



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4552

DATE FILMED 1/16/98 CAMERA NO. 2

CAMERAMAN SES

98043854953



DEMOCRATIC
CONGRESSIONAL
CAMPAIGN COMMITTEE

Martin Frost, TX
Chairman

October 30, 1996

Lawrence M. Noble, Esq.
Office of the General Counsel
Federal Election Commission
Sixth Floor
999 E. Street, N.W.
Washington, DC 20463

MUR4552

Re: Complaint Against Charles W. Norwood, et al.

OCT 30 4 14 PM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Mr. Noble:

The undersigned files this complaint charging violations of the Federal Election Campaign Act of 1971, as amended ("FECA"), 2 U.S.C. §§ 431 et seq., and related regulations of the Federal Election Commission ("FEC" or the "Commission"), 11 C.F.R. §§ 100.1 et seq., by Congressman Charles W. Norwood, Norwood for Congress, his principal campaign committee, and J. Richard Dunstan, as Treasurer, Norwood for Congress.

In sum, reports filed with the FEC indicate that Congressman Norwood has violated the FECA and FEC regulations by accepting an illegal corporate contribution. If that is the case, Congressman Norwood, Norwood for Congress, and Treasurer Dunstan are also guilty of violating FEC reporting requirements. In light of the information discussed below, the undersigned asks the Commission to review the enclosed documents, conduct a thorough and independent investigation of the facts, and pursue any and all violations of the FECA and Commission regulations.

It seems that Congressman Norwood illegally accepted \$2,100 from a corporation, Park Avenue Fabrics, disguised as a paycheck to one of his campaign workers. As of 1994, Park Avenue Fabrics was a Georgia corporation whose principal agent was Gloria W. Norwood, Congressman Norwood's wife, and whose secretary was Charles Norwood himself. In 1994, Park Avenue Fabrics paid Edith M. Peebles, a supposed employee, \$2,100.

Peebles, however, never worked for Park Avenue Fabrics (see enclosed affidavit). At the time she was allegedly working for Park Avenue Fabrics, Peebles was actually working on the Norwood for Congress campaign. The money paid to her through Park Avenue Fabrics was actually paid for her work on Norwood's campaign.

It is illegal for a corporation to contribute money out of its general treasury. 2 U.S.C. § 441b (a) states: "It is unlawful for...any corporation whatever...to make a contribution or expenditure in connection with any [federal] election." The statute continues: It is illegal "for any candidate [or] political committee...knowingly to accept or receive any contribution prohibited by this section." FEC regulations echo the statute, again prohibiting corporate contributions and forbidding candidates and committees from accepting them. 11 C.F.R. § 114.2(b) and (d).

If Congressman Norwood knew, then, that the contribution was corporate, he has violated the law. As Norwood's wife was Park Avenue Fabric's principle agent, and Norwood himself was the corporation's secretary, it is implausible that he would not have known that Edith Peebles's paycheck was actually a contribution to his own campaign.

Additionally, Congressman Norwood, Norwood for Congress, and Treasurer Dunstan may have violated FEC reporting requirements by not listing Peebles's services as a contribution. Since she was paid by Park Avenue Fabrics to work for Norwood, Peebles was neither a volunteer for, nor an employee of, the campaign, Park Avenue was technically contributing Peebles's work to the campaign. See 2 U.S.C. § 431 (8)(A)(ii): "Contribution" includes "the payment by any person of compensation for the personal services of another person [or corporation]¹ which are rendered to a political committee without charge for any purpose." See also 11 C.F.R. § 100.7 (b)(3). Peebles's work on the campaign, then, was an in-kind contribution (from Park Avenue Fabrics), which should have been reported pursuant to 2 U.S.C. § 434 (b) and 11 C.F.R. § 104.3

The available information suggests that Congressman Norwood, Norwood for Congress, and J. Richard Dunstan, as Treasurer, have violated the FECA and FEC regulations by accepting a large corporate contribution and subsequently failing to report it. The FEC should investigate their actions with regard to these matters.

Respectfully submitted,



Matthew H. Angle
Executive Director

Subscribed and sworn to before me this 30th day of October, 1996

My Commission expires 10/31/2000

Notary Public



¹See 2 U.S.C. § 431 (11), defining a "person" to also mean corporation

98043854955

STATE OF GEORGIA)

COUNTY OF RICHMOND)

AFFIDAVIT OF EDITH M. PEEBLES

PERSONALLY APPEARED, EDITH M. PEEBLES, before the undersigned officer duly authorized to administer oaths who, after first being sworn, deposes and states on oath the following:

-1-

THAT I am above the age of eighteen (18) years of age.

-2-

THAT during 1994, I worked for the campaign to elect Charlie Norwood in his race for the 10th Congressional District.

-3-

THAT at no time in 1994, or in any year have I worked for or been employed by Park Avenue Fabrics, Inc., located at 2131 Walton Way, Augusta, Georgia.

-4-

THAT while I worked for the campaign to elect Charlie Norwood to the 10th Congressional District, Park Avenue Fabrics, Inc. paid me \$2,100.00 in gross wages as wages for my employment with the campaign.

-5-

THAT Park Avenue Fabrics, Inc. was a Georgia corporation when these monies were paid to me and Charlie Norwood was the secretary of this corporation.

98043854956

THAT the foregoing is based on my personal knowledge.

