



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4510

DATE FILMED 12-29-57 CAMERA NO. 8

CAMERAMAN Jm 41

97043852434



National Republican Congressional Committee

Bill Paxton, M.C.
Chairman

Maria Cino
Executive Director

ORIGINAL

October 15, 1996

BEFORE THE FEDERAL ELECTION COMMISSION

DEBBIE STABENOW FOR CONGRESS

ALAN SUITS INVESTMENTS, CO.

MUR # 4510

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF CENTRAL
COUNSEL
OCT 15 12 33 PM '96

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) (1996). The N.R.C.C. is located at 320 First Street, S.E., Washington, D.C. 20003.

I. SUMMARY

Congressional candidate Debbie Stabenow accepted an illegal and excessive contribution in the form of a personal loan from an investment company owned by Alan Suits, Ms. Stabenow's alleged former business partner and the man subsequently named treasurer to her campaign. Ms. Stabenow failed to return this unlawful corporate contribution for several months after declaring her candidacy, and her campaign committee has never reported the terms or extent of her obligation. Such subsidization of a congressional campaign is improper and violates the most basic federal election laws -- these schemes must be discouraged.

II. FACTS & DISCUSSION

A loan other than a bank loan is considered a contribution to the extent of the outstanding balance of the loan. 2 U.S.C. § 431(8)(A)(1). Loans to pay living expenses while a person decides whether or not to become a candidate *become contributions* if the person does become a candidate. *FEC Advisory Opinion 1978-40 [15341]*. Contributions from corporations are prohibited, and candidates may not make personal use of campaign funds. 2 U.S.C. §§ 441b(a) & 439(a).

Debbie Stabenow borrowed \$22,000 from Suits Investments Company in East Lansing Michigan, purportedly for purchase of a car and home improvements. *See Stabenow 1995 Personal Financial Disclosure Statement (attached hereto as Exhibit 1)*. This loan was obtained prior to October of 1995 but was not repaid until some time in 1996. *See Stabenow 1996 PFD Statement (Exh. 2)*. In fact, according to these statements no repayments were made at all in 1995. In the interim -- while the entire balance of the corporate loan remained outstanding -- Ms. Stabenow announced her candidacy for Congress. *See Stabenow Statement of Candidacy, Oct. 25, 1995 (Exh. 3)*.

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

Although Ms. Stabenow acknowledged this contribution on her personal financial disclosure statements filed with the Clerk of the House of Representatives, her campaign committee never reported the loan to the FEC. *In all likelihood, Stabenow for Congress opted not to disclose the contribution since it came from a prohibited source, was excessive, and was put to personal use -- all in violation of federal election laws. See supra.*

The terms of this personal loan -- what Ms. Stabenow personally promised or paid in return for Mr. Suits' money -- have never been disclosed to Michigan's voters. At a minimum, then, Ms. Stabenow should volunteer and the Commission should require full disclosure of this improper loan, particularly in light of Suits' prominent position in the campaign and his alleged business partnership with Stabenow in prior years.

Ms. Stabenow's decision to retain this corporate loan following her announcement of candidacy was unlawful, as was her campaign committee's decision never to report it. *FEC Advisory Opinion 1978-40 [5341]*. If the law did not ban this practice then contribution limits would be meaningless -- candidates would simply borrow big dollars from prohibited sources on the eve of announcing their candidacy. Laws designed to prevent corruption and the appearance of corruption may not be so lightly evaded.

V. PRAYER FOR RELIEF

The N.R.C.C. respectfully requests that the Commission fully investigate the campaign activities of the Debbie Stabenow for Congress Campaign with particular emphasis upon the unreported, excessive and unlawful personal loan extended by Suits Investment, Co. Schemes such as Ms. Stabenow's must be rejected and discouraged. The Commission should take immediate and appropriate action to deter future violations of the law.

Respectfully Submitted,



Maria Cino
Executive Director

District of Columbia

Signed and sworn to before me this 14 th day of Oct, 1996.



NOTARY PUBLIC

My commission expires: _____

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

**UNITED STATES HOUSE OF REPRESENTATIVES
FINANCIAL DISCLOSURE STATEMENT**

Period Covered: January 1, 1995 - November 27, 1995

FORM B

For use by candidates
and new employees

RECEIVED
LEGISLATIVE CLERK

95 DEC -1 11 9:38

Deborah Ann Stabenow

(Full Name)

2709 S. Deerfield Lansing Michigan 48911

(Mailing Address)

Daytime Telephone:

(517) 485-4266

Filer
Status



Candidate for the
House of Representatives

State: Michigan
District: 8

Date of
Election: Nov. 1996

Check if
Amendment



New officer or
employee

Employing Office: _____

(Office Use Only)

A \$200 penalty shall be assessed
against anyone who files more
than 30 days late.

In all sections, please type or print clearly in black ink.

PRELIMINARY INFORMATION – ANSWER EACH OF THESE QUESTIONS

I. Did you or your spouse have "earned" income (e.g., salaries or fees) of \$200 or more from any source in the reporting period? If yes, complete and attach Schedule I.

