FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 411

Date Filmed 6/24/79 Camera No. --- 2

Cameraman BPC

FEDERAL ELECTION COMMISSION

Duplicates of letters
4/28/77 Zella - to CIS memo

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

___	(1) Classified Information	___	(6) Personal privacy
X	(2) Internal rules and practices	___	(7) Investigatory files
___	(3) Exempted by other statute	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
X	(5) Internal Documents + duplicates		

Signed Jay Myerson

date 5/31/78

FEC 9-21-77

7004010026

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amedeo C. Merolla, Esquire
Temkin, Merolla & Zurier
40 Westminster Street
Providence, RI 02930

Re: MUR 411(77)

Dear Mr. Merolla:

Please be advised that based on the additional information you have submitted to the Federal Election Commission on behalf of your client, Gordon R. Archibald, regarding his intended apportionment of his contribution between the primary and general election campaigns of the Noel for Senator Committee and to Mr. Noel personally, and the Commission's review of other relevant materials, the Commission has decided to close its file with respect to Mr. Archibald's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

Please note for future reference that the Commission's Regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election, and with respect to the general election if made after the date of the primary election. 11 C.F.R. §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Gordon R. Archibald

EM 411

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery .$____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Amedeo C. Merolla

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	408122	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
L. Kelly

4. DATE OF DELIVERY 16 MAY 78
POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7908401408992

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: Charles N. Steele

FROM: Jay B. Myerson

SUBJECT: MUR 411(77)

On April 26, 1978, the Commission decided to close the file in MUR 411(77) with respect to Gordon A. Archibald.1/ The Commission did not specifically find that there is no reasonable cause to believe that Mr. Archibald violated 2 U.S.C. §441b(a)(1)(A). The proposed letter to Mr. Archibald's attorney advising him of the Commission's action, contained a sentence informing him that "the Commission had determined that there is no reasonable cause to believe that Mr. Archibald violated..." that provision in connection with the questioned contributions, 2/ thereby necessitating a revision of the letter to accurately portray the Commission's action. Said revision is attached (Attachment "C").

OK

7 9 0 4 0 1 4 1 0 0 7

1/ A copy of the Secretary to the Commission's certification is attached (Attachment "A").

2/ A copy of the proposed draft of the letter is attached (Attachment "B").

Attachment "B"

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amedeo C. Merolla, Esquire
Temkin, Merolla & Zurier
40 Westminster Street
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Merolla:

Please be advised that based on the additional information you have submitted to the Federal Election Commission on behalf of your client, Gordon R. Archibald, regarding his intended apportionment of his contributions between the primary and general election campaigns of the Noel for Senator Committee and to Mr. Noel personally, and the Commission's review of other relevant materials, the Commission had determined that there is no reasonable cause to believe that Mr. Archibald violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to Mr. Archibald's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

Please note for future reference that the Commission's Regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election, and with respect to the general election if made after the date of the primary election. 11 C.F.R. §110.1(a)(2)(ii).

7 9 0 4 0 1 1 0 0 1

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Gordon R. Archibald

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Noel for U. S. Senator Committee) MUR 411 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 26, 1978, the Commission determined by a vote of 4-1 to close the file in MUR 411 (77) with respect to Gordon R. Archibald.

Voting for this determination were Commissioners Aikens, Springer, Staebler, and Thomson. Commissioner Harris cast the dissenting vote. Commissioner Tiernan abstained from voting.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date 4-28-78

7904014003

EXECUTIVE SESSION
APRIL 26, 1978

BEFORE THE FEDERAL ELECTION COMMISSION
April 11, 1978

In the Matter of	)	
	)	
Noel for U. S. Senator Committee	)	MUR 411(77)
	)	

GENERAL COUNSEL'S REPORT

The Commission approved the proposed conciliation agreements for Messrs. Peter Cruise and Gordon Archibald on 27 January 1978.

On 10 February 1978 Mr. Cruise signed the conciliation agreement and forwarded his check for $100.00 to pay the civil penalty. On 22 February 1978 the Commission approved the conciliation agreement and it was signed by the General Counsel on 10 March 1978.

On 3 April 1978 we received a letter (Attachment I) from Mr. Archibald which further explains the apportionment of his contributions between Mr. Noel's primary and general election campaigns, and to Mr. Noel personally. We note that Mr. Archibald's contribution of 9 December, 1976 was made, as stated in his previous affidavit dated 8 September 1976, with a check made out to the "Governor Philip W. Noel Testimonial Committee" and thus we are inclined to accept the explanation that this was not intended as a political contribution though it was ultimately used as such by the Noel Committee.

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In view of Mr. Archibald's explanation, and in order to be consistent with the Commission's previous action as to the other individual respondents in this matter, we recommend a "no reasonable cause" finding as to Mr. Archibald.

In about ten days we anticipate presenting a General Counsel's report with recommendations as to what action should be taken against the Noel Committee in this matter.

Recommendation

Rescind previous "reasonable cause" finding and find no reasonable cause to believe that Gordon R. Archibald violated 2 U.S.C. §44la(a)(l)(A) with respect to his contributions to the Noel for U. S. Senator Committee. Send attached letter.

20 Apr 1978
Date

William C. Oldaker
General Counsel

7 0 0 4 0 4 1 0 0 5

LAW OFFICES
TEMKIN, MEROLLA & ZURIER
20TH FLOOR 40 WESTMINSTER STREET
PROVIDENCE, R. I. 02903

78 APR 3 PM 3:58

Mr. Randy Johnson
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Edwards

ALC 3/29

GORDON R. ARCHIBALD
135 HEDGEROW DRIVE
WARWICK, RHODE ISLAND

78 APR 3 AM 10:00

March 29, 1978

801431

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Attention: Mr. Randy Johnson

Re: In the Matter of Gordon R. Archibald
*** MUR 411(77) ***

Gentlemen:

As you know, my attorney and your attorneys have been discussing the above-entitled problem. In support of my previous affidavit to you dated September 8, 1977, I certify to you the following facts as being correct and true to the best of my knowledge, information and belief.

1. The first $100 sum of money given to the election campaign for Governor Noel was intended for the general election campaign.

2. The second contribution to him in the sum of $1000 was intended for use in his primary campaign.

3. The next campaign contribution to him in the sum of $500 was intended for his use in the general election.

4. Subsequently, as you are aware, following the general election a testimonial was held for Governor Noel personally. At that time, I gave to him the sum of $400. It was my intention that that sum of money was a gift to him for his own personal use.

I trust that this will clarify the matter.

Sincerely yours,

Gordon R. Archibald

Gordon R. Archibald

7 0 0 4 0 1 4 1 0 0 7

TEMKIN, MEROLLA & ZURIER
ATTORNEYS AT LAW
20TH FLOOR, 40 WESTMINSTER STREET
PROVIDENCE, R. I. 02903
(401) 751-2400

MARTIN M. TEMKIN
AMEDEO C. MEROLLA
MELVIN L. ZURIER

CHARLES C. DUPRE
DONALD E. MILLER
KEVEN A. McKENNA

HARVEY S. REYNOLDS
(1925-1964)

March 30, 1978

Mr. Randy Johnson
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: In the Matter of Gordon R. Archibald
*** MUR 411(77) ***

Dear Mr. Johnson:

This letter will serve to acknowledge our telephone conversation of March 24, 1978. In accordance therewith, I enclose herewith the letter we discussed from Mr. Archibald.

I sincerely trust that this will now dispose of the problem.

Very truly yours,

Temkin, Merolla & Zurier

Amedeo C. Merolla

ACM:dag
Enclosure

7904011006

GORDON R. ARCHIBALD
135 HEDGEROW DRIVE
WARWICK, RHODE ISLAND

DLC 3125

78 APR 3 AM 10:00

March 29, 1978

801431

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Attention: Mr. Randy Johnson

Re: In the Matter of Gordon R. Archibald
*** MUR 411(77) ***

Gentlemen:

As you know, my attorney and your attorneys have been discussing the above-entitled problem. In support of my previous affidavit to you dated September 8, 1977, I certify to you the following facts as being correct and true to the best of my knowledge, information and belief.

1. The first $100 sum of money given to the election campaign for Governor Noel was intended for the general election campaign.

2. The second contribution to him in the sum of $1000 was intended for use in his primary campaign.

3. The next campaign contribution to him in the sum of $500 was intended for his use in the general election.

4. Subsequently, as you are aware, following the general election a testimonial was held for Governor Noel personally. At that time, I gave to him the sum of $400. It was my intention that that sum of money was a gift to him for his own personal use.

I trust that this will clarify the matter.

Sincerely yours,

Gordon R. Archibald

Gordon R. Archibald

7900411003

TEMKIN, MEROLLA & ZURIER
ATTORNEYS AT LAW
20TH FLOOR, 40 WESTMINSTER STREET
PROVIDENCE, R. I. 02903
(401) 751-2400

MARTIN M. TEMKIN
AMEDEO C. MEROLLA
MELVIN L. ZURIER

CHARLES C. DUPRE
DONALD E. MILLER
KEVEN A. McKENNA

HARVEY S. REYNOLDS
(1925-1964)

March 30, 1978

Mr. Randy Johnson
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: In the Matter of Gordon R. Archibald
*** MUR 411(77) ***

Dear Mr. Johnson:

This letter will serve to acknowledge our telephone conversation of March 24, 1978. In accordance therewith, I enclose herewith the letter we discussed from Mr. Archibald.

I sincerely trust that this will now dispose of the problem.

Very truly yours,

Temkin, Merolla & Zurier

Amedeo C. Merolla

ACM:dag
Enclosure

7900411010

PETER R. CRUISE
368 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 794

February 10, 19 78

57-1
115

PAY TO THE ORDER OF Federal Election Commission $ 100.00

One Hundred DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Civil Penalty

Peter R. Cruise

⑆011500061⑆ 15 16B0669⑈ 0794

HALLCO PAWTUCKET R.I.

C00141011

Federal Election Commission
1325 K Street N.W
Washington, D.C. 20463

MUR 4111
MO 2688

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter R. Cruise
368 Thayer Street
Providence, Rhode Island 02906

Re: MUR 411 (77)

Dear Mr. Cruise:

On February 22, 1978, the Commission approved the conciliation agreement which you executed in the above reference matter. Pursuant to the provisions of 2 U.S.C. §437g(a)(6)(C), the conciliation agreement will be made available to the public.

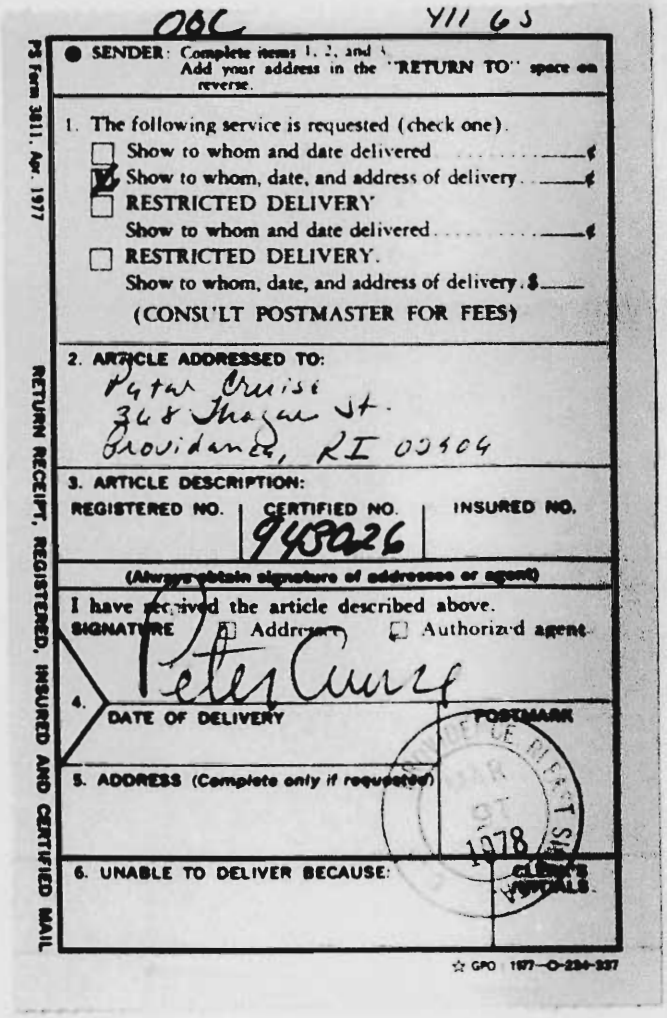
The conciliation agreement constitutes a complete bar to any further action by the Commission. Since you submitted with the conciliation agreement a check for the amount of the penalty involved, the Commission intends to close its file as it relates to you in this matter. A copy of the executed agreement is enclosed for your records.

If you have further questions, or need assistance in the future, please contact Gloria R. Sulton (telephone 800-424-9530), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



OBC Y11 6J

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☑ Show to whom, date, and address of delivery .... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Peter Cruise
348 Thayer St.
Providence, RI 02906

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	940026	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Peter Cruise

4. DATE OF DELIVERY — POSTMARK
PROVIDENCE RHODE ISLAND
OCT 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO 1977—O-234-327

7904041011

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Peter R. Cruise	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Peter R. Cruise ("Respondent") violated the provisions of 2 U.S.C. §441a:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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3. Respondent made contributions totalling $3,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $1,100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

7 0 0 4 0 1 4 1 0 1 6

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

3/10/78
Date

William C. Oldaker
General Counsel

2/10/78
Date

Peter R. Cruise
Peter R. Cruise
368 Thayer Street
Providence, RI 02906

7904041017

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Peter R. Cruise)

MUR 411 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 22, 1978, the Commission accepted the recommendation of the General Counsel that the Commission approve the Conciliation Agreement in MUR 411 (77) attached the General Counsel's Memorandum dated February 16, 1978.

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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

February 22, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: MUR 411 (77) - Conciliation Agreement

The above-mentioned document was circulated to the Commissioners on February 17.

No Objections were received to the Conciliation Agreement.

ATTACHMENT:
Certification

7804014019

February 16, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 411

Please have the attached conciliation agreement and Memo on MUR 411 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7 9 0 4 0 1 1 1 0 2 0

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 16, 1978

MEMORANDUM

TO : The Commission

FROM : William C. Oldaker

SUBJECT : Conciliation Agreement (Cruise)
MUR 411

Attached is a conciliation agreement signed by Mr. Peter R. Cruise in the above matter. The agreement contains an admission of a violation of the contribution limitations of 2 U.S.C. §441a and provides for a penalty of $100. Mr. Cruise forwarded a check in the amount of the penalty.

I recommend that the Commission approve the agreement.

Dulton

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Peter R. Cruise	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Peter R. Cruise ("Respondent") violated the provisions of 2 U.S.C. §441a:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

7 9 0 4 1 1 0 7 2

3. Respondent made contributions totalling $3,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $1,100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel
2/10/78 Date	Peter R. Cruise Peter R. Cruise 368 Thayer Street Providence, RI 02906

7004011024

PETER R. CRUISE
368 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 794

February 16, 19 78

57-1
115

PAY TO THE ORDER OF Federal Election Commission $ 100.00

One Hundred DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Civil Penalty

Peter R. Cruise

⑆011500018⑆ 15 16B0669⑈ 0794

HALLCO PAWTUCKET, R.I.

2 0 0 4 0 1 0 2 3

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amadeo C. Merolla, Esquire
Temkin, Merolla and Zurier
40 Westminster Street
20th Floor
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Merolla:

On January 4, 1978, the Commission determined that there is reasonable cause to believe your client, Gordon R. Archibald, committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct these violations for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). Enclosed is a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

7804041026

MUR 411

Sutton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
   - ☒ Show to whom and date delivered
   - ☐ Show to whom, date, and address of delivery ____¢
   - ☐ RESTRICTED DELIVERY
     Show to whom and date delivered ____¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery $____
     (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
   Amadeo Marollo
   20 Westminster St. - 20th Flr.
   Providence, RI 02903

3. ARTICLE DESCRIPTION:
   REGISTERED NO. | CERTIFIED NO. 944227 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. K. Scuncio

DATE OF DELIVERY 2 FEB 78

POSTMARK FEB 2 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7904041027

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amadeo C. Marolla, Esquire
Tomkin, Marolla and Burke
40 Westminster Street
20th Floor
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Marolla:

On January 4, 1978, the Commission determined that there is reasonable cause to believe your client, Gordon R. Archibald, committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct these violations for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). Enclosed is a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulten, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

7904041026

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Gordon R. Archibald	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Gordon R. Archibald ("Respondent") violated the provisions of 2 U.S.C. §441a:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

7904011022

3. Respondent made contributions totalling $2,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

7904041030

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

Gordon R. Archibald
135 Hedgerow Drive
Warwick, RI 02886

7004014037

FEDERAL ELECTION COMMISSION

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

January 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter R. Cruise
368 Thayer Street
Providence, RI 02906

Re: MUR 411(77)

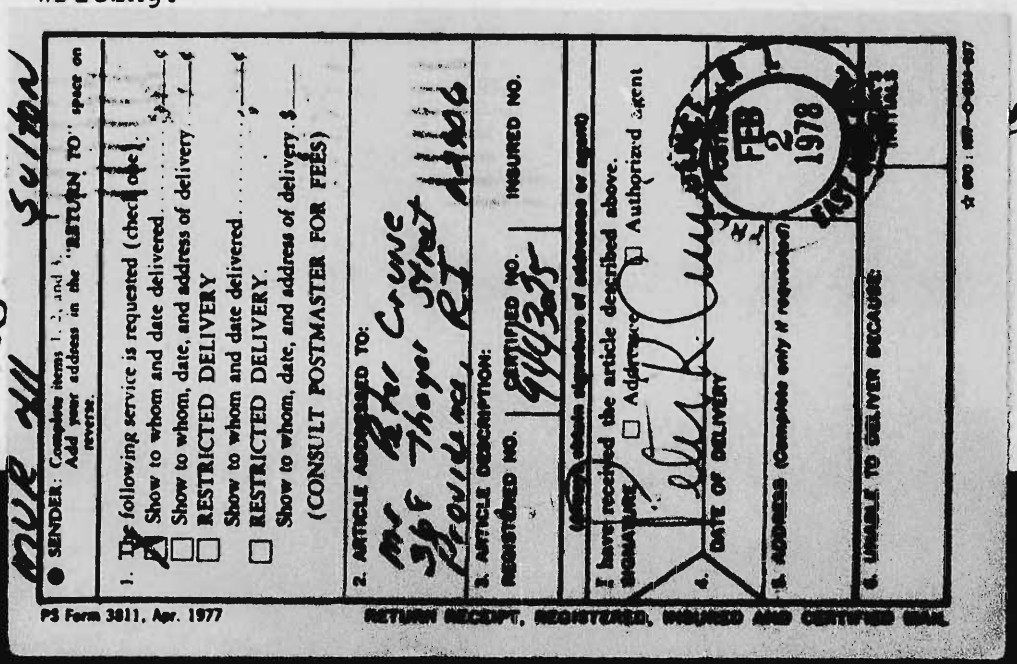
Dear Mr. Cruise:

On January 4, 1978, the Commission determined that there is reasonable cause to believe you violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct this violation for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). I am enclosing a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.



7900401033

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter R. Cruise
368 Thayer Street
Providence, RI 02906

Re: MUR 411(77)

Dear Mr. Cruise:

On January 4, 1978, the Commission determined that there is reasonable cause to believe you violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct this violation for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). I am enclosing a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

1-31-78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Peter R. Cruise	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Peter R. Cruise ("Respondent") violated the provisions of 2 U.S.C. §441a:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

7 9 0 4 0 1 4 1 0 3 4

3. Respondent made contributions totalling $3,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $1,100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

7 0 4 0 1 1 0 3 5

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

Peter R. Cruise
368 Thayer Street
Providence, RI 02906

7 0 6 4 0 1 4 1 0 3 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gordon R. Archibald)
Peter R. Cruise)

MUR 411 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 27, 1978, the Commission approved the proposed conciliation agreements and letters attached to the memorandum from the General Counsel, submitted to the Commissioners on January 26, 1978.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7 8 0 4 0 1 4 1 0 3 7

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 27, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: MUR 411 (77) - Letters and Conciliation Agreements

The above-mentioned documents were circulated to the Commissioners on January 26, 1978 at 11:00 a.m.

No objections were received regarding these matters.

ATTACHMENT:
Certification

7 9 0 4 1 0 1 1 0 3 3

January 25, 1978

MEMORANDUM TO: Marge Emmons.

FROM: Elissa T. Garr

SUBJECT: MUR 411

Please have the attached letters and conciliation agreements in MUR 411 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7904041039

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM

TO : The Commission

FROM : William C. Oldaker

SUBJECT : MUR 411

On January 4, 1978, the Commission found reasonable cause to believe that two individual respondents violated the contribution limitations of 2 U.S.C. §441a in connection with their contributions to the Noel for Senator Committee. We propose to send the attached letters and conciliation agreements to the two individual respondents.

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Amadeo C. Merolla, Esquire
Temkin, Merolla and Zurier
40 Westminster Street
20th Floor
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Merolla:

On January 4, 1978, the Commission determined that there is reasonable cause to believe your client, Gordon R. Archibald, committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct these violations for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). Enclosed is a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Gordon R. Archibald	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Gordon R. Archibald ("Respondent") violated the provisions of 2 U.S.C. §44la:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

7 0 4 0 1 4 1 0 4 2

3. Respondent made contributions totalling $2,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

Gordon R. Archibald
135 Hedgerow Drive
Warwick, RI 02886

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter R. Cruise
368 Thayer Street
Providence, RI 02906

Re: MUR 411(77)

Dear Mr. Cruise:

On January 4, 1978, the Commission determined that there is reasonable cause to believe you violated 2 U.S.C. §441a of the Federal Election Campaign Act of 1971, as amended, by contributing to the Noel for Senator Committee in excess of $1,000 with respect to a Federal election.

The Commission has a duty to attempt to correct this violation for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). I am enclosing a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Peter R. Cruise	)	
	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and an investigation having been conducted and reasonable cause to believe having been found that Peter R. Cruise ("Respondent") violated the provisions of 2 U.S.C. §441a:

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Federal Election Commission has jurisdiction over Respondent and the subject matter of this proceeding.

2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

3. Respondent made contributions totalling $3,100 to the Noel for Senator Committee with respect to two Federal elections in 1976.

4. Respondent is a "person" as defined in 2 U.S.C. §431(h) and subject to the contribution limitations contained in 2 U.S.C. §441a.

5. Respondent's contributions to the Noel for Senator Committee with respect to the 1976 elections exceeded the contribution limits contained in 2 U.S.C. §441a(1)(A) by $1,100.

6. Respondent will pay a civil penalty of $100 within ten days of the effective date of this agreement.

7. 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.

8. This agreement shall become effective on the date the Commission has approved the entire agreement which shall be evidenced by the signature of the General Counsel.

FEDERAL ELECTION COMMISSION

_____ Date

_____
William C. Oldaker
General Counsel

_____ Date

_____
Peter R. Cruise
368 Thayer Street
Providence, RI 02906

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Edward L. Maggiacomo
38 Belcrest Road
Cranston, RI 02920

Re: MUR 411(77)

Dear Mr. Maggiacomo:

Please be advised that based on information you submitted to the Federal Election Commission regarding your intent to make joint husband and wife contributions designated for the primary and general election campaigns of the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future references that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contributors, the amount

to be attributed to each contributor." 11 CFR §104.5 (e). The Regulations also provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

BURHH SULTAN

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Edward Maggiacomo
39 Detroit Ave
Cranston, RI 02920

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944257	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [x] Authorized agent
Angelose Daffara

4. DATE OF DELIVERY
1/27/78

POSTMARK
JAN 27 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1977—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Edmund Mauro, Jr.
67 Taber Avenue
Providence, RI 02906

Re: MUR 411(77)

Dear Mr. Mauro:

Please be advised that based on information you submitted to the Federal Election Commission regarding your intent to make joint husband and wife contributions to the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §44la(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contribu-

tors, the amount to be attributed to each contributor." 11 CFR §104.5(e).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 Sulton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Edmund Maus, Jr.
69 Isabel Avenue
Providence, RI 02906

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	999256	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

Edmund M Maus

4. DATE OF DELIVERY 1/27/78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977—O-234-357

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gustin L. Buonaiuto
210 Cedar Street
Warwick, RI 02818

Re: MUR 411(77)

Dear Mr. Buonaiuto:

Please be advised that based on information you submitted to the Federal Election Commission regarding your intent to make joint husband and wife contributions to the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contribu-

tors, the amount to be attributed to each contributor." 11 CFR §104.5(e).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 SULTON

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
   - [X] Show to whom and date delivered ..... ¢
   - [ ] Show to whom, date, and address of delivery ..... ¢
   - [ ] RESTRICTED DELIVERY
     Show to whom and date delivered ..... ¢
   - [ ] RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery $ .....
     (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Gustav Bucanuto
210 Cedar Street
Warwick, RI 02818

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944253	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent
Gustav Bucanuto
Linda Bucanuto

4. DATE OF DELIVERY
1-27-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-357

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Royal Little
40 Westminster Street
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Little:

Please be advised that based on the information you submitted to the Federal Election Commission regarding your contributions to the Noel for Senator Committee, and the Commission's reviewing of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information. Please note also that your check in the amount of $300 is being returned to you.

