responded nor contacted this Office.

II. ANALYSIS

An analysis of the violations in this matter is contained in the General Counsel's Brief signed on April 28, 1995. The factual and legal analysis set forth in the General's Counsel's brief is incorporated as if fully set forth herein.

It is uncontested that the Respondent made excessive contributions to federal candidates and/or committees in 1991, 1992 and 1993. Therefore, this Office recommends that the Commission find probable cause to believe that Angelo Parisi violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee ("NRSC") in 1992 and 1993.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

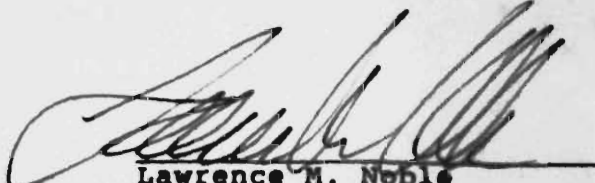
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IV. RECOMMENDATIONS

1. Find probable cause to believe that Angelo Parisi violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B) and 441a(a)(1)(C).

2. Approve the attached conciliation agreement and appropriate letter.

6/16/95
Date


Lawrence M. Noble
General Counsel

Attachments:

1. Counsel's Letter, dated May 24, 1995
2. OGC Letter, dated May 26, 1995
3. Conciliation Agreement

Staff assigned: Dominique Dillenseger

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS
COMMISSION SECRETARY

DATE: JUNE 21, 1995

SUBJECT: MUR 3894 - GENERAL COUNSEL'S REPORT
DATED JUNE 16, 1995.

The above-captioned document was circulated to the
Commission on Friday, June 16, 1995 at 12:00.

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

Commissioner Aikens	<u>xxx</u>
Commissioner Elliott	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Potter	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda
for Tuesday, June 27, 1995.

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

97043774311

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Angelo Parisi) MUR 3894

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 27, 1995, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3894:

1. Find probable cause to believe that Angelo Parisi violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B) and 441a(a)(1)(C).
2. Approve the conciliation agreement and the appropriate letter as recommended in the General Counsel's June 16, 1995 report.

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

Attest:

6-29-95
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 1995

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Warren M. Gould, Esquire
271 North Avenue, Suite 404
New Rochelle, N.Y. 10801-5112

RE: MUR 3894
Angelo Parisi

Dear Mr. Gould:

On June 27, 1995, the Federal Election Commission found that there is probable cause to believe your client, Angelo Parisi, violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B), and 441a(a)(1)(C), provisions of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to Federal candidates and/or committees in 1991, 1992 and 1993.

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

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

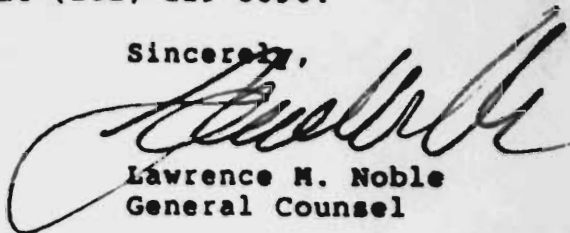
If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a

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Mr. Gould
Page 2

meeting in connection with a mutually satisfactory conciliation agreement, please contact Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

97043774344

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

OCT 24 30 PM '95

In the Matter of
Angelo Parisi

)
) MUR 3894
)

SENSITIVE

OCT 17 1995

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

I. BACKGROUND

On June 27, 1995, the Federal Election Commission ("the Commission") found probable cause to believe that Angelo Parisi ("Respondent") violated: (1) 2 U.S.C. § 441a(a)(3) with respect to his aggregate federal contributions for 1991, 1992, and 1993; (2) 2 U.S.C. § 441a(a)(1)(C) with respect to his contributions to American Citizens for Political Action in 1991; (3) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Congressional Committee in 1992; and (4) 2 U.S.C. § 441a(a)(1)(B) with respect to his aggregate annual contributions to the National Republican Senatorial Committee ("NRSC") in 1992 and 1993. At the same time, the Commission determined to offer to enter into post-probable cause conciliation with the Respondent and approved a conciliation agreement

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II. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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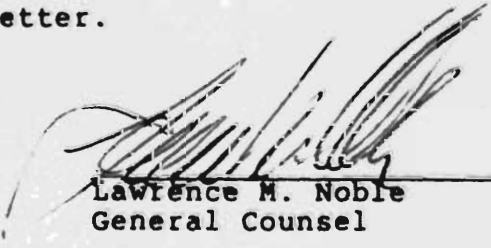
More than 90 days have passed since the date of the Commission's probable cause findings. Given our history of dealings with counsel and since efforts to obtain information from counsel have not been successful, this Office recommends that the Commission authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Angelo Parisi.