Yes ☒ No ☐

IV. Did you hold any reportable positions on or before the date of filing in the current calendar year or in the prior two years? If yes, complete and attach Schedule IV.

Yes ☒ No ☐

II. Did you, your spouse, or a dependent child receive "unearned" income of more than \$200 in the reporting period or hold any reportable asset worth more than \$1,000 at the end of the period? If yes, complete and attach Schedule II.

Yes ☒ No ☐

V. Did you have any reportable agreement or arrangement with an outside entity? If yes, complete and attach Schedule V.

Yes ☒ No ☐

III. Did you, your spouse, or a dependent child have any reportable liability (more than \$10,000) during the reporting period? If yes, complete and attach Schedule III.

Yes ☒ No ☐

VI. Did you receive compensation of more than \$5,000 from a single source in the two prior years? If yes, complete and attach Schedule VI.

Yes ☐ No ☒

Each question in this part must be answered and the appropriate schedule attached for each "Yes" response.

EXCLUSION OF SPOUSE, DEPENDENT, OR TRUST INFORMATION – ANSWER EACH OF THESE QUESTIONS

TRUSTS—Details regarding "Qualified Blind Trusts" approved by the Committee on Standards of Official Conduct and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or a dependent child? (See Instructions, pages 10-11.)

Yes ☐ No ☒

EXEMPTION—Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption? (See Instructions, page 11.)

Yes ☐ No ☒

CERTIFICATION – THIS DOCUMENT MUST BE SIGNED BY THE REPORTING INDIVIDUAL AND DATED

This Financial Disclosure Statement is required by the Ethics in Government Act of 1978, as amended. The Statement will be available to any requesting person upon written application and will be reviewed by the Committee on Standards of Official Conduct or its designee. Any individual who knowingly and willfully falsifies, or who knowingly and willfully fails to file this report may be subject to civil and criminal sanctions (See 5 U.S.C. app. 6, § 104 and 18 U.S.C. § 1001).

SIGNATURE OF REPORTING INDIVIDUAL

Debbie Stabenow

DATE (Month/Day/Year)

November 27, 1995

9 7 0 4 8 5 2 4 3 7

SCHEDULE III - LIABILITIES

Name

Page of

Report liabilities of over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent child. Mark the highest amount owed during the reporting period. Exclude: Any mortgage on your personal residence (unless there is rental income); loans secured by automobiles, household furniture, or appliances; and liabilities owed to a spouse, or the child, parent, or sibling of you or your spouse. Report revolving charge accounts only if the balance at the end of the reporting period exceeded \$10,000. For further information, see Instructions, pages 21-22.

SP. DC. JT	Creditor	Type of Liability	Amount of Liability								
			B	C	D	E	F	G	H		
			\$10,001 - \$15,000	\$15,001 - \$50,000	\$50,001 - \$100,000	\$100,001 - \$250,000	\$250,001 - \$500,000	\$500,001 - \$1,000,000	Over \$1,000,000		
	Example: First Bank of Wilmington, Delaware	Mortgage on 123 Main Street, Dover, Del.				X					
	Suits Investments, East Lansing, Michigan	personal loan (\$22,000) for purchase of a car and home improvements		X							

SCHEDULE IV - POSITIONS

Report all positions, compensated or uncompensated, held on or before the date of filing during the current calendar year and in the two prior years as an officer, director, trustee of an organization, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, any labor organization, or any educational or other institution other than the United States. For further information, see Instructions, pages 25-26.

Exclude: Positions held in any religious, social, fraternal, or political entities; positions solely of an honorary nature; and positions listed on Schedule I.

Position	Name of Organization
Consultant/Facilitator	Greater Lansing Business Monthly Magazine
President	Magic Ride, Inc. (child abuse prevention fundraiser)
Board member	Michigan Children Inc.
Board member	Ingham Education Foundation
Board member	Lansing Educational Advancement Foundation
Board member	Friends of Child Abuse and Neglect Prevention, Inc.

Use additional sheets if more space is required.

**UNITED STATES HOUSE OF REPRESENTATIVES
FINANCIAL DISCLOSURE STATEMENT**

FORM B
For use by candidates
and new employees

Period Covered: January 1, 199 6 - May 14, 1996

RECEIVED
LEGISLATIVE RESOURCE CENTER
36 MAY 15 PM 12:22

Deborah Ann Stabenow

(Full Name)

2709 S. Deerfield

(Mailing Address)

Lansing, Michigan 48911

(517) 482-1093

(Daytime Telephone)

OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

HAND DELIVERED

(Office Use Only)

Filer
Status



Candidate for the
House of Representatives

State: Michigan
District: 8

Date of
Election: Nov 5, 1996

Check if
Amendment



New officer or
employee

Employing Office:

A \$200 penalty shall be assessed
against anybody who files more
than 30 days late.

In all sections, please type or print clearly in black ink.