Please be further advised that the Commission, in accordance with 2 U.S.C. §437g(a)(6)(C), will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

ROYAL LITTLE
40 WESTMINSTER ST.
PROVIDENCE, R. I. 02903

3814

September 6, 19 77 57-102 115

PAY TO THE ORDER OF --UNITED STATES GOVERNMENT - FEDERAL ELECTION COMM.----- $ 300.00

----------THREE HUNDRED AND NO/100---------- DOLLARS

OLD STONE BANK
PROVIDENCE, RHODE ISLAND

Royal Little

⑈011500102⑈ 41 11 513 20⑈

MWR 411 Sutton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☑ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery .$ ___
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Royal Little
44 Westminster Street
Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944736	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Rita E Mullaney

4. DATE OF DELIVERY
2 Jan 78

POSTMARK
PROVIDENCE, R.I. STA
JAN 27 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

1 9 0 3 4 1 0 6 7

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fenton Keyes
1 Twin Oak Drive
Warwick, RI 02889

Re: MUR 411(77)

Dear Mr. Keyes:

Please be advised that based on the information you submitted regarding your belief that certain of your contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 911 3d 1 of N

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [X] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Fenton Keyes
1 Iowa Oak Drive
Warwick, RI 02889

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	P44245	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mr Fenton Keyes

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

FEB 1978 POSTMARK

☆ GPO : 1979—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Gertrude Keyes
1 Twin Oak Drive
Warwick, RI 02889

Re: MUR 411(77)

Dear Ms. Keyes:

Please be advised that based on the information you submitted regarding your belief that certain of your contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR411 Sylvia

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [X] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $ ____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Ms. Gertrude Keyes
1 Iowa Oak Drive
Warwick, RI 02819

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944286	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. Mrs Gertrude Keyes
DATE OF DELIVERY 55 T MR 9 8 33 POSTMARK FEB 4 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

☆ GPO 1977—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Lynch
96 Governors Drive
Warwick, RI 02818

Re: MUR 411(77)

Dear Mr. Lynch:

Please be advised that based on the information you submitted regarding your belief that certain of your contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

7901101067

MUR 411 Fulton

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [x] Show to whom and date delivered. ____¢
- [ ] Show to whom, date, and address of delivery. ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered. ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. John D. Lynch
96 Thomas Drive
Brunswick, Me 04018

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944247	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Brenda Burnett

4. DATE OF DELIVERY 1-27-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK JAN 27 1978 USPO

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★ GPO : 1977—O-234-857

7 9 0 4 0 1 1 1 0 7 0

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joseph R. Paolino
215 Blackstone Blvd.
Providence, RI

Re: MUR 411(77)

Dear Mr. Paolino:

Please be advised that based on the information you submitted regarding your belief that certain of your contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 911 Sylton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery .$.....
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Joseph R. Paolino
Suite 300, 76 Dorrance St.
Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94635	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. Orlando Gaspe (illegible)

DATE OF DELIVERY JAN 27 1978

POSTMARK JAN 27 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Patricia Lynch
96 Governors Drive
Warwick, RI 02818

Re: MUR 411(77)

Dear Mrs. Lynch:

Please be advised that based on the information you submitted regarding your belief that certain of your contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 SUTTON

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mrs. Patricia Lynch
96 Bowers Drive
Warwick, RI 02818

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944249	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent
P Lynch
Pat Lynch

4. DATE OF DELIVERY 1-27-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7904011407

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Salvatore L. Romano, Jr., Esquire
Coia & Lepore Ltd.
40 Westminster Street - Suite 1030
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Romano:

Please be advised that based on the information you submitted on behalf of your client, Arthur Coia, regarding his belief that certain of his contributions to the Noel for Senator Committee were made with respect to the general election, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe that Mr. Coia violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to Mr. Coia's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's regulations provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the

primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 Sutton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Salvatore L. Romano, Esq
40 Westminster St. - Suite 1200
Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	994252	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent
L. Harrison

4. DATE OF DELIVERY
3 JAN 18

POSTMARK
PROVIDENCE, R.I.
JAN 2 1918

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-827

P 760 011 079

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gene Mancino
56 Wowams Road
Barrington, RI 02806

Re: MUR 411(77)

Dear Mr. Mancino:

Please be advised that based on information you submitted to the Federal Election Commission regarding your intent to make joint husband and wife contributions designated for the primary and general election campaigns of the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contributors, the amount

to be attributed to each contributor." 11 CFR §104.5 (e). The Regulations also provide that contributions not designated in writing for a particular election shall not be considered as being made with respect to the primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 711 Sulton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr Gene Mancini
67 Woonsocket Road
Barrington, RI 02806

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	44425	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Gene Mancini

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆ GPO 1977—O-234-357

7908011062

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Francis J. Maguire, Esquire
Connors & Kilguss
75 Weybosset Street
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Maguire:

Please be advised that based on information submitted to the Federal Election Commission regarding the intent of your client, Joseph Mulcahy, to make joint husband and wife contributions to the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe your client violated 2 U.S.C. §441a(a)(1)(A) in connection with said contribution. Accordingly, the Commission intends to close its file with respect to Mr. Mulcahy's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an

accompanying writing signed by all contributors, the amount to be attributed to each contributor." 11 CFR §104.5(e).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 Sutton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
   - [X] Show to whom and date delivered ——¢
   - [ ] Show to whom, date, and address of delivery ——¢
   - [ ] RESTRICTED DELIVERY
     Show to whom and date delivered ——¢
   - [ ] RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery $——
   - (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
   Francis J. Maguire, Esq.
   75 Weybosset Street
   Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944254	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 1-28-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

JAN 1978

☆ GPO : 1977—O-234-397

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Al Mancino
324 County Road
Barrington, RI 02806

Re: MUR 411(77)

Dear Mr. Mancino:

Please be advised that based on information you submitted to the Federal Election Commission regarding your intent to make joint husband and wife contributions designated for the primary and general election campaigns of the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe you violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to your involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contributors, the amount

to be attributed to each contributor." 11 CFR §104.5 (e). The Regulations also provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 Sullivan

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☒ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr. Al Marcus
324 County Road
Barrington, RI 02806

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944253	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Elaine Gruta

DATE OF DELIVERY 1/27/78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7001 0110 0002

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James M. Jerue, Esquire
144 Westminster Street
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Jerue:

Please be advised that based on information you submitted to the Federal Election Commission on behalf of your client, Daniel MacLellan, regarding his intent to make joint husband and wife contributions designated for the primary and general election campaigns of the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe that Mr. MacLellan violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to Mr. MacLellan's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contributors, the amount

to be attributed to each contributor." 11 CFR §104.5 (e). The Regulations also provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 SUTTON

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James M. Jerue, Esq.
324 Westminster St.
Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944268	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

J. Jerue

4. DATE OF DELIVERY 1-27-78

POSTMARK
PROVIDENCE RI
JAN 27

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1977—O-234-237

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 23, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James M. Jerue, Esquire
144 Westminster Street
Providence, RI 02903

Re: MUR 411(77)

Dear Mr. Jerue:

Please be advised that based on information you submitted to the Federal Election Commission on behalf of your client, Joseph Matteo, regarding his intent to make joint husband and wife contributions designated for the primary and general election campaigns of the Noel for Senator Committee, and the Commission's review of other relevant materials, the Commission has determined that there is no reasonable cause to believe that Mr. Matteo violated 2 U.S.C. §441a(a)(1)(A) in connection with said contributions. Accordingly, the Commission intends to close its file with respect to Mr. Matteo's involvement in this matter.

A copy of the Commission's certification is enclosed for your information.

In accordance with 2 U.S.C. §437g(a)(6)(C), the Commission will make available to the public the determination it has reached in this matter.

Please note for future reference that the Commission's Regulations provide that "A contribution which represents contributions by more than one person shall indicate on the written instrument or an accompanying writing signed by all contributors, the amount

to be attributed to each contributor." 11 CFR §104.5 (e). The Regulations also provide that contributions not designated in writing for a particular election shall be considered as being made with respect to the primary election if made on or before the date of the primary election; and with respect to the general election if made after the date of the primary election. 11 CFR §110.1(a)(2)(ii).

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Charles N. Steele
Associate General Counsel

MUR 411 Sutton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James M. Grile, Esq.
624 Westminster St.
Providence, RI 02903

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944246	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

D. Grile

4. DATE OF DELIVERY
1-27-78

POSTMARK
JAN 27 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Noel for Senator)
17 Individual Contributors)

MUR 411 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 4, 1978, the Commission determined by a vote of 4-0 to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe that Gustin Buonainto, Arthur Coia, Fenton Keyes, Gertrude Keyes, John D. Lynch, Patricia Lynch, Daniel MacLellan, Edward L. Maggiacomo, Al Mancino, Gene Mancino, Joseph Matteo, Edmund Mauro, Jr., Joseph Mulcahy and Joseph Paolino violated 2 U.S.C. Section 441a(a)(1)(A) and so inform the afore-named respondents of this finding.

2. Find no reasonable cause to believe that Royal Little violated 2 U.S.C. Section 441a(a)(1)(A), return his check, and send the draft letter submitted by the FEC General Counsel.

3. Find Reasonable Cause to Believe that Gordon Archibald and Peter Cruise have violated 2 U.S.C. Section 441a(a)(1)(A) and enter into conciliation efforts with these respondents.

4. To delete the FEC General Counsel's recommendation to audit the books and records of the Noel for Senator Committee in order to determine the amount of any expenditures made by the Noel Committee "with respect to" the 1976 general election.

Commissioners Springer and Tiernan were not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7 6 0 4 0 1 4 1 0 6 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Noel for Senator)
17 Individual Contributors)

MUR 411 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 4, 1978, the Commission voted 3-1 on the following motion in the above-captioned matter:

1. To examine the books and records of the Noel for Senator Committee in order to determine the amount of any expenditures made by the Noel Committee "with respect to" the 1976 general election and to so notify the Treasurer of the Noel Committee;

2. Find no reasonable cause to believe that Gustin Buonainto, Arthur Coia, Fenton Keyes, Gertrude Keyes, John D. Lynch, Patricia Lynch, Daniel MacLellan, Edward L. Maggiacomo, Al Mancino, Gene Mancino, Joseph Matteo, Edmund Mauro, Jr., Joseph Mulcahy and Joseph Paolino violated 2 U.S.C. Section 441a(a)(1)(A) and to so inform these individuals;

3. Find no reasonable cause to believe that Royal Little violated 2 U.S.C. Section 441a(a)(1)(A), return his check and inform him of this finding;

4. Defer making any further determination regarding Gordon Archibald and Peter Cruise until the Noel Committee audit has been completed, the books and records subpoenaed in MUR 211 relating to the December 1975 fundraiser have been reviewed, and any additional information from Archibald and Cruise is received.

Commissioners Aikens, Staebler, and Thomson voted for the motion. Commissioner Harris voted against the motion. Commissioners Springer and Tiernan were not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7904041096

December 16, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 411 Team 93 Sulton

Please have the attached General Counsel's Report on MUR 411 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of December 21, 1977.

Thankyyou.

Laid Over

7 7 0 4 0 1 4 1 0 9 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 411(77)
Noel for Senator	)	
17 Individual Contributors	)	

GENERAL COUNSEL'S REPORT

I. Background and Previous Commission Action

This matter was initiated after the Disclosure Division reviewed the reports of receipts and expenditures filed by the Noel for Senator Committee, ("Noel Committee"), the principal campaign committee of Philip Noel, and it appeared that some persons may have exceeded the $1,000 contribution limitation of 2 U.S.C. §441a(a)(1)(A). Mr. Noel was an unsuccessful candidate for the U.S. Senate from Rhode Island in the primary election held on September 14, 1976. The Disclosure Division notified the Noel Committee by letter of these apparent violations on October 4, 1976, and October 28, 1976.

The Noel Committee replied on November 4, 1976, through its treasurer, Mr. John Lynch. Mr. Lynch claimed that the Noel Committee anticipated that Mr. Noel would be a candidate in the general election; that the

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questioned contributions provided the money for expenditures (such as television production) directed toward the general election; and that, therefore, such expenditures were "with respect to" the general election and within the contribution limitations of 2 U.S.C. §441a(a)(1)(A). However, the Noel Committee's January 31, 1977, report included a list entitled "contributions on hand to be liquidated." The list named 15 individuals whose contributions exceeded $1,000 each.

On March 23, 1977, the Noel Committee was notified of the Commission's determination that there was reasonable cause to believe it had violated 2 U.S.C. §441a.

This matter was referred to the Office of General Counsel by the Disclosure Division on April 28, 1977. A review of the Noel Committee's 1976 year-end report disclosed debts totaling $12,829.74. Mrs. Sulton of the General Counsel's staff contacted Mr. Lynch by telephone and was told that the Noel Committee had no funds to repay the apparent excess contributions and its other debts.

With respect to the individual contributors, the General Counsel's Office reviewed all of the reports of

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receipts and expenditures of the Noel Committee and identified two additional individuals whose total contributions exceeded $1,000 and whose names were not included on the Noel Committee's list of "contributions on hand to be liquidated." The apparent excess contributions totaled $12,600 after these two additional names were included and other corrections were made with respect to the names already identified (See Attachment A).

On August 17, 1977, the Commission found reason to believe that each of the 17 individuals identified on Attachment A hereto may have violated 2 U.S.C. §441a by contributing in excess of $1,000 to the Noel Committee. Notification letters were mailed to these individuals on August 26, 1977. Fifteen of the 17 individual respondents received their notification letters by September 1, 1977[1] and their responses have been received.

II. Evidence

The responses submitted by 15 of the individual respondents and attached hereto give five basic explanations

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[1] No return receipts were received for the letters mailed to Al and Gene Mancino. The letters were mailed again on October 5, 1977, and a return receipt was received. No responses have been received to date.

for contributions which may have exceeded the limitations of 2 U.S.C. §441a(a)(1)(A):

1. The contributions were intended as contributions from husband and wife.

2. Contributions were given with respect to obligations incurred for the general election and are analogous to situations in which the Commission has allowed candidates unopposed in the primary to accept contributions for both the primary and general elections. Therefore, these respondents claim such contributions are legal.

3. Contributions made in December 1976 were either a) gifts to Noel personally; or b) to pay campaign debts (which some assumed were not attributable to an election since Noel "had not been a candidate for 3 months..." (Mulcahy affidavit).

4. Contributions in December 1975 were not for: a) a Federal election since Noel was not a candidate; b) were attributable to Noel and Garrahy, the joint beneficiaries of the fundraiser, in equal amounts.

5. If contributions exceeded the limit, they were not made in willful violation of the Act.[2]

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[2]Mr. Little contributed $1200 to the Noel Committee. He stated in a letter that if he could contribute only $1000 because Noel was not on the general election ballot, then he had contributed $100 in excess of the limits. He claimed that his $100 contribution in December 1976 should be "exempt" because "it was made after the election." Little enclosed a check for $300 as a penalty. We recommend returning this check.

Six of the individual respondents indicate that their contributions should have been attributed to both spouses, though the copies of the checks submitted bear only one signature, do not have the spouse's name printed on the instrument, and contain no instructions to that effect. Nine of the respondents stated that some portion of their contributions were given for the general election campaign. With respect to the December 1976 "Testimonial", three individuals said their contributions were to pay campaign debts and two said their contributions were personal gifts to Governor Noel.[3] Two respondents said their December 1975 contributions were not given for a Federal election. Mr. Archibald said his December 1975 contribution should have been credited in equal amounts to Governor Noel and then Lt. Gov. Garrahy. Two individuals stated that they had made contributions in excess of $1000, but there was no intention to violate the Act. Although Al Mancino and Gene Mancino did not respond to the Commission's notification letter, the Noel Committee

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[3] We note that copies of cancelled checks from the December 1976 fundraiser were not payable to the Noel Committee (See attachments to Matteo, MacLellan and Cruise responses), though Mr. Matteo's check was endorsed by the Noel Committee.

reported that they had designated part of their contributions for the general election.

III. Analysis

2 U.S.C. §44la(f) prohibits knowing acceptance of a contribution in excess of the limits by a candidate or committee. Mr. Lynch, treasurer of the Noel Committee, maintains that an individual has a $2000 limit with respect to Mr. Noel's campaign in 1976, although the Noel Committee report for January 31, 1977, seems to admit that certain contributions which it accepted were in excess of the contribution limitations and should be returned[4] (See Lynch's response to the Disclosure notices and the response submitted herein.)

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[4] It might be argued that the "with respect to" language allows a person to contribute up to $1000 to a candidate/committee before a primary election and designate the money to be used with respect to the general election (See 11 CFR §110.1(a)(2); however, if the candidate loses in the primary and is not a candidate in the general election, then any contributions designated for the general election must be returned. Sen. Cannon, speaking on the 1974 conference report stated: "Individuals cannot give to any candidate or political committee supporting that candidate more than $1000 for each election in which the candidate participates..." 120 Con. Rec. S 18,525 (daily ed. October 8, 1974. (Emphasis Added).

In his affidavit dated August 30, 1977, Mr. Lynch states that the "Noel for Senate Committee [indicated to me] that expenditures were being made at that time toward the General Election." A number of other individuals state that the Noel Committee had indicated that contributions were being allocated to general election expenditures that were then being made. We believe that the books and records of the Noel Committee should be audited to determine the amount of any expenditures that may have been made with respect to the general election.

In view of the information submitted by the individual respondents and the representations made by the Noel Committee, we believe that the Commission should not proceed further against 15 of the individual respondents where the evidence indicates that the contributions should have been attributed to both spouses or designated for the primary and general elections, and such attribution and designation brings the individual respondents within the limitations of §441a(a)(1)(A). We believe the Commission should defer any further action regarding the two individual respondents whose contributions to the December 1975 and/or December 1976 fundraiser may have placed them over the §441a(a)(1)(A) contribution limitations until we receive more information from the

individuals reviewed the books and records of the December 1975 fundraiser (MUR 211), and complete the audit of the Noel Committee regarding that fundraiser.

IV. Recommendations

1. Audit the books and records of the Noel for Senator Committee in order to determine the amount of any expenditures made by the Noel Committee "with respect to" the 1976 general election and send attached letter to the Treasurer of the Noel Committee.

2. Find no reasonable cause to believe that Gustin Buonainto, Arthur Coia, Fenton Keyes, Gertrude Keyes, John D. Lynch, Patricia Lynch, Daniel MacLellan, Edward L. Maggiacomo, Al Mancino, Gene Mancino, Joseph Matteo, Edmund Mauro, Jr., Joseph Mulcahy and Joseph Paolino violated 2 U.S.C. §441a(a)(1)(A) and send attached letters.

3. Find no reasonable cause to believe that Royal Little violated 2 U.S.C. §441a(a)(1)(A), return his check, and send attached letter.

4. Defer making any further determination regarding Gordon Archibald and Peter Cruise until the Noel Committee audit has been completed, the books and records subpoenaed in MUR 211 relating to the December 1975 fundraiser have

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been reviewed, and any additional information from Archibald and Cruise is received.

12/15/77
Date

William C. Oldaker
General Counsel

7801041106

NAME	1975 CONTRIBUTIONS AMOUNT	1975 CONTRIBUTIONS DATE	1976 PRE-ELECTION CONTRIBUTIONS AMOUNT	1976 PRE-ELECTION CONTRIBUTIONS DATE	1976 POST-ELECTION CONTRIBUTIONS AMOUNT	1976 POST-ELECTION CONTRIBUTIONS DATE	TOTAL CONTRIBUTIONS	EXPLANATION
ARCHIBALD	$200	12/4/75	$500 $500 $500	5/14/76 6/16/76 8/21/76	$400	12/15/76	$2100	1. $200 1975 contribution for Noel and Garrahy and Noel equally. 2. $1000 (5/14 & 6/16) intended for primary. 3. $500(8/21) intended for general election. 4. December contribution as gift to Noel (Testimonial).
BUONAIUTO	$200	12/4/75	$200 $1000	5/14/76 9/1/76			$1400	1. All contributions made jointly with spouse.
COIA			$100 $1000	4/29/76 9/3/76			$1100	1. $100 (4/29) to purchase tickets for Noel cocktail party. 2. $1000Noel for Senator. 3. Unaware of FECA limit; violation not done willingly; termed "harmless error."
CRUISE			$400 $500	5/26/76 6/22/76	$2200	12/15/76	$3100	1. $900 to Noel for Senator. 2. $2200 for tickets to Noel's Testimonial-Fundraiser. Gift- no indication that sales used to pay off campaign debts.
KEYES, F.			$200 $1000	5/17/76 8/18/76	$200	12/16/76	$1400	1. Contributions were for two elections.

7904141107

NAME	1975 CONTRIBUTIONS AMOUNT	DATE	1976 PRE-ELECTION CONTRIBUTIONS AMOUNT	DATE	1976 POST-ELECTION CONTRIBUTIONS AMOUNT	DATE	TOTAL CONTRIBUTIONS	EXPLANATION
KEYES, G	$400	12/4/75	$200 $1000	5/17/76 8/18/76	$200	12/16/76	$1800	1. Contributions were for two elections.
LITTLE			$100 $1000	4/19/76 9/1/76	$100	12/15/76	$1200	1. Contributed $1000 without realizing that he had sent $100. 2. December contribution to Noel testimonial to help cover "deficit."
LYNCH, J.			$100 $900 $1000	2/26/76 3/19/76 8/16/76			$2000	1. $1000 (2/26 & 3/19) intended for primary. 2. $1000 (8/16) intended for general.
LYNCH, P.			$1000 $1000	6/22/76 8/26/76			$2000	1. Contributions were for two elections.
MACLELLAN	$750	12/4/75	$200 $500 $1000	5/11/76 6/22/76 9/1/76	$750	12/16/76	$3200	1. 1975 joint contribution with spouse intended for non-federal campaign (Noel-Garrahy; gubernatorial). 2. 1976 (5/11; 6/22; 9/1) joint contributions with spouse were for two elections. 3. December joint contributions for Noel Testimonial intended to pay campaign debts of primary or general election. 4. Requested refund from Noel committee on 2/1/77 - no funds available.
MAGGIACOMO			$200 $100 $1000	5/12/76 5/17/76 6/21/76			$1300	1. Joint contributions with spouse. 2. $1000 intended for primary. 3. $300 intended for general.

790410-106

NAME	1975 CONTRIBUTIONS AMOUNT	DATE	1976 PRE-ELECTION CONTRIBUTIONS AMOUNT	DATE	1976 POST-ELECTION CONTRIBUTIONS AMOUNT	DATE	TOTAL CONTRIBUTIONS	EXPLANATIONS
MANCINO, A.			$300 $1500	8/21/76 9/9/76			$1800	1. Reports list $1000 for general and $800 for primary. 2. No response in writing.
MANCINO, G.			$1500	9/9/76			$1500	1. Reports list $500 for general and $1000 for primary. 2. No response in writing.
MATTEO			$200 $500	5/20/76 8/6/76	$500	12/23/76	$1200	1. Joint contributions with spouse intended for two elections. 2. December contribution for Testimonial intended to pay expenses of general election. 3. Requested refund from Noel Committee on 2/1/77 - no funds available.
MAURO	$200	12/4/75	$200 $1000	4/30/76 8/21/76	$100	12/16/76	$1500	1. 1975 contribution to Noel-Garrahy committee; intended for local Democratic party. 2. 1976 contributions were made jointly with spouse.
MULCAHY			$600	6/22/76	$1000	12/13/76	$1600	1. Both contributions were made jointly with spouse. 2. $1000 for Noel Testimonial.
PAOLINO			$200	5/11/76	$1000	9/24/76	$1200	1. 5/11 contributions for two tickets to cocktail party. 2. $1000 to Noel for Senate. 3. Did not believe that both contributions would be "applied to same."

7904011102

MCC # 1446

TEMKIN, MEROLLA & ZURIER
ATTORNEYS AT LAW
20TH FLOOR, 40 WESTMINSTER STREET
PROVIDENCE, R. I. 02903
(401) 751-2400

MARTIN M. TEMKIN
AMEDEO C. MEROLLA
MELVIN L. ZURIER
CHARLES C. DUPRE
DONALD E. MILLER
KEVEN A. McKENNA

HARVEY S. REYNOLDS
(1925/1964)

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 13
4:00

September 8, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gloria Sulton, Esquire
The Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

772694

Re: Gordon R. Archibald
Your file No. MUR 411 (77)

Dear Ms. Sulton:

Enclosed herewith please find the Affidavit of Mr. Archibald in the above-entitled matter. In essence, the Affidavit points out that at least $100 of the alleged $1100 violation should not be considered at all because it was assumed to have been given to another individual, i.e., Lt. Governor Garrahy.

Thereafter, the balance of the funds would be distributed, as we now know by law, as follows: $1,000 to the primary campaign of former Governor Noel; $500 to the general election campaign; and $400, frankly, appears to be a gift because Governor Noel was a defeated candidate.

However, even if we assume that $1000 was given by Mr. Archibald to Governor Noel's campaign, it would not appear that it was done with any intent to violate the Federal Election Law. Obviously, Governor Noel's campaign committee had to be making plans for the November general election during the summer of 1976 and funds had to be secured therefor. At that time, it did appear that Governor Noel would be the victor in the September primary (he was campaigning against a relatively unknown individual who had never previously held any elective office). Also, it appears that Mr. Archibald was relying upon the advice of Mr. Lynch, Treasurer of the Noel Campaign Committee and an attorney for that Committee.

Therefore, it appears that if there was a violation of law, it certainly was not done intentionally.

Sincerely yours,

Temkin, Merolla & Zurier

Amedeo C. Merolla

ACM:dag
Enclosure

7706411110

STATE OF RHODE ISLAND
PROVIDENCE, SC.

AFFIDAVIT OF GORDON R. ARCHIBALD

TO THE FEDERAL ELECTION COMMISSION

Now comes GORDON R. ARCHIBALD of the City of Warwick in the State of Rhode Island and on oath deposes and states as follows:

(1) The Honorable Federal Election Commission has informed me that they believe that I may have committed a violation of 2 U.S.C. § 441a of The Federal Election Campaign Act, as amended, because of an alleged over-expenditure of contributions by me to the election campaign for the U.S. Senate seat for Rhode Island of former Governor Philip W. Noel.

(2) The said Commission states that I contributed $2,100.00 to said campaign election.

(3) By check dated November 24, 1975, I made a campaign donation to said Governor Noel and then Lt. Governor Garrahy in the sum of $200.00. This contribution, according to my intentions and the advertisements for said contribution, stated that this was a contribution to be shared equally by both candidates in their respective election campaigns for the U.S. Senate and Governor of the State of Rhode Island. I, therefore, considered that said contribution to Mr. Noel was in the sum of $100.00.

(4) By checks dated May 14, 1976, and June 16, 1976, I contributed the total sum of $1000.00 to the Noel for Senator Committee. It was my intention that that sum be used for his campaign for the primary election scheduled for September, 1976.

(5) On August 20, 1976, I made a contribution of $500.00 to the Noel for U.S. Senate Committee. It was my intention that this campaign contribution be utilized in the general election scheduled for November, 1976. At that

time, I was advised by John D. Lynch, Treasurer of the Noel for U.S. Senate Committee, that there was nothing improper about said contribution. It was further my understanding that then Governor Noel would certainly be the Democratic Party candidate for the U.S. Senate because it was the general sentiment of the public as expressed by professional political opinion that he would prove victorious in the primary election of September, 1976.

(6) By check dated December 9, 1976, I made a contribution of $400.00 to the Governor Philip W. Noel Testimonial Committee. At that time, then Governor Noel was about to leave office as Governor of the State of Rhode Island and was not a candidate for any elective office. I considered it a gift to him and not a campaign or election donation.

(7) I have been informed by the said John D. Lynch that any contributions made by me toward the general election of November, 1976, that were received by the Noel for U.S. Senate Committee were in fact expended for said general election because commitments had to be made therefor in the summer of 1976.

(8) After the defeat of said Governor Noel, said John D. Lynch explained to me that The Federal Election Commission allowed candidates who appeared in the general election of November, 1976, to receive contributions of up to $1,000.00 for an unopposed primary election and up to $1,000.00 for the general election. Therefore, he stated that he believed that the converse appeared to be true and because said John D. Lynch is an attorney, I believed that my contributions were permissible.

(9) I have been advised by the said John D. Lynch that there are no sums of money available from any source whatsoever which could be utilized to reimburse me if The Federal Election Commission should deem that I in some manner inadvertently violated the law.

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(10) I solemnly affirm that at no time did I knowingly or willfully violate The Federal Election Campaign Laws.

Gordon R. Archibald

Subscribed and sworn to before me in Providence, Rhode Island, this 8th day of September, 1977.

Notary Public
(My commission expires June 30, 1981)

BCC # 1447

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 13 PM 3:59

Gustin L. Buonaiuto
210 Cedar Street
Warwick, Rhode Island 02818

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

772695

RE: MUR 411 (77)

Dear Ms. Sulton:

Attached is a statement from my wife and I regarding our contribution to Philip W. Noel's Election Campaign of 1976.

The amount referred to in your letter of August 26, 1977 was the total of three (3) checks listed as follows:

November 24, 1975, Check No. 198, Amount-$200.00 - Purchase of 2 tickets for Noel party, $100.00 ea. (for Winnie J. Buonaiuto and Gustin L. Buonaiuto)

August 31, 1976, Check No. 243, Amount-$200.00 - Purchase of 2 tickets for Noel party, $100.00 ea. (for Winnie J. Buonaiuto and Gustin L. Buonaiuto)

August 31, 1976, Check No. 278, Amount-$1,000.00 - Contribution from Gustin L. Buonaiuto and Winnie J. Buonaiuto's joint checking account ($500.00 each person)

I hope that this information clarifies this matter.

Sincerely,

Gustin L Buonaiuto

Gustin L. Buonaiuto

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AFFIDAVIT

RE: MUR 411 (77)

We, Gustin L. Buonaiuto and Winnie J. Buonaiuto of the County of Kent and State of Rhode Island on oath depose and say that we are in receipt of a letter from the Federal Election Commission dated August 26, 1977 wherein it is stated that Gustin L. Buonaiuto made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 limit per election.

We, further on oath, depose and say that the total contribution of $1,400.00 to Mr. Noel's Campaign represents a contribution of $700.00 from Gustin L. Buonaiuto and $700.00 from his wife, Winnie J. Buonaiuto. The total amount was made through a joint checking account where either persons signature is authorized. While the donation checks were signed by Gustin L. Buonaiuto, it was our mutual understanding that the contributions were made on a 50-50 basis. At the time that each contribution was made, we were both in full agreement with each amounts.

Furthermore, Gustin L. Buonaiuto and Winnie J. Buonaiuto are both employed and share income and expenses commonly.

In light of the previously mentioned facts, we respectfully request that your records be amended to recognize a contribution of $700.00 from Winnie J. Buonaiuto and $700.00 from Gustin L. Buonaiuto.

Gustin L. Buonaiuto
GUSTIN L. BUONAIUTO

Winnie J. Buonaiuto
WINNIE J. BUONAIUTO

Subscribed and Sworn before me on this 8th Day of September, 1977.