SWORN TO AND SUBSCRIBED
before me this _____
day of _____
1996



Edith M. Peebles
EDITH M. PEEBLES

03047854967

ACTION: I (CIR)
CONTROL: 9315014 TYPE: DP DOMESTIC PROFIT DATE FILED: 06 25 199
STATUS: A ACTIVE/COMPLIANCE STATUS DATE: 07 02 199
NAME: JURISDICTION: 121 RICHMOND
PARK AVENUE FABRICS, INCORPORATED
PRINCIPAL ADDRESS: 2131 WALTON WAY
CITY: AUGUSTA STATE: GA ZIP: 30904 FEDERAL ID:

**** REGISTERED AGENT DATA ****

DATE RESIGNED:
NAME: GLORIA NORWOOD
ADDRESS: 2131 WALTON WAY
CITY: AUGUSTA STATE: GA ZIP: 30904
COUNTY OF AGENT: 121 RICHMOND DATE APPOINTED: 06 25 199

IF LP EXPIRATION DATE: IF ELECTED, PREVIOUS CONTROL:
LAST ANNUAL REPORT PAID: 03 01 1996 A/R FEES DUE:
LAST AMENDED: LAST MERGER: LAST NAME CHANGE:

NEXT SCREEN:
0045 REQUESTED RECORD DISPLAYED

230485498

GEORGIA SECRETARY OF STATE
BUSINESS SERVICES AND REGULATION
BUSINESS INFORMATION *

04/18/96 09:43 AM

ACTION: I (CI)
CONTROL: 9315014 TYPE: DP DOMESTIC PROFIT
STATUS: A ACTIVE/COMPLIANCE
NAME: JURISDICTION: 121 RICHMOND
PARK AVENUE FABRICS, INCORPORATED

DATE FILED: 06/25/199
STATUS DATE: 07/02/199

ATTORNEY/APPLICANT NAME: MARK S. BURGREN
ADDRESS1: P. O. BOX 1564
ADDRESS2:
CITY: AUGUSTA
TITLE OFFICER NAMES
CEO GLORIA W NORWOOD
SEC CHARLES NORWOOD

STATE: GA ZIP: 309031564
ADDRESS/CITY, STATE, ZIP
2131 WALTON WAY
AUGUSTA GA 30904
3914 MULLIKEN
EVANS GA 30809

PREV STAT/DATE: PENDING 06/28/1993 RESEARCH EMPL/DATE: -
NEXT SCREEN:
0045 REQUESTED RECORD DISPLAYED

9304854919



BUSINESS SERVICES AND REGULATION

State 318 West Tower
Martin Luther King Jr. Drive
Atlanta, Georgia 30334-1530
(404) 656-2817

MAX CLELAND
Secretary of State

J. F. GULLION
Director

TRANSMITTAL INFORMATION FOR GEORGIA
PROFIT OR NONPROFIT CORPORATIONS

DO NOT WRITE IN SHADED AREA - SOS USE ONLY

DOCKET #	931790535	PENDING CONTROL #	P.040863	CONTROL #	9315014
Docket Code	311	Corporation Type	DP		
Date Filed	6/25/93	Received \$	600.00	Check/Receipt #	8475
Jurisdiction (County) Code	Richmond 121				
Examiner	76	Date Completed			

NOTICE TO APPLICANT: PRINT PLAINLY OR TYPE REMAINDER OF THIS FORM.
INSTRUCTIONS ARE ON THE BACK OF THIS FORM.

Corporate name reservation number		
PARK AVENUE FABRICS, INCORPORATED		
Corporate name (exactly as appears on name reservation)		
APPLICANT/ATTORNEY		Telephone Number
P. O. Box 1564		
Address		
Augusta	GA	20901-1564
City	State	Zip Code

NOTICE: THIS FORM DOES NOT REPLACE THE ARTICLES OF INCORPORATION. MAIL OR DELIVER DOCUMENTS AND THE SECRETARY OF STATE FILING FEE TO THE ABOVE ADDRESS. DOCUMENTS SHOULD BE SUBMITTED IN THE FOLLOWING ORDER. (A COVER LETTER IS NOT REQUIRED.)

1. FORM 227 - TRANSMITTAL FORM (ATTACH SECRETARY OF STATE FILING FEE OF \$60.00 TO THIS FORM)
2. ORIGINAL ARTICLES OF INCORPORATION
3. ONE COPY OF ARTICLES OF INCORPORATION

I understand that the information on this form will be entered in the Secretary of State business registration database. I certify that a Notice of intent to incorporate and a publishing fee of \$40.00 has been mailed or delivered to the authorized newspaper as required by law.

Authorized Signature Mark S. Burgreen

June 23, 1993
Date

Mr. HOWELL, NORMAN & BARRETT

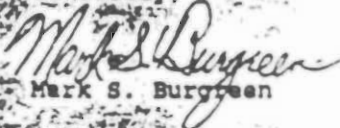
The Honorable Max T. Cleland

June 23, 1993

Page Two

It will be appreciated if you will file and process these documents in accordance with the Georgia Business Corporation code and return a conformed copy of the Articles of Incorporation, together with your certificate of incorporation, to the undersigned at the address shown above.

Sincerely,



Mark S. Burgeen

MSB:hsm
Enclosures

cc: Mrs. Gloria Norwood

(PR120111.000)

JAMES E. HANCOCK
 JAMES E. HANCOCK
 DOUGLAS S. BATTLE
 DAVID E. HANCOCK
 GREAT E. HANCOCK
 JOHN E. HANCOCK
 WILLIAM E. HANCOCK
 MARK E. HANCOCK
 GEORGE E. HANCOCK
 JAMES E. HANCOCK
 (MICHAEL TAYLOR)
 ROBERT A. HANCOCK
 WILLIAM E. HANCOCK
 EDWARD J. HANCOCK
 JOEL SCHWARTZ
 MICHAEL E. CARLSON
 JAMES E. HANCOCK
 JAMES E. HANCOCK

AUGUSTA, GEORGIA 30902-5644

JOHN BELL TOWILL

OFFICE

TRUST COMPANY BANK BUILDING
801 BROAD STREET
SEVENTH FLOOR
AUGUSTA, GEORGIA 30901

TELEPHONE (708) 722-4401
TELECOPIER (708) 722-9.79

ປີພິມ: 23/1993

The Honorable Max Cleland
Secretary of State
Corporation Department
Suite 106 West Tower
#2 Martin Luther King, Jr. Dr. S.E.
Atlanta, Georgia 30334

RE: PARK AVENUE FABRICS, INCORPORATED -
Filing of Articles of Incorporation

Dear Sir:

In accordance with the Georgia Business Corporation Code, there are enclosed the following documents in connection with the incorporation of the above-referenced Corporation:

1. The original and one (1) conformed copy of the Articles of Incorporation of Park Avenue Fabrics, Incorporated.
2. Our check in the amount of \$60.00 in payment of your fee for filing the Articles of Incorporation with your office.
3. Form 227.