PRELIMINARY INFORMATION — ANSWER EACH OF THESE QUESTIONS

I. Did you or your spouse have "earned" income (e.g., salaries or fees) of \$200 or more from any source in the reporting period? If yes, complete and attach Schedule I.

Yes ☒

No ☐

IV. Did you hold any reportable positions on or before the date of filing in the current calendar year or in the prior two years? If yes, complete and attach Schedule IV.

Yes ☒

No ☐

II. Did you, your spouse, or a dependent child receive "unearned" income of more than \$200 in the reporting period or hold any reportable asset worth more than \$1,000 at the end of the period? If yes, complete and attach Schedule II.

Yes ☒

No ☐

V. Did you have any reportable agreement or arrangement with an outside entity? If yes, complete and attach Schedule V.

Yes ☒

No ☐

III. Did you, your spouse, or a dependent child have any reportable liability (more than \$10,000) during the reporting period? If yes, complete and attach Schedule II.

Yes ☒

No ☐

VI. Did you receive compensation of more than \$5,000 from a single source in the two prior years? If yes, complete and attach Schedule VI.

Yes ☐

No ☒

Each question in this part must be answered and the appropriate schedule attached for each "Yes" response.

EXCLUSION OF SPOUSE, DEPENDENT, OR TRUST INFORMATION — ANSWER EACH OF THESE QUESTIONS

TRUSTS—Details regarding "Qualified Blind Trusts" approved by the Committee on Standards of Official Conduct and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or a dependent child? (See Instructions, pages 10-11.)

Yes ☐

No ☒

EXEMPTION—Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption? (See Instructions, page 11.)

Yes ☐

No ☒

CERTIFICATION — THIS DOCUMENT MUST BE SIGNED BY THE REPORTING INDIVIDUAL AND DATED

This Financial Disclosure Statement is required by the Ethics in Government Act of 1978, as amended. The Statement will be available to any requesting person upon written application and will be reviewed by the Committee on Standards of Official Conduct or its designee. Any individual who knowingly and willfully falsifies, or who knowingly and willfully fails to file this report may be subject to civil penalties (See 5 U.S.C. app. 6, § 104).

SIGNATURE OF REPORTING INDIVIDUAL

Deborah Ann Stabenow

DATE (Month/Day/Year)

May 14, 1996

6 5 4 2 5 8 2 2 0 7 6

SCHEDULE III — LIABILITIES

Name Deborah A. Stabenow

Page of

Report liabilities of over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent child. Mark the highest amount owed during the reporting period. Exclude: Any mortgage on your personal residence (unless there is rental income); loans secured by automobiles, household furniture, or appliances; and liabilities owed to a spouse, or the child, parent, or sibling of you or your spouse. Report revolving charge accounts only if the balance at the end of the reporting period exceeded \$10,000. For further information, see instructions, pages 21-22.

SP, DC, JT	Creditor	Type of Liability	Amount of Liability										
			B Less than \$10,000	C \$10,001— \$25,000	D \$25,001— \$50,000	E \$50,001— \$100,000	F \$100,001— \$250,000	G \$250,001— \$500,000	H \$500,001— \$1,000,000	I \$1,000,001— \$5,000,000	J \$5,000,001— \$25,000,000	K Over \$25,000,000	
	Example: First Bank of Wilmington, Delaware	Mortgage on 123 Main Street, Dover, Del.				X							
	Suits Investments, East Lansing Michigan	personal loan (#22,000) for purchase of a car and home improvements (paid off)		X									

SCHEDULE IV — POSITIONS

Report all positions, compensated or uncompensated, held on or before the date of filing during the current calendar year and in the two prior years as an officer, director, trustee of an organization, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, any labor organization, or any educational or other institution other than the United States. For further information, see instructions, pages 25-26.

Exclude: Positions held in any religious, social, fraternal, or political entities; positions solely of an honorary nature; and positions listed on Schedule I.

Position	Name of Organization
President	Magic Ride, Inc. (child abuse prevention fundraiser)
Board member	Michigan Children
Board member	Ingham Education Foundation
Board member	Lansing Educational Advancement Foundation
Board member	Friends of Child Abuse and Neglect Prevention Inc.

Use additional sheets if more space is required.

0 2 2 9 8 5 4 0 1 6

[93341] AO 1978-40: Loans for Living Expenses as Contributions

Loans to pay living expenses while a person decides whether or not to become a candidate become contributions if the person does become a candidate. Answer to Thomas E. Jenner, Treasurer, Ray Kogovsek for Congress, 127 First National Bank Building, Pueblo, Colorado 81003.]

This responds to your letter of June 21, 1978, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act") and applicable regulations regarding loans received by a candidate for personal and family living expenses during the period when he was evaluating his candidacy.

Your letter states that on June 1, 1977, Ray Kogovsek's position as a paralegal was abolished and that he needed funds for his personal and family living expenses while evaluating his candidacy. During the month of June 1977, before his decision to seek nomination or election to the United States House of Representatives, Mr. Kogovsek borrowed a total of \$3,900 from ten individuals. A note was executed for each loan. The proceeds were placed in a separate checking account. All withdrawals from the account were made for personal and family living expenses. Mr. Kogovsek announced his candidacy and filed FEC Form 2, statement of candidacy, after he borrowed the money.