Luena M. Rennington
NOTARY PUBLIC
My Commission expires 6/30/81

7904041115

MUR 1379

'77 SEP 6 AM 10:30

COIA & LEPORE Ltd.
Counsellors at Law
Arthur A. Coia
Albert J. Lepore
Stephen T. Napolitano

September 2, 1977

772633

Ms. Gloria Sulton
c/o Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Arthur E. Coia
42 Standish Avenue
N. Providence, Rhode Island

Dear Ms. Sulton:

Enclosed please find an Affidavit that has been duly sworn and attested by Mr. Coia indicating under oath the travel of the matter that is before your commission.

The Affidavit indicates that during a period of several months two expenditures were made by Mr. Coia, one in the amount of $1,000.00, and the other in the amount of $100.00, which represented the purchase of a cocktail party ticket. As a result of the difference in time between the two expenditures and Mr. Coia's unfamiliarity with the prohibitions of the Federal Election Campaign Act, it would appear that he gave an amount of money ($100.00) in excess of the statutory provisions of the Act.

I have indicated in the Affidavit that it appears that Mr. Coia's technical and minor violation of the Act was unintentional and unrealized because of his lack of familiarity with the Federal Election Campaign Act. I am, therefore, requesting that, even though it would appear that there is a minor violation of the Act, that you would treat this as an untentional and unwilful oversight on the part of Mr. Coia and I would

Forty Westminster Street, Providence, Rhode Island 02903/Suite 1030 /(401) 751-5522

like you to treat it accordingly. You may be assured in the future this will not happen again.

Very truly yours,

COIA & LEPORE, LTD.

Salvatore L. Romano, Jr.

SLR,Jr:jea

Enclosure

7904041117

FEDERAL ELECTION COMMISSION

VS.

ARTHUR E. COIA

A F F I D A V I T

I, ARTHUR E. COIA, first being duly sworn on solemn oath do hereby depose and state as follows:

1. That I reside at 42 Standish Avenue, in the Town of North Providence, County of Providence, State of Rhode Island;

2. That I made a personal donation to the Noel for Senator Committee on or about August 30, 1976, in the amount of $1,000.00;

3. That the monies which I donated on the above date were derived from my own personal assets;

4. That I have annexed a true copy of the receipt for this check and wish that it be incorporated by reference hereto as Exhibit A;

5. That on or about April 29, 1976, I purchased a $100 ticket which allowed me to attend and participate in a cocktail party given for Governor Philip Noel.

7904041118

6. That on or about August 26, 1977, I received a letter which indicated that I had contributed to the Noel for Senator Committee in excess of $100.00 over and above the maximum donation amount as set forth in 2 U.S.C. Section 411A of the Federal Election Campaign Act as amended;

7. That at no time did I willingly or knowingly make the two above-described donations in violation of the Federal Election Campaign Act;

8. That it was my sincere belief that Philip Noel, a candidate for U. S. Senator, would have been successful in his primary campaign and gone on to win the November election for the Senatorial seat he was seeking;

9. That had I known or been aware of the fact that I could only contribute the maximum amount of $1,000.00 to the Noel for Senator Committee, I would have not purchased the additional ticket which is the issue at hand;

10. That this $100.00 ticket purchase was given without knowledge that it would have been deemed a violation of the Federal Election Campaign Act as stated above.

For these reasons I would ask you to consider this small amount of money, which is over the maximum donation amount, as a harmless error on my part and treat it as such.

ARTHUR E. COIA

Subscribed and sworn to before me this 2 day of September, A.D. 1977.

Notary Public

7904041119

MUR 1347

Peter R. Cruise
368 Thayer Street
Providence, Rhode Island, 02906

RECEIVED
FEDERAL ELECTION
COMMISSION
'76 SEP 6 AM 8:34

August 29, 1977

Federal Election Commission

1325 K Street N. W.

Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

In response to your letter of August 26, 1977 signed by Charles N. Steele, Associate General Counsel and my telephone conversation of August 29, 1977 with attorney Gloria Sulton concerning the Commission's belief that I committed a violation of 2 U.S.C. S44la by contributing more than $1,000 to the Noel for Senator Committee in connection with the September 14 primary election I wish to demonstrate that no action should be taken against me.

Enclosed please find copies of check #6639 made out to Noel for Senator Committee for $400 dated May 26, 1976, check #6668 made out to Noel for Senator Committee for $500 dated June 22, 1976, check #355 made out to Gov. Philip W. Noel Testimonial for $200 dated December 9, 1976, check #369 made out to Gov. Philip Noel Testimonial for $2,000 dated December 14, 1976, and a ticket for Testimonial Fund Raiser in honor of Governor Philip W. Noel held December 15, 1976.

It should be noted that the December 15 Testimonial was held after Governor Noel had been defeated in the September 14 primary. He was still Governor and the ticket lists the affair as a Testimonial in honor of Governor Philip W. Noel.

There was no indication given to me when the tickets were purchased that my contribution would be used to pay off debts of the unsuccessful senatorial campaign. I am well aware of the federal law concerning the $1,000 limit.

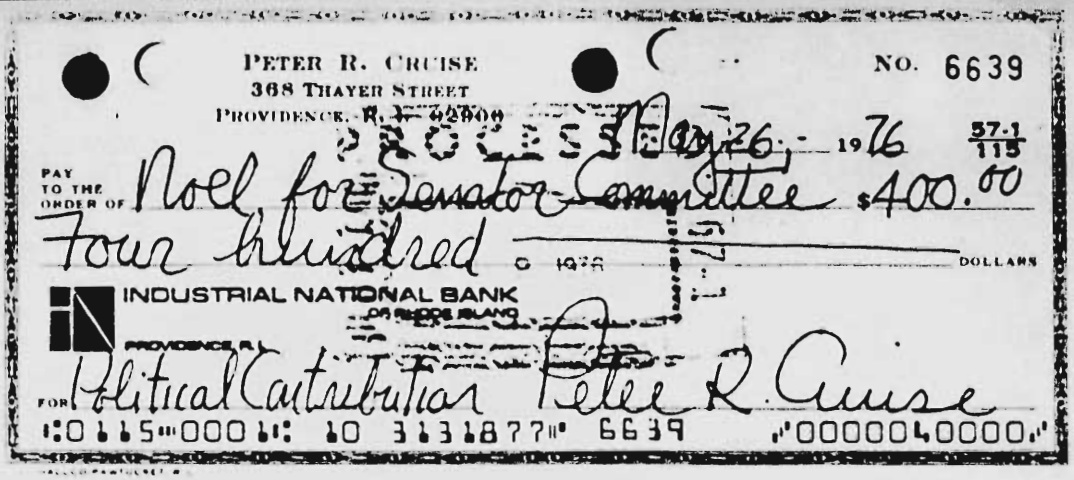
If my contribution was used to pay off senatorial campaign debts it was without my knowledge or permission.

Sincerely,

Peter R. Cruise

Enclosures

I do hereby swear that the above statements are true.



PETER R. CRUISE
368 THAYER STREET
PROVIDENCE, R. I. 02906

NO. 6639

PROCESSED

May 26, 1976 — 57-1 / 115

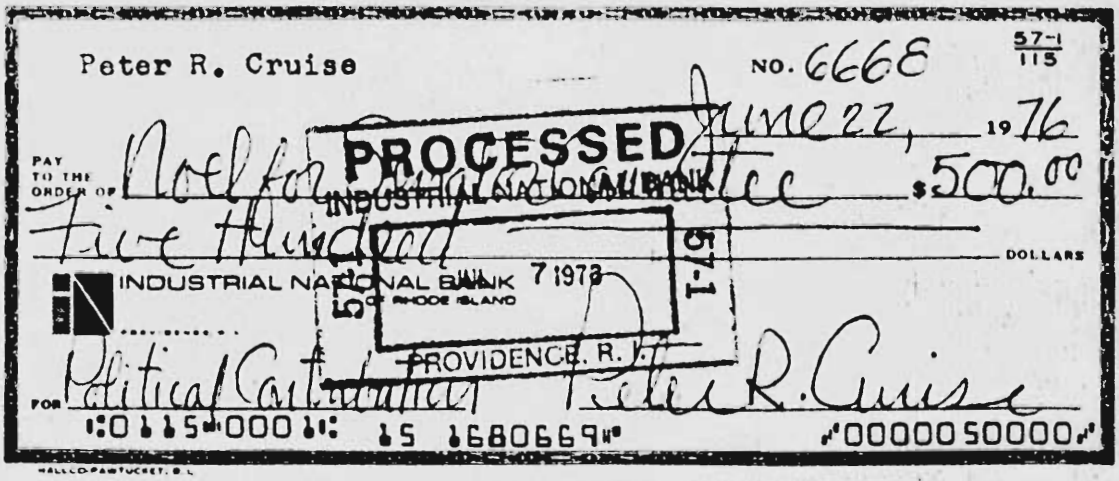
PAY TO THE ORDER OF Noel for Senator Committee $400.00

Four Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE R.I.

FOR Political Contribution Peter R. Cruise

:0115:000: 10 3131877: 6639 "00004 0000"



Peter R. Cruise

NO. 666E

57-1 / 115

PROCESSED

June 22, 1976

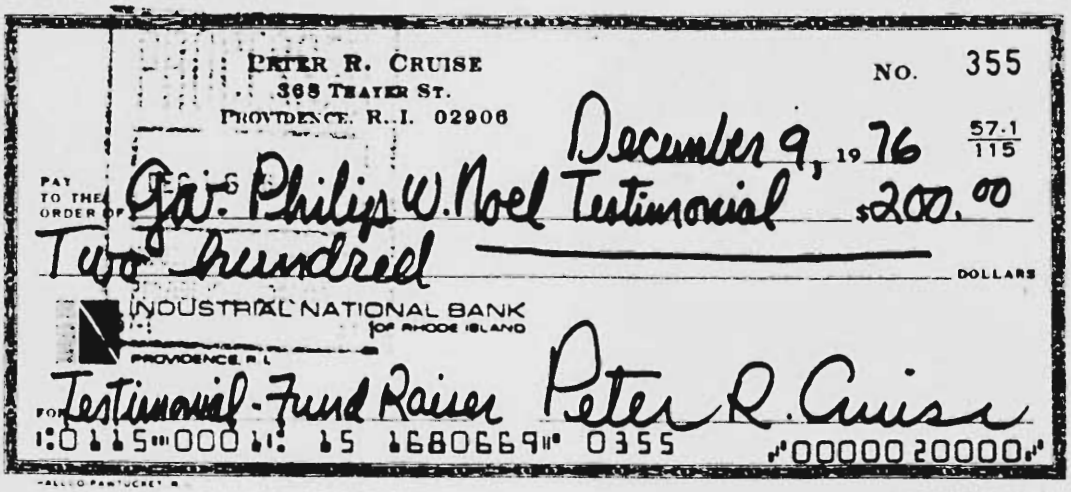
PAY TO THE ORDER OF Noel for Senator Committee $500.00

Five Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Political Contribution Peter R. Cruise

:0115:000: 15 1680669: "00005 0000"



PETER R. CRUISE
368 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 355

December 9, 1976 — 57-1 / 115

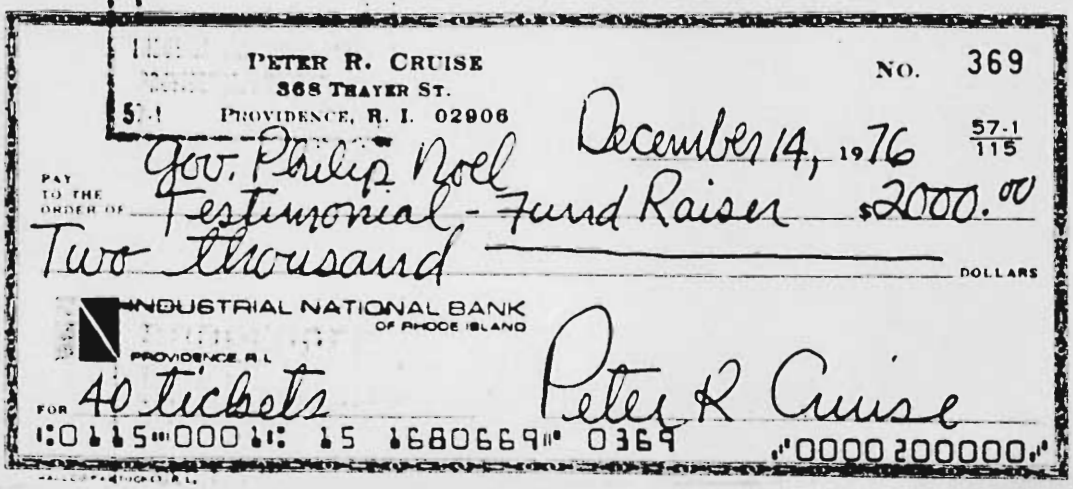
PAY TO THE ORDER OF Gov. Philip W. Noel Testimonial $200.00

Two Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE R.I.

FOR Testimonial - Fund Raiser Peter R. Cruise

:0115:000: 15 1680669: 0355 "00002 0000"



PETER R. CRUISE
368 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 369

December 14, 1976 — 57-1 / 115

PAY TO THE ORDER OF Gov. Philip Noel Testimonial - Fund Raiser $2000.00

Two Thousand DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE R.I.

FOR 40 tickets Peter R Cruise

:0115:000: 15 1680669: 0369 "0002 00000"

Testimonial - Fund Raiser

IN HONOR OF

Governor Philip W. Noel

WEDNESDAY EVENING. DECEMBER 15. 1976

WINDJAMMER LOUNGE
ROCKY POINT WARWICK. R. I.

COCKTAILS 7 TO 9 $50.00 PER PERSON

R.S.V.P. by December 10th

KEYES

Keyes Associates
Architects / Engineers / Planners
321 South Main Street
Providence, Rhode Island 02903
Telephone 401 861-2900

RECEIVED
FEDERAL ELECTION COMMISSION
'77 SEP 15 AM 11:08

Acc#
779725

9/2/77

Fed. Election Commission

RE. MUR 411(77)

Ref. Letter of Aug 24, 77

Donations given for election campaign of Philip Noel was actually for a primary & an anticipated regular campaign - Therefore was for 2 campaigns and within the maximum allowed.

Sincerely,

V. J. Keyes

1 Thurlow Drive
Warwick, R.I. 02885

FEC Form 17 (Revised March 1977)

GPO 913-946

Sept. 12. 1977. MCC# 1464

Fed Election Commission 772734

Re: Mur (411(77)

Ref yours of Aug 26. 1977.

11:03

Donations given for election campaign of Philip Noel was actually for a primary and an anticipated regular campaign - therefore was for two campaigns and within the maximum allowed.

Sincerely
Gertrude M Keyes
1 Twin oak Dr
Warwick, R.I.
02889.

FEC Form 17 (Revised March 1977)

GPO 919-946

MUR 1378

ROYAL LITTLE
40 WESTMINSTER STREET
PROVIDENCE, RHODE ISLAND 02903
401-751-1000
401-274-4400

RECEIVED
FEDERAL ELECTION COMMISSION
'77 SEP 8 AM 10:33

September 6, 1977

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

Re: MUR 411 (77)

772640

Dear Mr. Steele:

After studying the provisions of the Federal Election Campaign Law, I find that I was in technical violation as a result of making a $100 contribution to "Noel for Senator Committee" on April 19, 1976, then on August 31, 1976, contributing $1,000 to "Noel for U. S. Senate Committee" without realizing that I had sent in $100 in April.

On December 10, 1976 I did contribute $100 to "Governor Philip W. Noel Testimonial" to help him cover his deficit in the primary elections. I believe that this latter contribution should be exempt since it was made after the election.

Under Para. 441j PENALTY FOR VIOLATIONS, Sub Para. (a) provides that there shall be a fine of not greater than 300% of the amount of any contribution of such violation, imprisonment for not more than one year, or both. I am enclosing my check for $300, hoping that my inadvertent over-contribution of $100 will be a sufficiently minor violation to eliminate imprisonment for one year.

I must compliment you and the other members of the Federal Election Commission for being so thorough.

Sincerely yours,

Royal Little

ROYAL LITTLE
40 WESTMINSTER STREET
PROVIDENCE, RHODE ISLAND 02903
401-751-1000
401-274-4400

September 6, 1977

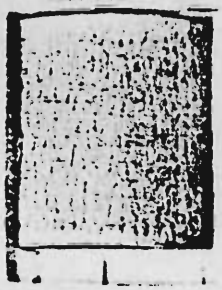
State of Rhode Island
County of Providence

On September 6, 1977 there appeared before me Royal Little, to me known and known by me to be the person signing the attached letter to the Federal Election Committee, and he certified same to be his free act and deed.

Mary T. Young

Mary T. Young
Notary Public

My Commission Expires June 30, 1981



ROYAL LITTLE
40 WESTMINSTER ST.
PROVIDENCE, R. I. 02903

3814

September 6, 19 77 57-102 115

PAY TO THE ORDER OF --UNITED STATES GOVERNMENT - FEDERAL ELECTION COMM.----- $ 300.00

----------THREE HUNDRED AND NO/100---------- DOLLARS

OLD STONE BANK
PROVIDENCE, RHODE ISLAND

Royal Little

⑈0115⑈0102⑆ 41 11 513 20⑈

Doc 1355

LYNCH & COLEMAN
ATTORNEYS AT LAW
608 TOLLGATE ROAD
WARWICK, R. I. 02886
739-8500

JOHN D. LYNCH
MICHAEL D. COLEMAN

RECEIVED
FEDERAL ELECTION
COMMISSION
'76 SEP 6 AM 10:43

September 2, 1977

IN REPLY PLEASE
REFER TO FILE NO. _____

Charles N. Steele, Associate Gen. Counsel
Federal Election Commission
1325 K. Street N. W.
Washington, D. C. 20463

772801

RE: Patricia M. Lynch
John D. Lynch
MUR 411 (77)

Dear Mr. Steele:

Enclosed herewith find two Affidavits together with copies of your letters dated August 26, 1977, regarding the above matters.

Very truly yours,

LYNCH & COLEMAN

John D. Lynch

JDL:brr

Enclosures

7804011 28

AFFIDAVIT

I, Patricia M. Lynch, of the City of Warwick, County of Kent and State of Rhode Island, on oath depose and say that I am in receipt of communication from the Federal Election Commission, dated August 26, 1977, wherein it is stated that I made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 per election limit.

I further on oath depose and say that two contributions were made to this campaign by me, one in the amount of $1,000.00 for the Primary Election and one in the amount of $1,000.00 towards the General Election. Since Mr. Noel was defeated in the Primary Election, his name did not appear on the ballot in the General Election in November of 1976. I further on oath depose and say that each contribution was made by me toward a specific election and that it was my intention to contribute towards expenditures which had been made in August and early September, 1976, toward General Election expenditures. It had been indicated to me by the Noel for Senate Committee that expenditures were being made at that time toward the General Election. I have subsequently been informed that my contribution toward the General Election and several others which were received by the Noel for U. S. Senate Committee were in fact expended toward the General Election since financial commitments of necessity had to be made in August and early September, 1976. I have further been advised by the Noel for U. S. Senate Committee that these funds have been expended and that no refunds are forthcoming

to the Noel for U. S. Senate Committee from those who received payment.

I further on oath depose and say that I have requested refund of the contribution which was made by me toward the General Election but have been informed by the Noel for U. S. Senate Committee that there are no funds available to make this repayment to me. It has been explained to me that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, I feel that my contribution to the Primary Election and the General Election are allowable.

Patricia M. Lynch

Patricia M. Lynch

Subscribed and sworn to before me this 30th day of August, 1977.

Brenda R. Ruggieri

NOTARY PUBLIC

Notary Public

7904041150

AFFIDAVIT

I, John D. Lynch, of the City of Warwick, County of Kent and State of Rhode Island, on oath depose and say that I am in receipt of communication from the Federal Election Commission, dated August 26, 1977, wherein it is stated that I made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 per election limit.

I further on oath depose and say that two contributions were made to this campaign by me, one in the amount of $1,000.00 for the Primary Election and one in the amount of $1,000.00 towards the General Election. Since Mr. Noel was defeated in the Primary Election, his name did not appear on the ballot in the General Election in November of 1976. I further on oath depose and say that each contribution was made by me toward a specific election and that it was my intention to contribute towards expenditures which had been made in August and early September, 1976, toward General Election expenditures. It had been indicated to me by the Noel for Senate Committee that expenditures were being made at that time toward the General Election. I have subsequently been informed that my contribution toward the General Election and several others which were received by the Noel for U. S. Senate Committee were in fact expended toward the General Election since financial commitments of necessity had to be made in August and early September, 1976. I have further been advised by the Noel for U. S. Senate Committee that these funds have been expended and that no refunds are forthcoming

to the Noel for U. S. Senate Committee from those who received payment.

I further on oath depose and say that I have requested refund of the contribution which was made by me toward the General Election but have been informed by the Noel for U. S. Senate Committee that there are no funds available to make this repayment to me. It has been explained to me that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, I feel that my contribution to the Primary Election and the General Election are allowable.

John D. Lynch

Subscribed and sworn to before me this 30th day of August, 1977.

Brenda R Ruggieri
NOTARY PUBLIC
Notary Public

7904041132

MCC # 1455

James M. Jerue
Attorney at Law

(401) 272-2770

The Lauderdale Building
144 Westminster Street, Providence, Rhode Island 02903

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 14 10:21

September 12, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Daniel MacLellan who received a communication suggesting a possible violation of the Federal Election Campaign Act. I have enclosed a statement under oath from my client outlining the circumstances of contributions made to the campaign of Philip W. Noel for the United States Senate. Also enclosed are copies of the checks used for said contributions.

After reviewing these documents, I would appreciate the opportunity to discuss this matter with you further.

Very truly yours,

James M. Jerue

JMJ/jac

Enclosures 2

7904141132

7 9 0 4 0 1 4 1 1 3 4

AFFIDAVIT

I, Daniel H. MacLellan, have received a communication from the Federal Election Commission, dated August 26, 1977, indicating that I made improper contributions to the United States Senate Campaign of former Governor Philip W. Noel in that I contributed a sum in excess of the allowable limit. In response to said communication, I hereby under oath make the following affidavit:

On November 1, 1975, my wife and I jointly contributed $750.00 to the Noel-Garrahy Campaign Committee. At that time it was not known whether Governor Noel was going to be a candidate for re-election to the position of Governor of the State of Rhode Island. It was our intention that this contribution would be used by either Governor Noel or Lt. Governor Joseph Garrahy in the 1976 Gubernatorial Campaign. Subsequent to this contribution, Governor Noel became a candidate for the United States Senate, and Lt. Governor Garrahy became a candidate for Governor.

On September 1, 1976 and September 3, 1976 my wife and I contributed $1150.00 to the Noel for Senate Committee. It was our intention that a portion of this contribution was made for the Primary Election and a portion toward the General Election. We were informed by the Noel for Senate Committee that the contribution would be allocated accordingly. Governor Noel was defeated in the Primary Election and thus was not a candidate in the General Election. I was informed by the Noel for Senate Committee that a portion of our contribution was in fact expended for the General Election before the primary results were known. I was further informed that there were not sufficient funds to meet the expenses already incurred for the General Election. On December 15, 1976 my wife and I made an additional contribution of $750.00 to a Testimonial for Noel. It was our intent that

this contribution would go to pay the expenses incurred on behalf of Governor Noel for the General Election. I was informed by the Noel for Senate Committee that this contribution was used to pay expenses incurred for the General Election.

On or about February 1, 1977 we requested a refund from the Noel for Senate Committee of any funds remaining which had been contributed by us for the expense of the General Election. We were informed that all of the funds had been expended and that there were no funds available to make any refunds. It had been indicated to me that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, I feel that our contribution to the Primary Election and the General Election are allowable.

I have been informed that I was listed on the reports filed by the Noel for Senate Committee as contributing the above funds singly. This is in error as all of the above mentioned contributions were made jointly with my wife and should thus be divided accordingly between two individuals.

In summary, I feel that the funds contributed by my wife and I were not in voilation of the Federal Election Campaign Act. The contributions to the Noel-Garrahy Committee were intended for the Gubernatorial Campaign, and the contribution to the Noel for Senate Committee and the Testimonial for Noel were for both the Primary and General Elections.

Daniel H. MacLellan

Subscribed and sworn to before me this 12th day of September, 1977

NOTARY PUBLIC

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 876 57-1/115

Oct 1 19 75

PAY TO THE ORDER OF Noel Gregory Committee $ 150

(One Hundred Fifty) DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑈0115⑈0001⑈ 52 3520756⑈ ⑈00000 15000⑈

ES HALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 874 57-1/115

Nov 1 19 75

PAY TO THE ORDER OF Noel Gregory Committee $ 100

Two Hundred DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑈0115⑈0001⑈ 52 3520756⑈ ⑈00000 20000⑈

ES HALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 873 57-1/115

Nov 1 19 75

PAY TO THE ORDER OF Noel Gregory Committee $ 200

Two Hundred DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑈0115⑈0001⑈ 52 3520756⑈ ⑈00000 20000⑈

ES HALLCO PAWTUCKET, R.I.

for Natal

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 982

Oct 13 19 71 57-1/115

PAY TO THE ORDER OF [illegible] $ 150.00

[illegible] DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR [illegible]

:0115:0001: 52 3520756: 0982 "00000 15000"

E.S. MALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 1018

12-05 19 71 57-1/115

PAY TO THE ORDER OF Postmaster Fo Mail $ 750.00

DEC 20 Seven Hundred Fifty 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR [illegible]

:0115:0001: 52 3520756: 1018 "00000 75000"

E.S. MALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 872 57-1/115

Dec 1 19 75

PAY TO THE ORDER OF [illegible] $ 200.00

[illegible] DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR [illegible]

:0115:0001: 52 3520756: "00000 20000"

E.S. MALLCO PAWTUCKET, R.I.

7904014137

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 980

57-1
115

19

PAY TO THE ORDER OF

$

DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500011⑆ 52 3520756⑈ 0980 ⑈000003000⑈

ES HALLCO-PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 979

57-1
115

19

PAY TO THE ORDER OF

$

DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500011⑆ 52 3520756⑈ 0979 ⑈000005000⑈

ES HALLCO-PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 981

57-1
115

19

PAY TO THE ORDER OF

$

DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500011⑆ 52 3520756⑈ 0981 ⑈000002000⑈

ES HALLCO-PAWTUCKET, R.I.

7904041138

FEC # 1512

TELEPHONE: (401) 7200 CABLE: ADPOL TELEX: 927661

ADLER POLLOCK & SHEEHAN
INCORPORATED
ONE HOSPITAL TRUST PLAZA
PROVIDENCE, RHODE ISLAND 02903

FEDERAL ELECTION COMMISSION
'77 SEP 19 AM 10:10

BERNARD R. POLLOCK
WILLIAM J. SHEEHAN
NORMAN JAY BOLOTOW
PETER LAWSON KENNEDY
EDWARD L. MAGGIACOMO
PATRICK A. LIGUORI
JOHN P. CORRIGAN
JOHN F. BOMSTER
STANLEY J. KANTER
ERNEST D. HUMPHREYS
GEORGE L. VIZVARY
JOHN E. MOORE
STEPHEN A. CARDI
E. HANS LUNDSTEN
STEPHEN T. O'NEILL
(NEW YORK ONLY)
RICHARD C. DeYOUNG III
JOHN C. DEAN
(ILL. AND WISC. ONLY)
GARY R. ST. PETER
RICHARD W. MacADAMS
RICHARD G. GALLI
ROBERT D. WIECK

WALTER ADLER (RETIRED)

772762

September 15, 1977

Gloria Sulton, Esq.
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Dear Ms. Sulton:

As per our telephone conversation, enclosed you will find Affidavit regarding the contributions made in my name for Philip W. Noel Campaign.

If you desire anything further do not hesitate to call.

Cordially,

EDWARD L. MAGGIACOMO

ELM:CAR

Enclosure

7904041139

A F F I D A V I T

I, EDWARD L. MAGGIACOMO, of the City of Cranston, County of Providence and State of Rhode Island, on oath depose and say that the contributions made in my name to the Philip W. Noel Campaign for U.S. Senator from Rhode Island on May 12, May 17 and June 21, 1976, in the total amount of One Thousand Three Hundred ($1,300) Dollars, although made from a checking account in my name alone were intended and directed to have been made by myself and my wife, Ingeborg Maggiacomo.