We have been advised by your office that the above-referenced name appears to be available.

ARTICLES OF INCORPORATION
OF
PARK AVENUE FABRICS, INCORPORATED

Article I

The name of the Corporation is "Park Avenue Fabrics, Incorporated".

Article II

The Corporation shall have authority to issue not more than 20,000 shares of common stock having no par value that together have unlimited voting rights and that together are entitled to receive the net assets of the Corporation upon dissolution.

Article III

None of the holders of shares of common stock of the Corporation shall be entitled as a matter of right to acquire any new or additional shares of capital stock of the Corporation of any class, or any options or warrants for such new or additional shares.

Article IV

The address of the initial registered office of the Corporation shall be 2131 Walton Way, Augusta, Richmond County, Georgia 30904, and the initial Registered Agent of the Corporation at such address shall be Gloria Norwood.

Article V

The name and address of the Incorporator is as follows:

Mark S. Burgreen
Hull, Towill, Norman & Barrett, P.C.
P. O. Box 1564
Augusta, GA 30913

Article VI

The mailing address of the principal office of the Corporation is 2131 Walton Way, Augusta, Georgia 30904.

Article VII

This Corporation is a statutory close corporation as defined in Article 9 of the Georgia Business Corporation Code.

Article VIII

The share transfer prohibitions and restrictions of O.C.G.A. Sections 14-2-911 and 14-2-912 shall not apply to this Corporation.

Article IX

The compulsory purchase of shares of O.C.G.A. Sections 14-2-914 through 14-2-917 shall not apply to this Corporation.

IN WITNESS WHEREOF, the undersigned Incorporator has executed these Articles of Incorporation, this 23RD day of June, 1993.


Mark S. Burgreen
Incorporator

(PRK29109.aol)

DEPT OF STATE

JUN 22 1993

Secretary of State
Business Services and Regulation
Suite 215, West Tower
2 Martin Luther King Jr. Dr.
Atlanta, Georgia 30334-1530

CONTROL NUMBER: 9315014
EFFECTIVE DATE: 06/25/1993
COUNTY : RICHMOND
REFERENCE : 0076
PRINT DATE : 07/02/1993
FORM NUMBER : 311

MARK S. BURGREN
P. O. BOX 1564
AUGUSTA GA 30903-1564

CERTIFICATE OF INCORPORATION

I, MAX CLELAND, Secretary of State and the Corporation Commissioner of the State of Georgia, do hereby certify under the seal of my office that

PARK AVENUE FABRICS, INCORPORATED

has been duly incorporated under the laws of the State of Georgia on the effective date stated above by the filing of articles of incorporation in the office of the Secretary of State and by the paying of fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on the date set forth above.



SECURITIES
656-2894

CEMETERIES
656-3078

CORPORATIONS
656-2817

CORPORATIONS HOT LINE
404-656-2222
Outside Metro-Atlanta

Max Cleland

MAX CLELAND
SECRETARY OF STATE

Verley J. Spivey

VERLEY J. SPIVEY
DEPUTY SECRETARY OF STATE



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 5, 1996

Matthew H. Angle, Executive Director
Democratic Congressional Campaign Committee
430 South Capitol Street
Washington, DC 20003


RE: MUR 4552

Dear Mr. Angle:

This letter acknowledges receipt on October 30, 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 4552. 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

2804385496



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 5, 1996

Gloria Norwood, Registered Agent
Park Avenue Fabrics
2131 Walton Way
Augusta, GA 30904

RE: MUR 4552

Dear Ms. Norwood:

The Federal Election Commission received a complaint which indicates that Park Avenue Fabrics and 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 4552. 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 Park Avenue Fabrics and 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.

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 cursive script, appearing to read "Colleen T. Sealander".

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

28047854988



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 5, 1996

The Honorable Charles W. Norwood, Jr.
PO Box 499
Evans, GA 30809

RE: MUR 4552

Dear Representative Norwood:

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 4552. Please refer to this number in all future correspondence.

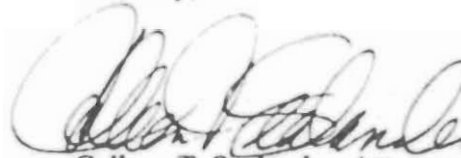
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under 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.

98043854969

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 light-colored rectangular background.

Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

93043854910



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 5, 1996

Richard J. Dunstan, Treasurer
Norwood for Congress
PO Box 499
Evans, GA 30809

RE: MUR 4552

Dear Mr. Dunstan:

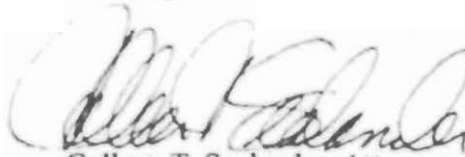
The Federal Election Commission received a complaint which indicates that Norwood for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4552. Please refer 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

980438549/2

Norwood

U.S. CONGRESS

November 25, 1996

Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR 4552

Nov 27 9 23 AM '96

Nov 29 10 23 AM '96

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Sirs:

We have received the complaint filed with the FEC by the Democratic Congressional Campaign Committee. We have reviewed the complaint and feel we need further time to respond. Staff from our 1994 campaign (cited in the complaint) are now working on other campaigns in several different locations. We do not feel we have adequate time or resources to respond to these allegations, particularly with our current campaign closing down after election day. We would therefore respectfully request that we be given an extension of time in which to respond to this complaint.

