



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4452

DATE FILMED 6-8-87 CAMERA NO. 4

CAMERAMAN JMK

97043820587



National Republican Congressional Committee

Bill Paxon, M.C.
Chairman

Maria Cino
Executive Director

ORIGINAL

September 6, 1996

BEFORE THE FEDERAL ELECTION COMMISSION

Nora Bredes For Congress Committee

Mid-Suffolk N.O.W., Inc.

MUR # 2452

SEP 6 3 03 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

COMPLAINT

The National Republican Congressional Committee ("N.R.C.C."), by and through its Executive Director, Maria Cino, brings this complaint pursuant to 2 U.S.C. § 437g(a)(1) (1994). The N.R.C.C. is located at 320 First Street, S.E., Washington, D.C. 20003.

I. SUMMARY

Mid-Suffolk N.O.W. is making, and Nora Bredes for Congress is accepting, unlawful solicitations to the general public on behalf of Bredes' Congressional campaign. These solicitations lack basic disclaimers and identifiers required by federal tax and election laws. Specifically,

1. Mid-Suffolk N.O.W. mailed a letter dated June 21, 1996 soliciting contributions for Ms. Bredes' campaign. Federal law forbids corporations (including § 501(c)(4) corporations) from making expenditures "in connection with" federal elections, 2 U.S.C. § 441b(a) (1996).
2. Mid-Suffolk N.O.W.'s solicitation on behalf of Bredes for Congress fails to comply with Internal Revenue & Federal Election mandatory disclaimer laws. 26 U.S.C. § 6710 (1996), 2 U.S.C. §§ 432(i) & 441d(a) (1996).
3. Mid-Suffolk N.O.W., Inc. and two other incorporated entities sponsored a reception for Nora Bredes and paid for a mailing (without disclaimers) that expressly advocated her election to the general public. Again, these expenditures violate federal election law. 2 U.S.C. § 441b(a).

320 First Street, S.E.
Washington, D.C. 20003
(202) 479-7020

II. FACTS & DISCUSSION

1. Mid-Suffolk N.O.W.'s Solicitations of Contributions on Behalf of Nora Bredes for Congress Lack Federally-Mandated Disclaimer Notifications

Nora Bredes -- according to Mid-Suffolk N.O.W. a "committed feminist and NOW member" -- is presently running for U.S. Congress, seeking to represent the 1st district of New York. Mid-Suffolk N.O.W., Inc. is a local self-professed "feminist" organization incorporated under New York law as a tax-exempt § 501(c)(4) entity on June 9, 1988.

On June 21, 1996, Mid-Suffolk N.O.W. wrote and subsequently mailed a letter to "Mid-Suffolk NOW Supporters" expressly advocating the election of Nora Bredes for Congress -- "Let's elect Nora Bredes to Congress -- and soliciting contributions on her behalf. *See Mid-Suffolk NOW Bredes Solicitation Letter, June 21, 1996 (attached hereto as Exhibit 1).* Upon information and belief, this solicitation was mailed to individuals beyond Mid-Suffolk N.O.W. Inc.'s restricted class and members as defined at 11 C.F.R. § 114.7(a). The mailing in question then provided the campaign address to which donors can mail contributions to Nora Bredes. *Id.* This page, which upon information and belief was mailed by itself, fails to offer any disclaimers such as:

- (1) Who paid for the solicitation. REQUIRED by 2 U.S.C. § 441d(a).
- (2) Whether the Bredes campaign authorized the solicitation. REQUIRED by 2 U.S.C. § 441d(a).
- (3) Explaining that contributions are not tax deductible. REQUIRED by 26 U.S.C. § 6113 (1996). *Section 6113 of the Internal Revenue Code requires political committees whose gross annual receipts normally exceed \$100,000 to include a special notice on their solicitations to inform solicitees that contributions are NOT tax deductible. Failure to disclose that contributions are nondeductible results in a mandatory penalty of \$1,000 for each day on which such a failure occurred. 26 U.S.C. § 6710 (1996).*
- (4) Requesting contributors' names, addresses, occupation and employer as is REQUIRED by 2 U.S.C. § 432(i).

2. Mid-Suffolk N.O.W.'s Solicitations of Contributions on Behalf of Nora Bredes Constitute Unlawful Contributions from a Prohibited Source.

It is unlawful for corporations to make any expenditures in connection with federal elections, 2 U.S.C. § 441b(a) (1994), and this prohibition equally applies to non-profit corporations such as Mid-Suffolk N.O.W., Inc. *See FEC v. Nat'l Right to Work Comm.*, 459 U.S. 197 (1982). Illegal corporate expenditures include all funds spent on communications to the general public that solicit funds for a candidate. Solicitations of contributions and express

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advocacy through a mailing sent to individuals beyond a corporation's restricted class are considered contributions and are unlawful if made by a corporation. *See 11 C.F.R. § 114.4; FEC AO 1996-21*. Such solicitations require clear and conspicuous disclaimers under FEC and IRS law. *Id.*; 2 U.S.C. § 441d(a). It was and remains unlawful for Mid-Suffolk N.O.W. to make (and for Ms. Bredes to accept) this contribution from a corporation. 2 U.S.C. § 441b(a).

3. **Mid-Suffolk N.O.W.'s Planned and Proposed Campaign Activity on Behalf of Nora Bredes Would Constitute Unlawful Contributions from a Prohibited Source.**

A postscript to the Mid-Suffolk N.O.W. solicitation letter in question informs supporters that:

As the campaign moves closer, we will be calling for volunteers for phone banking, literature drops, house parties to introduce Nora to your friends and neighbors, and all the other important campaign work.

Obviously, corporations may not conduct campaign activity in connection with federal elections. 2 U.S.C. § 441b(a). Recruiting volunteers for the campaign and/or providing goods or services for the campaign at the campaign's request would constitute unlawful in-kind contributions by Mid-Suffolk N.O.W. The Commission should ensure that these proposed activities comply with the law.