III. RECOMMENDATIONS

- 1.
2. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Angelo Parisi.
3. Approve the appropriate letter.

Date

10/2/95


Lawrence M. Noble
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Angelo Parisi) MUR 3894
)

CERTIFICATION

I, Marjorie W. Emons, recording secretary for the Federal Election Commission executive session on October 17, 1995, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 3894:

- 1.
2. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Angelo Parisi.
3. Approve the appropriate letter as recommended in the General Counsel's October 2, 1995 report.

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

Attest:

10-19-95
Date

Marjorie W. Emons
Marjorie W. Emons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 23, 1995

Warren M. Gould, Esquire
271 North Avenue, Suite 404
New Rochelle, N.Y. 10801-5112

RE: MUR 3894
Angelo Parisi

Dear Mr. Gould:

You were previously notified that on June 27, 1995, the Federal Election Commission found probable cause to believe that Angelo Parisi, your client, violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(B), and 441a(a)(1)(C), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Stephen Hershkowitz, Assistant General Counsel, at (202) 219-3400, within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble (7/2)
Lawrence M. Noble
General Counsel

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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Jan 16 2 00 PM '97



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *[Signature]*
Associate General Counsel

SUBJECT: MUR 3894 (Angelo Parisi, et al.)

The litigation relating to MUR 3894 (FEC v. Angelo Parisi, Civil Action No. 96-348(BDP) (S.D.N.Y. filed January 18, 1996)) was concluded by Order and Judgment entered on October 31, 1996. Attachment.

This Office recommends that the Commission close the file in this matter. This Office further recommends that the Commission approve notification letters to the defendant, the complainant, and those remaining respondents concerning whom the Commission had previously closed the matter, informing them that the entire matter is now closed.

Recommendations:

1. Close the file in MUR 3894.
2. Approve the appropriate letters.

Attachment
Order and Judgment

Staff Assigned: Dominique Dillenseger

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Angelo Parisi, et al.

)
)
)

MUR 3894

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 22, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 3894:

1. Close the file in MUR 3894.
2. Approve the appropriate letters, as recommended in the General Counsel's Memorandum.

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

Attest:

1-23-97
Date

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

Received in the Secretariat:	Thurs., Jan. 16, 1997	2:00 p.m.
Circulated to the Commission:	Thurs., Jan. 16, 1997	4:00 p.m.
Deadline for vote:	Wed., Jan. 22, 1997	4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 24, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kent C. Cooper, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

Dear Mr. Cooper:

This is in reference to the complaint filed by the Center for Responsive Politics with the Federal Election Commission on January 21, 1994, concerning possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the National Republican Senatorial Committee, the American Citizens for Political Action, and Angelo Parisi.

The Commission found there was reason to believe that the National Republican Senatorial Committee and Stan Huckaby, as treasurer, violated 2 U.S.C. § 441a(f), and conducted an investigation. On February 27, 1995, a conciliation agreement signed by the treasurer was accepted by the Commission. Attachment 1. The Commission also found reason to believe that American Citizens for Political Action and Robert E. Dolan, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(2)(A), however, after considering the circumstances of this matter, the Commission determined to take no further action as to these respondents.

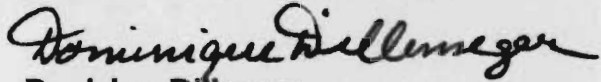
After conducting an investigation the Commission found probable cause to believe that Angelo Parisi violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(C) and 441a(a)(1)(B). The Commission was unable to settle the matter through a conciliation agreement and, therefore, authorized the filing of a civil suit in United States District Court. On October 31, 1996, the district court issued a final Order and Judgment against Mr. Parisi. Attachment 2. The Commission's consideration of this matter was concluded on January 22, 1996, and the file is now closed.

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Kent C. Cooper, Executive Director
Page 2

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Dominique Dillenseger
Attorney

Attachments
Conciliation Agreement
Order and Judgment

9704374354



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 24, 1997

Stan Huckaby, Treasurer
National Republican Senatorial
Committee
425 Second Street, NE
Washington, D.C. 20002

RE: MUR 3894

Dear Mr. Huckaby:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, reading "Dominique Dillenseger", is positioned above the typed name.