We appreciate your consideration.

Sincerely,



John Walker
Campaign Manager

8549 / 3
9874

Norwood

U.S. CONGRESS

December 5, 1996

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dec 5 11 09 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Sirs:

We have received the complaint filed with the FEC (MUR 4552) by the Democratic Congressional Campaign Committee. We have reviewed the complaint and feel we need further time to respond. Staff from our 1994 campaign (cited in the complaint) are now working on other campaigns in several different locations. We do not feel we have adequate time or resources to respond to these allegations, particularly with our current campaign closing down after election day. We would therefore respectfully request that we be give an extension of 30 days in which to respond to this complaint.

We appreciate your consideration.

Sincerely,



Charlie Norwood
Member of Congress

9304854974



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 6, 1996

John Walker, Campaign Manager
Norwood for Congress
PO Box 499
Evans, Georgia 30809

RE: MUR 4552
Norwood for Congress
Richard Dunstan, as treasurer

Dear Mr. Walker:

This is in response to your letters dated November 25, 1996, and December 5, 1996, requesting a 30 day extension to respond to the complaint filed in the above-noted matter. Although your requests were made after the due date of your response, 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 December 20, 1996.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Alva E. Smith".

Alva E. Smith, Paralegal
Central Enforcement Docket

98043854975

Park Avenue Fabrics
2131 Walton Way
Augusta, Georgia 30904

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

DEC 23 9 35 AM '96

December 20, 1996

Federal Election Commission
999 E Street, NE
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 23 10 11 AM '96

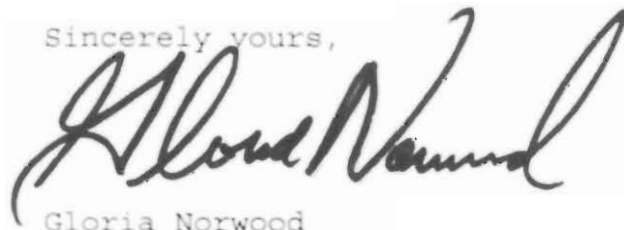
Dear Sirs:

I have received the complaint filed with the FEC (MUR 4552) by the Democratic Congressional Campaign Committee. I would like to take this opportunity to respond to the facts of the complaint.

During 1994, Edith M. Peebles was paid \$2,100 by Park Avenue Fabrics, a corporation for which I am the Registered Agent. While in the employment of Park Avenue Fabrics, Edie served as a personal assistant to one Park Avenue Fabrics' officers, my husband, Dr. Charles Norwood. He needed to someone to help keep track of bills, run personal errands, and other related tasks. When Edie's duties were changed to encompass campaign work, she was taken off of Park Avenue Fabrics' payroll. For the remainder of 1994, Edie was on the payroll of the Norwood for Congress campaign.

In the future, although I will gladly answer any questions of fact as they regard this complaint, I would respectfully ask the FEC refer questions of FEC policy and rule interpretation to Norwood for Congress.

Sincerely yours,



Gloria Norwood
Park Avenue Fabrics

93043854976

Norwood

U.S. CONGRESS

January 3, 1997

Federal Election Commission
Attn: Alva E. Smith
999 E Street, NW
Washington, DC 20463

JAN 8 12 19 PM '97

FEDERAL ELECTION
COMMISSION
OFFICE OF THE
CLERK

Dear Ms. Smith:

I am answering this request as the current treasurer, as I was not treasurer when this happened. This is my research from the situation, regarding **MUR 4552**. Additional information with notarized statements will be sent to you by January 20, 1997.

In your letter, you indicate that you received a complaint that Norwood for Congress may have violated the Federal Election Commission Act of 1971 by taking an illegal corporate contribution. It is alleged by the Democratic Congressional Campaign Committee that Edith Peebles was paid by a corporation while working for Norwood for Congress. Ms. Peebles signed an affidavit to this effect.

Charlie Norwood was a dentist for thirty years before he decided to run for Congress in 1994. It soon became apparent that personal matters that Dr. Norwood needed to take care were falling through the cracks because of the time he was spending campaigning.

In May, 1994, it was decided to hire Ms. Peebles to handle personal and business matters for Dr. and Mrs. Norwood. She would be paid \$600 a month. She worked in the upstairs of a building owned by Dr. Norwood. The lower floor of the building held the dental offices. The upper level held the personal offices of the dentists in the practice. The upper level also had space which the Norwood for Congress campaign occupied. Ms. Peebles desk was set up right outside of the door to Dr. Norwood's personal office.

Ms. Peebles has confused her payment method (Park Avenue Fabrics) for personal work with that of her campaign work to which she was paid out of the campaign funds.

During this time Ms. Peebles was directed to perform only work for Dr. and Mrs. Norwood. She was essentially a personal secretary. She paid bills, regulated visitors to his office, helped finish any leftover dental business, and performed other personal duties as required by Dr. Norwood. Ms. Peebles made it very clear to campaign staff, dental office staff, friends,

and anyone within earshot that she was hired to take care of Dr. Norwood's personal business.

As Dr. Norwood's personal affairs were cleared up and the leftover paperwork from the sale and shutdown of Dr. Norwood's dental practice were completed, it had become increasingly difficult to fill Ms. Peebles time. Also, as Dr. Norwood's personal affairs became less associated with life as a dentist and more associated with life as a candidate, it became increasingly difficult to separate the personal work from the campaign work.