4. **N.O.W., EEGO & East End Women's Alliance's Aug. 24 Reception for Ms. Bredes -- Including the Invitations Mailed for this Event -- Constitute Unlawful Corporate Contributions.**

Although the invitations for the August 24, 1996 fundraising reception lacked disclaimers, it is reasonable to assume that the sponsors of the event -- N.O.W., EEGO, and the East End Women's Alliance -- paid for them. *See N.O.W. Invitation (Exh. 2)*. These invitations expressly advocate Ms. Bredes' election, declaring:

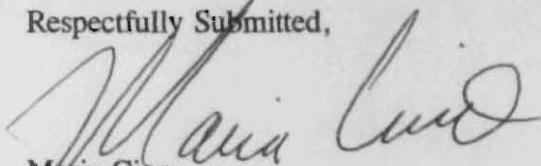
Nora Bredes is a winner and can unseat this Gingrich clone **if we give her the support she needs NOW!**

This invitation lacked required federal disclaimers. Furthermore, none of these incorporated sponsoring organizations is a PAC, meaning that the contributions were unlawful. 2 U.S.C. § 441b(a) (1996).

IV. PRAYER FOR RELIEF

The Commission should investigate the Nora Bredes for Congress Campaign and its improper acceptance of corporate contributions and solicitations on the campaign's behalf. All necessary and appropriate measures should be taken pursuant to 2 U.S.C. § 437g(d)(1) to remedy these unlawful activities and to deter future illegality.

Respectfully Submitted,


Maria Cino
Executive Director

District of Columbia

Signed and sworn to before me this 6 th day of Sept, 1996.



NOTARY PUBLIC

My commission expires: _____

M. D. Acton
Notary Public, District of Columbia
My Commission Expires July 14, 1999



MID-SUFFOLK NOW NATIONAL ORGANIZATION FOR WOMEN

Post Office Box 330, Stony Brook, New York 11790 • (516) 244-3923

June 21, 1996

EXHIBIT 1

Dear Mid-Suffolk NOW Supporter:

NORA BREDES IS RUNNING FOR CONGRESS!!!!

One of our very own, a committed feminist and NOW member, could have a voice in the House of Representatives — a voice for us on choice, women, families, children, and the environment.

Nora has been a Suffolk County Legislator since 1992 with a record of unwavering support for women, children, domestic violence reform, and pro-choice issues. She has a strong concern for our environment, was a leader in the "Stop Shoreham" movement, and was the Executive Director of the League of Conservation voters.

Nora is challenging anti-choice Republican incumbent Michael Forbes, one of Newt's "contract kids" and a man whom Jesse Helms lauded as one of the most conservative freshmen in Washington. As I'm sure you know, Forbes's record on choice is horrible. Not only has he taken the Right to Life line, but he has actually boarded the local anti-choice buses to Washington and marched with them two years in a row! His voting record on choice, welfare reform, and health care is consistently anti-women.

Nora has a real opportunity to win this seat and take our voices to Washington with her. She has support from the pro-choice community, the environmental community and the labor/union community. Her race is one of four New York State races targeted as potentially winnable by the Democratic National Committee to unseat anti-choice incumbents like Forbes, but she needs your help.

Nora's must raise enough early money in several weeks to prove she is a viable candidate. **EARLY MONEY IS CRUCIAL!** To quote Gloria Steinem: *"Open your checkbook and see how much you paid for your last pair of shoes. You should be able to spend that much to work for what you believe in."*

Let's elect Nora Bredes to Congress! Please consider what you can afford and mail it to:

NORA BREDES FOR CONGRESS

P. O. Box 799

Stony Brook, N. Y. 11790

Fran Conlon
Co-President

Karen Weisberg
Co-President

P.S. As the campaign moves closer, we will be calling for volunteers for phone banking, literature drops, house parties to introduce Nora to your friends and neighbors, and all the other important campaign work.

NOW - EGO - EAST END WOMEN'S ALLIANCE

Invite you to a

National Women's Day Reception*
for Congressional Candidate

NORA BREDES

Suffolk County Legislator since 1992 - Sierra Club
Environmentalist of the Year - SARC (Pro-Choice) &
NOW-PAC & ESPA (lesbian/gay pac) ENDORSEE!

Saturday, August 24th 4-6PM

at the home of

Marilyn Fitterman

66 Hildreth Place, East Hampton NY 11937

Music by Sandy Rapp - Surprise Guests

Take Rt 27 East to East Hampton Windmill Fork to Windmill's left on North
Main St. Fork right and go 3 miles on Springs-Fireplace Rd. Turn right on
Hildreth to 66 Hildreth midway on left. For more info call (516) 329-5193.

Your anti-abortion-choice, pro-assault weapon sitting
Congressman, Michael Forbes (R) is pledged to imposing
his anti-woman religious beliefs on every woman in the
country. He spends taxpayer money mailing
correspondence about these religious beliefs and opposes
the lesbian/gay anti-discrimination bill. Nora Bredes is a
winner and can unseat this Gingrich clone if we give her
the support she needs NOW!

Suggested donation \$15

* No contribution too small (or too large)!



FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 13, 1996

Maria Cino, Executive Director
National Republican Congressional Committee
320 First Street, SE
Washington, DC 20003

RE: MUR 4452

Dear Ms. Cino:

This letter acknowledges receipt on September 6, 1996, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4452. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosure
Procedures

97043820594



FEDERAL ELECTION COMMISSION

Washington, DC 20463

September 13, 1996

Jay A. Schoenfield, Treasurer
Nora Bredes for Congress
PO Box 799
Stony Brook, NY 11790

RE: MUR 4452

Dear Mr. Schoenfield:

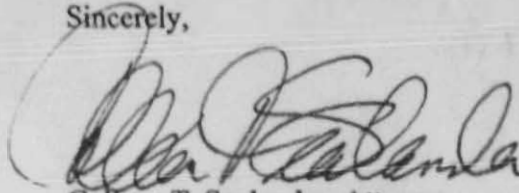
The Federal Election Commission received a complaint which indicates that Nora Bredes for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4452. Please refer to this number in all future correspondence.

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

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

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

cc: Nora Louise Bredes

97043820596



FEDERAL ELECTION COMMISSION

Washington, DC 20463

September 13, 1996

Fran Conlon, Co-President
Karen Weisberg, Co-President
Mid-Suffolk N.O.W., Inc.
PO Box 330
Stoney Brook, NY 11790

RE: MUR 4452

Dear Ms. Conlon & Ms. Weisberg:

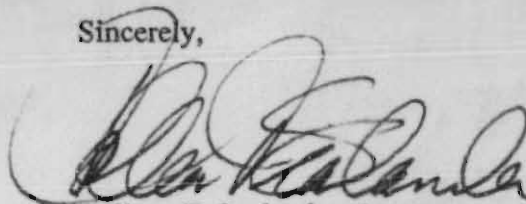
The Federal Election Commission received a complaint which indicates that Mid-Suffolk NOW may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4452. Please refer to this number in all future correspondence.