Specifically, you ask if these loans are contributions under the Act. If so, you ask how the loans and expenditures from the loan proceeds for personal living expenses are to be reported, and by whom? Finally you ask what "procedures" and "specific forms" the candidate must file to be in compliance with the Act.

The Commission concludes that these loans are contributions for purposes of the Act. Therefore the loans must be disclosed in reports filed by the Ray Kogovsek For Congress Committee, and the amount contributed (loaned) by any individual with respect to any election must not exceed \$1,000.1/ 2 U.S.C. §434(b), §441a(a)(1).

Candidate status may arise before candidacy is publicly declared or before an FEC Form 2 is filed. 2 U.S.C. §431(b) defines "candidate", in part, as an individual who seeks nomination for election, or election, to Federal office... and... an individual shall be deemed to seek nomination for election, or election, if he has -

- (1) taken the action necessary under the law of a State to qualify himself for nomination for election, or election to Federal office; or
- (2) received contributions or made expenditures... with a view of bringing about his nomination for election, or election to such office.

A "contribution" is defined in part, as a "gift, subscription, loan, advance, or deposit of money or anything of value made for the purpose of influencing the nomination, for election, or election, of any person to Federal office." 2 U.S.C. §431(e)(1). A limited exception to that definition is recognized in Commission regulation 100.4(b)(1) where it is stated that the term contribution does not include payments made for the purpose of determining whether an individual should become a candidate, if the individual does not otherwise become a candidate. If, however, the individual subsequently becomes a candidate, the payments are contributions and must be reported with the first appropriate report filed regardless of the date the payments were made. 11 CFR 100.7(b)(2) is a similar exception for expenditures.

In this instance you state that, during June 1977, Mr. Kogovsek was evaluating his candidacy. Reports filed by the Ray Kogovsek for Congress Committee, show contributions received in April 1977 and both contributions and expenditures in June 1977. Although these may have been payments made for the purpose of determining whether he should become a candidate, the fact that he did become a

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candidate has the effect of making these payments contributions and expenditures for purposes of the Act as of the date the transactions occurred.

As already stated, a contribution is defined, in part, as a "gift... loan... or anything of value made for the purpose of influencing the nomination, for election, or election, of any person to Federal office. The Commission has previously held that funds provided to a candidate to be used solely for personal living expenses and subsistence of the candidate and his family are contributions for purposes of the Act if the funds are not "personal funds" under Commission regulations, §110.10(b).2/

This section states that, except for Presidential candidates receiving public financing, candidates may make unlimited expenditures from personal funds. The following definition is given:

(b) for purposes of this section, "personal funds" means—

(1) Any assets to which at the time he or she became a candidate the candidate had legal and rightful title, or with respect to which the candidate had the right of beneficial enjoyment under applicable State law, and which the candidate had legal right of access to or control over, including funds from immediate family members; and

(2) Salary and other earned income from bona fide employment; dividends and proceeds from the sale of the candidate's stocks or other investments; bequests to the candidate; income from trusts established before candidacy; income from trusts established by bequest after candidacy of which the candidate is the beneficiary; gifts of a personal nature which had been customarily received prior to candidacy; proceeds from lotteries and similar legal games of chance.

The thrust of §110.10 is that a candidate is expending campaign contributions rather than personal funds, unless the funds involved are assets to which he or she had legal and rightful title or the right of beneficial enjoyment at the time he or she became a candidate, or unless the funds were personal assets under §110.10(b)(2). The same rationale would apply to the proceeds of loans received by a candidate, although used only for personal living expenses, since using this test those loans are not personal funds, but are contributions under the Act. Accordingly, the loans must be reported giving the information specified in 2 U.S.C. §434(b)(5). See also §104.2(b)(5) of Commission regulations and supplemental reporting instructions for loans to candidates (copy enclosed).

Since the \$3,900 in loans constitute contributions rather than personal funds, the expenditures for personal living expenses from the \$3,900 must be reported in accord with 2 U.S.C. §434(b)(9) and §104.2 of the Commission regulations.3/ Mr. Kogovsek may be identified as the person to whom the expenditure was made and the purpose of the expenditure may be described as personal and family living expenses during a stated time period. §104.2(b)(9).

Your final question concerns the procedures to be followed to comply with the Act in connection with the described loans. Since the loans fall within §100.4(b)(1) of the regulations, which requires that contributions be reported with the first report filed by the candidate or principal campaign committee, the committee should file an amendment to its first report within the next 15 days listing both the loans, and payments made from the loan proceeds, in the manner discussed above.

This response constitutes an advisory opinion concerning the application of a general rule of law stated in the Act, or prescribed as a Commission regulation, to the specific factual situation set forth in your request. See 2 U.S.C. §437f.

Dated: September 1, 1978.