In August of 1994 after Dr. Norwood won the primary runoff, the campaign staff was shuffled. It was decided that Jim Beatty, who had been the office manager for Norwood for Congress, would start traveling around the district with Dr. Norwood. Ms. Peebles had told everyone that she was a good bookkeeper and office manager. It was decided that in addition to serving as Dr. Norwood's personal assistant, Ms. Peebles would now serve the campaign as office manager. Because of this switch in duties and the difficulties described above, it was now necessary that Ms. Peebles be paid by Norwood for Congress. She was removed from the payroll of Park Avenue Fabrics. It was also decided to pay Ms. Peebles an amount from the campaign to cover any time she had inadvertently spent performing campaign work while on the payroll of Park Avenue Fabrics.

Documentation is attached to verify these facts. Mrs. Peebles was paid \$300 (net of \$277.05) on seven dates by Park Avenue Fabrics - 5/18/94, 5/31/94, 6/16/94, 6/30/94, 7/14/94, 7/28/94, and 8/22/94. Also attached is a report detailing all disbursements to Ms. Peebles in 1994 from Norwood for Congress. As can be seen, Ms. Peebles was first paid from the campaign on 8/18/94. This was the amount paid for any work inadvertently performed for Norwood for Congress while on the Park Avenue Fabrics payroll. As I understand it, it is not a violation for a corporate employee to volunteer their time to a campaign, and it is certainly not a violation for a person to be paid for work performed.

I hope this information helps clear up this matter. Further information with notarized statements will be following by January 20, 1997

Sincerely,



Abram Serotta
Treasurer

Norwood for Congress

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT IS:		PARK AVENUE FABRICS OF AUGUSTA 2131 WALTON WAY AUGUSTA, GA 30904		13760 64-33/811
TOTALS OF INVOICES		PAY TO THE ORDER OF	July 14 1994 Edith Peebles \$ 277 ⁰⁵ / ₁₀₀	
LESS % DISCOUNT		Two hundred: seventy-seven: ⁰⁵ / ₁₀₀ DOLLARS		
LESS				
TOTAL DEDUCTIONS				
AMOUNT OF CHECK		Trust Company Bank of Augusta, N.A. P.O. Box 927 Augusta, Georgia 30903		
FOR		Gloria Howard		

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT IS:		PARK AVENUE FABRICS OF AUGUSTA 2131 WALTON WAY AUGUSTA, GA 30904		13800 64-33/811
TOTALS OF INVOICES		PAY TO THE ORDER OF	July 28 1994 Edith Peebles \$ 277 ⁰⁵ / ₁₀₀	
LESS % DISCOUNT		Two hundred: seventy-seven: ⁰⁵ / ₁₀₀ DOLLARS		
LESS				
TOTAL DEDUCTIONS				
AMOUNT OF CHECK		Trust Company Bank of Augusta, N.A. P.O. Box 927 Augusta, Georgia 30903		
FOR		Gloria Howard		

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT IS:		PARK AVENUE FABRICS OF AUGUSTA 2131 WALTON WAY AUGUSTA, GA 30904		13903 64-33/811
TOTALS OF INVOICES		PAY TO THE ORDER OF	Aug 22 1994 Edith Peebles \$ 277 ⁰⁵ / ₁₀₀	
LESS % DISCOUNT		Two hundred: seventy-seven: ⁰⁵ / ₁₀₀ DOLLARS		
LESS				
TOTAL DEDUCTIONS				
AMOUNT OF CHECK		Trust Company Bank of Augusta, N.A. P.O. Box 927 Augusta, Georgia 30903		
FOR		Gloria Howard		

ENDORSE HERE

Leanne Pueren

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTIONS' USE ONLY

21 4532

PAID
22210832

0000000000

ENDORSE HERE

For Deposit Only
Leanne Pueren

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTIONS' USE ONLY

2022

2022

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PAID

0000000000

98043854930

PARK AVENUE FABRICS OF AUGUSTA
2131 WALTON WAY
AUGUSTA, GA 30904

1054 0112420313622

64-33/611

June 16 1994

PAY
TO THE
ORDER OF

Edith Peebles

\$ 277^{05/100}

Two hundred seventy-seven and 05/100

DOLLARS



**Trust Company Bank
of Augusta, N.A.**

P.O. Box 927
Augusta, Georgia 30903

267641600

DL

120397

06/17/94 5:01 PM

12:22 PM

Gloria Forward

FOR

PARK AVENUE FABRICS OF AUGUSTA
2131 WALTON WAY
AUGUSTA, GA 30904

13685

64-33/611

June 30 1994

PAY
TO THE
ORDER OF

Edith Teller #497 Peebles

\$ 277^{05/100}

Two hundred seventy-seven and 05/100

DOLLARS



**Trust Company Bank
of Augusta, N.A.**

P.O. Box 927
Augusta, Georgia 30903

ATM Atlanta

Gloria Forward

FOR

ENCLOSURE

Five Deposit Only
Edith M. Fickler

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTION USE ONLY

01445155

* 001000227 *
FIRST UNION NAT'L
BANK OF GEORGIA
1005 AVIATION PKWY
ATLANTA, GEORGIA
* 061000227 *

20 MAY 94

PAID
20945100

FEDERAL RESERVE BANK REGULATION CO.

98043854982

FEDERAL RESERVE BANK REGULATION CO.