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

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

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Sealander", written over a horizontal line.

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

1. Complaint
2. Procedures

97043820598



FEDERAL ELECTION COMMISSION

Washington, DC 20463

September 13, 1996

East End Gay Organization
Hands Creek Road
East Hampton, NY 11937

RE: MUR 4452

Dear Madam:

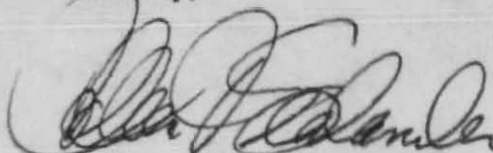
The Federal Election Commission received a complaint which indicates that East End Gay Organization ("EEGO") may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4452. Please refer to this number in all future correspondence.

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

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

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

97043820600C



FEDERAL ELECTION COMMISSION

Washington, DC 20463

September 13, 1996

East End Women's Alliance, Inc.
PO Box 136
South Hampton, NY 11968

RE: MUR 4452

Dear Madam:

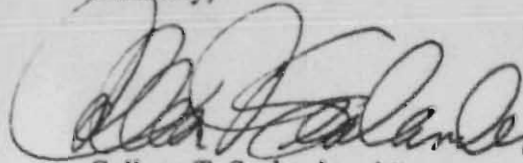
The Federal Election Commission received a complaint which indicates that East End Women's Alliance, Inc. may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4452. Please refer to this number in all future correspondence.

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

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

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

97043820602



MID-SUFFOLK NOW, INC.

NATIONAL ORGANIZATION FOR WOMEN
P.O. Box 330, Stony Brook, NY 11789
(516) 244-3923

September 28, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 28 12 32 PM '96

Ms. Colleen T. Sealander
Central Enforcement Docket
General Counsel Office
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Re: MUR 4452

Dear Ms. Sealander:

We are requesting an extension of time to respond to complaint MUR 4452, dated 9/13/96, received 9/16/96, due to the following circumstances:

- ♦ We have not been able to secure a lawyer to help us answer this complaint and need more time to do so.
- ♦ We are a volunteer organization, no one is paid. Each of us have a family and career besides this organization.
- ♦ Our new officers have had a myriad of problems. One co-president was away on business and then ill. The vice president underwent a major operation and has not been available at all. The other co-president began her two jobs in September and has had to shoulder all of the responsibility.

We intend to fully cooperate and assist in your inquiry. We hope you will grant us this extension to allow us time to deal with this important matter with the seriousness it requires, and respectfully appreciate your consideration of this request.

Sincerely,

Fran Conlon
Karen Weisberg
Fran Conlon, Co-President
Karen Weisberg, Co-President



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 4, 1996

Fran Conlon, Co-President
Karen Weisberg, Co-President
Mid-Suffolk NOW, Inc.
P.O. Box 330
Stony Brook, NY 11789

RE: MUR 4452

Dear Ms. Conlon and Ms. Weisberg:

This is in response to your letters dated September 28 and October 3, 1996, requesting a two week extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on October 15, 1996.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Alva E. Smith, Paralegal
Central Enforcement Docket

97043820604

LAW OFFICES
OLMSTEAD GAUGHRAN & YULE

46 WOODBINE AVENUE
NORTHPORT, NEW YORK 11768-2884

ARTHUR E. OLMSTEAD
JAMES F. GAUGHRAN
EDWARD J. YULE*
* Also admitted in Connecticut

TEL: 516/754-3200
FAX: 516/754-3003
(Not for Service)

September 30, 1996

General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 4 11 54 AM '96

Re: Nora Bredes for Congress Comm.
MUR 4452

Dear Sir or Madam:

I represent the Nora Bredes for Congress Committee and its' Treasurer Jay Schoenfeld. On their behalf I am responding to the complaint filed against them by the National Republican Congressional Committee which has been designated MUR 4452.

My clients believe that the within complaint is politically motivated and without merit and that no action should be taken by the Federal Election Commission against either the Nora Bredes for Congress Committee or Jay Schoenfeld as Treasurer.

Enclosed please find an affidavit sworn to by Jay Schoenfeld, Treasurer of the Nora Bredes for Congress Committee, ("Schoenfeld Affidavit"), as well as a Statement of Designation of Counsel.

The response by my clients to each and every allegation of the within complaint as outlined in the Republican Congressional Committee's "Facts and Discussion" is as follows:

1. ALLEGATION: "Mid-Suffolk N.O.W.'s Solicitations of Contributions on Behalf of Nora Bredes for Congress Lack Federally-Mandated Disclaimer Notifications."

RESPONSE: The Nora Bredes for Congress Committee and Jay Schoenfeld as Treasurer did not pay for or authorize any expenditure to finance the communications referred to as Exhibit One and Exhibit Two of the within complaint, ("Communications"). The Nora Bredes for Congress Committee did not authorize any other committee or individual to produce and or distribute the Communications. Nora Bredes as candidate did not authorize Nora Bredes for Congress or any other Committee or individual(s) to produce, pay for and, or distribute the Communications. All of this is sworn to in the Schoenfeld Affidavit. In sum, Nora Bredes for Congress and Jay Schoenfeld as Treasurer had nothing to do with the Communications and therefore they are not in violation of 2 U.S.C Section 441d(a), 26 U.S.C. Section 6113 (1996) or 2 U.S. C. Section 432(i) as alleged in the within complaint.

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2. ALLEGATION: "Mid-Suffolk N.O.W.'s Solicitations of Contributions on Behalf of Nora Bredes Constitute Unlawful Contributions from a Prohibited Source."

RESPONSE: Nora Bredes for Congress and Jay Schoenfeld as Treasurer are not in violation of 2 U.S.C. Section 441b(a) since they did not have actual knowledge of the Communications prior to receiving a copy of the within complaint on or about September 16, 1996. A violation of 2 U.S.C. Section 441b(a) occurs if a "candidate, political committee, or other person knowingly" accepts a contribution. Since receiving the Communications, Nora Bredes for Congress and Jay Schoenfeld as Treasurer have written to the organizations allegedly involved in the Communications to obtain lists of names and addresses said Communications may have been distributed to. Nora Bredes for Congress and Jay Schoenfeld as Treasurer will return any and all contributions received as a result of the Communications. Please note that they are taking this action because of the campaign's policy of returning any and all contributions alleged to be in violation of Election Law. This should not be interpreted as concluding that any of the organizations alleged to be involved in the distribution of the Communications violated the law.