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Advisory Opinions

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- 1/ A loan from an individual is a contribution as long as it is outstanding and unpaid by the candidate or committee to whom the loan was made. 11 C.F.R. 100.4(a)(1)(i). As it is repaid, the individual lender is no longer charged with a contribution for limit purposes under 2 U.S.C. §441a.
- 2/ See the Commission's response to Advisory Opinion Request 1976-84 and Advisory Opinion 1976-70, copies enclosed.
- 3/ As contributions, the loan proceeds constitute campaign funds not personal funds. Therefore, the reporting exemption in §100.7(b)(10) of Commission regulations for payments of routine living expenses from "non-campaign funds" would not apply in the circumstances you have presented.

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FEDERAL ELECTION COMMISSION

Washington, DC 20463

October 18, 1996

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

RE: MUR 4510

Dear Ms. Cino:

This letter acknowledges receipt on October 15, 1996, of the complaint you filed 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 4510. 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. Scalander (x28)

Colleen T. Scalander, Attorney
Central Enforcement Docket

Enclosure
Procedures

97043852414



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 18, 1986

Alan P. Suits, Treasurer
Stabenow for Congress
PO Box 4945
E. Lansing, MI 48826

RE: MUR 4510

Dear Mr. Suits:

The Federal Election Commission received a complaint which indicates that Stabenow 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 4510. 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.

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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

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

9 7 0 4 3 8 5 2 4 4 6



FEDERAL ELECTION COMMISSION

Washington, DC 20463

October 18, 1996

Debbie Stabenow
2709 S. Deerfield
Lansing, MI 48911

RE: MUR 4510

Dear Ms. Stabenow:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4510. Please refer to this number in all future correspondence.

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

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

97043852447

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 (yes)

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

97043852418



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 18, 1996

Robert A. Crane, Registered Agent
Alan Suits Investment Company
1226 Winchcombe Road
Bloomfield Hills, MI 48013

RE: MUR 4510

Dear Mr. Crane:

The Federal Election Commission received a complaint which indicates that the Alan Suits Investment Company 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 4510. 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 Alan Suits Investment Company 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.

97043852449

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

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

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Stabenow for Congress

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

OCT 30 2 09 PM '96

October 24, 1996

Alma E. Smith
Central Enforcement Docket
Federal Election Commission
999 E Street, NW
Washington, DC 20463

OCT 31 9 58 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Ms. Smith:

Per your conversation with our campaign office, we are writing to officially request an extension of time in which to respond to a complaint filed against the Stabenow for Congress campaign committee (MUR 4510).

With the general election only 13 days away, we find that we do not have the resources necessary to respond to this complaint in the thorough manner required. We therefore request a two-week (14-day) extension. This will give us the opportunity to reply appropriately. The extended response deadline date would be November 21, 1996.

We greatly appreciate your consideration of this request. Please contact us if you require any additional information.

Sincerely,



Alan P. Suits
Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1996

Alan P. Suits, Treasurer
Stabenow for Congress
P.O. Box 4945
E. Lansing, MI 48826

MUR: 4510

Dear Mr. Suits:

This is in response to your letter received on October 31, 1996, requesting an extension until November 21, 1996, 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 November 21, 1996.

If you have any questions, please contact me at (202) 219-4300.

Sincerely,

A handwritten signature in cursive script that reads "Alva E. Smith".

Alva E. Smith, Paralegal
Central Enforcement Docket

97043852452

Hi:
Per your instruction here is the info you asked to be returned
I am not the Robert A Crane listed here. Feel
Free to call if I can help

BM 313.560.3009



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 18, 1996

Robert A. Crane, Registered Agent
Alan Suits Investment Company
1226 Winchcombe Road
Bloomfield Hills, MI 48013

RE: MUR 4510

Dear Mr. Crane:

The Federal Election Commission received a complaint which indicates that the Alan Suits Investment Company 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 4510. 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 Alan Suits Investment Company 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.

NOV 25 9 34 AM '96
FEDERAL ELECTION COMMISSION
OFFICE OF THE COMMISSIONER

97043852453

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

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

97043852434



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 19, 1996

Alan Suits, Owner
Alan Suits Investment Company
4700 South Hagadorn
East Lansing, MI 48823

RE: MUR 4510

Dear Mr. Suits:

The Federal Election Commission received a complaint which indicates that Alan Suits Investment Company 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 4510. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to administrative oversight. Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Alan Suits Investment Company 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.

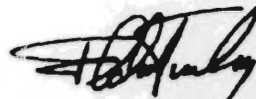
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

97043852455

Alan Suits Investment Company
Page 2

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,



F. Andrew Turley, Attorney
Central Enforcement Docket

Enclosures

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

9 7 0 4 3 8 5 2 4 5 6

Stabenow for Congress

November 20, 1996

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

Nov 21 3 01 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

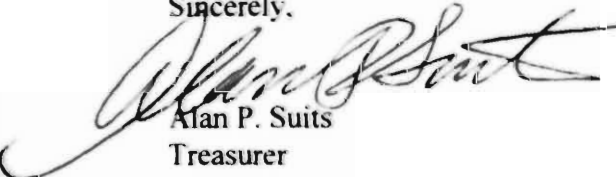
Dear Ms. Sealander,

I am writing in response to complaint MUR 4510 filed by the National Republican Congressional Committee charging that a personal loan by a personal investment company that I own was an illegal loan to "pay the living expenses while a person decides whether or not to become a candidate."