ENCLOSURE

Edith M. Fickler

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTION USE ONLY

099459678

* 001000227 *
FIRST UNION NAT'L
BANK OF GEORGIA
1005 AVIATION PKWY
ATLANTA, GEORGIA
* 061000227 *

27 JUN 94

PAID
117402

01445155

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT (S)		PARK AVENUE FABRICS OF AUGUSTA 2131 WALTON WAY AUGUSTA, GA 30904		13487 64-33/611
	300 00			
S.S.	18 60			
Medicaid	4 35			
TOTALS OF INVOICES				
LESS % DISCOUNT				
LESS				
TOTAL DEDUCTIONS				
AMOUNT OF CHECK		277 05		

PAY TO THE ORDER OF Edith M. Peebles

May 18 1994

\$ 277 ⁰⁵/₁₀₀

Two hundred : seventy-seven : 05/100 DOLLARS

T Trust Company Bank
of Augusta, N.A.
P.O. Box 927
Augusta, Georgia 30903

Gloria Norwood

FOR _____

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT (S)		PARK AVENUE FABRICS OF AUGUSTA 2131 WALTON WAY AUGUSTA, GA 30904		13555 64-33/611
TOTALS OF INVOICES				
LESS % DISCOUNT				
LESS				
TOTAL DEDUCTIONS				
AMOUNT OF CHECK		277 05		

PAY TO THE ORDER OF Edith Peebles

May 31 1994

\$ 277 ⁰⁵/₁₀₀

Two hundred : seventy-seven : 05/100 DOLLARS

T Trust Company Bank
of Augusta, N.A.
P.O. Box 927
Augusta, Georgia 30903

Gloria Norwood

FOR _____

Case 30-1000

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTIONS USE ONLY

PAID

22194397

FOR DEPOSIT ONLY

FEDERAL RESERVE BANK OF ATLANTA, GA

*For Deposit Only
Case 30-1000*

DO NOT SIGN / WRITE / STAMP BELOW THIS LINE
FOR FINANCIAL INSTITUTIONS USE ONLY

PAID

0002721

DETROIT
FIRST UNION
BANK OF SEATTLE
100 AVENUE
ATLANTA, GEORGIA

01 AUG

22064637

FOR DEPOSIT ONLY

FEDERAL RESERVE BANK OF ATLANTA, GA

98043854934

Case 30-1000

DO NOT SIGN

05042910

24 AUG 94

PAID

DETROIT
FIRST UNION
BANK OF SEATTLE
100 AVENUE
ATLANTA, GEORGIA

FEDERAL RESERVE BANK

Records: 2

Mail name

Home Address

Work Address

Mail Address

Peebles, Edith

Edith M. Peebles

Salutation: Edith

402 Greene Street

Apt. D

Augusta, GA 30901-

Home Phone:

Work Phone: 706-651-1420

Fax Phone:

Alt. Phone:

Affil.:

Sex: F Employer: Norwood for Congress

Occupation: Office Manager

Origin:

Disbursement Information

Date	Amount	Kind	Item #	Acct. Chk.	Purpose
08/18/94		Operating Expenditure		0.00 676	Bonus
08/23/94		Operating Expenditure		0.00 700	Payroll
08/26/94		Operating Expenditure		0.00 710	Payroll
09/02/94		Operating Expenditure		0.00 739	Payroll
09/09/94		Operating Expenditure		0.00 790	Payroll
09/12/94		Operating Expenditure		0.00 809	Reimb. Janitor Gramm Event
09/13/94		Operating Expenditure		0.00 821	Office Supplies
09/23/94		Operating Expenditure		0.00 870	Payroll
10/03/94		Operating Expenditure		0.00 907	Payroll
10/03/94		Operating Expenditure		0.00 908	Payroll
10/07/94		Operating Expenditure		0.00 960	Payroll
10/17/94		Operating Expenditure		0.00 005	Payroll
10/20/94		Operating Expenditure		0.00 1025	Payroll
10/27/94		Operating Expenditure		0.00 1084	Payroll
11/03/94		Operating Expenditure		0.00 1122	Payroll
11/08/94		Operating Expenditure		0.00 1244	Bonus
11/11/94		Operating Expenditure		0.00 1173	Payroll
11/18/94		Operating Expenditure		0.00 1186	Payroll
11/23/94		Operating Expenditure		0.00 1197	Payroll
12/02/94		Operating Expenditure		0.00 1204	Payroll
12/08/94		Operating Expenditure		0.00 1243	Travel Reimbursement
12/09/94		Operating Expenditure		0.00 1247	Payroll
12/15/94		Operating Expenditure		0.00 1259	Payroll
12/30/94		Operating Expenditure		0.00 1304	Travel Reimbursement

December 17, 1996

Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: **Amendment to Registration of
Norwood for Congress
C00287367**

Ladies and Gentlemen:

I am writing to amend the registration of Norwood for Congress, FEC Number C00287367, by changing the Treasurer. Effective immediately, the responsibilities of campaign Treasurer will be performed by Mr. Abram J. Serotta of Augusta, Georgia.

Thank you for your time in making these changes in our Campaign's registration.

Sincerely yours,

J. Richard Dunstan, Jr.
Treasurer
Norwood for Congress

9 8 0 4 3 8 5 4 9 3 6

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE

SEP 16 12 39 PM '97

Norwood

U.S. CONGRESS

September 8, 1997

Federal Election Commission
Attn: Alva E. Smith
999 E Street, NW
Washington, DC 20463

Dear Ms. Smith:

This is an additional response to your letter of November 5, 1996, regarding MUR 4552. In the complaint filed against Norwood for Congress, it was alleged that the 1994 Norwood for Congress campaign illegally accepted corporate contributions in the form of payroll checks to Edith Peebles.

Enclosed you will find another statement refuting the charges from an individual who was closely associated with the 1994 Norwood for Congress campaign. This statement is in addition to the six other statements provided by individuals who had first hand knowledge of Ms. Peebles role with Charlie Norwood and later with the campaign. As I understand it, the only evidence to support the charges from Ms. Peebles is her claim.