Dominique Dillenseger
Attorney

97043174355



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 24, 1997

Robert E. Dolan, Treasurer
American Citizens for Political Action
6524 San Felipe #129
Houston, TX 77057

RE: MUR 3894

Dear Mr. Dolan:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

9704374356



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 24, 1997

Warren M. Gould, Esquire
271 North Avenue, Suite 520
New Rochelle, N.Y. 10801-5112

RE: MUR 3894
Angelo Parisi

Dear Mr. Gould:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger
Dominique Dillenseger
Attorney

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF CLERK

Nov 4 2 33 PM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Federal Election Commission, :

Plaintiff, :

-against- :

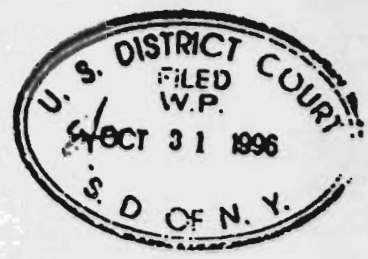
Angelo Parisi, :

Defendant :
-----X

96 CIVIL 0348(BDP)

JUDGMENT # 96-0348wp

12



Whereas the above entitled action having been assigned to the Honorable Barrington D. Parker, U.S.D.J., and the Court thereafter on October 29, 1996, having handed down its Order permanently enjoining defendant from future violations of the provisions of the Federal Election Campaign Act of 1971. Defendant shall pay a civil penalty of \$30,000.00 to the plaintiff. All but \$5,000.00 of the civil penalty is suspended due to mitigating circumstances. Defendant shall pay \$5,000.00 no later than 15 days of this order. If defendant violates this order, he shall pay the remainder of the \$30,000.00 penalty, it is,

ORDERED, ADJUDGED AND DECREED: That the plaintiff recover from the defendant the sum of \$30,000.00, \$5,000.00 is to be paid no later than 15 days of this order. The complaint be and is hereby dismissed.

Dated: White Plains, New York
October 31, 1996

Jane Parkinson
Clerk

97043774358

OCT 31 1996

U.S.D.C. S.D.N.Y.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

Nov 4 2 33 PM '96



FEDERAL ELECTION COMMISSION,)

Plaintiff,)

v.)

ANGELO PARISI,)

Defendant.)

No. 96-CIV-0348 (BDP)

ORDER

ORDER

Upon full consideration of the record in the above-captioned litigation, including the transcript of the deposition upon oral examination of the defendant Angelo Parisi, a medical expert report prepared on behalf of defendant, and representations made by counsel during the October 23, 1996 hearing in this matter,

IT IS HEREBY ORDERED that

1. Defendant Angelo Parisi is permanently enjoined from future violations of 2 U.S.C. § 441a(a)(3), 2 U.S.C. § 441a(a)(1)(C), and 2 U.S.C. § 441a(a)(1)(B), provisions of the Federal Election Campaign Act of 1971;
2. For his violations of 2 U.S.C. § 441a(a)(3), 2 U.S.C. § 441a(a)(1)(C), and 2 U.S.C. § 441a(a)(1)(B), defendant Angelo Parisi shall pay a civil penalty in the amount of Thirty Thousand Dollars (\$30,000) to the plaintiff Federal Election Commission (the "Commission");
3. That because of mitigating circumstances present in this case, including those presented in the medical expert report on defendant, all but Five Thousand Dollars (\$5,000) of the civil penalty to be paid by defendant Angelo Parisi is suspended;

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4. That defendant Angelo Parisi shall pay \$5,000 to the Commission no later than 15 days after this Order is entered by the Court; and

5. That if defendant Angelo Parisi violates the permanent injunction against his making contributions in excess of the limitations of 2 U.S.C. § 441a(a)(3), 2 U.S.C. § 441a(a)(1)(C), and 2 U.S.C. § 441a(a)(1)(B), he shall pay the remainder of the \$30,000 penalty.

Date

SO ORDERED:

B. D. Parker, Jr.

Barrington D. Parker, Jr.
United States District Judge

10-29-96

97043774360



FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 19, 1997

Donna Singleton, Treasurer
National Republican Congressional
Committee
320 First Street, SE
Washington, D.C. 20003

RE: MUR 3894

Dear Ms. Singleton:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger
Dominique Dillenseger
Attorney

97043774361



FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 19, 1997

Kent C. Cooper, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3894

Dear Mr. Cooper:

This supplements our letter dated January 24, 1997, regarding the above-referenced matter. The Federal Election Commission also found there was reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f). However, after considering the circumstances of this matter, the Commission determined to take no further action and closed the file as to these respondents. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3894

DATE FILMED 2-24-67 CAMERA NO. 4

CAMERAMAN JMU

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