Edward L. Maggiacomo
EDWARD L. MAGGIACOMO

Subscribed and sworn to before me at Providence, Rhode Island, this 15th day of September, A.D. 1977.

Cheryl Ann Rocco
NOTARY PUBLIC

7904011140

FEC # 1454

James M. Jerue
Attorney at Law

(401) 272-2770

The Lauderdale Building
144 Westminster Street, Providence, Rhode Island 02903

FEDERAL ELECTION COMMISSION
'77 SEP

772710

September 12, 1977

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Joseph Matteo, 1 Matteo Drive, North Providence, Rhode Island who received a communication suggesting a possible violation of the Federal Election Campaign Act.

I have discussed this matter with my client, and we are unable to identify contributions in excess of $1,000. Would you kindly indicate the dates of the contributions together with the payee. We will then examine our records and make comment as suggested in your letter.

Very truly yours,

James M. Jerue

JMJ/jac

7904104-1141

FEC # 1660

James M. Jerue
Attorney at Law

(401) 272-2770

The Lauderdale Building
144 Westminster Street, Providence, Rhode Island 02903

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 26 A9:29

September 21, 1977

702831

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Joseph Matteo who received a communication suggesting a possible violation of the Federal Election Campaign Act. I have enclosed a statement under oath from my client and his wife outlining the circumstances of contributions made to the campaign of Philip W. Noel for the United States Senate. Also enclosed are copies of the checks used for said contributions.

After reviewing these documents, I would appreciate the opportunity to discuss this matter with you further.

Very truly yours,

James M. Jerue

JMJ/jac

Enclosures 2

7904011142

For Natal

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 982

Sept 3 19 71 57-1/115

PAY TO THE ORDER OF Family Service of Greater Pawtucket $ 150.00

One Hundred Fifty and 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Christmas Fund

:0115:0001: 52 3520756: 0982 "00000 15000"

ES HALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 1018

12-6 19 71 57-1/115

PAY TO THE ORDER OF Pawtucket Boys Club $ 750.00

DEC 20 Seven Hundred Fifty and 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Christmas Fund

:0115:0001: 52 3520756: 1018 "00000 75000"

ES HALLCO PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 872 57-1/115

Dec 1 19 75

PAY TO THE ORDER OF Visiting Nurse Assn $ 200.00

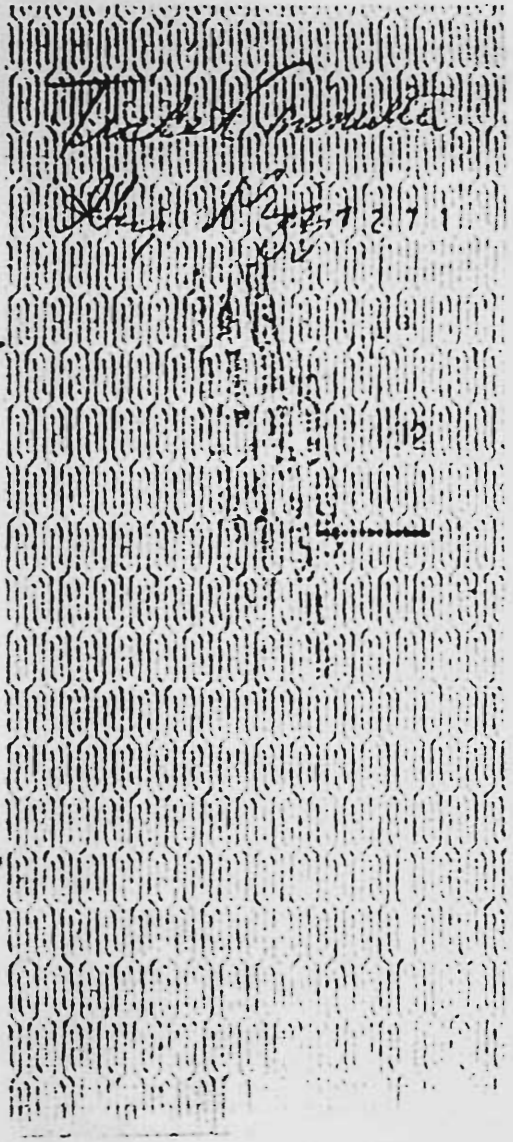
Two Hundred and 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Christmas Fund

:0115:0001: 52 3520756: "00000 20000"

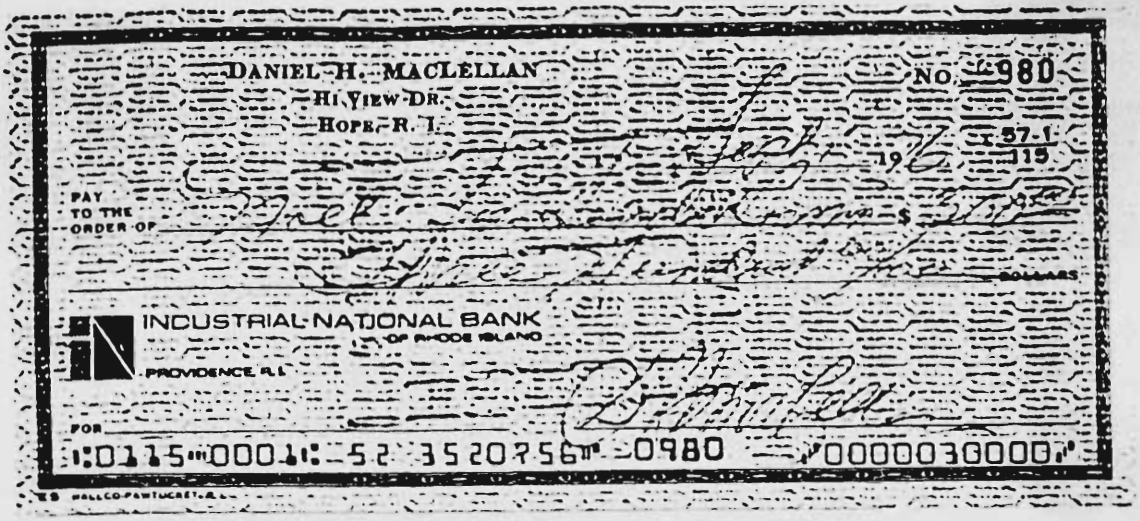
ES HALLCO PAWTUCKET, R.I.



FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

PAY TO THE ORDER OF
CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.

7904041144


DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 980

57-1
115

19

PAY TO THE ORDER OF

$

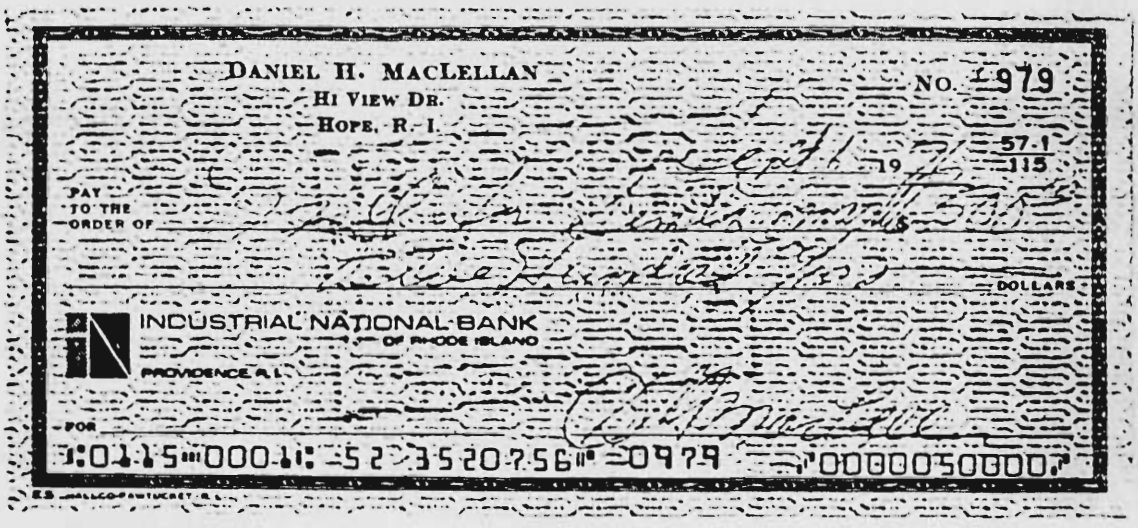
DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500011⑆ 52 3520756 0980 ⑈0000030000⑈

ES HALLCO-PAWTUCKET, R.I.


DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 979

57-1
115

19

PAY TO THE ORDER OF

$

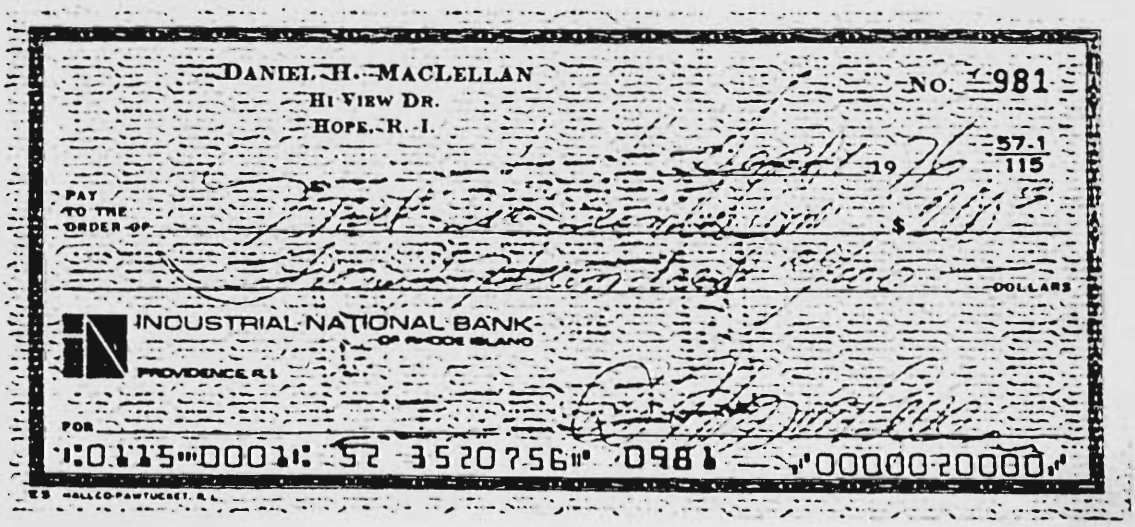
DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500011⑆ 52 3520756 0979 ⑈0000050000⑈

ES HALLCO-PAWTUCKET, R.I.


DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 981

57-1
115

19

PAY TO THE ORDER OF

$

DOLLARS

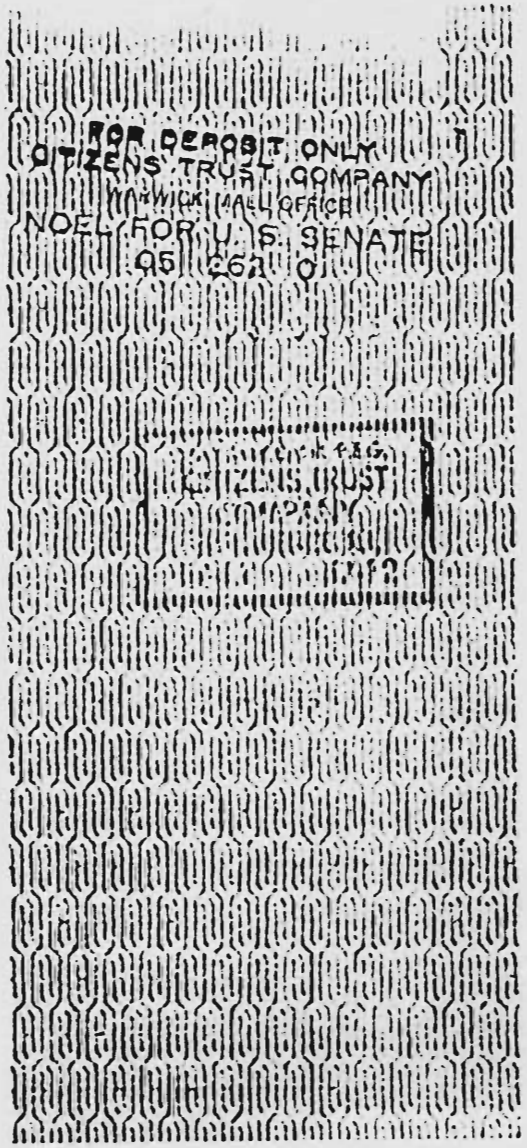
INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

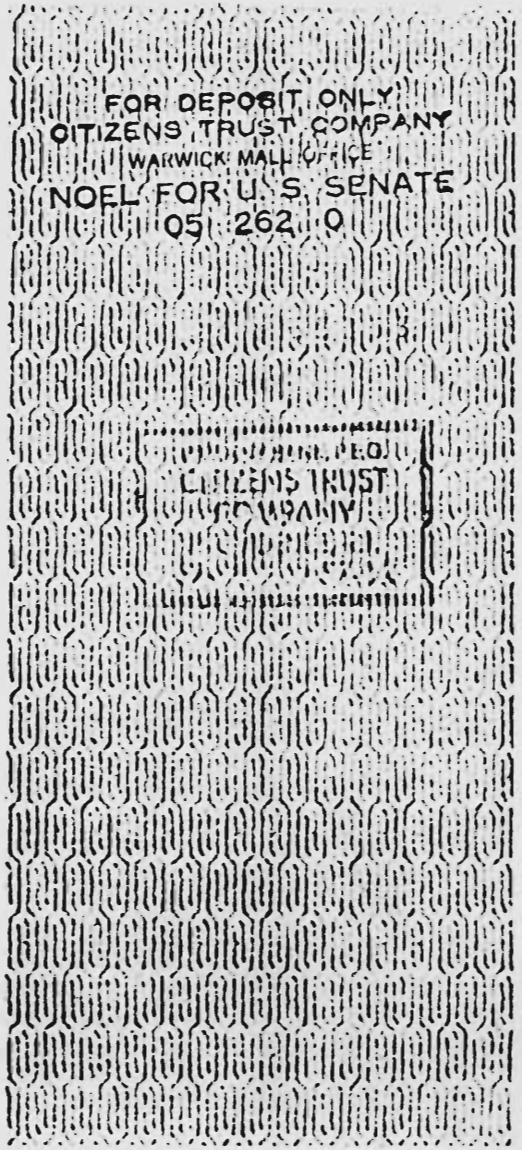
FOR

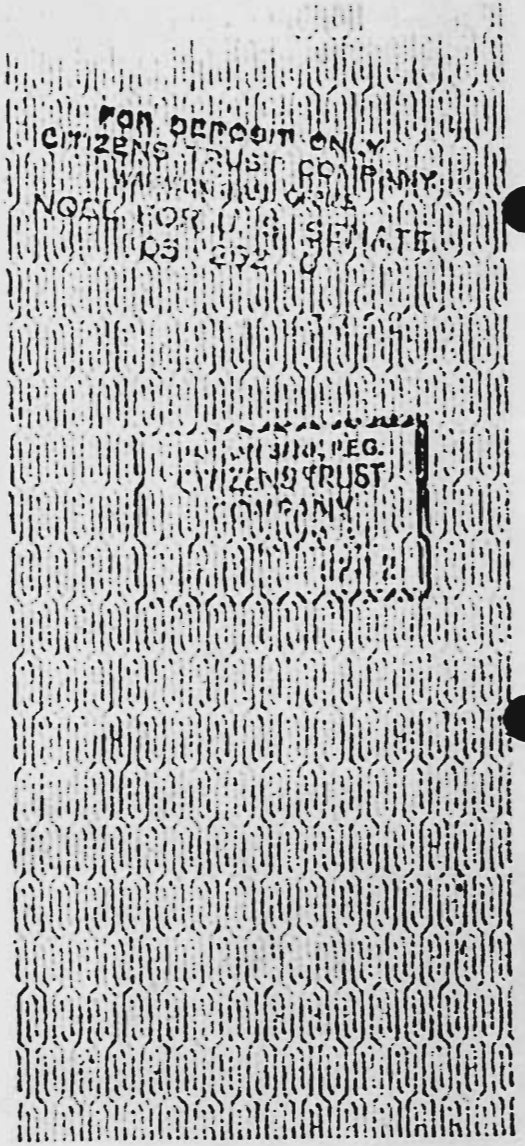
⑆011500011⑆ 52 3520756 0981 ⑈0000020000⑈

ES HALLCO-PAWTUCKET, R.I.

7 9 0 4 0 1 4 1 1 4 6







7 9 0 4 0 1 4 1 1 7

AFFIDAVIT

I, Joseph Matteo, have received a communication from the Federal Election Commission, dated August 26, 1977, indicating that I made improper contributions to the United States Senate Campaign of former Governor Philip W. Noel in that I contributed a sum in excess of the allowable limit. In response to said communication, my wife Teresa Matteo and I hereby under oath make the following affidavit:

On May 20, 1976 Teresa and Joseph Matteo contributed $200.00 to the Noel for Senate Committee, and on September 3, 1976 we contributed $500.00 to the Noel for Senate Committee. It was our intention that a portion of this contribution was made for the Primary Election and a portion toward the General Election. We were informed by the Noel for Senate Committee that the contribution would be allocated accordingly. Governor Noel was defeated in the Primary Election and thus was not a candidate in the General Election. We were informed by the Noel for Senate Committee that a portion of our contribution was in fact expended for the General Election before the primary results were known. We were further informed that there were not sufficient funds to meet the expenses already incurred for the General Election. On December 13, 1976 we made an additional contribution of $500.00 to a Governor Philip W. Noel Testimonial-Fund Raiser. It was our intent that this contribution would go to pay the expenses incurred on behalf of Governor Noel for the General Election. We were informed by the Noel for Senate Committee that this contribution was used to pay expenses incurred for the General Election.

7 9 0 4 0 1 4 1 1 4 3

On or about February 1, 1977, we requested a refund from the Noel for Senate Committee of any funds remaining which had been contributed by us for the expense of the General Election. We were informed that all of the funds had been expended and that there were no funds available to make any refunds. It has been indicated to us that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, we feel that our contribution to the Primary Election and the General Election are allowable.

We have been informed that only Joseph Matteo was listed on the reports filed by the Noel for Senate Committee as contributing the above funds. This is in error as all of the above mentioned contributions were made jointly by Teresa Matteo and Joseph Matteo and should thus be divided accordingly between two individuals.

Accordingly, we feel that the funds contributed by us were not in violation of the Federal Election Campaign Act.

Joseph Matteo

Teresa Matteo

Subscribed and sworn to before me this 19th day of September, 1977.

Notary

JOSEPH A. MATTEO INSURANCE

COLUMBUS NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, RHODE ISLAND 0[illegible]

2607

57-40
115

July 13 1976

PAY TO THE ORDER OF Phillip W. Noel $ 500.00

[illegible] and 00/100 DOLLARS

Joseph A. Matteo

⑆011500400⑆ 02 626 2⑈ ⑈0000050000⑈

JOSEPH A. MATTEO INSURANCE

COLUMBUS NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, RHODE ISLAND 02903

2704

57-40
115

December 15 1976

PAY TO THE ORDER OF Governor Phillip W. Noel Testimonial - Fund Raiser $ 500.00

[illegible] and 00/100 DOLLARS

06

Joseph A. Matteo

⑆011500400⑆ 02 626 2⑈ ⑈0000050000⑈

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

6666 21090

PAY ANY BANK, P.O.
CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.
57-12 07-12

AUG 10 73

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

6666 25446

CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.
57-12 07-12

DEC 29 73

JOSEPH A. MATTEO
INVESTMENTS

People's Trust Company
Providence, Rhode Island

1430

07-103
116

PAY TO THE ORDER OF Mrs. Jos. M. Lewis

May 20 1976

$200.00

Two Hundred and 00 cts DOLLARS

Joseph A. Matteo

⑈001430⑈ ⑆011500806⑆ 55 0 03573 6⑈ ⑈00000 20000⑈

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY

PAY ANY BANK OR
CITIZENS TRUST
COMPANY
PROVIDENCE, R. I.
57-12 17-02

LYNCH, WALSH & COBLEIGH
ATTORNEYS AT LAW
605 TOLLGATE ROAD
WARWICK, R. I. 02886
739-6500

JOHN D. LYNCH
JOSEPH W. WALSH
GERARD P. COBLEIGH
MICHAEL A. HIGGINS
JOHN C. REVENS, JR.

1976 NOV -9 AM 11:13
HAND DELIVERED ☐

IN REPLY PLEASE
REFER TO FILE NO.

November 5, 1976

Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

RE: Noel for Senator
S-2150, RAD 0069 ND
10 Day Pre-Election Report

Gentlemen: RI DEM C671

In response to your inquiry, dated October 28, 1976, relative to the receipt of campaign contributions in excess of $1,000 from individual contributors, I have the following comments.

It was anticipated that the candidate would be in the General election as well as the Primary election. Consequently, expenditures were made toward that goal. For example, television production was geared for both the primary and general elections. Thus, the questioned contributions (Reference enclosure) provided the support for these payments.

If you need additional information regarding this matter, please contact me directly.

Sincerely yours,

JOHN D. LYNCH

JDL/ps
Enclosure

MCL 1597

Office of the President

International Supply Co.

215 Niantic Avenue
Cranston, Rhode Island 02907
Telephone 401-944-1600

FEDERAL ELECTION COMMISSION
'77 SEP 21 AM 10:08

793

September 13, 1977

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

Attention: Charles N. Steele, Associate General Counsel

Re: MUR 411 (77)

To Whom It May Concern:

I am in receipt of Charles N. Steele's letter of August 26, 1977, and understand that you wish to investigate as soon as possible the contributions made by my wife Jan and me to Philip Noel.

The first check issued to the Noel-Garrahy Committee, which was in the amount of $200 and dated November 7, 1975, was for two tickets to a reception scheduled for December 4, 1975. This check, I thought, was being made to the local Democratic Party and was not intended as a contribution to a Federal election.

With respect to the three checks totaling $1,300, my wife Jan and I made these contributions. Since Jan wished to participate equally in the support of Philip Noel, we intended 50% of these gifts to be contributions of Janet Mauro. Since the regulation was unclear to us, Jan will indicate her intention of making such a gift in the future.

As Jan and I are now aware of the regulation's specific meaning, we will be most careful in the future in complying. We sincerely apologize for the ambiguity.

7904041154

If you wish further information, please write to me at my business address, or call me at my office -- (401) 944-1600.

Sincerely,

Edmund M. Mauro, Jr.

Subscribed to and sworn to before me in the County of Providence, State of Rhode Island, this 19th day of September 1977.

Notary Public

EMM,jr/b
cc: Bruce R. Ruttenberg
Suite 1515
40 Westminster Street
Providence, Rhode Island 02903

7904041155

MCC# 1632

TELEPHONES: 751-3900
751-3901
751-3902
751-3903

CONNORS & KILGUSS
COUNSELLORS AT LAW

LEO T. CONNORS
FREDERICK C. KILGUSS, JR.
FRANCIS J. MAGUIRE
F. THOMAS O'HALLORAN
MARION J. DILLON
JOHN V. McCLOSKEY
GEORGE A. PLIAKAS
NORMAN E. V. D'ANDREA
THOMAS C. MULLANEY, JR.

FEDERAL ELECTION COMMISSION
'77 SEP 23 P 2:27

75 WEYBOSSET STREET
PROVIDENCE, RHODE ISLAND 02903

LEO T. CONNORS
MASTER IN CHANCERY

September 20, 1977

702321

Federal Election Commission
1325 K Street (NW)
Washington, D. C. 20463

Attn: Gloria Sutton

Re: MUR411 ('77)
- Joseph Mulcahy

Gentlemen:

This office represents Mr. Joseph Mulcahy. Enclosed is affidavit on the above about which we have conferred several times over the past weeks.

We move for denial of any liability on our client's part and seek a prompt, favorable resolution of the matter.

Very truly yours,

Francis J. Maguire

FJM:rs
cc: Mr. Joseph Mulcahy

7904041155

7 9 0 4 0 1 4 1 1 5 7

STATE OF RHODE ISLAND
PROVIDENCE, Sc.

FEDERAL ELECTION
COMMISSION
1325 K. Street (NW)
Washington, D.C. 20463

AFFIDAVIT

The undersigned on oath deposes and says as follows:

1. I am a resident and voter in Cranston, Rhode Island, and participated in both the primary and "election" campaigns of 1976 on behalf of Philip W. Noel, candidate for the U. S. Senate.

2. My contribution to the Noel primary (scheduled for 9/14/76) did not exceed $1,000 having made pre-primary contributions of $500 on 6/22/76 by check and $100 on 6/22/76 in cash for an aggregate of $600.00, which facts were fully disclosed--receipts attached hereto.

3. Though Noel lost the primary yet he still had "election committments; some of which I understand were contracted for before the primary.

4. My wife, Antoinette I. Mulcahy and I attended and contributed in good faith to a testimonial for Governor Noel in December 1976 with a check in the amount of $1,000 --- receipt attached hereto. I later was informed that these funds were used to defray campaign expenses and that the expenses related to both the Primary Election and the planned General Election.

5. This checking account, used to pay these payments $500.00 in June 1976 and $1,000.00 in December 1976, was a personal business account on which my wife, Antoinette I. Mulcahy, had equal access and the sums can be attributed 1/2 to her and 1/2 to me -- hence the $1500 given by us or $750 each plus $100 in cash by each results in contributions:

- $850 by Antoinette I. Mulcahy ($100 cash on 6/22/77)
- $850 by me, Joseph Mulcahy.

6. Also and most importantly I was urged and believed that there was plenty of room to make such contributions, that is to say, by letter dated 7/13/76 I was informed as follows:

> "at the present time any one wishing to assist Phil Noel in this election can contribute $1,000 to be used in the Primary Election to be held September 14, 1976, and an additional $1,000 to be used in the General Election to be held November 2, 1976. This amount can be doubled. Husbands and wives can contribute separately. Using the above rule, a $4,000 contribution could be made by personal checks..."

Thus, I believed our limit to be $4,000 and in any event we did not each exceed this $1,000 as indicated above.

7. The intent was, and I was encouraged, to contribute in any event to separate elections (primary and general) and/or to attend (at least in December) a testimonial to pay for "election" expenses, i.e.-for the general election. Hence even if "grossed up" the $1,600 is below the $2,000 limit. Such contributions toward the General Election I believe were so used and there are no funds left so that my efforts to retrieve any of any alleged "excess" contributions are hopeless. In short, there will be no refund to me though I have requested such to clear up this technical matter.

8. The fact is also that the 12/15/76 contribution was for a Governor Noel Testimonial and he had not been a candidate for 3 months at that time in December 1976.

9. A technical argument is also available, to wit, that for one year ended 6/30/76 and for the other year ending 6/30/77, I did not exceed the $1,000 limit and since I am enmeshed in technalities the sword should cut 2 ways.

10. Further I understand that candidates who had no primary opposition were able to receive $2,000 per individual donor and with this dichotomy to rely on, my contributions

790401111 5

would appear to be within these parameters.

Joseph Mulcahy

Joseph Mulcahy

Subscribed and sworn to before me this 19th day of September 1977.

Francis J. Magner

CASH	BANK TRANSIT NO. / CHECKS	AMOUNT	DATE	NAME	FUND/ACTIVITY	RECEIVED BY
	57-33-115	500 00	6-22-76	Mulcahy Engineers	6-22-76	JDL

RETAIN THIS RECEIPT FOR YOUR RECORDS

681 Park Ave.
Cranston, R.I.
MAILING ADDRESS AND ZIP CODE

OCCUPATION AND PRINCIPLE PLACE OF BUSINESS

AGGREGATE YEAR TO DATE: 500.00

NOT VALID WITHOUT ABOVE SIGNATURE

1421

EARMARKED FUNDS: Joseph Mulcahy

NOEL FOR U. S. SENATE
CAMPAIGN FUND

CASH	BANK TRANSIT NO / CHECKS	AMOUNT	DATE	NAME	FUND/ACTIVITY	RECEIVED BY
100 00			6-22-76	Joseph F. Mulcahy	6-22-76FR	JDL

RETAIN THIS RECEIPT FOR YOUR RECORDS

70 Blackmore Ave.
Cranston, R.I
MAILING ADDRESS AND ZIP CODE

Engineer 681 Park Ave Cranston R.I
OCCUPATION AND PRINCIPLE PLACE OF BUSINESS

AGGREGATE YEAR TO DATE: 600.00

NOT VALID WITHOUT ABOVE SIGNATURE

1440

EARMARKED FUNDS.