Several months before Ms. Peebles claim was filed with your office by the Democratic Congressional Campaign Committee, she hired an attorney to make a separate claim against Dr. Norwood for an additional compensation she was owed by the campaign. That matter was settled, and a mutual release was signed. Not once in the release did she mention that she had been improperly compensated, or that anything improper, unethical or illegal had been done by Dr. Norwood. She only claimed additional compensation for work she had done. She also stated in the release that she no longer had any "claims" with Dr. Norwood. Her signature was witnessed by her attorney, Mr. Ken Nimmons. Mr. Nimmons is a close supporter of Dr. Norwood's opponent in the 1996 election, Mr. David Bell. Mr. Bell is also an attorney. Two months after Ms. Peebles signed the mutual release, and six days before the election, the complaint was filed with your office, and was released to the news media by Mr. Bell's campaign.

We find it ironic that soon after Ms. Peebles and her attorney sign the mutual release, they took a completely different approach and contended that they did in fact have a "claim" against Dr. Norwood for improper compensation of Ms. Peebles.

2 3 0 4 8 5 4 9 8

The motive of this complaint should be apparent. The facts are very clear that after the 1994 campaign, Ms. Peebles accepted a position on the congressional staff; she was disappointed in the nature of the position; she failed to show up for the congressional job; she remained in the employ of Norwood for Congress until late 1995; three months after leaving the employ of Norwood for Congress, she hired an attorney to claim additional compensation for work performed in 1995; not once did she or her attorney claim any compensation was improper; the only dispute was whether or not back compensation for 1995 was owed and the amount of that compensation; the parties reached an agreement in August, 1996; Ms. Peebles made these spurious charges five days before the 1996 general election allowing Mr. Bell to use her name in campaign ads.

Norwood for Congress has submitted numerous statements refuting her charges. It is my understanding that Ms. Peebles has supplied no further evidence beyond her initial statement. The reasoning is obvious: there is no material evidence to support her charges; the election of 1996 is concluded; and the candidate she supported in an effort to unseat Dr. Norwood lost. This complaint and your office were used for political purposes. If Ms. Peebles is truly acting as a citizen trying to ensure compliance with election laws, why didn't she bring her charges in 1994, 1995 or sometime in 1996 before signing the mutual release and receiving a settlement with Dr. Norwood? I seriously doubt that the seven people who have submitted sworn statements to you would risk criminal charges for perjury.

I hope this additional information will aid your investigation and that, given the preponderance of evidence, the FEC will promptly dispense further consideration of this matter.

Sincerely,



Duncan Johnson
Chairman
Norwood for Congress Campaign Committee

John E. Stone
9557 James Madison Highway
Warrenton, Virginia 20187

28
August 27, 1997
A.S.

Federal Elections Commission
Washington, DC

Dear Commissioners;

As a former key staff member of Norwood for Congress during the 1994 campaign, I feel my recollections of the services rendered by Ms. Edith Peebles may be of help in determining the validity of charges filed against Norwood for Congress concerning the status of Ms. Peeble's employment.

I began advising Dr. Norwood on a volunteer basis in October, 1993, concerning policy positions, media relations, and campaign organization. I continued in this volunteer capacity until mid-August, 1994, when I joined the campaign full-time as Communications Director. I remained Communications Director for Norwood for Congress through December 31, 1994.

From the summer of 1993 through the fall of 1994, Dr. Norwood was actively campaigning for Congress and still practicing dentistry, while closing out the sale of his share of a three-man practice to one of his partners, Dr. Fred Thielke. Dr. Norwood continued to see patients during this time period in order to complete dental procedures already underway, and to ensure a smooth transition of long-time patients to Dr. Thielke.

The dental practice is located in a large, two-story building in Augusta owned by Dr. Norwood. The first floor consists of the dental practice treatment rooms and offices, while the second floor consists of conference facilities, additional office space, a dental lab, and the private offices of Dr. Norwood and Dr. Ronnie Bowers. The second floor had a separate outside entrance, and was also accessible to the first floor dental practice through a private inside stairway.

During the 1994 campaign, Norwood for Congress used the additional office space and conference facilities on the second floor as campaign headquarters. This

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arrangement allowed Dr. Norwood to continue seeing patients, while having instant access to the campaign office.

During my frequent after-hours meetings with Dr. Norwood during the October '93-August '94 time period, I personally witnessed a state of mass confusion as a result of these conditions. Dr. Norwood would sit in his private office, still in his dental smock, a surgical mask dangling from his neck, while trying to learn detailed policy issues, make campaign decisions, and attend to his personal affairs.

Norwood for Congress at this time was staffed by several young campaign workers, whose zeal for the cause was exceeded only by their immaturity and lack of organization. The staff was loud and obnoxious, and would incessantly barge into Dr. Norwood's office, interrupting his work.

Dr. Norwood's schedule was total chaos. The campaign staff would schedule events at conflicting times with his dental office and private schedule, and the conflicts would frequently result in loud and abrasive arguments.

Due to the youthfulness of the staff, there was no concept of chain-of-command. Dr. Norwood would issue directions to either a campaign or dental office worker, and a staffer would then countermand the instruction.

In the meanwhile, in addition to his dental and campaign activities becoming an organizational disaster, all Dr. Norwood's personal responsibilities such as paying bills, opening and answering mail, scheduling personal and family time, etc. went down the drain.

Edith Peebles was therefore hired by Dr. Norwood personally, for the sole purpose of solving these problems as his personal assistant. I do not remember her exact date of hire, but I recall her being in place during one of my visits sometime around mid-year, with a decided positive effect.

Because of the conditions described above, Dr. Norwood was insistent that Ms. Peebles should not work for either the campaign or the dental practice, but for him exclusively as his personal assistant. He did not want Ms. Peebles answering to anyone other than himself, and felt that if she were paid by the campaign she would rapidly become involved in campaign activities and defeat the purpose of her hire.

Dr. Norwood and his wife Gloria hired and paid Ms. Peebles through Mrs. Norwood's business, Park Avenue Fabrics, of which Dr. Norwood was Secretary.

Ms. Peeble's key actions on the job which I personally witnessed during this time were coordinating all of the competing requests for Dr. Norwood's time and energy. She positioned her desk and room dividers outside the door to Dr.