Debbie Stabenow took a loan for a car and home improvements in May 1993 from Suits Investments Company -- over two years before even considering or contemplating a run for Congress in late 1995, and over two years before I became treasurer of her congressional campaign. The loan was for entirely personal use and was in no relationship to her run for Congress two years later. This loan was properly reported on Debbie Stabenow's financial disclosure form filed with the clerk of the house (see attached). The loan was paid off in 1996 as required by the terms of the loan.

Because this loan clearly was not made for the purpose of influencing the nomination for election or election of Debbie Stabenow, or to pay her living expenses while deciding to become a candidate, it is not considered a contribution under federal law. Thus, I urge your dismissal of this complaint.

Sincerely,


Alan P. Suits
Treasurer

SCHEDULE III — LIABILITIES

Name Deborah A. Stabenow

Page of

Report liabilities of over \$10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent child. Mark the highest amount owed during the reporting period. Exclude: Any mortgage on your personal residence (unless there is rental income); loans secured by automobiles, household furniture, or appliances; and liabilities owed to a spouse, or the child, parent, or sibling of you or your spouse. Report revolving charge accounts only if the balance at the end of the reporting period exceeded \$10,000. For further information, see instructions, pages 21-22.

SP DC JT	Creditor	Type of Liability	Amount of Liability						
			C \$10,001— \$25,000	E \$25,001— \$50,000	G \$50,001— \$100,000	H \$100,001— \$250,000	I \$250,001— \$500,000	J \$500,001— \$1,000,000	K Over \$1,000,000
	<u>Example: First Bank of Wilmington, Delaware</u>	<u>Mortgage on 118 Main Street, Dover, Del.</u>		X					
	<u>Suits Investments, East Lansing Michigan</u>	<u>personal loan (\$22,000) for purchase of a car and home improvements (paid off)</u>	X						

SCHEDULE IV — POSITIONS

Report all positions, compensated or uncompensated, held on or before the date of filing during the current calendar year and in the two prior years as an officer, director, trustee of an organization, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, any labor organization, or any educational or other institution other than the United States. For further information, see instructions, pages 25-28.

Exclude: Positions held in any religious, social, fraternal, or political entities; positions solely of an honorary nature; and positions listed on Schedule I.

Position	Name of Organization
<u>President</u>	<u>Magic Ride, Inc. (child abuse prevention fundraiser)</u>
<u>Board member</u>	<u>Michigan Children</u>
<u>Board member</u>	<u>Ingham Education Foundation</u>
<u>Board member</u>	<u>Lansing Educational Advancement Foundation</u>
<u>Board member</u>	<u>Friends of Child Abuse and Neglect Prevention Inc.</u>

Use additional sheets if more space is required.

9 7 0 4 8 5 2 4 5 8

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Doc. 2
Nov 32 9 34 AM '96

SUITS INVESTMENT COMPANY

4700 S. Hagadom Suite 290
East Lansing, MI 48823
(517) 332-1600

November 26, 1996

F. Andrew Turley, Attorney
Central Enforcement Docket
General Counsel's Office
Federal Election Commission
Washington, DC 20463

RE: MUR 4510

Dear Mr. Turley:

I am writing in response to complaint MUR 4510 filed by the National Republican Congressional Committee charging that a personal loan by a company I own was an illegal loan to "pay the living expenses while a person decides whether or not to become a candidate."

As Treasurer of the Stabenow for Congress Committee I sent you a response to the complaint on November 20, 1996 addressed to Colleen T. Sealander, Central Enforcement Division.

Yours sincerely,



Alan P. Suits, Owner

97043852459

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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ENFORCEMENT PRIORITY

SENSITIVE

GENERAL COUNSEL'S REPORT

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.

This is the first Enforcement Priority Report that reflects the impact of the 1996 election cycle cases on the Commission's enforcement workload. We have identified cases that are stale which are recommended for dismissal at this time. This is the highest number of cases identified as stale in a single report, and the highest number of stale cases recommended for closure at one time, since the inception of EPS in 1993.