NOEL FOR U. S. SENATE
CAMPAIGN FUND

70040141161

CASH	BANK TRANSIT NO. / CHECKS	AMOUNT	DATE	NAME	FUND/ACTIVITY	RECEIVED BY
	51-33-115	1,122.00	12-23-76	Mincey Engineers	12-15-76 F-T.	JFK.

NOT VALID WITHOUT ABOVE SIGNATURE

RETAIN THIS RECEIPT
FOR YOUR RECORDS

MAILING ADDRESS AND PROFILE

631 Park Ave.
Cincinnati, O.
OCCUPATION AND PRINCIPLE PLACE OF BUSINESS

AGGREGATE YEAR TO DATE
$1,600.00

1977

EARMARKED FUNDS

NOEL FOR U. S. SENATE
CAMPAIGN FUND

ACCT. NO. 001-068832

ACCOUNT TITLE Mulcahy Engineers

FEDERAL TAX I.D. NUMBER

ALL ITEMS DEPOSITED SHALL BE SUBJECT TO THE TERMS PRINTED ON THE REVERSE SIDE HEREOF

AUTHORIZED SIGNATURES

Joseph F. Mulcahy

Antoinette I. Mulcahy

ENTER TO SIGN

ADDRESS 601 Park Avenue

Cranston, R. I. 02910

DATE 4/15/74

ACCOUNT OPENED BY

RHODE ISLAND HOSPITAL TRUST NATIONAL BANK

279 BUSINESS ACCOUNT SIGNATURE CARD

TYPE OF BUSINESS

PREV. OR OTHER BANK

REASON RHT SELECTED

KNOWN TO

DESCRIPTION ORIGINAL TRANSACTION

37-12

OTHER RHT ACCTS: NUMBERS IF KNOWN

REMARKS

TELEPHONE #

Items received for deposit or collection are accepted on the following terms and conditions: This bank acts only as depositor's collecting agent and assumes no responsibility beyond its exercise of due care. All items are credited subject to final payment and to actual receipt by this bank at its own office. This bank may forward items to correspondents and each such correspondent may handle items for collection or credit in accordance with its own rules and regulations without responsibility except for its own lack of due care. Items drawn on this bank are payable only at its own counter. Items received by this bank after its regular banking hours may be treated as received on the next banking day. This bank may charge back any item credited to the depositor's account which is returned unpaid or which any drawee or correspondent may claim to have been paid in error, and may refuse to permit withdrawals against uncollected funds. This bank may send items for collection to any bank, including any correspondent of this bank, and may accept the bank's collection letter in lieu of protest. Any bank, including this bank, may act upon any instruction, information or request which it believes to be genuine and to have been given by a person authorized to act for the depositor, and this bank shall not be liable for any loss resulting from its acting upon any such instruction, information or request which proves to be unauthorized or fraudulent, provided this bank has exercised ordinary care. This bank may charge against any account of the depositor any item deposited to which this bank is entitled, whether or not such item has been returned to the depositor. This bank may refuse to permit withdrawals against uncollected funds. This bank may refuse to pay checks drawn on it by the depositor if there are insufficient funds in the account to cover the check, or if the check is not in such form as this bank may require, or if this bank has reasonable cause to question the genuineness or validity of any check or of any endorsement thereon or for any other reason without liability to the depositor. This bank may refuse to pay checks or withdrawals after the death of the depositor until such time as it shall be instructed to the contrary by the executor or administrator of the estate of the depositor. This bank may refuse to pay checks or withdrawals after receipt of notice of the bankruptcy or insolvency of the depositor. This bank may refuse to pay checks or withdrawals after receipt of notice of any dispute between the depositor and any person claiming an interest in the account

FEC C# 1299

772562

Joseph R. Paolino

274.6611
274.6612
274.6613

Suite 300
76 Dorrance Street
Providence, R. I. 02903

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 AUG 31 PM 3:34

August 29, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 411(77)

Attention: Ms Gloria Sulton

Dear Ms Sulton:

Regarding our conversation of today, 8-29-77, I am sorry to say that on May 11, 1976, my check # 1131 drawn on the Rhode Island Hospital Trust Bank in the amount of $200.00 was for two tickets to a cocktail party, one for my son and one for myself.

On September 8, 1976, my check # 1239 drawn on the same bank as above was for a donation in the amount of $1000.00 made out to the Noel for Senate Committee.

When I did this, it was done not knowing that it was a violation of law and I did not beleive that the cocktail party tickets and donation were to be applied to same.

If more information is needed, please contact me.

Very truly yours,

J. R. Paolino

Joseph R. Paolino

7964011163

JOSEPH R. PAOLINO
76 DORRANCE ST.
PROVIDENCE, R. I.

No. 1239

9-8 SEP 19 76 57-33 / 115

PAY TO THE ORDER OF Nixel for Senate Com. $1000 00/100

EXACTLY 1000 00 CTS

DOLLARS

Rhode Island Hospital Trust National Bank
PROVIDENCE, RHODE ISLAND

:011500331: 000 330639" 0000100000"

- 9 - 28 - 76

JOSEPH R. PAOLINO - 5 - 19 - 76
76 DORRANCE ST.
PROVIDENCE, R. I.

No. 1131

5 MAY 19 76 57-33 / 115

PAY TO THE ORDER OF Nixel for Senate Committee $200 00/100

EXACTLY 200 00 CTS

DOLLARS

Rhode Island Hospital Trust National Bank
PROVIDENCE, RHODE ISLAND

:011500331: 000 330639" 0000020000"

MANCINO ASSOCIATES ARCHITECTS

MEMBER A.I.A.

324 COUNTY ROAD, BARRINGTON, RHODE ISLAND 02806
TEL. 245-2050

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 DEC 21 AM 11:38

DCC 2308

December 9, 1977

Federal Election Commission
1325 K Street N. W.
Washington
D. C. 20463

Attn: Mr. Oldaker

Dear Mr. Oldaker,

In response to your letter of August 26, 1977 be advised that it is my understanding that each family member can contribute $1,000.00. The enclosed affadavit will indicate that my wife joined with me in contributing to the Philip W. Noel Senate Campaign.

Very truly yours,

MANCINO ASSOCIATES

Al Mancino

7904041165

AFFADAVIT

I, Al Mancino, of Barrington, Rhode Island on oath depose and say that the $1800.00 that I contributed to the 1976 Noel for Senate Campaign represented a contribution of $900.00 from me and $900.00 from my wife Elaine Mancino.

Al Mancino

Al Mancino

Subscribed and sworn to before me at Barrington, Rhode Island this 16TH day of DECEMBER, 1977.

Howard L. Weldon

Notary Public

[redacted]

MANCINO
ASSOCIATES
ARCHITECTS
324 COUNTY ROAD, BARRINGTON, RHODE ISLAND 02806

United States Po

'77 DEC 21 AM 11:38

RECD
FEDERAL ELE
COMMISSION

Federal Election Commission
1325 K Street N. W.
Washington, D. C.
20463

MUR 2297
NRN

MANCINO ASSOCIATES ARCHITECTS

MEMBER A.I.A.

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 DEC 20 AM 9:01

324 COUNTY ROAD, BARRINGTON, RHODE ISLAND 02806
TEL. 245-2050

December 9, 1977

Federal Election Commission
1325 K Street N. W.
Washington
D. C. 20463

Attn: Mr. Oldaker

Dear Mr. Oldaker,

In response to your letter of August 26, 1977 be advised that it is my understanding that each family member can contribute $1,000.00. The enclosed affadavit will indicate that my wife joined with me in contributing to the Philip W. Noel Senate Campaign.

Very truly yours,

MANCINO ASSOCIATES

Gene Mancino

Gene Mancino

7904041168

AFFADAVIT

I, Gene Mancino, of Barrington, Rhode Island on oath depose and say that the $1500.00 that I contributed to the 1976 Noel for Senate Campaign represented a contribution of $750.00 from me and $750.00 from my wife Patricia Mancino.

Gene Mancino

Subscribed and sworn to before me at Barrington, Rhode Island this 16 TH day of DECEMBER, 1977.

Howard L. Weldon
Notary Public

MY COMMISSION EXPIRES JUNE 30, 1981

7 2 0 4 0 1 4 1 1 6 2

MANCINO
ASSOCIATES
ARCHITECTS
324 COUNTY ROAD, BARRINGTON, RHODE ISLAND 02806

PROVIDENCE R.I.
1 PM
DEC
1977

United States

FEDERAL ELECTION COMMISSION
'77 DEC 20 AM

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463
Attn: Mr. Oldaker

FEC 2047

ROYAL LITTLE
40 WESTMINSTER STREET
PROVIDENCE, RHODE ISLAND 02903
401-751-1000
401-274-4400

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 NOV 16 AM 8:23

November 11, 1977

703336

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

Re: MUR 411 (77)

Dear Mr. Steele:

Supplementing my letter of September 6, 1977, in reply to your letter of August 26, 1977, I am enclosing a copy of a letter from former Governor Philip W. Noel, explaining that my contribution did not violate any of the Federal Election Laws.

Very truly yours,

Royal Little

Royal Little

RL:y
att.

COFFEY, McGOVERN, NOEL AND NOVOGROSKI
ATTORNEYS AT LAW
15 WESTMINSTER STREET
PROVIDENCE, R. I. 02903

TELEPHONE
274-1144

JOHN G. COFFEY
CHARLES J. McGOVERN
PHILIP W. NOEL
ARTHUR NOVOGROSKI

JUSTIN P. McCARTHY
JOHN G. COFFEY, JR.
KENNETH R. NEAL
STEPHEN C. HANLEY
RUSSELL R. SICARD

November 2, 1977

Mr. Royal Little
40 Westminster Street
Providence, Rhode Island

Dear Royal:

Thank you for sending me copies of your correspondence with the Federal Election Commission and Bob Tiernan. I think that this outfit is a disaster. Their only mission seems to be generating work for themselves so that they may be able to justify their continued existence.

Your contribution did not violate any of the Federal Election Laws since we were raising and spending money for both the primary and the general election. The production for our entire television advertising program through the November election was authorized, completed and paid for out of funds received. This was, without question, the most expensive part of our entire campaign.

What many married people did was to simply send in an affadavit indicating that the contribution was made on behalf of both the husband and wife and this satisfied the Commission.

I am sorry for the inconvenience that has been caused you, and I would like to again thank you for the help and support that you gave to me while I was in public life.

Kind regards,

Philip W. Noel

pwn:vtc

7904041172

ROYAL LITTLE
40 WESTMINSTER ST.
PROVIDENCE, R. I. 02903

'77 NOV 16 AM

Mr. Charles N. Steele

Associate General Counsel

Federal Election Commission

1325 K Street, N.W.

Washington, D. C. 20463

FCC # 1660

James M. Jerue
Attorney at Law

(401) 272-2770

The Lauderdale Building
144 Westminster Street, Providence, Rhode Island 02903

FEDERAL ELECTION COMMISSION
'77 SEP 26 4:29

September 21, 1977

702831

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Joseph Matteo who received a communication suggesting a possible violation of the Federal Election Campaign Act. I have enclosed a statement under oath from my client and his wife outlining the circumstances of contributions made to the campaign of Philip W. Noel for the United States Senate. Also enclosed are copies of the checks used for said contributions.

After reviewing these documents, I would appreciate the opportunity to discuss this matter with you further.

Very truly yours,

James M. Jerue

JMJ/jac

Enclosures 2

AFFIDAVIT

I, Joseph Matteo, have received a communication from the Federal Election Commission, dated August 26, 1977, indicating that I made improper contributions to the United States Senate Campaign of former Governor Philip W. Noel in that I contributed a sum in excess of the allowable limit. In response to said communication, my wife Teresa Matteo and I hereby under oath make the following affidavit:

On May 20, 1976 Teresa and Joseph Matteo contributed $200.00 to the Noel for Senate Committee, and on September 3, 1976 we contributed $500.00 to the Noel for Senate Committee. It was our intention that a portion of this contribution was made for the Primary Election and a portion toward the General Election. We were informed by the Noel for Senate Committee that the contribution would be allocated accordingly. Governor Noel was defeated in the Primary Election and thus was not a candidate in the General Election. We were informed by the Noel for Senate Committee that a portion of our contribution was in fact expended for the General Election before the primary results were known. We were further informed that there were not sufficient funds to meet the expenses already incurred for the General Election. On December 13, 1976 we made an additional contribution of $500.00 to a Governor Philip W. Noel Testimonial-Fund Raiser. It was our intent that this contribution would go to pay the expenses incurred on behalf of Governor Noel for the General Election. We were informed by the Noel for Senate Committee that this contribution was used to pay expenses incurred for the General Election.

7904011176

On or about February 1, 1977, we requested a refund from the Noel for Senate Committee of any funds remaining which had been contributed by us for the expense of the General Election. We were informed that all of the funds had been expended and that there were no funds available to make any refunds. It has been indicated to us that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, we feel that our contribution to the Primary Election and the General Election are allowable.

We have been informed that only Joseph Matteo was listed on the reports filed by the Noel for Senate Committee as contributing the above funds. This is in error as all of the above mentioned contributions were made jointly by Teresa Matteo and Joseph Matteo and should thus be divided accordingly between two individuals.

Accordingly, we feel that the funds contributed by us were not in violation of the Federal Election Campaign Act.

Joseph Matteo

Teresa Matteo

Subscribed and sworn to before me this 19th day of September, 1977.

Notary

JOSEPH A. MATTEO INSURANCE

COLUMBUS NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, RHODE ISLAND 02903

2607

57-40
115

PAY TO THE ORDER OF

DOLLARS

⑈0115⑈001⑆0⑈ 02 1262 7⑈ ⑈00000500000⑈

JOSEPH A. MATTEO INSURANCE

COLUMBUS NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, RHODE ISLAND 02903

2704

57-40
115

PAY TO THE ORDER OF Governor Phillip W. Noel Testimonial - Fund Raiser

DOLLARS

⑈0115⑈001⑆0⑈ 02 1262 5⑈ ⑈00000500000⑈

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MAIN OFFICE
NOEL FOR U. S. SENATE
05 202 0

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MAIN OFFICE
NOEL FOR U. S. SENATE
05 202 0

PAY ANY BANK, TRUST CO. OR BANKER
CITIZENS TRUST COMPANY
PROVIDENCE, R.I.

PAY ANY BANK, TRUST CO. OR BANKER
CITIZENS TRUST COMPANY
PROVIDENCE, R.I.

⑆211170⑆ 7⑈0⑈1⑈0⑈7

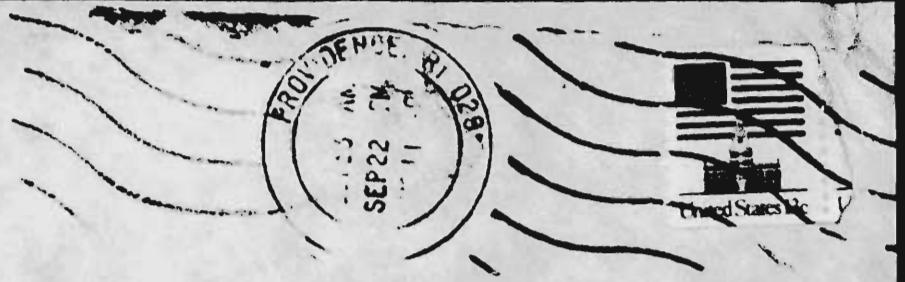
People's Trust Company

1430

67-103
115

JOSEPH A. MATTEO
INVESTMENTS

James M. Jones
Attorney at Law
The Lauderdale Building
744 Westminster Street
Providence, Rhode Island 02903



Federal Election Commission

1325 K Street N.W.

Washington, D. C. 20463

SCC# 1632

TELEPHONES: 751-3900
751-3901
751-3902
751-3903

CONNORS & KILGUSS
COUNSELLORS AT LAW

LEO T. CONNORS
FREDERICK C. KILGUSS, JR.
FRANCIS J. MAGUIRE
F. THOMAS O'HALLORAN
MARION J. DILLON
JOHN V. McCLOSKEY
GEORGE A. PLIAKAS
NORMAN E. V. D'ANDREA
THOMAS C. MULLANEY, JR.

75 WEYBOSSET STREET
PROVIDENCE, RHODE ISLAND 02903

LEO T. CONNORS
MASTER IN CHANCERY

FEDERAL ELECTION COMMISSION

77 SEP 23 PM 12:27

September 20, 1977

702821

Federal Election Commission
1325 K Street (NW)
Washington, D. C. 20463

Attn: Gloria Sutton

Re: MUR411 ('77)
- Joseph Mulcahy

Gentlemen:

This office represents Mr. Joseph Mulcahy. Enclosed is affidavit on the above about which we have conferred several times over the past weeks.

We move for denial of any liability on our client's part and seek a prompt, favorable resolution of the matter.

Very truly yours,

Francis J. Maguire

FJM:rs
cc: Mr. Joseph Mulcahy

7904041182

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STATE OF RHODE ISLAND
PROVIDENCE, Sc.

FEDERAL ELECTION
COMMISSION
1325 K. Street (NW)
Washington, D.C. 20463

AFFIDAVIT

The undersigned on oath deposes and says as follows:

1. I am a resident and voter in Cranston, Rhode Island, and participated in both the primary and "election" campaigns of 1976 on behalf of Philip W. Noel, candidate for the U. S. Senate.

2. My contribution to the Noel primary (scheduled for 9/14/76) did not exceed $1,000 having made pre-primary contributions of $500 on 6/22/76 by check and $100 on 6/22/76 in cash for an aggregate of $600.00, which facts were fully disclosed--receipts attached hereto.

3. Though Noel lost the primary yet he still had "election" committments; some of which I understand were contracted for before the primary.

4. My wife, Antoinette I. Mulcahy and I attended and contributed in good faith to a testimonial for Governor Noel in December 1976 with a check in the amount of $1,000 --- receipt attached hereto. I later was informed that these funds were used to defray campaign expenses and that the expenses related to both the Primary Election and the planned General Election.

5. This checking account, used to pay these payments $500.00 in June 1976 and $1,000.00 in December 1976, was a personal business account on which my wife, Antoinette I. Mulcahy, had equal access and the sums can be attributed 1/2 to her and 1/2 to me -- hence the $1500 given by us or $750 each plus $100 in cash by each results in contributions:

- $850 by Antoinette I. Mulcahy ($100 cash on 6/22/77)
- $850 by me, Joseph Mulcahy.

6. Also and most importantly I was urged and believed that there was plenty of room to make such contributions, that is to say, by letter dated 7/13/76 I was informed as follows:

> "at the present time any one wishing to assist Phil Noel in this election can contribute $1,000 to be used in the Primary Election to be held September 14, 1976, and an additional $1,000 to be used in the General Election to be held November 2, 1976. This amount can be doubled. Husbands and wives can contribute separately. Using the above rule, a $4,000 contribution could be made by personal checks..."

Thus, I believed our limit to be $4,000 and in any event we did not each exceed this $1,000 as indicated above.

7. The intent was, and I was encouraged, to contribute in any event to separate elections (primary and general) and/or to attend (at least in December) a testimonial to pay for "election" expenses, i.e.-for the general election. Hence even if "grossed up" the $1,600 is below the $2,000 limit. Such contributions toward the General Election I believe were so used and there are no funds left so that my efforts to retrieve any of any alleged "excess" contributions are hopeless. In short, there will be no refund to me though I have requested such to clear up this technical matter.

8. The fact is also that the 12/15/76 contribution was for a Governor Noel Testimonial and he had not been a candidate for 3 months at that time in December 1976.

9. A technical argument is also available, to wit, that for one year ended 6/30/76 and for the other year ending 6/30/77, I did not exceed the $1,000 limit and since I am enmeshed in technalities the sword should cut 2 ways.

10. Further I understand that candidates who had no primary opposition were able to receive $2,000 per individual donor and with this dichotomy to rely on, my contributions

would appear to be within these parameters.

Joseph Mulcahy

Joseph Mulcahy

Subscribed and sworn to before me this 19th day of September 1977.

Francis J. Hague

CASH	BANK TRANSIT NO. / CHECKS	AMOUNT	DATE	NAME	FUND/ACTIVITY	RECEIVED BY
	57-33-115	500 00	6-22-76	Mulcahy Engineers	6-22-76	JDL

NOT VALID WITHOUT ABOVE SIGNATURE

681 Park Ave.
Cranston, R.I
MAILING ADDRESS AND ZIP CODE

OCCUPATION AND PRINCIPLE PLACE OF BUSINESS

AGGREGATE YEAR TO DATE 500.00

1421

RETAIN THIS RECEIPT FOR YOUR RECORDS

NOEL FOR U. S. SENATE
CAMPAIGN FUND

EARMARKED FUNDS
Joseph Mulcahy

CASH	BANK TRANSIT NO. / CHECKS	AMOUNT	DATE	NAME	FUND/ACTIVITY	RECEIVED BY
100.00			6-22-76	Joseph F Mulcahy	6-22-76FR	JDL

NOT VALID WITHOUT ABOVE SIGNATURE

70 Blackmore Ave.
Cranston, R.I
MAILING ADDRESS AND ZIP CODE

Engineer 681 Park Ave
Cranston R I
OCCUPATION AND PRINCIPLE PLACE OF BUSINESS

AGGREGATE YEAR TO DATE 600 00

1440

RETAIN THIS RECEIPT FOR YOUR RECORDS

NOEL FOR U. S. SENATE
CAMPAIGN FUND

EARMARKED FUNDS

79040141187

CASH	BANK TRANSIT NO. CHECKS	AMOUNT	DATE	NAME	FUND ACTIVITY	RECEIVED BY
	51-33-115	1,222.00	10-31-76	Military Engineers	10 C 76 FI	JAL

NOT VALID WITHOUT ABOVE SIGNATURE

RETAIN THIS RECEIPT
FOR YOUR RECORDS

MAILING ADDRESS AS
651 Park Ave.
Clarion PE
(OCCUPATION AND PRINCIPLE PLACE OF BUSINESS)

AGGREGATE YEAR TO DATE
1,000.00

1977

EARMARKED FUNDS

NOEL FOR U. S. SENATE
CAMPAIGN FUND

ACCT. NO. 001-068832

ACCOUNT TITLE: Mulcahy Engineers

FEDERAL TAX I.D. NUMBER

ALL ITEMS DEPOSITED SHALL BE SUBJECT TO THE TERMS PRINTED ON THE REVERSE SIDE HEREOF

AUTHORIZED SIGNATURES

Joseph F. Mulcahy

Lorinette I. Mulcahy

PRINT & SIGN

ADDRESS: 601 Park Avenue

Cranston, R. I. 02910

DATE: 4-15-74

ACCOUNT OPENED BY

RHODE ISLAND HOSPITAL TRUST NATIONAL BANK

279 BUSINESS ACCOUNT SIGNATURE CARD

TYPE OF BUSINESS

PREV. OR OTHER BANK

REASON RHMT SELECTED

KNOWN TO

DESCRIPTION ORIGINAL TRANSACTION

OTHER RHMT ACCTS NUMBERS IF KNOWN

REMARKS

TELEPHONE #

Items received for deposit or collection are accepted on the following terms and conditions: This bank acts only as depositor's collecting agent and assumes no responsibility beyond its exercise of due care. All items are credit subject to final payment and to receipt of proceeds. This bank may send items for collection to any bank and accept its draft or credit as payment. Credit may be withdrawn if final payment is not received in due course. Items drawn on this bank may be charged against any account even though they create an overdraft. This bank may refuse to honor checks drawn on it by any person or corporation when, in its opinion, there are insufficient funds or credit available for the payment thereof. This bank may accept for deposit or collection items bearing restrictive indorsements without liability for breach of such restrictions. Items drawn on this bank will be paid only when presented at this bank's office. Items received after the regular closing hour shall be considered received the next business day. Items received on Saturday shall be deemed received the next business day. Items received after this bank's regular afternoon closing hour shall be credited on the following business day. Items not paid or payable shall be returned or presented by the next business day following the day of receipt. Items drawn on this bank may be charged against insufficient funds or overdrafts at any time prior to midnight on the business day next following the day of receipt. Any item drawn on this bank may be returned unpaid at any time prior to midnight on the business day next following the day of receipt. This bank may charge back at any time prior to midnight of the business day next following the day of receipt any item credited to your account which is returned unpaid or which is subsequently determined to have been improperly credited. This bank may refuse to honor checks drawn on it by any person or corporation when, in its opinion, there are insufficient funds or credit available for the payment thereof. This bank may accept for deposit or collection items bearing restrictive indorsements without liability for breach of such restrictions. Items drawn on this bank will be paid only when presented at this bank's office. Items received after the regular closing hour shall be considered received the next business day. Items received on Saturday shall be deemed received the next business day. Items received after this bank's regular afternoon closing hour shall be credited on the following business day. Items not paid or payable shall be returned or presented by the next business day following the day of receipt. Items drawn on this bank may be charged against insufficient funds or overdrafts at any time prior to midnight on the business day next following the day of receipt. Any item drawn on this bank may be returned unpaid at any time prior to midnight of

CONNORS & KILGUSS
2600 INDUSTRIAL BANK BUILDING
PROVIDENCE, RHODE ISLAND 02903

Federal Election Commission

1325 K Street (NW)

Washington, D. C. 20463

MCL 1597

Office of the President

International Supply Co.

215 Niantic Avenue
Cranston, Rhode Island 02907
Telephone 401-944-1600

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 21 AM 10:08

793

September 13, 1977

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

Attention: Charles N. Steele, Associate General Counsel

Re: MUR 411 (77)

To Whom It May Concern:

I am in receipt of Charles N. Steele's letter of August 26, 1977, and understand that you wish to investigate as soon as possible the contributions made by my wife Jan and me to Philip Noel.

The first check issued to the Noel-Garrahy Committee, which was in the amount of $200 and dated November 7, 1975, was for two tickets to a reception scheduled for December 4, 1975. This check, I thought, was being made to the local Democratic Party and was not intended as a contribution to a Federal election.

With respect to the three checks totaling $1,300, my wife Jan and I made these contributions. Since Jan wished to participate equally in the support of Philip Noel, we intended 50% of these gifts to be contributions of Janet Mauro. Since the regulation was unclear to us, Jan will indicate her intention of making such a gift in the future.

As Jan and I are now aware of the regulation's specific meaning, we will be most careful in the future in complying. We sincerely apologize for the ambiguity.

7 9 0 4 0 1 4 1 1 6 0

If you wish further information, please write to me at my business address, or call me at my office -- (401) 944-1600.

Sincerely,

Edmund M. Mauro, Jr.

Subscribed to and sworn to before me in the County of Providence, State of Rhode Island, this 19th day of September 1977.

Notary Public

EMM,jr/b
cc: Bruce R. Ruttenberg
Suite 1515
40 Westminster Street
Providence, Rhode Island 02903

7004041101

International Supply Co.
215 Niantic Avenue
Cranston, Rhode Island 02907

FEDERAL ELECTION COMMISSION
9:58
SEP 21 1977

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

Attention: Charles N. Steele

MCL # 1512

TELEPHONE: (401) [redacted]7200 CABLE: ADPOL TELEX: 927661

ADLER POLLOCK & SHEEHAN
INCORPORATED
ONE HOSPITAL TRUST PLAZA
PROVIDENCE, RHODE ISLAND 02903

FEDERAL ELECTION COMMISSION
'77 SEP 19 AM 10:10

BERNARD R. POLLOCK
WILLIAM J. SHEEHAN
NORMAN JAY BOLOTOW
PETER LAWSON KENNEDY
EDWARD L. MAGGIACOMO
PATRICK A. LIGUORI
JOHN P. CORRIGAN
JOHN F. BOMSTER
STANLEY J. KANTER
ERNEST D. HUMPHREYS
GEORGE L. VIZVARY
JOHN E. MOORE
STEPHEN A. CARDI
E. HANS LUNDSTEN
STEPHEN T. O'NEILL
(NEW YORK ONLY)
RICHARD C. DeYOUNG III
JOHN C. DEAN
(ILL. AND VIRG. ONLY)
GARY R. ST. PETER
RICHARD W. MacADAMS
RICHARD G. GALLI
ROBERT D. WIECK

WALTER ADLER (RETIRED)

777762

September 15, 1977

Gloria Sulton, Esq.
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Dear Ms. Sulton:

As per our telephone conversation, enclosed you will find Affidavit regarding the contributions made in my name for Philip W. Noel Campaign.