3. ALLEGATION: "Mid-Suffolk N.O. W.'s Planned and Proposed Campaign Activity on Behalf of Nora Bredes Would Constitute Unlawful Contributions from a Prohibited Source."

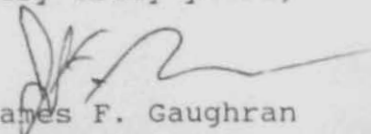
RESPONSE: Same as Response for Allegation "2" above.

4. ALLEGATION: "N.O.W, EEGO & East End Women's Alliance's Aug. 24 Reception for Ms. Bredes--Including the Invitations Mailed for this Event--Constitute Unlawful Corporate Contributions."

RESPONSE: As stated in the responses above, Nora Bredes for Congress and Jay Schoenfeld as Treasurer had no actual knowledge of the Communications prior to the receipt of the within complaint. Nora Bredes for Congress and Jay Schoenfeld as Treasurer are not in violation of 2 U.S.C Section 441b(a) (1996) for the same reasons outlined in response to Allegation "2" above.

I hope the above responses and the documentation provided are of assistance to you in reaching a conclusion on this matter. I would respectfully request on behalf of my clients that no action be taken by the Federal Election Commission on the within politically motivated complaint.

Very truly yours,


James F. Gaughran

cc: Jay Schoenfeld
Nora Bredes

97043820606

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4452

NAME OF COUNSEL: James F. Gaughran

FIRM: James F. Gaughran, Attorney at Law

ADDRESS: 46 Woodbine Ave.

Northport, NY 11768

TELEPHONE: (516) 754-0461

FAX: (516) 754-3003

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

9/30/96
Date

Jay Schoenfeld
Signature

RESPONDENT'S NAME: Jay Schoenfeld

ADDRESS: P.O. Box 799

Stony Brook, NY 11790

TELEPHONE: HOME (516) 981-5128

BUSINESS (516) 751-4435

97043820607

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4452

NAME OF COUNSEL: James F. Gaughran

FIRM: James F. Gaughran, Attorney at Law

ADDRESS: 46 Woodbine Ave.

Northport, NY 11768

TELEPHONE: (516) 754-0461

FAX: (516) 754-3003

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

9/30/96
Date

Jay Schenfeld
Signature
Treasurer

RESPONDENT'S NAME: Nora Bredes for Congress

ADDRESS: P. O. Box 799

Stony Brook, NY 11790

TELEPHONE: HOME (516) 981-5128

BUSINESS (516) 751-4435

97043820608

STATE OF NEW YORK)
COUNTY OF SUFFOLK)

ss.:

JAY SCHOENFELD, being duly sworn, deposes and says:

1. Deponent resides at [REDACTED]

[REDACTED] in the County of Suffolk, State of New York, and is a citizen of the United States.

2. Deponent is the Treasurer of the Nora Bredes for Congress Committee.

3. On or about September 16, 1996 deponent received a letter from the Federal Election Commission dated September 13, 1996 which included a copy of a Complaint filed by the National Republican Congressional Committee alleging violations of Federal Election Law by the Nora Bredes for Congress Committee.

4. The aforesaid alleged violations are based on two communications, which are marked as Exhibit One and Exhibit Two in the within complaint, purporting to solicit contributions for the Nora Bredes for Congress Committee.

5. Your deponent as Treasurer and the Nora Bredes for Congress Committee did not authorize the communications marked as Exhibit One and Exhibit Two of the within complaint.

6. Your deponent as Treasurer and the Nora Bredes for Congress Committee received actual notice of the communications marked as Exhibit One and Exhibit Two of the within complaint, on or about September 16, 1996, when the aforesaid communication from the Federal Election Commission was received.

7. Your deponent as Treasurer conducted an internal investigation of the facts and circumstances concerning the communications marked as Exhibit One and Exhibit Two, and concluded after discussing this matter with the candidate and any and all

97043820609

relevant campaign staff members, that no one within the Nora Bredes for Congress Committee, including the candidate and your deponent authorized either communication.

8. Your deponent acknowledges that a reception for Nora Bredes did take place at the home of Marilyn Fitterman on August 24, 1996, but that your deponent and the Nora Bredes for Congress Committee believed that said event was a house party sponsored by Ms. Fitterman as an individual supporter of the campaign.

9. Your deponent as Treasurer mailed letters to Mid Suffolk NOW, EEGO, and the East End Women's Alliance, on or about September 27, 1996, requesting information concerning the communications marked as Exhibit One and Exhibit Two and copies of said letters are annexed hereto.

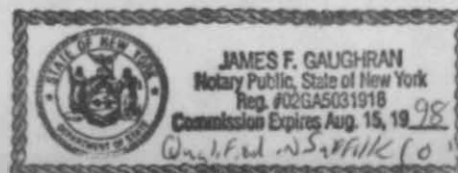
10. Your deponent as Treasurer will return any and all contributions received as a result of the communications marked as Exhibit One and Exhibit Two of the within complaint.

11. Your deponent as Treasurer and the Nora Bredes for Congress Committee denies each and every allegation of the within complaint and respectfully requests that the Federal Election Commission take no action against your deponent and the Nora Bredes for Congress Committee.

Jay Schoenfeld
JAY SCHOENFELD

Sworn to before me this
30th day of September, 1996

James F. Gaughran
NOTARY PUBLIC



Nora Bredes

FOR CONGRESS

203 Main Street

E. Searles, NY 11753

telephone 516-791-1111

fax 516-791-1101

September 27, 1996

Fran Conlon, Co-President
Karen Weisberg, Co-President
Mid-Suffolk N.O.W., Inc.
P. O. Box 330
Stony Brook, NY 11790

Re: Federal Election Commission
MUR 4452

Dear Ms. Conlon and Ms. Weisberg:

The Federal Election Commission recently received a complaint alleging that Mid-Suffolk N.O.W. violated Federal Election Laws. Within that complaint are two exhibits which purport to show solicitations made by your organization for campaign contributions to the Nora Bredes for Congress Committee. Please be advised that the Nora Bredes for Congress Committee did not authorize either solicitation.