9704385240

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 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, resulting in a numerical rating for 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 cases that do not warrant further action relative to other pending matters.³ 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.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more difficult to develop as it ages. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community. In recognition of this fact, EPS provides us with the

³ These cases are:

RAD 97L-10 (Citizens for Randy Borow); RAD 97L-16 (Republican State Central Committee of South Dakota); Pre-MUR 347 (Producers Lloyds Insurance Company); Pre-MUR 348 (Peoples National Bank of Commerce); Pre-MUR 349 (Trump Plaza); Pre-MUR 350 (Citibank, N.A.); Pre-MUR 355 (Feingold Senate Committee); MUR 4494 (Georgianna Lincoln);

MUR 4586 (Friends of Zach Wamp); MUR 4590 (Oklahoma Education Association); MUR 4600 (San Diego Police Officers Assoc.); MUR 4612 (Teresa Doggett for Congress); MUR 4615 (Catholic Democrats for Christian Values); MUR 4616 (American Legislative Exchange Council); MUR 4620 (Eastern Connecticut Chamber of Commerce); MUR 4622 (Telles for Mayor); MUR 4628 (Gutknecht for Congress); MUR 4629 (Janice Schakowsky); MUR 4636 (IBEW Local 505); MUR 4637 (Dettman for Congress); MUR 4639 (Larson for Congress); MUR 4641 (Beckler for Congress); MUR 4644 (Detroit City Council); MUR 4651 (Mike Ryan); MUR 4653 (Pritzker for Congress); MUR 4656 (H. Carroll for Congress); and MUR 4657 (Buchanan for President).

means to identify those cases which, though earning a higher rating when received, remained unassigned for a significant period due to a lack of staff resources for effective investigation. The utility of commencing an investigation declines as these cases age, until they reach a point when activation of a case would not be an efficient use of the Commission's resources.

We have identified cases that have remained on the Central Enforcement Docket for a sufficient period of time to render them stale. We are recommending the closure of cases based on staleness.⁶

⁶ These cases are: MUR 4283 (*Chenoweth for Congress*); MUR 4341 (*Juan Soliz for Congress*); MUR 4402 (*U.S. Representative Helen Chenoweth*); MUR 4435 (*Lincoln for Congress*); MUR 4439 (*UAW*); MUR 4442 (*Lipinski for Congress*); MUR 4444 (*Roberts for Congress*); MUR 4445 (*Randy Tate for Congress*); MUR 4446 (*Clinton/Gore '96 Primary*); MUR 4447 (*Random House, Inc.*); MUR 4449 (*Clinton Administration*); MUR 4453 (*Mike Ward for Congress*); MUR 4454 (*Ralph Nader*); MUR 4459 (*Clinton/Gore '96*); MUR 4474 (*Salvi for Senate*); MUR 4477 (*BBDO-New York*); MUR 4481 (*Diamond Bar Caucus*); MUR 4485 (*Perot '92 Petition Committee*); MUR 4486 (*Bunda for Congress*); MUR 4495 (*Pennsylvania PACE for Federal Elections*); MUR 4496 (*Norwood for Congress*); MUR 4497 (*Pease for Congress*); MUR 4510 (*Stabenow for Congress*); MUR 4511 (*Bob Coffin for Congress*); MUR 4514 (*Friends for Franks*); MUR 4515 (*Clinton Investigative Commission*); MUR 4521 (*VMAL 630 AM*); MUR 4525 (*Senator Larry Pressler*); MUR 4527 (*Brennan for Senate*); MUR 4536 (*Signature Properties, Inc.*); MUR 4540 (*Tim Johnston for SD*); MUR 4542 (*Dan Frisa for Congress*); MUR 4552 (*Charles W. Norwood*); MUR 4554 (*John Byron for Congress*); MUR 4556 (*Jim Wiggins for Congress*); MUR 4561 (*Jay Hoffman for Congress*); MUR 4564 (*National Republican Congressional Committee*); MUR 4567 (*DNC Services Corp.*); MUR 4569 (*McGovern Committee*); RAD 96L-11 (*New York Republican County Committee*); Pre-MUR 343 (*NRSC*); and Pre-MUR 312 (*Joseph Demio*). The Demio case involves fundraising related to former Congresswoman Mary Rose Oskar's 1992 congressional campaign. It was held as a courtesy to the Department of Justice pending resolution of a parallel criminal matter in the District Court for the District of Columbia. Mr. Demio recently entered into a plea agreement with the Department of Justice (on which we were not consulted) in which he agreed, among other things, to waive the statute of limitations regarding civil violations of the FECA. Considering the age of the case and activity, the fact that DOJ has not formally referred this matter to us, and the Commission's continuing resource constraints, dismissal is the appropriate disposition of this matter.

97043852462

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective November 17, 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.

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective November 17, 1997, and approve the appropriate letters in the following matters:

RAD 96L-11

Pre-MUR 312

Pre-MUR 349

Pre-MUR 343

Pre-MUR 350

RAD 97L-10

Pre-MUR 347

Pre-MUR 355

RAD 97L-16

Pre-MUR 348

97043852463

B. Take no action, close the file effective November 17, 1997, and approve the appropriate letters in the following matters:

MUR 4283
MUR 4341
MUR 4402
MUR 4435
MUR 4439
MUR 4442
MUR 4444
MUR 4445
MUR 4446
MUR 4447
MUR 4449
MUR 4453
MUR 4454
MUR 4459
MUR 4474
MUR 4477
MUR 4481
MUR 4485
MUR 4486