If you desire anything further do not hesitate to call.

Cordially,

EDWARD L. MAGGIACOMO

ELM:CAR

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
1977 SEP 19 AM 10:10

A F F I D A V I T

I, EDWARD L. MAGGIACOMO, of the City of Cranston, County of Providence and State of Rhode Island, on oath depose and say that the contributions made in my name to the Philip W. Noel Campaign for U.S. Senator from Rhode Island on May 12, May 17 and June 21, 1976, in the total amount of One Thousand Three Hundred ($1,300) Dollars, although made from a checking account in my name alone were intended and directed to have been made by myself and my wife, Ingeborg Maggiacomo.

Edward L. Maggiacomo
EDWARD L. MAGGIACOMO

Subscribed and sworn to before me at Providence, Rhode Island, this 15th day of September, A.D. 1977.

Cheryl Ann Rocco
NOTARY PUBLIC

7901411194

ADLER POLLOCK & SHEEHAN
INCORPORATED
ONE HOSPITAL TRUST PLAZA
PROVIDENCE, RHODE ISLAND 02903

FEDERAL ELECTION COMMISSION
'77 SEP 19 AM 8:53

Gloria Sulton, Esq.
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

DCC# 1464

Sept 2. 1977.

Fed. Election Commission

772734

Re: Muer (411(77)

Ref yours of Aug 26. 1977.

11:03

Donations given for election campaign of Philip Noel was actually for a primary and an anticipated regular campaign - therefore was for two campaigns and within the maximum allowed.

Sincerely

Gertrude W Keyes

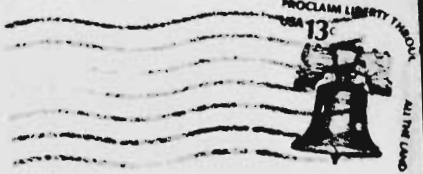
1 Twin oak Dr

Warwick, R.I.

02889.

G. V. Kuyus
1 Wildoaks Dr.
Warwick
R. I. 02889

PROVIDENCE R.I. PM 13 SEP 1977



Federal Election Commission
1325 K St. N. W.
Washington
D.C.
20463

69

KEYES
Keyes Associates
Architects / Engineers / Planners
321 South Main Street
Providence, Rhode Island 02903
Telephone 401 861-2900

FCC #

772725

'77 SEP 15 AM 11:08

9/2/77

For. Election Commission

RE. MUR 411(77)

Ref. yours of Aug 25 '77

Donations given for election campaign of Philip Noel was actually for a primary & an anticipated regular campaign - The gift was for 2 campaigns and within the maximum allowed.

Sincerely,

V. J. Keyes

1 Twin Oak Drive
Warwick, R.I. 02903

F. Keyes
1 Trinity Pl.
Warwick R.I. 02887

PM
15 SEP
1977

FEDERAL
COMM

77 SEP 15 AM 10:49

Federal Election Commission
1325 K St. N.W.
Wash., D.C.
20463

FRANCIS J. MAGUIRE
ATTORNEY AT LAW
INDUSTRIAL BANK BUILDING
111 WESTMINSTER BUILDING
PROVIDENCE, R. I. 02903

ASSOCIATE:
MARION J. DILLON

SUITE 2600
751-3900
AREA CODE 401

September 12, 1977

Federal Election Commission
1325 K Street (NW)
Washington, D.C. 20463

Attn: Gloria Sulton

Re: MUR 411(77)

Gentlemen:

Per our telephone conferences you are aware I represent Mr. Mulcahy in the above referred to matter.

We will be sending you further information in the near future to help bring a speedy resolution to this matter favorable to our client.

Very truly yours,

Francis J. Maguire

FJM:rs
cc: Mr. Joseph Mulcahy

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FRANCIS J. MAGUIRE
INDUSTRIAL BANK BUILDING
111 WESTMINSTER STREET
PROVIDENCE, R. I. 02903

FEDERAL ELECTION COMMISSION

'77 SEP 14 AM 10:23

Federal Election Commission

1325 K Street (NW)

Washington, DC 20463

FCC # 1455

James M. Jerue
Attorney at Law

(401) 272-2770

The Londendale Building
144 Westminster Street, Providence, Rhode Island 02903

FEDERAL ELECTION COMMISSION
'77 SEP 14 A 10:21

77271

September 12, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Daniel MacLellan who received a communication suggesting a possible violation of the Federal Election Campaign Act. I have enclosed a statement under oath from my client outlining the circumstances of contributions made to the campaign of Philip W. Noel for the United States Senate. Also enclosed are copies of the checks used for said contributions.

After reviewing these documents, I would appreciate the opportunity to discuss this matter with you further.

Very truly yours,

James M. Jerue

JMJ/jac

Enclosures 2

7704041203

AFFIDAVIT

I, Daniel H. MacLellan, have received a communication from the Federal Election Commission, dated August 26, 1977, indicating that I made improper contributions to the United States Senate Campaign of former Governor Philip W. Noel in that I contributed a sum in excess of the allowable limit. In response to said communication, I hereby under oath make the following affidavit:

On November 1, 1975, my wife and I jointly contributed $750.00 to the Noel-Garrahy Campaign Committee. At that time it was not known whether Governor Noel was going to be a candidate for re-election to the position of Governor of the State of Rhode Island. It was our intention that this contribution would be used by either Governor Noel or Lt. Governor Joseph Garrahy in the 1976 Gubernatorial Campaign. Subsequent to this contribution, Governor Noel became a candidate for the United States Senate, and Lt. Governor Garrahy became a candidate for Governor.

On September 1, 1976 and September 3, 1976 my wife and I contributed $1150.00 to the Noel for Senate Committee. It was our intention that a portion of this contribution was made for the Primary Election and a portion toward the General Election. We were informed by the Noel for Senate Committee that the contribution would be allocated accordingly. Governor Noel was defeated in the Primary Election and thus was not a candidate in the General Election. I was informed by the Noel for Senate Committee that a portion of our contribution was in fact expended for the General Election before the primary results were known. I was further informed that there were not sufficient funds to meet the expenses already incurred for the General Election. On December 15, 1976 my wife and I made an additional contribution of $750.00 to a Testimonial for Noel. It was our intent that

7 9 0 4 0 1 4 1 2 0 4

this contribution would go to pay the expenses incurred on behalf of Governor Noel for the General Election. I was informed by the Noel for Senate Committee that this contribution was used to pay expenses incurred for the General Election.

On or about February 1, 1977 we requested a refund from the Noel for Senate Committee of any funds remaining which had been contributed by us for the expense of the General Election. We were informed that all of the funds had been expended and that there were no funds available to make any refunds. It had been indicated to me that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, I feel that our contribution to the Primary Election and the General Election are allowable.

I have been informed that I was listed on the reports filed by the Noel for Senate Committee as contributing the above funds singly. This is in error as all of the above mentioned contributions were made jointly with my wife and should thus be divided accordingly between two individuals.

In summary, I feel that the funds contributed by my wife and I were not in voilation of the Federal Election Campaign Act. The contributions to the Noel-Garrahy Committee were intended for the Gubernatorial Campaign, and the contribution to the Noel for Senate Committee and the Testimonial for Noel were for both the Primary and General Elections.

Daniel H. MacLellan

Subscribed and sworn to before me this 12th day of September, 1977.

NOTARY PUBLIC

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 876 57-1/115

Oct 1 19 75

PAY TO THE ORDER OF Nee Gordon Committee $ 150

One Hundred Fifty ——— DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ ⑈00000 15000⑈

ES HALLCO PAWTUCKET, R. I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 874 57-1/115

Nov 1 19 75

PAY TO THE ORDER OF Nee Gordon Committee $ 200

Two Hundred ——— DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ ⑈00000 20000⑈

ES HALLCO PAWTUCKET, R. I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 873 57-1/115

Oct 1 19 75

PAY TO THE ORDER OF Nee Gordon Committee $ 200

Two Hundred ——— DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ ⑈00000 20000⑈

ES HALLCO PAWTUCKET, R. I.

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7904011206

2305 JEC1959 ***20000

2315 JEC1959 ***20000

2405 JEC1959 ***15000

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

No. 980

19 76 57-1/115

PAY TO THE ORDER OF

$ 300.00

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

:0115:0001: 52 3520756" 0980 "000003000"

ES HALLCO-PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

No. 979

19 76 57-1/115

PAY TO THE ORDER OF

DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

:0115:0001: 52 3520756" 0979 "000005000"

ES HALLCO-PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

No. 981

19 76 57-1/115

PAY TO THE ORDER OF

$ 200.00

DOLLARS

INDUSTRIAL NATIONAL BANK
OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

:0115:0001: 52 3520756" 0981 "000002000"

ES HALLCO-PAWTUCKET, R.I.

790401 11207

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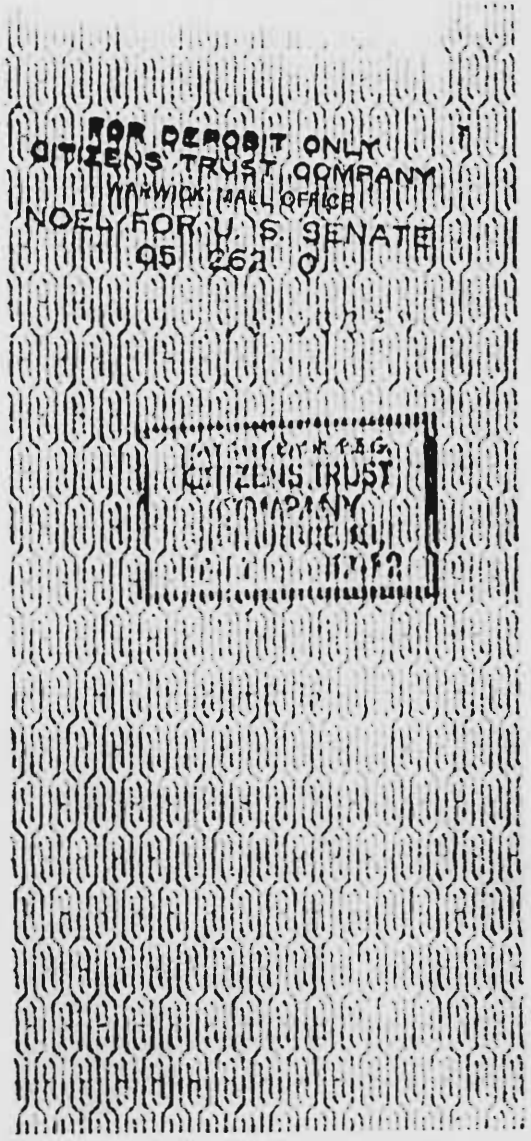
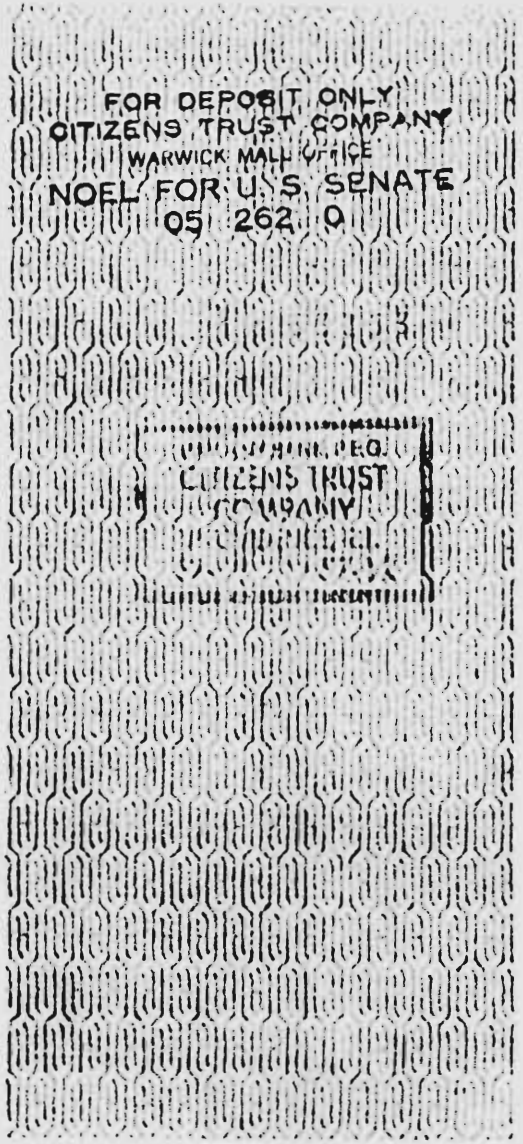
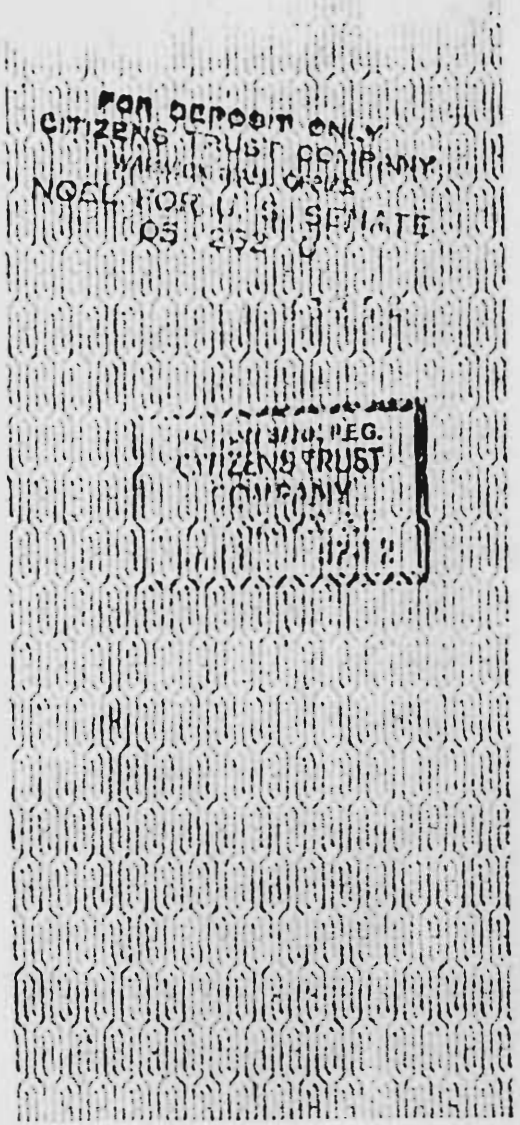






DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 982

Oct 13 19 76 57-1/115

PAY TO THE ORDER OF Leonard Lemon $ 150.00

One Hundred Fifty 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ 0982 ⑈000001500⑈

ES HALLCO-PAWTUCKET, R.I.

PROCESSED
INDUSTRIAL NATIONAL BANK

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 1018

12-15 19 76 57-1/115

PAY TO THE ORDER OF Postmaster Mail $ 750.00

DEC 20 Seven Hundred Fifty 00/100 DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ 1018 ⑈000007500⑈

ES HALLCO-PAWTUCKET, R.I.

DANIEL H. MACLELLAN
HI VIEW DR.
HOPE, R. I.

NO. 872 57-1/115

Dec 1 19 75

PAY TO THE ORDER OF Nat Christmas Comm $ 200.00

Two Hundred 00/100 DOLLARS

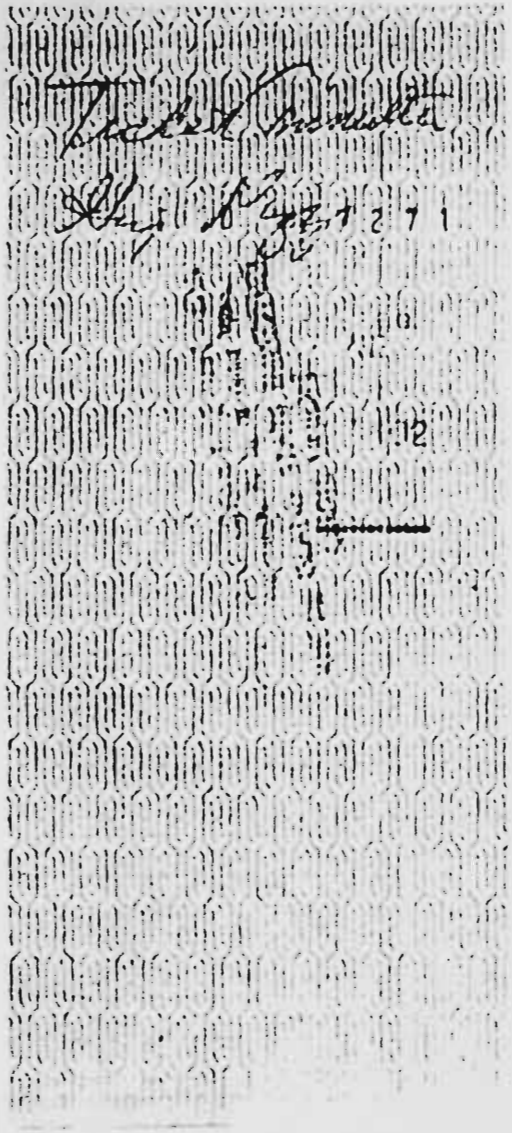
INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR

⑆011500001⑆ 52 3520756⑈ ⑈000020000⑈

ES HALLCO-PAWTUCKET, R.I.

7900141209



FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

PAY ANY BANK, P.&D.
CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.

22ɔ[illegible] ***20000

790401121

James M. Jerue
Attorney at Law
The Lauderdale Building
144 Westminster Street
Providence, Rhode Island 02903

Federal Election Commission

1325 K Street N. W.

Washington, D. C. 20463

MCC # 1454

James M. Jerue
Attorney at Law

(401) 272-2770

The Lauderdale Building
144 Westminster Street, Providence, Rhode Island 02903

FEDERAL ELECTION COMMISSION
'77 SEP

772710

September 12, 1977

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

This office represents Joseph Matteo, 1 Matteo Drive, North Providence, Rhode Island who received a communication suggesting a possible violation of the Federal Election Campaign Act.

I have discussed this matter with my client, and we are unable to identify contributions in excess of $1,000. Would you kindly indicate the dates of the contributions together with the payee. We will then examine our records and make comment as suggested in your letter.

Very truly yours,

James M. Jerue

JMJ/jac

James M. Jerue
Attorney at Law
The Lauderdale Building
144 Westminster Street
Providence, Rhode Island 02903

RECEIVED
FEDERAL ELECTION
COMMISSION

77 SEP 14 AM 10:23

PROVIDENCE RI

Federal Election Commission

1325 K Street N. W.

Washington, D. C. 20463

BCC # 1447

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 13 PM 3:59

Gustin L. Buonaiuto
210 Cedar Street
Warwick, Rhode Island 02818

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

772695

RE: MUR 411 (77)

Dear Ms. Sulton:

Attached is a statement from my wife and I regarding our contribution to Philip W. Noel's Election Campaign of 1976.

The amount referred to in your letter of August 26, 1977 was the total of three (3) checks listed as follows:

November 24, 1975, Check No. 198, Amount-$200.00 - Purchase of 2 tickets for Noel party, $100.00 ea. (for Winnie J. Buonaiuto and Gustin L. Buonaiuto)

August 31, 1976, Check No. 243, Amount-$200.00 - Purchase of 2 tickets for Noel party, $100.00 ea. (for Winnie J. Buonaiuto and Gustin L. Buonaiuto)

August 31, 1976, Check No. 278, Amount-$1,000.00 - Contribution from Gustin L. Buonaiuto and Winnie J. Buonaiuto's joint checking account ($500.00 each person)

I hope that this information clarifies this matter.

Sincerely,

Gustin L Buonaiuto

Gustin L. Buonaiuto

7704041 214

AFFIDAVIT

RE: MUR 411 (77)

We, Gustin L. Buonaiuto and Winnie J. Buonaiuto of the County of Kent and State of Rhode Island on oath depose and say that we are in receipt of a letter from the Federal Election Commission dated August 26, 1977 wherein it is stated that Gustin L. Buonaiuto made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 limit per election.

We, further on oath, depose and say that the total contribution of $1,400.00 to Mr. Noel's Campaign represents a contribution of $700.00 from Gustin L. Buonaiuto and $700.00 from his wife, Winnie J. Buonaiuto. The total amount was made through a joint checking account where either persons signature is authorized. While the donation checks were signed by Gustin L. Buonaiuto, it was our mutual understanding that the contributions were made on a 50-50 basis. At the time that each contribution was made, we were both in full agreement with each amounts.

Furthermore, Gustin L. Buonaiuto and Winnie J. Buonaiuto are both employed and share income and expenses commonly.

In light of the previously mentioned facts, we respectfully request that your records be amended to recognize a contribution of $700.00 from Winnie J. Buonaiuto and $700.00 from Gustin L. Buonaiuto.

Gustin L. Buonaiuto
GUSTIN L. BUONAIUTO

Winnie J. Buonaiuto
WINNIE J. BUONAIUTO

Subscribed and Sworn before me on this 8th Day of September, 1977.

Luena M. Rennington
NOTARY PUBLIC
My Commission expires 6/30/81

7904041215

G. L. Buonaiuto
210 Cedar Street
Warwick, R.I. 02818

CERTIFIED MAIL No. 823837

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Attention: Ms. Gloria Sulton, please.

CERTIFIED MAIL. RETURN RECEIPT REQUESTED.

DCC # 1446

TEMKIN, MEROLLA & ZURIER
ATTORNEYS AT LAW
20TH FLOOR, 40 WESTMINSTER STREET
PROVIDENCE, R. I. 02903
(401) 751-2400

MARTIN M. TEMKIN
AMEDEO C. MEROLLA
MELVIN L. ZURIER
CHARLES C. DUPRE
DONALD E. MILLER
KEVEN A. McKENNA

HARVEY S. REYNOLDS
(1925-1964)

FEDERAL ELECTION COMMISSION
'77 SEP 13 4:00

September 8, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gloria Sulton, Esquire
The Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

772694

Re: Gordon R. Archibald
Your file No. MUR 411 (77)

Dear Ms. Sulton:

Enclosed herewith please find the Affidavit of Mr. Archibald in the above-entitled matter. In essence, the Affidavit points out that at least $100 of the alleged $1100 violation should not be considered at all because it was assumed to have been given to another individual, i.e., Lt. Governor Garrahy.

Thereafter, the balance of the funds would be distributed, as we now know by law, as follows: $1,000 to the primary campaign of former Governor Noel; $500 to the general election campaign; and $400, frankly, appears to be a gift because Governor Noel was a defeated candidate.

However, even if we assume that $1000 was given by Mr. Archibald to Governor Noel's campaign, it would not appear that it was done with any intent to violate the Federal Election Law. Obviously, Governor Noel's campaign committee had to be making plans for the November general election during the summer of 1976 and funds had to be secured therefor. At that time, it did appear that Governor Noel would be the victor in the September primary (he was campaigning against a relatively unknown individual who had never previously held any elective office). Also, it appears that Mr. Archibald was relying upon the advice of Mr. Lynch, Treasurer of the Noel Campaign Committee and an attorney for that Committee.

Therefore, it appears that if there was a violation of law, it certainly was not done intentionally.

Sincerely yours,

Temkin, Merolla & Zurier

Amedeo C. Merolla

ACM:dag
Enclosure

7 7 0 4 0 1 4 1 2 1 7

7 9 0 4 0 1 1 1 2 1 8

STATE OF RHODE ISLAND
PROVIDENCE, SC.

AFFIDAVIT OF GORDON R. ARCHIBALD

TO THE FEDERAL ELECTION COMMISSION

Now comes GORDON R. ARCHIBALD of the City of Warwick in the State of Rhode Island and on oath deposes and states as follows:

(1) The Honorable Federal Election Commission has informed me that they believe that I may have committed a violation of 2 U.S.C. § 441a of The Federal Election Campaign Act, as amended, because of an alleged over-expenditure of contributions by me to the election campaign for the U.S. Senate seat for Rhode Island of former Governor Philip W. Noel.

(2) The said Commission states that I contributed $2,100.00 to said campaign election.

(3) By check dated November 24, 1975, I made a campaign donation to said Governor Noel and then Lt. Governor Garrahy in the sum of $200.00. This contribution, according to my intentions and the advertisements for said contribution, stated that this was a contribution to be shared equally by both candidates in their respective election campaigns for the U.S. Senate and Governor of the State of Rhode Island. I, therefore, considered that said contribution to Mr. Noel was in the sum of $100.00.

(4) By checks dated May 14, 1976, and June 16, 1976, I contributed the total sum of $1000.00 to the Noel for Senator Committee. It was my intention that that sum be used for his campaign for the primary election scheduled for September, 1976.

(5) On August 20, 1976, I made a contribution of $500.00 to the Noel for U.S. Senate Committee. It was my intention that this campaign contribution be utilized in the general election scheduled for November, 1976. At that

time, I was advised by John D. Lynch, Treasurer of the Noel for U.S. Senate Committee, that there was nothing improper about said contribution. It was further my understanding that then Governor Noel would certainly be the Democratic Party candidate for the U.S. Senate because it was the general sentiment of the public as expressed by professional political opinion that he would prove victorious in the primary election of September, 1976.

(6) By check dated December 9, 1976, I made a contribution of $400.00 to the Governor Philip W. Noel Testimonial Committee. At that time, then Governor Noel was about to leave office as Governor of the State of Rhode Island and was not a candidate for any elective office. I considered it a gift to him and not a campaign or election donation.

(7) I have been informed by the said John D. Lynch that any contributions made by me toward the general election of November, 1976, that were received by the Noel for U.S. Senate Committee were in fact expended for said general election because commitments had to be made therefor in the summer of 1976.

(8) After the defeat of said Governor Noel, said John D. Lynch explained to me that The Federal Election Commission allowed candidates who appeared in the general election of November, 1976, to receive contributions of up to $1,000.00 for an unopposed primary election and up to $1,000.00 for the general election. Therefore, he stated that he believed that the converse appeared to be true and because said John D. Lynch is an attorney, I believed that my contributions were permissible.

(9) I have been advised by the said John D. Lynch that there are no sums of money available from any source whatsoever which could be utilized to reimburse me if The Federal Election Commission should deem that I in some manner inadvertently violated the law.

790401 1220

(10) I solemnly affirm that at no time did I knowingly or willfully violate The Federal Election Campaign Laws.

Gordon R. Archibald

Subscribed and sworn to before me in Providence, Rhode Island, this 8TH day of September, 1977.

Notary Public
(My commission expires June 30, 1981)

LAW OFFICES
TEMKIN, MEROLLA & ZURIER
20TH FLOOR, 40 WESTMINSTER STREET
PROVIDENCE, R.I. 02903

CERTIFIED
No. 422089
MAIL

Gloria Sulton, Esquire
The Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR 1378

ROYAL LITTLE
40 WESTMINSTER STREET
PROVIDENCE, RHODE ISLAND 02903
401-751-1000
401-274-4400

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 SEP 8 AM 10:33

September 6, 1977

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

Re: MUR 411 (77)

772640

Dear Mr. Steele:

After studying the provisions of the Federal Election Campaign Law, I find that I was in technical violation as a result of making a $100 contribution to "Noel for Senator Committee" on April 19, 1976, then on August 31, 1976, contributing $1,000 to "Noel for U. S. Senate Committee" without realizing that I had sent in $100 in April.

On December 10, 1976 I did contribute $100 to "Governor Philip W. Noel Testimonial" to help him cover his deficit in the primary elections. I believe that this latter contribution should be exempt since it was made after the election.