Further the Nora Bredes for Congress Committee respectfully requests that your organization provide us with a list of all individuals and, or organizations both solicitations were sent to, their addresses and the date(s) they were sent. Once our Committee receives the list we will review our list of contributions received and refund any and all contributions received as a result of the solicitations.

Please be assured that the Nora Bredes for Congress Committee believes that this complaint filed by the National Republican Congressional Committee is politically motivated and without merit. However it is the policy of the Nora Bredes for Congress Committee to refund all contributions received where it is alleged that acceptance of them would not be in compliance with Federal Election law.

I thank you very much for your assistance with this matter.

Very truly yours,

Jay Schoenfeld

Jay Schoenfeld
Treasurer

97043820611

Nora Bredes

FOR CONGRESS

203 Main Street

B. Schenck, NY 11733

telephone 516-731-4443

fax 516-731-4000

September 27, 1996

EEGO
P. O. Box 708
Bridgehampton, NY 11932

Re: Federal Election Commission
MUR 4452

Dear Chairperson:

The Federal Election Commission recently received a complaint alleging that Mid-Suffolk N.O.W. violated Federal Election Laws. Within that complaint is an exhibit which purports to show a solicitation made by your organization for campaign contributions to the Nora Bredes for Congress Committee. (A copy of the Exhibit is enclosed). Please be advised that the Nora Bredes for Congress Committee did not authorize said solicitation.

Further the Nora Bredes for Congress Committee respectfully requests that your organization provide us with a list of all individuals and, or organizations the solicitation was sent to, their addresses and the date(s) they were sent. Once our Committee receives the list we will review our list of contributions received and refund any and all contributions received as a result of the solicitation.

Please be assured that the Nora Bredes for Congress Committee believes that this complaint filed by the National Republican Congressional Committee is politically motivated and without merit. However it is the policy of the Nora Bredes for Congress Committee to refund all contributions received where it is alleged that acceptance of them would not be in compliance with Federal Election law.

I thank you very much for your assistance with this matter.

Very truly yours,

Jay Schoenfeld
Jay Schoenfeld
Treasurer

97043820612

NOW - EEGO - EAST END WOMEN'S ALLIANCE

Invite you to a

National Women's Day Reception*
for Congressional Candidate

NORA BREDES

Suffolk County Legislator since 1992 - Sierra Club
Environmentalist of the Year - SARC (Pro-Choice) &
NOW-PAC & ESPA (lesbian/gay pac) ENDORSE!

Saturday, August 24th 4-6PM
at the home of

Marilyn Fitterman
66 Hildreth Place, East Hampton NY 11937

Music by Sandy Rapp - Surprise Guests

Take Rt 27 East to East Hampton Windmill. Fork to Windmill's left on North
Main St. Fork right and go 3 miles on Springs-Fireplace Rd. Turn right on
Hildreth to 66 Hildreth midway on left. For more info call (516) 329-5193.

Your anti-abortion-choice, pro-assault weapon sitting
Congressman, Michael Forbes (R) is pledged to imposing
his anti-woman religious beliefs on every woman in the
country. He spends taxpayer money mailing
correspondence about these religious beliefs and opposes
the lesbian/gay anti-discrimination bill. Nora Breder is a
winner and can unseat this Gingrich clone if we give her
the support she needs NOW!

Suggested donation \$15

* No contribution too small (or too large)!

Nora Bredes

FOR CONGRESS

203 Main Street

E. Setauket, NY 11733

telephone 516-731-4439

fax 516-731-4440

September 27, 1996

East End Women's Alliance
P. O. Box 2
Amagansett, NY 11930

Re: Federal Election Commission
MUR 4452

Dear Chairperson:

The Federal Election Commission recently received a complaint alleging that Mid-Suffolk N.O.W. violated Federal Election Laws. Within that complaint is an exhibit which purports to show a solicitation made by your organization for campaign contributions to the Nora Bredes for Congress Committee. (A copy of the exhibit is enclosed). Please be advised that the Nora Bredes for Congress Committee did not authorize said solicitation.

Further the Nora Bredes for Congress Committee respectfully requests that your organization provide us with a list of all individuals and, or organizations the solicitation was sent to, their addresses and the date(s) they were sent. Once our Committee receives the list we will review our list of contributions received and refund any and all contributions received as a result of the solicitation.

Please be assured that the Nora Bredes for Congress Committee believes that this complaint filed by the National Republican Congressional Committee is politically motivated and without merit. However it is the policy of the Nora Bredes for Congress Committee to refund all contributions received where it is alleged that acceptance of them would not be in compliance with Federal Election law.

I thank you very much for your assistance with this matter.

Very truly yours,

Jay Schoenfeld

Jay Schoenfeld
Treasurer

97043820614

NOW - EEGO - EAST END WOMEN'S ALLIANCE

Invite you to a
National Women's Day Reception*
for Congressional Candidate

NORA BREDES

**Suffolk County Legislator since 1992 - Sierra Club
Environmentalist of the Year - SARC (Pro-Choice) &
NOW-PAC & ESPA (lesbian/gay pac) ENDORSEE!**

Saturday, August 24th 4-6PM
at the home of

Marilyn Fitterman
66 Hildreth Place, East Hampton NY 11937

Music by Sandy Rapp - Surprise Guests

**Take Rt 27 East to East Hampton Windmill. Fork to Windmill's left on North
Main St. Fork right and go 3 miles on Springs-Fireplace Rd. Turn right on
Hildreth to 66 Hildreth midway on left. For more info call (516) 329-5193.**

**Your anti-abortion-choice, pro-assault weapon sitting
Congressman, Michael Forbes (R) is pledged to imposing
his anti-woman religious beliefs on every woman in the
country. He spends taxpayer money mailing
correspondence about these religious beliefs and opposes
the lesbian/gay anti-discrimination bill. Nora Brede is a
winner and can unseat this Gingrich clone if we give her
the support she needs NOW!**

Suggested donation \$15

*** No contribution too small (or too large)!**



MID-SUFFOLK NOW, INC.

NATIONAL ORGANIZATION FOR WOMEN

P.O. Box 330, Stony Brook, NY 11790

(516) 244-3923

October 10, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 15 3 38 PM '96

Ms. Colleen T. Sealander
Central Enforcement Docket
General Counsel Office
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

Re: MUR 4452

Dear Ms. Sealander:

The letter in question, sent by Mid-Suffolk NOW, dated June 21, 1996, was sent in good faith to Mid-Suffolk NOW members only.