MUR 4494

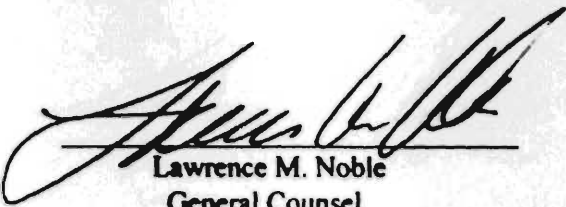
MUR 4495
MUR 4496
MUR 4497
MUR 4510
MUR 4511
MUR 4514
MUR 4515

MUR 4521
MUR 4525
MUR 4527
MUR 4536
MUR 4540
MUR 4542
MUR 4552
MUR 4554
MUR 4556
MUR 4561

MUR 4564
MUR 4567

MUR 4569
MUR 4586
MUR 4590
MUR 4600
MUR 4612
MUR 4615
MUR 4616
MUR 4620
MUR 4622
MUR 4628
MUR 4629
MUR 4636
MUR 4637
MUR 4639
MUR 4641
MUR 4644
MUR 4651
MUR 4653
MUR 4656
MUR 4657

11/7/97
Date


Lawrence M. Noble
General Counsel

Attachment
Tier 3 Case Summaries

97043852464

9 7 0 4 3 8 5 2 4 6 5

In the Matter of)
)
Enforcement Priority) Agenda Document No. X97-77

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 2, 1997, do hereby certify that the Commission took the following actions with respect to Agenda Document No. X97-77:

1. Decided by a vote of 5-0 to

A. Decline to open a MUR, close the file effective December 15, 1997, and approve the appropriate letters in the following matters:

- | | | | |
|----|-------------|-----|-------------|
| 1. | RAD 96L-11 | 7. | Pre-MUR 347 |
| | | 8. | Pre-MUR 348 |
| 3. | RAD 97L-10 | 9. | Pre-MUR 349 |
| 4. | RAD 97L-16 | 10. | Pre-MUR 350 |
| 5. | Pre-MUR 312 | 11. | Pre-MUR 355 |
| 6. | Pre-MUR 343 | | |

B. Take no action, close the file effective December 15, 1997, and approve the appropriate letters in the following matters:

- | | | | | | |
|----|-----|------|-----|-----|------|
| 1. | MUR | 4283 | 6. | MUR | 4442 |
| 2. | MUR | 4341 | 7. | MUR | 4444 |
| 3. | MUR | 4402 | 8. | MUR | 4445 |
| 4. | MUR | 4435 | 9. | MUR | 4446 |
| 5. | MUR | 4439 | 10. | MUR | 4447 |

(continued)

Federal Election Commission
Certification: Agenda Document
No. X97-77
December 2, 1997

Page 2

11.	MUR 4449	36.	MUR 4556
12.	MUR 4453	37.	MUR 4561
13.	MUR 4454	38.	MUR 4564
14.	MUR 4459	39.	MUR 4567
15.	MUR 4474	40.	MUR 4569
16.	MUR 4477	41.	MUR 4586
17.	MUR 4481	42.	MUR 4590
18.	MUR 4485	43.	MUR 4600
19.	MUR 4486	44.	MUR 4612
20.	MUR 4494	45.	MUR 4615
21.	MUR 4495	46.	MUR 4616
22.	MUR 4496	47.	MUR 4620
23.	MUR 4497	48.	MUR 4622
24.	MUR 4510	49.	MUR 4628
25.	MUR 4511	50.	MUR 4629
26.	MUR 4514	51.	MUR 4636
27.	MUR 4515	52.	MUR 4637
28.	MUR 4521	53.	MUR 4639
29.	MUR 4525	54.	MUR 4641
30.	MUR 4527	55.	MUR 4644
31.	MUR 4536	56.	MUR 4651
32.	MUR 4540	57.	MUR 4653
33.	MUR 4542	58.	MUR 4656
34.	MUR 4552	59.	MUR 4657
35.	MUR 4554		

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

Attest:

12-4-97
Date

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

97043852466



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ted Maness, Executive Director
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 4510

Dear Mr. Maness:

On October 15, 1996, the Federal Election Commission received the complaint filed 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 exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on December 15, 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. § 437(g)(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043852467



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

Alan P. Suits, Treasurer
Stabenow for Congress
P.O. Box 4945
E. Lansing, MI 48826

RE: MUR 4510

Dear Mr. Suits:

On October 18, 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 exercised its prosecutorial discretion to take no action against Stabenow for Congress and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on December 15, 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

97043852468



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

Debbie Stabenow
2709 S. Deerfield
Lansing, MI 48911

RE: MUR 4510

Dear Ms. Stabenow:

On October 18, 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 exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on December 15, 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,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043852469



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

Alan Suits
Alan Suits Investment Company
4700 South Hagadorn
East Lansing, MI 48823

RE: MUR 4510

Dear Mr. Suits:

On November 19, 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 exercised its prosecutorial discretion to take no action against Alan Suits Investment Company. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in the matter on December 15, 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

970438524/0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4510

DATE FILMED 12-29-57 CAMERA NO. 2

CAMERAMAN JMA

97043852471