Under Para. 441j PENALTY FOR VIOLATIONS, Sub Para. (a) provides that there shall be a fine of not greater than 300% of the amount of any contribution of such violation, imprisonment for not more than one year, or both. I am enclosing my check for $300, hoping that my inadvertent over-contribution of $100 will be a sufficiently minor violation to eliminate imprisonment for one year.

I must compliment you and the other members of the Federal Election Commission for being so thorough.

Sincerely yours,

Royal Little

Royal Little

ROYAL LITTLE
40 WESTMINSTER STREET
PROVIDENCE, RHODE ISLAND 02903
401-751-1000
401-274-4400

September 6, 1977

State of Rhode Island
County of Providence

On September 6, 1977 there appeared before me Royal Little, to me known and known by me to be the person signing the attached letter to the Federal Election Committee, and he certified same to be his free act and deed.

Mary T. Young
Notary Public

My Commission Expires June 30, 1981

7900401 41 22

ROYAL LITTLE
40 WESTMINSTER ST.
PROVIDENCE, R. I. 02903

3814

September 6, 19 77 57-102 115

PAY TO THE ORDER OF --UNITED STATES GOVERNMENT - FEDERAL ELECTION COMM.----- $ 300.00

----------THREE HUNDRED AND NO/100---------- DOLLARS

OLD STONE BANK
PROVIDENCE, RHODE ISLAND

Royal Little

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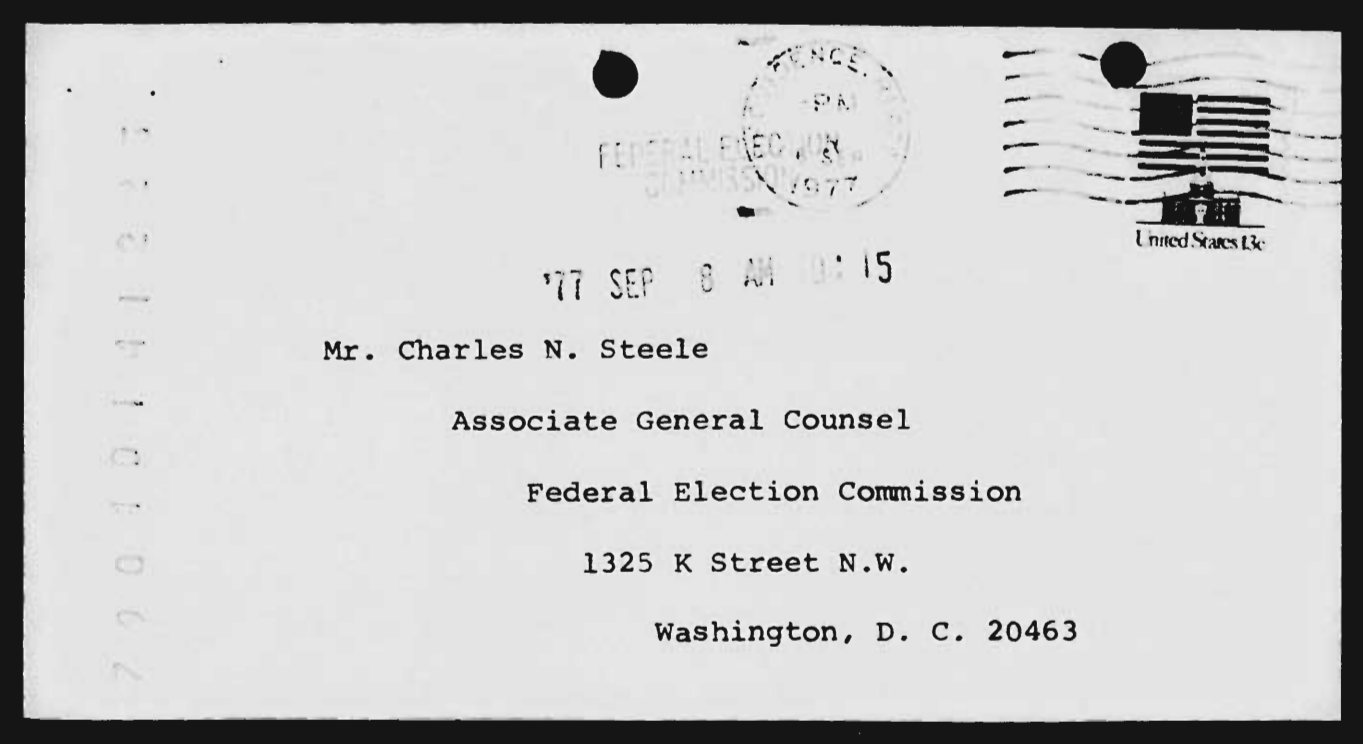
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FEDERAL ELEC. COMM.
SEP 8
1977
United States 13c
'77 SEP 8 AM 15
Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

LAC 1379

'77 SEP 6 AM 10:30

COIA & LEPORE Ltd.
Counsellors at Law
Arthur A. Coia
Albert J. Lepore
Stephen T. Napolitano

September 2, 1977

772633

Ms. Gloria Sulton
c/o Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Arthur E. Coia
42 Standish Avenue
N. Providence, Rhode Island

Dear Ms. Sulton:

Enclosed please find an Affidavit that has been duly sworn and attested by Mr. Coia indicating under oath the travel of the matter that is before your commission.

The Affidavit indicates that during a period of several months two expenditures were made by Mr. Coia, one in the amount of $1,000.00, and the other in the amount of $100.00, which represented the purchase of a cocktail party ticket. As a result of the difference in time between the two expenditures and Mr. Coia's unfamiliarity with the prohibitions of the Federal Election Campaign Act, it would appear that he gave an amount of money ($100.00) in excess of the statutory provisions of the Act.

I have indicated in the Affidavit that it appears that Mr. Coia's technical and minor violation of the Act was unintentional and unrealized because of his lack of familiarity with the Federal Election Campaign Act. I am, therefore, requesting that, even though it would appear that there is a minor violation of the Act, that you would treat this as an untentional and unwilful oversight on the part of Mr. Coia and I would

Forty Westminster Street, Providence, Rhode Island 02903/Suite 1030 /(401) 751-5522

like you to treat it accordingly. You may be assured in the future this will not happen again.

Very truly yours,

COIA & LEPORE, LTD.

Salvatore L. Romano, Jr.

SLR,Jr:jea

Enclosure

7804041227

FEDERAL ELECTION COMMISSION

VS.

ARTHUR E. COIA

A F F I D A V I T

I, ARTHUR E. COIA, first being duly sworn on solemn oath do hereby depose and state as follows:

1. That I reside at 42 Standish Avenue, in the Town of North Providence, County of Providence, State of Rhode Island;

2. That I made a personal donation to the Noel for Senator Committee on or about August 30, 1976, in the amount of $1,000.00;

3. That the monies which I donated on the above date were derived from my own personal assets;

4. That I have annexed a true copy of the receipt for this check and wish that it be incorporated by reference hereto as Exhibit A;

5. That on or about April 29, 1976, I purchased a $100 ticket which allowed me to attend and participate in a cocktail party given for Governor Philip Noel.

7904041226

6. That on or about August 26, 1977, I received a letter which indicated that I had contributed to the Noel for Senator Committee in excess of $100.00 over and above the maximum donation amount as set forth in 2 U.S.C. Section 411A of the Federal Election Campaign Act as amended;

7. That at no time did I willingly or knowingly make the two above-described donations in violation of the Federal Election Campaign Act;

8. That it was my sincere belief that Philip Noel, a candidate for U. S. Senator, would have been successful in his primary campaign and gone on to win the November election for the Senatorial seat he was seeking;

9. That had I known or been aware of the fact that I could only contribute the maximum amount of $1,000.00 to the Noel for Senator Committee, I would have not purchased the additional ticket which is the issue at hand;

10. That this $100.00 ticket purchase was given without knowledge that it would have been deemed a violation of the Federal Election Campaign Act as stated above.

For these reasons I would ask you to consider this small amount of money, which is over the maximum donation amount, as a harmless error on my part and treat it as such.

ARTHUR E. COJA

Subscribed and sworn to before me this 2 day of September, A.D. 1977.

Notary Public

COIA & LEPORE Ltd.
Forty Westminster Street
Providence, Rhode Island 02903
Suite 1030

'87 SEP 8 AM 10:15

Ms. Gloria Sulton
c/o Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

MCC 1355

LYNCH & COLEMAN
ATTORNEYS AT LAW
602 TOLLGATE ROAD
WARWICK, R. I. 02886
739-8500

JOHN D. LYNCH
MICHAEL D. COLEMAN

RECEIVED
FEDERAL ELECTION
COMMISSION
'76 SEP 6 AM 10:48

September 2, 1977

IN REPLY PLEASE
REFER TO FILE NO. _____

Charles N. Steele, Associate Gen. Counsel
Federal Election Commission
1325 K. Street N. W.
Washington, D. C. 20463

772601

RE: Patricia M. Lynch
John D. Lynch
MUR 411 (77)

Dear Mr. Steele:

Enclosed herewith find two Affidavits together with copies of your letters dated August 26, 1977, regarding the above matters.

Very truly yours,

LYNCH & COLEMAN

John D. Lynch

JDL:brr

Enclosures

7804141231

AFFIDAVIT

I, Patricia M. Lynch, of the City of Warwick, County of Kent and State of Rhode Island, on oath depose and say that I am in receipt of communication from the Federal Election Commission, dated August 26, 1977, wherein it is stated that I made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 per election limit.

I further on oath depose and say that two contributions were made to this campaign by me, one in the amount of $1,000.00 for the Primary Election and one in the amount of $1,000.00 towards the General Election. Since Mr. Noel was defeated in the Primary Election, his name did not appear on the ballot in the General Election in November of 1976. I further on oath depose and say that each contribution was made by me toward a specific election and that it was my intention to contribute towards expenditures which had been made in August and early September, 1976, toward General Election expenditures. It had been indicated to me by the Noel for Senate Committee that expenditures were being made at that time toward the General Election. I have subsequently been informed that my contribution toward the General Election and several others which were received by the Noel for U. S. Senate Committee were in fact expended toward the General Election since financial commitments of necessity had to be made in August and early September, 1976. I have further been advised by the Noel for U. S. Senate Committee that these funds have been expended and that no refunds are forthcoming

to the Noel for U. S. Senate Committee from those who received payment.

I further on oath depose and say that I have requested refund of the contribution which was made by me toward the General Election but have been informed by the Noel for U. S. Senate Committee that there are no funds available to make this repayment to me. It has been explained to me that the Federal Election Commission has allowed candidates who appeared in the General Election, but did not have Primary Elections, to receive contributions up to $1,000.00 for each election, although they did not have Primary opposition. Relying on this practice, I feel that my contribution to the Primary Election and the General Election are allowable.

Patricia M. Lynch

Patricia M. Lynch

Subscribed and sworn to before me this 30th day of August, 1977.

Brenda R. Ruggieri

NOTARY PUBLIC

Notary Public

AFFIDAVIT

I, John D. Lynch, of the City of Warwick, County of Kent and State of Rhode Island, on oath depose and say that I am in receipt of communication from the Federal Election Commission, dated August 26, 1977, wherein it is stated that I made a contribution to the United States Senate Campaign of Philip W. Noel in excess of the $1,000.00 per election limit.

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to the Noel for U. S. Senate Committee from those who received payment.

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John D. Lynch

Subscribed and sworn to before me this 30th day of August, 1977.

Brenda R. Ruggiero
NOTARY PUBLIC
Notary Public

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

John D. Lynch
96 Governors Drive
Warwick, Rhode Island 02818

Re: MUR 411(77)

Dear Mr. Lynch:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $2,000.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,000.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904211236

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Patricia M. Lynch
96 Governors Drive
Warwick, Rhode Island 02818

Re: MUR 411(77)

Dear Ms. Lynch:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $2,000.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,000.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

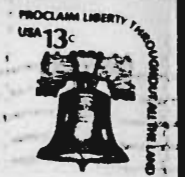
Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041237

LYNCH & COLEMAN
ATTORNEYS AT LAW
602 TOLLGATE ROAD
WARWICK, R. I. 02886

FEDERAL ELECTION COMMISSION
'76 SEP 6 AM 8:45



Charles N. Steele, Associate Gen. Counsel
Federal Election Commission
1325 K. Street N. W.
Washington, D. C. 20463

7604012

MCC 1347

Peter R. Cruise
368 Thayer Street
Providence, Rhode Island, 02906

RECEIVED
FEDERAL ELECTION
COMMISSION
'76 SEP 6 AM 9,34

August 29, 1977

Federal Election Commission

1325 K Street N. W.

Washington, D. C. 20463

Re: MUR 411 (77)

Gentlemen:

In response to your letter of August 26, 1977 signed by Charles N. Steele, Associate General Counsel and my telephone conversation of August 29, 1977 with attorney Gloria Sulton concerning the Commission's belief that I committed a violation of 2 U.S.C. S441a by contributing more than $1,000 to the Noel for Senator Committee in connection with the September 14 primary election I wish to demonstrate that no action should be taken against me.

Enclosed please find copies of check #6639 made out to Noel for Senator Committee for $400 dated May 26, 1976, check #6668 made out to Noel for Senator Committee for $500 dated June 22, 1976, check #355 made out to Gov. Philip W. Noel Testimonial for $200 dated December 9, 1976, check #369 made out to Gov. Philip Noel Testimonial for $2,000 dated December 14, 1976, and a ticket for Testimonial Fund Raiser in honor of Governor Philip W. Noel held December 15, 1976.

It should be noted that the December 15 Testimonial was held after Governor Noel had been defeated in the September 14 primary. He was still Governor and the ticket lists the affair as a Testimonial in honor of Governor Philip W. Noel.

There was no indication given to me when the tickets were purchased that my contribution would be used to pay off debts of the unsuccessful senatorial campaign. I am well aware of the federal law concerning the $1,000 limit.

If my contribution was used to pay off senatorial campaign debts it was without my knowledge or permission.

Sincerely,

Peter R. Cruise

Enclosures

I do hereby swear that the above statements are true.

PETER R. CRUISE
308 THAYER STREET
PROVIDENCE, R. I. 02906

NO. 6639

PROCESSED

May 26, 1976 — 57-1/115

PAY TO THE ORDER OF Noel for Senator Committee $400.00

Four Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Political Contribution Peter R. Cruise

:0115:000: 10 3131877: 6639 :000004000:

Peter R. Cruise

NO. 666E

57-1/115

PROCESSED
INDUSTRIAL NATIONAL BANK
JUN 7 1976
PROVIDENCE, R. I.

June 22, 1976

PAY TO THE ORDER OF Noel for Senator Committee $500.00

Five Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Political Contribution Peter R. Cruise

:0115:000: 15 1680669: :00000 50000:

PETER R. CRUISE
308 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 355

December 9, 1976 — 57-1/115

PAY TO THE ORDER OF Gov. Philip W. Noel Testimonial $200.00

Two Hundred DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR Testimonial - Fund Raiser Peter R. Cruise

:0115:000: 15 1680669: 0355 :00000 20000:

PETER R. CRUISE
308 THAYER ST.
PROVIDENCE, R. I. 02906

NO. 369

December 14, 1976 — 57-1/115

PAY TO THE ORDER OF Gov. Philip Noel Testimonial - Fund Raiser $2000.00

Two Thousand DOLLARS

INDUSTRIAL NATIONAL BANK OF RHODE ISLAND
PROVIDENCE, R.I.

FOR 40 tickets Peter R Cruise

:0115:000: 15 1680669: 0369 :0000 200000:

Testimonial - Fund Raiser

IN HONOR OF

Governor Philip W. Noel

WEDNESDAY EVENING. DECEMBER 15. 1976

WINDJAMMER LOUNGE
ROCKY POINT WARWICK. R. I

COCKTAILS 7 TO 9 $50.00 PER PERSON

R.S.V.P. by December 10th

FEDE
CO

'76 SEP 8 AM 9:50

7904012242

Federal Election Commission

1325 K Street N. W.

Washington, D. C. 20463

FEC # 1299

772562

Joseph R. Paolino

274.6611
274.6612
274.6613

Suite 300
76 Dorrance Street
Providence, R. I. 02903

RECEIVED
FEDERAL ELECTION
COMMISSION
'77 AUG 31 PM 3:34

August 29, 1977

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 411(77)

Attention: Ms Gloria Sulton

Dear Ms Sulton:

Regarding our conversation of today, 8-29-77, I am sorry to say that on May 11, 1976, my check # 1131 drawn on the Rhode Island Hospital Trust Bank in the amount of $200.00 was for two tickets to a cocktail party, one for my son and one for myself.

On September 8, 1976, my check # 1239 drawn on the same bank as above was for a donation in the amount of $1000.00 made out to the Noel for Senate Committee.

When I did this, it was done not knowing that it was a violation of law and I did not beleive that the cocktail party tickets and donation were to be applied to same.

If more information is needed, please contact me.

Very truly yours,

J. R. Paolino

Joseph R. Paolino

7900401411243

JOSEPH R. PAOLINO
76 DORRANCE ST.
PROVIDENCE, R. I.

- 8 - 7 6

No. 1239

9-8 SEP 19 76

57-33
115

PAY TO THE ORDER OF Noel for Senate Committee

$ 1000 ±

EXACTLY 1000 CTS

DOLLARS

Rhode Island Hospital Trust National Bank
PROVIDENCE, RHODE ISLAND

:011500331: 000 330639" "0000100000"

- 8 - 28 - 76

JOSEPH R. PAOLINO
76 DORRANCE ST.
PROVIDENCE, R. I.

- 5 - 19 - 76

No. 1131

5-MAY 19 76

57-33
115

PAY TO THE ORDER OF Noel for Senate Committee

$ 200 ±

EXACTLY 200 CTS

DOLLARS

Rhode Island Hospital Trust National Bank
PROVIDENCE, RHODE ISLAND

:011500331: 000 330639" "00000 20000"

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Joseph R. Paolino
215 Blackstone Blvd.
Providence, Rhode Island

Re: MUR 411(77)

Dear Mr. Paolino:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,200.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $200.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7900411245

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

0001 76163

PAY ANY BANK P.E.O.
CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.
57-12 57-12

SEP 27 76

FOR DEPOSIT ONLY
CITIZENS TRUST COMPANY
WARWICK MALL OFFICE
NOEL FOR U. S. SENATE
05 262 0

2222 72222

PAY ANY BANK P.E.O.
CITIZENS TRUST
COMPANY
PROVIDENCE, R.I.
57-12 57-12

MAY 18 76

7904010412 46

JOSEPH R. PAOLINO
SUITE 300 76 DORRANCE ST
PROVIDENCE, R. I. 02903

77 AUG 31 PM 2:37

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Attn: Gloria Sulton

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Gene Mancino
56 Wowams Road
Barrington, Rhode Island 02806

Re: MUR 411(77)

Dear Mr. Mancino:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,500.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $500.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904014248

MUR 911 SUBJ

PS Form 3811, Nov. 1975

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... 25¢
- ☒ Show to whom, date, & address of delivery ..... 45¢
- ☐ RESTRICTED DELIVERY.
Show to whom and date delivered ..... 85¢
- ☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery .. $1.05

(Fees shown are in addition to postage charges and other fees).

2. ARTICLE ADDRESSED TO:
Gene Mancino

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438158	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY
OCT 11 1977

POSTMARK
OCT 11 197

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1975—O-203-465

7904101411249

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON D.C. 20463

August 26, 1977

Al Mancino
324 County Road
Barrington, Rhode Island 02806

Re: MUR 411(77)

Dear Mr. Mancino:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,800.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,000.00. ($800 was designated for the primary and $1,000 was designated for the general election.)

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041250

PS Form 3811, Nov. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER**: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
   - ☐ Show to whom and date delivered . . . . . 25¢
   - ☒ Show to whom, date, & address of delivery . . . . . 45¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom and date delivered . . . . . 85¢
   - ☐ RESTRICTED DELIVERY.
     Show to whom, date, and address of delivery . . $1.05

   (Fees shown are in addition to postage charges and other fees).

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	038159	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. Elaine Pinto

DATE OF DELIVERY 10-11-77

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: [illegible]

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Gordon R. Archibald
135 Hedgerow Drive
Warwick, Rhode Island 02886

Re: MUR 411(77)

Dear Mr. Archibald:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §44la of the Federal Election Campaign Act, as amended ("the Act"). Section 44la prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $2,100.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,100.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041252

MUR 411 Sutton

PS Form 3811, Mar. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Gordon R Archibald

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943995	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY
8-30-77

5. ADDRESS (Complete only if requested)
135 Hedgerow Ct

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1979-O-289-488

WASHINGTON D.C. AUG 30 1977

Z 004 041 253

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Gustin L. Buonaiuto
210 Cedar Street
Warwick, Rhode Island 02818

Re: MUR 411(77)

Dear Mr. Buonaiuto:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,400.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $400.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041254

MUR 411 Sutton

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 25¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Gustin L. Buonaiuto

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 903990 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
W. Buonaiuto

4. DATE OF DELIVERY
8 30 77

5. ADDRESS (Complete only if requested)
210 Cedar St

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
CHICAGO RI
OCT 1977
ILLINOIS

PS Form 3811, Mar. 1974

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★ GPO: 1974—O-546-808

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Fenton Keyes
1 Twin Oak Drive
Warwick, Rhode Island 02889

Re: MUR 411(77)

Dear Mr. Keys:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,400.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $400.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041256

MUR 411 SWTCO

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Fenton Keyes

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	903913	

(Always obtain signature of addressee or agent)

I have delivered the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Gertrude Keyes

4. DATE OF DELIVERY
FEB-31-77

5. ADDRESS (Complete only if requested)
'76

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

AUG 31 1976

☆ GPO : 1976—O-226-465

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Gertrude Keyes
1 Twin Oak Drive
Warwick, Rhode Island 02889

Re: MUR 411(77)

Dear Ms. Keyes:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,800.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $800.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041250

MUR 411 Sulted

PS Form 3811, Mar. 1976 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Gertrude Keyes

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943992	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Gertrude Keyes

4. DATE OF DELIVERY
8-31-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

AUG 31 1977

☆ GPO : 1976—O-209-165

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

John D. Lynch
96 Governors Drive
Warwick, Rhode Island 02818

Re: MUR 411(77)

Dear Mr. Lynch:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $2,000.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,000.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011260

MUR 411 Sutton

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery..85¢

2. ARTICLE ADDRESSED TO:
John D. Lynch

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	96399	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
John D Lynch
Patricia M. Lynch

4. DATE OF DELIVERY: 8-31-77 POSTMARK

5. ADDRESS (Complete only if requested)
SEE

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1976—O-210-488

7 9 0 4 0 1 4 1 1 2 6 1

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Joseph Mulcahy
70 Blackmore Avenue
Cranstone, Rhode Island 02940

Re: MUR 411(77)

Dear Mr. Mulcahy:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,600.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $600.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041262

MUR 411 Subpoena

PS Form 3811, Mar. 1976 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Joseph Mulrany

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	903790	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. X Joseph M[illegible]
DATE OF DELIVERY 8/27/77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PROVIDENCE, R.I. FEDERAL ELECTION COMMISSION

☆ GPO : 1976—O-203-465

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Joseph Matteo
One Matteo Drive
No. Providence, Rhode Island 02904

Re: MUR 411(77)

Dear Mr. Matteo:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,200.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $200.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011264

MUR 411 Sub'd

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Joseph Matteo

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943889	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Teresa Wolfe

4. DATE OF DELIVERY
8/27/77

PO VIENNA VA
AUG 27 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1976—O-209-465

7904041126

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Peter R. Cruise
368 Thayer Street
Providence, Rhode Island

Re: MUR 411(77)

Dear Mr. Cruise:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $3,100.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $2,100.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011266

MUR 411 Suitco

PS Form 3811, Mar. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Peter R. Cruise

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943988	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

Peter R. Cruise

4. DATE OF DELIVERY: 01 NOV 79 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO: 1979-O-286-488

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Royal Little
131 Boston Neck Road
Narragansett, Rhode Island 02882

Re: MUR 411(77)

Dear Mr. Little:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,200.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $200.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011268

MUR 411 Sutton

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Royal Little

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	993979	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Royal Little

4. DATE OF DELIVERY

POSTMARK
PROVIDENCE, R.I. MAILING

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1976—O-203-465

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Arthur Coia
42 Standish Avenue
No. Providence, Rhode Island 02911

Re: MUR 411(77)

Dear Mr. Coia:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,100.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $100.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011270

MUR 411 Sulzer

PS Form 3811, Mar. 1976 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Arthur Coia

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	043980	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Kathy Flynn

4. DATE OF DELIVERY
8/29/77

5. ADDRESS (Complete only if requested)
42 S Standish

6. UNABLE TO DELIVER BECAUSE:
North Pine
02911

POSTMARK: AUG 29 1977

☆ GPO: 1976—O-209-465

2700401127 1

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Joseph R. Paolino
215 Blackstone Blvd.
Providence, Rhode Island

Re: MUR 411(77)

Dear Mr. Paolino:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,200.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $200.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

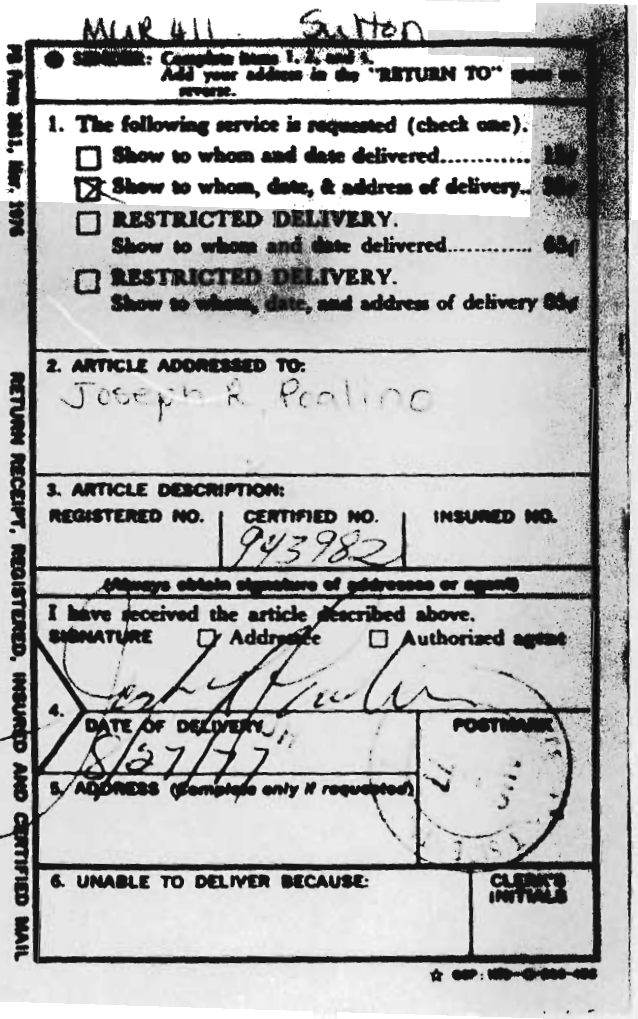
Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7 9 0 4 0 1 4 1 2 7 2



MAR 411 Sutton

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 90¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 65¢

2. ARTICLE ADDRESSED TO:
Joseph R. Pealino

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943982	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 8-27-77 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO: 1975-O-212-865

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON D.C. 20463

August 26, 1977

Patricia M. Lynch
96 Governors Drive
Warwick, Rhode Island 02818

Re: MUR 411(77)

Dear Ms. Lynch:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $2,000.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $1,000.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011274

MUR 411 SubHOD

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Patricia M. Lynch

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94383	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. Patricia M. Lynch
DATE OF DELIVERY
8-27-77

5. ADDRESS (Complete only if requested)
96 GOVERNORS DR
EAST GREENWICH RI 02818

6. UNABLE TO DELIVER BECAUSE:

GREENWICH, R.I.
AUG 29 1977

CLERK'S INITIALS

★ GPO : 1976-O-226-488

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Daniel MacLellan
Hi View Drive
Hope, Rhode Island 02831

Re: MUR 411(77)

Dear Mr. MacLellan:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $3,200.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $2,200.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041276

MUR 411 Sluiter

PS Form 3811, Mar. 1976 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Daniel MacLellan
Mr Daniel MacLellan

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943984	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY: 8-31-77
POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

☆ GPO: 1976—O-209-465

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Edward Maggiacomo
38 Belcrest Road
Cranston, Rhode Island 02920

Re: MUR 411(77)

Dear Mr. Maggiacomo:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,300.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $300.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904011278

MWR 411 Suites

PS Form 3811, Mar. 1974

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Edward Maggiacomo

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943985	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Edward Maggiacomo
per M Gambale

4. DATE OF DELIVERY

POSTMARK

AUG 30 1971

USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1973—O-513-409

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 26, 1977

Edmund M. Mauro, Jr.
67 Taber Avenue
Providence, Rhode Island 02906

Re: MUR 411(77)

Dear Mr. Mauro:

On August 17, 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $1,500.00 to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (The September 14, primary election), you exceeded the contribution limit of $1,000 per election by $500.00.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

Enclosures: Copy of the Act
Copy of Regulations

7904041280

MUR 411 Switzer

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Edmund M. Maurz, Jr.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943986	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
Sally Maurz

4. DATE OF DELIVERY — POSTMARK
FEB 3 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: — CLERK'S INITIALS

☆ GPO : 1976—O-226-488

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Noel for Senator/17 Individual Contributors	)	MUR 411 (77)
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 18, 1977, the Commission determined by a vote of 5-0 to find Reason to Believe a violation of 2 U.S.C. section 441a had been committed by each of the seventeen individuals listed on Attachment B of the General Counsel's report on the above-captioned matter.