The letter in question was sent by Mid-Suffolk NOW on our own, having no consultation with the Nora Bredes for Congress campaign.

Mid-Suffolk NOW had no connection or sponsorship to the August 24, 1996 fund raiser in question.

We hope we have answered all of the complaints to your satisfaction.

Sincerely,

Karen Weisberg
Fran Conlon (Rev)

Fran Conlon, Co-President

Karen Weisberg, Co-President

66 Hildreth St.
East Hampton, NY 11937
(516) 329-0593
October 8, 1996

General Counsel Office
Federal Election Commission
999 E St. NW
Washington, DC 20463

To Whom It May Concern:

In reference to complaint MUR 4452:

I, Marilyn Fitterman, held a party at my house with the purpose of raising money for Nora Bredes, running for Congress in the 1st CD. Other individuals helped me pay for the cost of this event. Mid-Suffolk NOW was not involved with this fund raiser at all.

If you have any questions, please feel free to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Marilyn Fitterman', written in a cursive style.

Marilyn Fitterman

97043820617

MARY ELLA REUTERSHAN
STONY HILL ROAD BOX TWO
AMAGANSETT, NEW YORK 11930-0002

516/267-3074

Phone & Fax

12 October 1996

Colleen T. Sealander, Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, NW
Washington DC 20463

RE: MUR 4452

Dear Ms. Sealander:

The East End Women's Alliance is not now and never has been incorporated as a non-profit group or otherwise. It was always non-partisan and was an informal group of women who presented a community program from 1971-1992 to celebrate ratification of the 19th Amendment, August 26, 1920, granting women the vote.

We have no membership list, no elected officers, and we have not presented a public affairs program since 1992.

Some of us who live on the East End gave our name for the August 24, 1996 event, but we had no participation in any publicity, news or other decisions about the event.

For the above reasons, we do not believe that we should be included as a party to MUR 4452. For your information: (1) the Commission's letter to our group was incorrectly addressed and included "Inc." to our name which is incorrect. The Commission's letter was dated September 13, 1996 but did not reach this writer until October 10th. The envelop mailing stamp was October 08, 96.

Please let us know if the Commission has any further questions for us regarding MUR 4452.

Sincerely,

Mary Ella Reutershan
MARY ELLA REUTERSHAN

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

OCT 21 1 05 PM '96

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAY 6 2 45 PM '97

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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ENFORCEMENT PRIORITY

GENERAL COUNSEL'S REPORT

SENSITIVE

I. INTRODUCTION.

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing such cases permits the Commission to focus its limited resources on more important cases presently pending before it. Based upon this review, we have identified 28 cases which do

97043820619

not warrant further action relative to other pending matters.¹ Attachment 1 to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

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¹ These cases are: MUR 4419 (*Weinzapfel for Congress*); MUR 4423 (*Davis for Congress*); MUR 4424 (*Nevadans for "Spike" Wilson*); MUR 4429 (*Delahunt for Congress*); MUR 4430 (*Jean Leising for Congress*); MUR 4431 (*Engel for Congress*); MUR 4433 (*Delahunt for Congress*); MUR 4437 (*DiNicola for Congress Committee*); MUR 4440 (*Sue Kelly for Congress*); MUR 4450 (*National Treasury Employees*); MUR 4452 (*Mid-Suffolk N.O.W.*); MUR 4455 (*City of Milwaukee*); MUR 4456 (*Jackson Mint Ltd.*); MUR 4457 (*U.S. Department of Health and Human Services*); MUR 4458 (*KMA-AM Radio*); MUR 4461 (*Americans For Freedom Of Choice PAC*); MUR 4462 (*Ellen O. Tauscher*); MUR 4464 (*Norwood for Congress*); MUR 4465 (*Lincoln for Congress*); MUR 4469 (*Moseley-Braun for Senate*); MUR 4475 (*Manpower Temporary Services, Inc.*); MUR 4479 (*Owens for Congress Committee*); MUR 4482 (*Mike McCormack for Congress*); MUR 4487 (*Citizens for A Strong America*); MUR 4488 (*Ortiz for Congress*); MUR 4489 (*Gill for Congress*); MUR Pre-MUR 338 (*Richard Chrysler Inc.*); and Pre-MUR 339 (*Mammel & Associates, Inc.*).

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective May 19, 1997. Closing these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

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III. RECOMMENDATIONS.

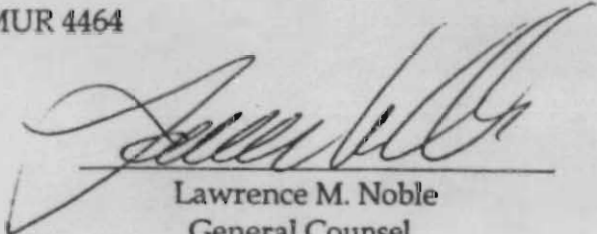
A. Decline to open a MUR, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 338
2. Pre-MUR 339

B. Take no action, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

- | | | |
|-------------|--------------|--------------|
| 1. MUR 4419 | 10. MUR 4450 | 19. MUR 4465 |
| 2. MUR 4423 | 11. MUR 4452 | 20. MUR 4469 |
| 3. MUR 4424 | 12. MUR 4455 | 21. MUR 4475 |
| 4. MUR 4429 | 13. MUR 4456 | 22. MUR 4479 |
| 5. MUR 4430 | 14. MUR 4457 | 23. MUR 4482 |
| 6. MUR 4431 | 15. MUR 4458 | 24. MUR 4487 |
| 7. MUR 4433 | 16. MUR 4461 | 25. MUR 4488 |
| 8. MUR 4437 | 17. MUR 4462 | 26. MUR 4489 |
| 9. MUR 4440 | 18. MUR 4464 | |

5/6/97
Date


Lawrence M. Noble
General Counsel

97043820622

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enforcement Priority.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that the Commission decided by a vote of 5-0 on May 12, 1997, to take the following actions with respect to the General Counsel's May 6, 1997 report on enforcement priority:

A. Decline to open a MUR, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 338
2. Pre-MUR 339

B. Take no action, close the file effective May 19, 1997, and approve the appropriate letters in the following matters:

- | | | |
|-------------|--------------|--------------|
| 1. MUR 4419 | 10. MUR 4450 | 19. MUR 4465 |
| 2. MUR 4423 | 11. MUR 4452 | 20. MUR 4469 |
| 3. MUR 4424 | 12. MUR 4455 | 21. MUR 4475 |
| 4. MUR 4429 | 13. MUR 4456 | 22. MUR 4479 |
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| 6. MUR 4431 | 15. MUR 4458 | 24. MUR 4487 |
| 7. MUR 4433 | 16. MUR 4461 | 25. MUR 4488 |
| 8. MUR 4437 | 17. MUR 4462 | 26. MUR 4489 |
| 9. MUR 4440 | 18. MUR 4464 | |

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

Attest:

5-13-97
Date

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

Received in the Secretariat: Tues., May 06, 1997 2:45 p.m.
Circulated to the Commission: Wed., May 07, 1997 11:00 a.m.
Deadline for vote: Mon., May 12, 1997 4:00 p.m.

bjr

97043820623



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ted Manuss, Executive Director
National Republican Congressional Committee
320 First Street, SE
Washington, DC 20003

RE: MUR 4452

Dear Mr. Manuss:

On September 6, 1996, the Federal Election Commission received you a complaint file by Maria Cino alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 1997. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043820624

MUR 4452

MID-SUFFOLK N.O.W.

Maria Cino, Executive Director of the National Republican Congressional Committee, alleges that Mid-Suffolk N.O.W. made a corporate contribution to Nora Bredes' congressional campaign by soliciting contributions on her behalf by letter dated 6/21/96 from the general public, rather than its restricted class. Ms. Cino alleges that the letter contained no disclaimer, provided the Bredes' campaign address for contribution purposes, and did not explain that contributions were not tax deductible. Further, the letter requests volunteers to help with the campaign. Ms. Cino also believes that Mid-Suffolk N.O.W., Inc., and two other corporate entities, EEGO and East End Women's Alliance, sponsored a reception for Ms. Bredes on August 24, 1996, making corporate contributions by paying for invitations sent to the general public which lacked a disclaimer and expressly advocated Ms. Bredes' election.

Ms. Bredes, Nora Bredes for Congress Committee, and Jay Schoenfeld, the Treasurer, disclaim any involvement with the letters or solicitations of Mid-Suffolk N.O.W., and did not authorize their production or distribution. They claimed to have had no knowledge of the letters until receiving the complaint. Mr. Schoenfeld acknowledges that a reception for Ms. Bredes took place on August 24, 1996, at Marilyn Fitterman's house; however, he and the Committee believed it was a house party sponsored by Ms. Fitterman as an individual supporter. Mr. Schoenfeld, upon receiving the complaint, reports that he sent letters to Mid-Suffolk N.O.W., EEGO, and East End Women's Alliance asking for information about who received the June letters in an attempt to identify and refund any contributions generated by these letters, which is consistent with the Committee's policy of returning any questionable contributions.

Mary Ella Reutershan responds for East End Women's Alliance that although some members lent their names to the August 24, 1996, event, they had no participation in it or its publicity. She states that the Alliance has not had a program since 1992 and has never been incorporated for any purposes.

Fran Conlon and Karen Weisberg, Co-Presidents of Mid-Suffolk N.O.W., respond that the June 21, 1996, letter was only sent to its members and was not undertaken in coordination or consultation with the Nora Bredes for Congress Committee. They also assert that Mid-Suffolk N.O.W. had no connection or sponsorship to the August 24, 1996, event.

Marilyn Fitterman responds that she held a party at her house for Nora Bredes as an individual, with some help from other individuals, and denies any involvement by Mid-Suffolk N.O.W.

This matter is less significant relative to other matters pending before the Commission.

97043820625



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1997

James F. Gaughran, Esq.
46 Woodbine Ave.
Northport, NY 11768

RE: MUR 4452
Nora Bredes for Congress and Jay Schoenfeld, as treasurer

Dear Mr. Gaughran:

On September 13, 1996, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 1997.

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

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 219-3400.

Sincerely

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043820626

MUR 4452
MID-SUFFOLK N.O.W.

Maria Cino, Executive Director of the National Republican Congressional Committee, alleges that Mid-Suffolk N.O.W. made a corporate contribution to Nora Bredes' congressional campaign by soliciting contributions on her behalf by letter dated 6/21/96 from the general public, rather than its restricted class. Ms. Cino alleges that the letter contained no disclaimer, provided the Bredes' campaign address for contribution purposes, and did not explain that contributions were not tax deductible. Further, the letter requests volunteers to help with the campaign. Ms. Cino also believes that Mid-Suffolk N.O.W., Inc., and two other corporate entities, EEGO and East End Women's Alliance, sponsored a reception for Ms. Bredes on August 24, 1996, making corporate contributions by paying for invitations sent to the general public which lacked a disclaimer and expressly advocated Ms. Bredes' election.

Ms. Bredes, Nora Bredes for Congress Committee, and Jay Schoenfeld, the Treasurer, disclaim any involvement with the letters or solicitations of Mid-Suffolk N.O.W., and did not authorize their production or distribution. They claimed to have had no knowledge of the letters until receiving the complaint. Mr. Schoenfeld acknowledges that a reception for Ms. Bredes took place on August 24, 1996, at Marilyn Fitterman's house; however, he and the Committee believed it was a house party sponsored by Ms. Fitterman as an individual supporter. Mr. Schoenfeld, upon receiving the complaint, reports that he sent letters to Mid-Suffolk N.O.W., EEGO, and East End Women's Alliance asking for information about who received the June letters in an attempt to identify and refund any contributions generated by these letters, which is consistent with the Committee's policy of returning any questionable contributions.

Mary Ella Reutershan responds for East End Women's Alliance that although some members lent their names to the August 24, 1996, event, they had no participation in it or its publicity. She states that the Alliance has not had a program since 1992 and has never been incorporated for any purposes.

Fran Conlon and Karen Weisberg, Co-Presidents of Mid-Suffolk N.O.W., respond that the June 21, 1996, letter was only sent to its members and was not undertaken in coordination or consultation with the Nora Bredes for Congress Committee. They also assert that Mid-Suffolk N.O.W. had no connection or sponsorship to the August 24, 1996, event.