Norwood's office, and blocked all access of campaign workers unless they scheduled a time through her at Dr. Norwood's convenience. She also successfully reconciled his dental, campaign, and personal schedules, and negotiated final details of the transfer of the dental practice to Dr. Thielke.

I witnessed Ms. Peebles providing Dr. Norwood's lunch and dinner, arranging for laundry services, attending to his personal finances, and coordinating his family activities with Mrs. Norwood at Park Avenue Fabrics.

However, in the process of accomplishing these myriad tasks, and with the ever-increasing tempo of the campaign, Ms. Peeble's contact with campaign staffers and supporters necessarily became more frequent and detailed, for as time progressed, Dr. Norwood became less and less a dentist and more and more a candidate. So in spite of Ms. Peebles earlier success in distancing herself from campaign activities, it became evident to all involved that it would be impossible to maintain that independence through the election cycle.

At around the same time period that I joined the campaign full-time in August 1994, I recall Ms. Peebles being removed from the payroll of Park Avenue Fabrics and hired full-time by the campaign in order to prevent there being any conflict with federal election laws. It is ironic that this is now the precise complaint under consideration by the Commission.

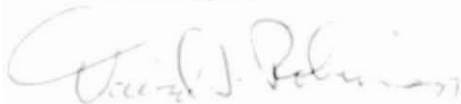
I cannot attest to every activity that Ms. Peebles engaged in while under the personal employ of Dr. Norwood through Park Avenue Fabrics, but I can attest to the fact that she was hired with the specific intent of providing Dr. Norwood with a personal assistant who did not work for the campaign, and I personally witnessed her performing those duties for which she was hired.

Sincerely,



John E. Stone

DISTRICT OF COLUMBIA
Subscribed and sworn (or affirmed) to before
me this 22nd day of August 1994.



DAVID J. ROBINSON
Notary Public
District of Columbia
My Commission Expires September 14, 1997

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)
)
)

ENFORCEMENT PRIORITY

May 10 1997
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.

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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 I 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 (*Gulkecht for Congress*); MUR 4629 (*Janice Schakowsky*); MUR 4636 (*IBEW Local 505*); MUR 4637 (*Dettman for Congress*); MUR 4639 (*Larson for Congress*); MUR 4641 (*Becker 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*).

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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

* 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 (*WMAL 630 AM*); MUR 4525 (*Senator Larry Pressler*); MUR 4527 (*Brennan for Senate*); MUR 4536 (*Signature Properties, Inc.*); MUR 4540 (*Tim Johnson 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 Oaker'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.

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

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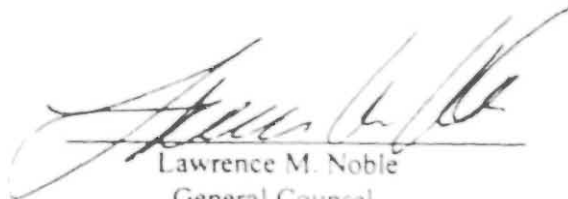
B. Take no action, close the file effective November 17, 1997, and approve the appropriate letters in the following matters:

MUR 4283	MUR 4495	
MUR 4341	MUR 4496	MUR 4569
MUR 4402	MUR 4497	MUR 4586
MUR 4435	MUR 4510	MUR 4590
MUR 4439	MUR 4511	MUR 4600
MUR 4442	MUR 4514	MUR 4612
MUR 4444	MUR 4515	MUR 4615
MUR 4445		MUR 4616
MUR 4446	MUR 4521	MUR 4620
MUR 4447	MUR 4525	MUR 4622
MUR 4449	MUR 4527	MUR 4628
MUR 4453	MUR 4536	MUR 4629
MUR 4454	MUR 4540	MUR 4636
MUR 4459	MUR 4542	MUR 4637
MUR 4474	MUR 4552	MUR 4639
MUR 4477	MUR 4554	MUR 4641
MUR 4481	MUR 4556	MUR 4644
MUR 4485	MUR 4561	MUR 4651
MUR 4486		MUR 4653
	MUR 4564	MUR 4656
MUR 4494	MUR 4567	MUR 4657

Date

7/97

Lawrence M. Noble
General Counsel



98043854996

BEFORE THE FEDERAL ELECTION COMMISSION

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

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)

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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

98043854928



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Matthew H. Angle, Executive Director
Democratic Congressional Campaign Committee
430 South Capitol Street
Washington, D.C. 20003

RE: MUR 4552

Dear Mr. Angle:

On October 30, 1996, the Federal Election Commission received your complaint 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)(4)(B).

Sincerely,

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

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

93043854909



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

The Honorable Charlie Norwood
P.O. Box 499
Evans, GA 30809

RE: MUR 4552

Dear Mr. Norwood:

On November 5, 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 Tuttle".

F. Andrew Tuttle
Supervisory Attorney
Central Enforcement Docket

9804385010



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

Abram J. Serotta, Treasurer
Norwood for Congress
P.O. Box 499
Evans, GA 30809

RE: MUR 4552

Dear Mr. Serotta:

On November 5, 1996, the Federal Election Commission notified Richard J. Dunstan, former treasurer, 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 Norwood 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,

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

F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

1005501



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 15, 1997

The Honorable Charlie Norwood
United States House of Representatives
1707 Longworth House Office Building
Washington, D.C. 20515-1010

RE: MUR 4552

Dear Mr. Norwood:

On November 5, 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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1997

Gloria Norwood, Registered Agent
Park Avenue Fabrics
2131 Walton Way
Augusta, GA 30904

RE: MUR 4552

Dear Ms. Norwood:

On November 5, 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 Park Avenue Fabrics. 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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4552
DATE FILMED 1/16/93 CAMERA NO. 2
CAMERAMAN EES

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