Commissioner Tiernan abstained from voting.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7 9 0 4 0 1 1 1 2 9 2

August 3, 1977

MEMORANDUM TO: Marjoire Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 411 (77)

Please have the attached General Counsel's Report on MUR 411 (77) distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of August 11, 1977.

Thank you.

7 9 0 4 0 1 4 1 2 8 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Noel for Senator/17 Individual Contributors	)	MUR 411 (77)
	)	

GENERAL COUNSEL'S REPORT

I. History

This matter was initiated internally after a review of the reports of receipts and expenditures filed by the Noel for Senator committee, the principal campaign committee of Philip Noel. Mr. Noel was an unsuccessful candidate for the U.S. Senate from Rhode Island in the primary election held on September 14, 1976.

The 10-day pre-election report listed contributions from certain individuals exceeding $1,000. The January 31, 1977 report included a list of "contributions on hand to be liquidated"; the contributions reported from 15 individuals exceeded the limits imposed under 2 U.S.C. §441a(a)(1)(A) by a total of $8,000.

The Disclosure Division notified respondent by letter of these apparent violations on October 4 and 28, 1976. On March 23, 1977, respondent was notified that the Commission had found reasonable cause to believe a violation of the Act had occurred. Respondent replied on November 4, 1976, through its treasurer, Mr. John Lynch. Mr. Lynch claimed that the committee anticipated

that Mr. Noel would be a candidate in the general election and that the questioned contributions provided the money for expenditures (such as television production) directed toward the general election.

This matter was referred to the Office of General Counsel on April 28, 1977. A review of the committee's 1976 year-end report indicates debts totalling $12,829.74. Mrs. Sulton of the General Counsel's staff contacted Mr. Lynch by telephone and was told that the committee has no funds to repay the excess contributions and other debts it owes.

II. Analysis

2 U.S.C. §441a(a)(1) provides that no person shall make a contribution to a candidate or his authorized political committee exceeding $1,000 with respect to any election. Section 110.1(a)(2) of the Regulations provides that unless otherwise designated in writing, a contribution made before a primary election shall be considered as being made for the primary election; and a contribution made after a primary election shall be considered as being made for the general election. 2 U.S.C. §441a(f) prohibits knowing acceptance of a contribution in excess of the limits by the candidate or committee. Both an individual who contributes over $1,000 and a committee which accepts such a contribution are in violation of the statute.

The General Counsel's Office made an extensive review of the reports of receipts and expenditures of the committee filed with the Commission. The reports show no expenditure

7 9 0 4 0 1 1 2 8 5

by the committee identified as relating to the general election, although we question whether such designation would have any effect on the contribution limitations where a candidate runs only in the primary election.

Our review of reported individual contributions revealed that three persons, Edward Maggiacomo, Gene Mancino and Al Mancino, designated their contributions for either the primary or general elections (See attachment B). The committee did not properly report that two individuals, Joseph Matteo and Joseph Mulcahy, made aggregate contributions in excess of $1,000 (See attachment B).

In December 1975, the candidate held a joint fundraiser with Lt. Governor Garrahy. On its April 10, 1976 report, the Noel for Senator Committee listed the proceeds from this fundraiser as "cash on hand January 1, 1976", and requested an advisory opinion as to whether these funds could be used by the committee. The committee also attached a list of contributors to the fundraiser. The amounts contributed by those individuals were not aggregated by the committee in determining the excess contributions reported by the committee on its 1976 year-end report. This partly explains the differences between the actual excess contributions listed on Attachment B and the excess contributions reported by the committee and set forth on Attachment A.

7904041128

In December 1976, the committee held another fundraiser. Again some of the contributions to this fundraiser were not aggregated by the committee in determining the amount of contributions. (Compare Attachment A with Attachment B).

With the exception of Joseph Paolino, Joseph Matteo and Joseph Mulcahy, all of the individuals listed on Attachment B exceeded the $1,000 contribution limit before the primary election held on September 14, 1976. Paolino made a contribution on September 24, 1977, and Matteo and Mulcahy made contributions in December 1976, which raised their aggregate contributions above the $1,000 limit. Five other individuals who had already contributed in excess of $1,000 made further contributions in December 1976.

III. Recommendations

We recommend finding reason to believe a violation of 2 U.S.C. §441a has been committed by each of the 17 individuals listed on Attachment B. Each individual will have an opportunity to demonstrate that it was not his/her intent to contribute in excess of the limit and to present any evidence of designating contributions for the general election that is not reflected on the committee's reports.

With respect to respondent committee, we propose to submit a conciliation agreement allowing a time certain for refunding the excess contributions, and imposing a penalty based upon

the outstanding amount in the event such refunds are not made.

IV. Conclusion

Send attached letter to individuals identified on Attachment B.

DATE: 8/2/77

William C. Oldaker
General Counsel

7904041288

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

Dear

On , 1977, the Commission found reason to believe you committed a violation of 2 U.S.C. §441a of the Federal Election Campaign Act, as amended ("the Act"). Section 441a prohibits an individual from contributing more than $1,000 per election to a federal candidate. A review of the reports of receipts and expenditures filed by the Noel for Senator Committee indicates you contributed $ to Phillip Noel's campaign. Since Mr. Noel was a candidate in only one Federal election (the September 14, primary election), you exceeded the contribution limit of $1,000 per election by $.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton, (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures: Copy of the Act
Copy of Regulations

ATTACHMENT A
MUR (77)

Name of Individual	Excess Amount Contributed
A. Gordon R. Archibald 135 Hedgerow Drive Warwick, Rhode Island 02886	$ 500.00
B. Gustin L. Buonaiuto 210 Cedar Street Warwick, Rhode Island 02818	200.00
C. Fenton Keyes 1 Twin Oak Drive Warwick, Rhode Island 02889	200.00
D. Gertrude Keyes 1 Twin Oak Drive Warwick, Rhode Island 02889	200.00
E. John D. Lynch 96 Governors Drive Warwick, Rhode Island 02818	1,000.00
F. Patricia M. Lynch 96 Governors Drive Warwick, Rhode Island 02818	1,000.00
G. Daniel MacLellan Hi View Drive Hope, Rhode Island 02831	700.00
H. Edward Maggiacomo 38 Belcrest Road Cranston, Rhode Island 02920	300.00
I. Edmund M. Mauro, Jr. 67 Taber Avenue Providence, Rhode Island 02906	200.00
J. Joseph R. Paolino 215 Blackstone Blvd. Providence, Rhode Island	200.00
K. Al Mancino 324 County Road Barrington, Rhode Island 02806	800.00
L. Arthur Coia 42 Standish Avenue No. Providence, Rhode Island 02911	100.00
M. Royal Little 131 Boston Neck Rd. Narragansett, Rhode Island 02882	100.00

Name of Individual	Excess Amount Contributed
N. Gene Mancino 56 Wowams Road Barrington, Rhode Island 02806	500.00
O. Peter R. Cruise 368 Thayer Street Providence, Rhode Island	2,100.00

7904041291

ATTACHMENT B
MUR 411

KOEL FOR SENATE COMMITTEE

CONTRIBUTORS	DATE	AMOUNT	DATE	AMOUNT	DATE	AMOUNT	12/4/75 Fundraising DATE	12/4/75 Fundraising AMOUNT	12/76 Fundraising DATE	12/76 Fundraising AMOUNT	TOTAL	Excess
John D. Lynch	2/26/76 3/19/76	100 900	8/16/76	1000							2000.00	1000.00
Patricia Lynch	6/22/76	1000	8/21/76	1000							2000.00	1000.00
Gordon Archibald	5/14/76 6/16/76	500 500	8/21/76	500			12/4/75	200	12/5/76	400	2100.00	1100.00
Peter Cruise	5/26/76 6/22/76	400 500							12/15/76 12/15/76	2000 200	3100.00	2100.00
Edward L. Maggiacomo	5/12/76** 5/17/76** 6/1/76*	200(General Election) 100(General Election) 1000(Primary Election)									1300.00	300.00
Daniel MacLellan	5/11/76 6/22/76	200 500			9/7/76	1000	12/4/75	750	12/16/76	750	3200.00	1200.00
Edmund Mauro Jr.	4/30/76	200	8/21/76	1000			12/4/75	200	12/16/76	100	1500.00	500.00
Joseph R. Paolino	5/11/76	200			9/24/76	1000					1200.00	200.00
Gene Mancino					9/9/76	1500	(General Election $500)		(Primary $1000)		1500.00	500.00
Al Mancino			8/21/76	300*	9/9/76	1500	(General Election $1000)		(Primary $800)		1800.00	1000.00
Gertrude Keyes	5/17/76	200	8/21/76	1000			12/4/75	400	12/16/76	200	1800.00	600.00
Fenton Keyes	5/17/76	200	8/16/76	1000					12/16/76	200	1400.00	400.00
Gustin Buonainto	5/14/76	200			9/7/76	1000	12/4/75	200			1400.00	400.00
Royal Little			?	100	9/7/76	1000			12/16/76	100	1200.00	200.00
Arthur Cola			?	100	9/3/73	1000					1100.00	100.00
[illegible]***	5/20/76	300			9/1/76	500			12/13/76	500	1300.00	300.00
[illegible] Mulcahy***	6/22/76 6/22/76	500 100							12/13/76	1000	1600.00	600.00

* Earmarked for primary
** Earmarked for General
*** Not listed on summary statement filed with 1976 year-end report

*/ Amount differs from summary statement filed with 1976 year-end report.

BEFORE THE FEDERAL ELECTION COMMISSION

June 7, 1977

In the Matter of	)	
	)	
Noel for Senator/15 Individual Contributors	)	MUR 411 (77)
	)	

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

GENERAL COUNSEL'S REPORT

I. History

This matter was initiated internally after a review of the reports of receipts and expenditures filed by Noel for Senator, the principal campaign committee of Philip Noel. Mr. Noel was an unsuccessful candidate for U.S. Senate from Rhode Island in the primary election held on September 14, 1976.

The 10-day pre-election report listed contributions from individuals exceeding $1,000. The January 31, 1977 report included a complete list of "contributions on hand to be liquidated." The contributions exceeding the limits imposed under 2 U.S.C. §441a(a)(1)(A) total $8,000 from 15 individuals.

The Disclosure Division notified respondent by letter on October 4 and 28, 1976, November 16, 1976, and March 23, 1977, the latter a notification of reasonable cause to believe a violation of the Act had occurred. Respondent, through its treasurer, John Lynch, replied on November 5, 1976 stating that the committee anticipated that Mr. Noel would be a candidate in the general election and consequently, expenditures were made toward that goal, such as television production; that the

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questioned contributions provided the money for activities directed toward the general election.

This matter was referred to the Office of General Counsel on April 28, 1977. A review of respondent's year-end report indicates debts totalling $12,829.74. Mr. Lynch, treasurer of Noel for Senator, was contacted by telephone by Mrs. Sulton of my staff and advised that the committee had no funds to repay the excess contributions and other debts owed by it.

II. Analysis

2 U.S.C. §441a(a)(1) provides that no person (which includes an individual) shall make a contribution to a candidate or his authorized political committee exceeding $1,000 with respect to any election. Similarly, 2 U.S.C. §441a(f) makes knowing acceptance of a contribution in excess of the limits by the candidate or committee unlawful. Both the individuals who contributed over $1,000 and the committee which accepted the donations are in violation of the statute.

III. Recommendations

1. Find reason to believe a violation of 2 U.S.C. §441a has been committed by the individuals identified on Attachment A and incorporated by reference.

2. With respect to the respondent committee, we are preparing a conciliation agreement seeking repayment within

7 0 4 0 1 4 1 2 9 4

a time certain.

IV. Conclusion

Send attached letter to individuals identified on Attachment A.

6/9/77
Date

William C. Oldaker
General Counsel

7004011295

ATTACHMENT A
MUR (77)

Name of Individual	Excess Amount Contributed
A. Gordon R. Archibald 135 Hedgerow Drive Warwick, Rhode Island 02886	$ 500.00
B. Gustin L. Buonaiuto 210 Cedar Street Warwick, Rhode Island 02818	200.00
C. Fenton Keyes 1 Twin Oak Drive Warwick, Rhode Island 02889	200.00
D. Gertrude Keyes 1 Twin Oak Drive Warwick, Rhode Island 02889	200.00
E. John D. Lynch 96 Governors Drive Warwick, Rhode Island 02818	1,000.00
F. Patricia M. Lynch 96 Governors Drive Warwick, Rhode Island 02818	1,000.00
G. Daniel MacLellan Hi View Drive Hope, Rhode Island 02831	700.00
H. Edward Maggiacomo 38 Belcrest Road Cranston, Rhode Island 02920	300.00
I. Edmund M. Mauro, Jr. 67 Taber Avenue Providence, Rhode Island 02906	200.00
J. Joseph R. Paolino 215 Blackstone Blvd. Providence, Rhode Island	200.00
K. Al Mancino 324 County Road Barrington, Rhode Island 02806	800.00
L. Arthur Coia 42 Standish Avenue No. Providence, Rhode Island 02911	100.00
M. Royal Little 131 Boston Neck Rd. Narragansett, Rhode Island 02882	100.00

Name of Individual	Excess Amount Contributed
N. Gene Mancino 56 Wowams Road Barrington, Rhode Island 02806	500.00
O. Peter R. Cruise 368 Thayer Street Providence, Rhode Island	2,100.00

7904041297

Letter to Individiual Contributors

FEDERAL ELECTION COMMISSION

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

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Dear

On , 1977, the Commission found reason to believe you committed a violation of 2 U.S.C §441a of the Federal Election Campaign Act of 1971, as amended (the Act). A review of the reports of receipts and expenditures filed by Noel for Senator indicates you contributed $_____ to Governor Philip Noel's campaign. Since Governor Noel was a candidate in only one Federal election, you exceeded the contribution limit of $1,000 per election by $_____.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Statements should be submitted under oath.

The Commission is under a duty to investigate this matter expenditiously; therefore, your response should be submitted with in ten days after receipt of this notification. If you have any questions, please contact Gloria Sulton (telephone no. 202/523-4057 or toll free 800/424-9530), the attorney assigned to this matter.

This matter will remain condifential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

Sincerely yours,

William Oldaker
General Counsel

Enclosures: Copy of the Act
Copy of Regulations

DISCLOSURE DIVISION
TRANSMITTAL TO WORD PROCESSING

___1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
___2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
_X_3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

4-13

1. _____
(full name of committee making the contribution)

_____
(address)

_____
(city, state, zip)

_____
(treasurer, if given)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

TYPE OF REPORT: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

CODED BY: _____

DATE: _____

SV# _____

/ / APPENDIX XII

/ / APPENDIX XII(R)

/ / APPENDIX XII(NR)

2. Noel for Senate
(full name of committee receiving the contribution)

602 Tallgate Road
(address)

Warwick, Rhode Island 02886
(city, state, zip)

John D. Lynch
(treasurer, if given)

TYPE OF REPORT: 10 Day Pre Election

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): November 9, 1976

TEAM ANALYST: Suzanne Wilson

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: D(S)

CODED BY: SW

DATE: 8 Mar. 1977

SV# RAD0069ND

/X/ APPENDIX XII

/X/ APPENDIX XII(R)

/ / APPENDIX XII(NR)

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 23, 1977

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

John D. Lynch, Treasurer
Noel for Senate
602 Tallgate Road
Warwick, RI 02886

Re: In reply please refer to:
RAD0069ND

Dear Mr. Lynch:

You have been notified twice that certain entries in the 10 Day Pre Election Report of Receipts and Expenditures filed by your committee raised problems under Section 441a(a) (1) (A) of the Federal Election Campaign Act of 1971, as amended.

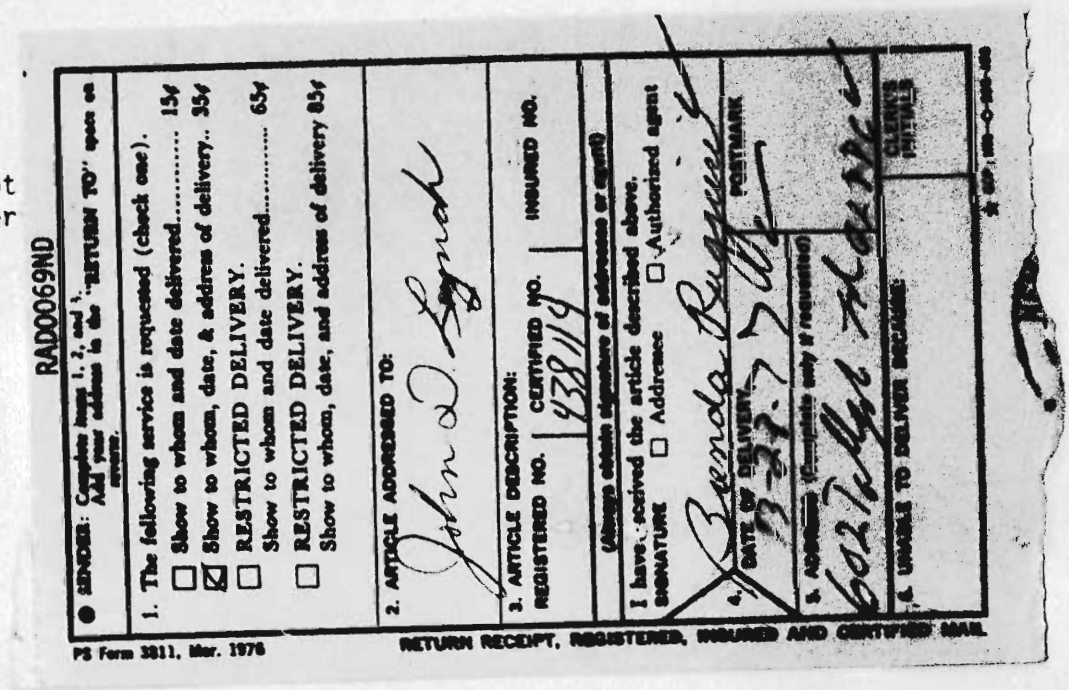
We received a response from you on November 9, 1976, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reasonable cause to believe that you may have committed a violation of the Act. Should you fail to correct this matter within thirty (30) days of receipt of this letter, this matter will be turned over to our Office of General Counsel for appropriate statutory action.

Sincerely,

Thomas E. Harris

Commissioner

Return Receipt Requested: Cer



AMERICAN REVOLUTION BICENTENNIAL 1776-1976

In reply please refer to RAD0069ND

FEDERAL ELECTION COMMISSION

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

November 16, 1976

Due Dec. 16

John D. Lynch, Treasurer
Noel for Senate
602 Tallgate Road
Warwick, Rhode Island 02886

Dear Mr. Lynch:

You have been notified twice that certain entries in the 10 Day Pre-Election Report of Receipts and Expenditures filed by your committee raised problems under Section 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended.

As of this date we have received no response from you. Your failure to respond gives the Commission **reasonable cause** to believe that you may have committed a violation of the Act. Should you fail to correct this matter within thirty (30) days of receipt of this letter, this matter will be turned over to our office of General Counsel for appropriate statutory action.

Sincerely,

Vernon W. Thomson

Commissioner

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 9 0 4 0 1 1 3 0 1

RASCOE-GNU

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

GRAHAM

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438331	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY: NOV 30 1976

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1976—O-209-459

7904041302

LYNCH, WALSH & COBLEIGH
ATTORNEYS AT LAW
605 TOLLGATE ROAD
WARWICK, R. I. 02886
739-6500

JOHN D. LYNCH
JOSEPH W. WALSH
GERARD P. COBLEIGH
MICHAEL A. HIGGINS
JOHN C. REVENS, JR.

1976 NOV -9 AM 11:13

HAND DELIVERED

IN REPLY PLEASE
REFER TO FILE NO.

November 5, 1976

Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

RE: Noel for Senator
S-2150, RAD 0069 ND
10 Day Pre-Election Report

Gentlemen: RI DEM C671

In response to your inquiry, dated October 28, 1976, relative to the receipt of campaign contributions in excess of $1,000 from individual contributors, I have the following comments.

It was anticipated that the candidate would be in the General election as well as the Primary election. Consequently, expenditures were made toward that goal. For example, television production was geared for both the primary and general elections. Thus, the questioned contributions (Reference enclosure) provided the support for these payments.

If you need additional information regarding this matter, please contact me directly.

Sincerely yours,

JOHN D. LYNCH

JDL/ps
Enclosure

76020133421

7900114304

LYNCH, WALSH & COBLEIGH
ATTORNEYS AT LAW
602 TOLLGATE ROAD
WARWICK, R. I. 02886

Federal Election Commission
1325 K. Street, N.W.
Washington, D. C. 20463

7900114304

FRANCIS R. VALEO
SECRETARY

United States Senate

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20510

N O T I C E

THE POSTMARK ON THE PRECEDING ENVELOPE IS _____.

7602013342 3

In reply please refer to RAD0069ND

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

11/12

SENT 10/28/76

John D. Lynch, Treasurer
Noel for Senate
602 Tallgate Road
Warwick, Rhode Island 02886

Dear Mr. Lynch:

On October 4, 1976, you were notified that certain entries in the 10 Day Pre-Election Report of Receipts and Expenditures filed by your committee raised problems under section 44la(a)(l)(A) of the Federal Election Campaign Act of 1971, as amended.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of section 44la(a)(l)(A).

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Nancy Davis (202/382-3484) our reports analyst assigned to you.

Sincerely,

Thomas E. Harris

Commissioner

RAD0069ND

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☑ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	97305	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. Catarina Blanton

DATE OF DELIVERY 11-17-76

POSTMARK

5. ADDRESS (Complete only if requested)
642 TOLLGATE RD.
WARWICK, RI

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1975—O-212-865

7904011507

In reply please refer to RAD0069ND

Oct/19

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

John D. Lynch, Treasurer
Noel for Senate
602 Tallgate Road
Warwick, Rhode Island 02886

October 4, 1976

Dear Mr. Lynch:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. One such provision precludes individuals and political committees, other than certain multicandidate committees, from making political contributions to a candidate for Federal election in excess of $1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

During review of the 10 Day Pre-Election Report of Receipts and Expenditures filed with the Federal Election Commission, we noticed entries indicating that you may have received contributions which exceed the limits noted above. A copy of that portion of your report is attached so that a review of your records can be made.

If you find that the contributions you received were in excess of the limits set forth in the Act, the Commission recommends that you return the amounts in excess of $1,000 to the donors. These returns should be reported immediately by letter and should be reflected as contribution refunds on your next report of Receipts and Expenditures.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on these matters. If you have any questions, please do not hesitate to contact Nancy Davis (202/382-3484) our reports analyst assigned to you.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Return Receipt
Requested: Certified

Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Number 15, 16, 17 and/or 18 of FEC Form 3

(see instructions on back)

LINE NUMBER 15a

(Use a separate schedule(s) for each number you enter.)

Name of Candidate or Committee (in full)

NOEL FOR SENATOR

Name and address (and ZIP code)	Occupation / Principal place of business	Date (month, day, year)	Amount of each receipt in this series
John R. Allen 31 Woodland Road Barrington, R.I. 02806	Lawyer Hinkley, Allen, Salisbury & Parsons 2200 Industrial Bank Bldg. Providence, R. I. 02903		▶ $ 35.00
Gordon R. Archibald 151 Hedgerow Drive Warwick, Rhode Island 02886	Civil Engineer Gordon R. Archibald Engineer 76 Pine Street Providence, R. I. 02903	5-21-76	▶ $ 500.00
Peter Arden 251 Lansdown Way Concord, Massachusetts 01742	Engineer Arden Engineering Co., Inc. 2 Taylor Drive E. Providence, R. I. 02916		▶ $
Angelo E. Anninaro 3 Patterson Avenue Westerly, R.I. 02891	Director Labor Relations Administrator State of Rhode Island 150 Promenade Street Providence, R.I. 02908		▶ $
Lloyd A. Baker Old Potter Hill Road Westerly, Rhode Island 02891	Vice Pres. & Secretary Architect Baker & Conlon Architects, Inc. 152 Warren Avenue E. Providence, R. I. 02914		▶ $
Aldo A. Beretta 115 Varnum Avenue Pawtucket, Rhode Island 02860	Vice President Durastone Co., Inc. Hamlinsen Avenue Lincoln, R. I. 02865		▶ $ 200.00

Subtotal of receipts this page (optional) ▶ $ 500.00

Total this period (last page this line number only) ▶ $

Page 1

76020037 0

Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

See instructions on back

LINE NUMBER 15a

Use a separate schedule for each line number used

EMPLOYER

Lynch Drive 02818		8-16-76	$1,000.00
Cahleigh Road	Lawyer		
W. Lynch Drive Island 02818		8-21-76	$1,000.00
Drive Island	Housewife		
Street 02916			
Financial Group	Investor		
A. McDermott Hillcrest Street Pawtucket, Rhode Island 02916			
Hillcrest Street Pawtucket, Rhode Island 02916	Housewife		
Anne A. Nadeau Birch Street Harwich, R. I. 02852			
Birch Street Harwich, R. I. 02852	Housewife		
Doris L. McGowan 11 Middle Highway Barrington, R. I. 02806			
11 Middle Highway Barrington, R. I. 02806	Housewife		

Subtotal for this page (optional) ▶ $2000.00

Total (if carried from last page this line number only) ▶ $

FOR SENATOR

George J. Jeremy, Jr. Gertrude Avenue E. Providence, R.I. 02916			
The Robinson, Green Beretta Corp. 1 John Street Providence, R.I. 02906	Vice-President		
David Kerr Pierre Hotel New York, N.Y. 10021	Father		
Kerr			
Norton D. Reyes 7 Twin Oak Drive Warwick, Rhode Island 02889	Civil Engineer	5-25-76	$1,000.00
Reyes Associates 321 South Main Street 02903			
Gertrude T. Reyes 7 Twin Oak Drive Warwick, Rhode Island 02889		5-25-76	$1,000.00
7 Twin Oak Drive Warwick, R. I. 02889	Housewife		
Janet T. Reyes			
	Housewife		
Walter I. Reyes			
Reyes Associates 321 South Main Street 02903	Civil Engineer		

Subtotal of receipts this page (optional)	$ 2,000.00
Total this period (last page this line number only)	$

760082346

PS

PS Form 3811, Mar. 1976

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☑ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

RADC069ND

2. ARTICLE ADDRESSED TO:
Lynch

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438186	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mary L Morette

4. DATE OF DELIVERY 10-6-76 POSTMARK

5. ADDRESS (Complete only if requested)
602 Tallyho Rd

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO: 1976—O-203-456

RADC069ND

PS Form 3811, Mar. 1976

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Lynch

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438330	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Patricia Blanton

4. DATE OF DELIVERY 11-1-76 POSTMARK

5. ADDRESS (Complete only if requested)
602 Tallyho Rd

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO: 1976—O-203-456

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 411

Date Filmed 6/29/79 Camera No. --- 2

Cameraman SPC