Marilyn Fitterman responds that she held a party at her house for Nora Bredes as an individual, with some help from other individuals, and denies any involvement by Mid-Suffolk N.O.W.

This matter is less significant relative to other matters pending before the Commission.

97043820627



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 19, 1997

Fran Conlon, Co-President
Karen Weisberg, Co-President
Mid-Suffolk N.O.W., Inc.
P.O. Box 330
Stoney Brook, NY 11790

RE: MUR 4452

Dear Ms. Conlon and Ms. Weisberg:

On September 13, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Mid-Suffolk N.O.W.. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 1997.

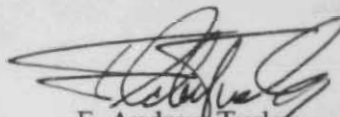
The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any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

Page 2

Mid-Suffolk N.O.W., Inc.

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 219-3400.

Sincerely



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

970438206229

MUR 4452
MID-SUFFOLK N.O.W.

Maria Cino, Executive Director of the National Republican Congressional Committee, alleges that Mid-Suffolk N.O.W. made a corporate contribution to Nora Bredes' congressional campaign by soliciting contributions on her behalf by letter dated 6/21/96 from the general public, rather than its restricted class. Ms. Cino alleges that the letter contained no disclaimer, provided the Bredes' campaign address for contribution purposes, and did not explain that contributions were not tax deductible. Further, the letter requests volunteers to help with the campaign. Ms. Cino also believes that Mid-Suffolk N.O.W., Inc., and two other corporate entities, EEGO and East End Women's Alliance, sponsored a reception for Ms. Bredes on August 24, 1996, making corporate contributions by paying for invitations sent to the general public which lacked a disclaimer and expressly advocated Ms. Bredes' election.

Ms. Bredes, Nora Bredes for Congress Committee, and Jay Schoenfeld, the Treasurer, disclaim any involvement with the letters or solicitations of Mid-Suffolk N.O.W., and did not authorize their production or distribution. They claimed to have had no knowledge of the letters until receiving the complaint. Mr. Schoenfeld acknowledges that a reception for Ms. Bredes took place on August 24, 1996, at Marilyn Fitterman's house; however, he and the Committee believed it was a house party sponsored by Ms. Fitterman as an individual supporter. Mr. Schoenfeld, upon receiving the complaint, reports that he sent letters to Mid-Suffolk N.O.W., EEGO, and East End Women's Alliance asking for information about who received the June letters in an attempt to identify and refund any contributions generated by these letters, which is consistent with the Committee's policy of returning any questionable contributions.

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Fran Conlon and Karen Weisberg, Co-Presidents of Mid-Suffolk N.O.W., respond that the June 21, 1996, letter was only sent to its members and was not undertaken in coordination or consultation with the Nora Bredes for Congress Committee. They also assert that Mid-Suffolk N.O.W. had no connection or sponsorship to the August 24, 1996, event.

Marilyn Fitterman responds that she held a party at her house for Nora Bredes as an individual, with some help from other individuals, and denies any involvement by Mid-Suffolk N.O.W.

This matter is less significant relative to other matters pending before the Commission.

9704382063C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1997

East End Gay Organization
PO Box 708
Bridgehampton, NY 11932

RE: MUR 4452

Dear Sir or Madam:

On September 13, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the East End Gay Organization. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 1997.

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

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 219-3400.

Sincerely

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043820631

MUR 4452

MID-SUFFOLK N.O.W.

Maria Cino, Executive Director of the National Republican Congressional Committee, alleges that Mid-Suffolk N.O.W. made a corporate contribution to Nora Bredes' congressional campaign by soliciting contributions on her behalf by letter dated 6/21/96 from the general public, rather than its restricted class. Ms. Cino alleges that the letter contained no disclaimer, provided the Bredes' campaign address for contribution purposes, and did not explain that contributions were not tax deductible. Further, the letter requests volunteers to help with the campaign. Ms. Cino also believes that Mid-Suffolk N.O.W., Inc., and two other corporate entities, EEGO and East End Women's Alliance, sponsored a reception for Ms. Bredes on August 24, 1996, making corporate contributions by paying for invitations sent to the general public which lacked a disclaimer and expressly advocated Ms. Bredes' election.

Ms. Bredes, Nora Bredes for Congress Committee, and Jay Schoenfeld, the Treasurer, disclaim any involvement with the letters or solicitations of Mid-Suffolk N.O.W., and did not authorize their production or distribution. They claimed to have had no knowledge of the letters until receiving the complaint. Mr. Schoenfeld acknowledges that a reception for Ms. Bredes took place on August 24, 1996, at Marilyn Fitterman's house; however, he and the Committee believed it was a house party sponsored by Ms. Fitterman as an individual supporter. Mr. Schoenfeld, upon receiving the complaint, reports that he sent letters to Mid-Suffolk N.O.W., EEGO, and East End Women's Alliance asking for information about who received the June letters in an attempt to identify and refund any contributions generated by these letters, which is consistent with the Committee's policy of returning any questionable contributions.

Mary Ella Reutershan responds for East End Women's Alliance that although some members lent their names to the August 24, 1996, event, they had no participation in it or its publicity. She states that the Alliance has not had a program since 1992 and has never been incorporated for any purposes.

Fran Conlon and Karen Weisberg, Co-Presidents of Mid-Suffolk N.O.W., respond that the June 21, 1996, letter was only sent to its members and was not undertaken in coordination or consultation with the Nora Bredes for Congress Committee. They also assert that Mid-Suffolk N.O.W. had no connection or sponsorship to the August 24, 1996, event.

Marilyn Fitterman responds that she held a party at her house for Nora Bredes as an individual, with some help from other individuals, and denies any involvement by Mid-Suffolk N.O.W.

This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 19, 1997

Mary Ella Reutershan
East End Women's Alliance
Stony Hill Road Box Two
Amagansett, NY 11930-0002

RE: MUR 4452

Dear Ms. Reutershan:

On September 13, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against East End Women's Alliance. See attached narrative. Accordingly, the Commission closed its file in this matter on May 19, 1997.

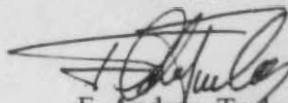
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Page 2
East End Women's Alliance

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Sincerely



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

97043820634

MUR 4452
MID-SUFFOLK N.O.W.

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This matter is less significant relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4452

DATE FILMED 6-8-57 CAMERA NO. 4

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