



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 25, 1999

Andrew Huang  
50 Le Clair Court  
Naugatuck, CT 06770

RE: MUR 4682  
Andrew Huang

Dear Mr. Huang:

On May 11, 1999, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441d(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission determined to take no further action with regard to this violation. The Commission then closed the file in this matter. A Factual and Legal Analysis, which formed a basis for the Commission's finding of reason to believe, is attached for your information.

In addition, on the same date the Federal Election Commission found, on the basis of the information in the complaint and the information that you submitted, no reason to believe that you violated 2 U.S.C. §§ 441e(a) and 441f. Also, the Commission rejected the recommendation of the Office of the General Counsel to find reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A).

The Commission reminds you that failing to place a disclaimer on a direct mailing that solicits contributions on behalf of a Federal candidate is a violation of 2 U.S.C. § 441d(a)(3). You should take steps to ensure that this activity does not occur in the future.

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

Mr. Huang  
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If you have any questions, please contact Tamara K. Kapper, the staff member assigned to this matter, at (202) 694-1650.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures  
Factual and Legal Analysis  
GC Report

2025-04-23 10:00

**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT:      Andrew Huang

MUR: 4682

This matter was generated by a complaint filed with the Federal Election Commission (“the Commission”) by Chris DePino, Chairman, Connecticut Republican State Central Committee. *See* 2 U.S.C. § 437g(a)(1).

**A.      Applicable Law**

Pursuant to 2 U.S.C. § 441d(a)(3)

any person that makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any broadcasting station newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication-

if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidate’s committee.

Pursuant to 11 C.F.R. § 110.11(a)(3), “direct mailing” includes any number of substantially similar pieces of mail but does not include a mailing of one hundred pieces or less by any person. According to 11 C.F.R. § 110.11(a)(1), the disclaimer shall be “presented in a clear and conspicuous manner to give the reader . . . adequate notice of the identity of the persons who paid for and, where required, who authorized the communication.” Exceptions to the disclaimer requirements include “bumper stickers, pins, buttons, pens, and similar small items upon which the disclaimer cannot be conveniently printed.” 11 C.F.R. § 110.11(a)(6)(i).

**B. Facts**

On November 4, 1997, Mr. Huang submitted a response to the complaint which details his association with Rep. Gejdenson and his fundraising activities on behalf of the Sam Gejdenson Re-Election Committee and Patricia Tedisco Lagrega, as treasurer, ("Gejdenson Committee"). Mr. Huang claims that in 1977 he began working as a manager of a restaurant in Middletown, Connecticut, which Rep. Gejdenson and his staff frequented. As a result of his employment at the restaurant, he became friendly with Rep. Gejdenson. Mr. Huang asserts that he is a member of the Taiwanese American Association ("TAA") in the Hartford, Connecticut area, and that he solicited contributions from other members of the TAA on behalf of the Gejdenson Committee because of Mr. Gejdenson's immigrant background and the positions he has held on issues affecting the Taiwanese American community. Along with his response Mr. Huang enclosed a copy of the political sketch of Sam Gejdenson and a typical invitation "we" would send out to Taiwanese Association Members. Mr. Huang states:

There is a strong Taiwanese American Association existing in the Greater Hartford area. The number of members could reach 300 families. Enclosed is a copy of the political sketch of Sam Gejdenson and a typical invitation we would send out to Taiwanese Association Members.

**C. Analysis**

Mr. Huang implies that he is a member of the Taiwanese American Chamber of Commerce but does not indicate his position within the organization. He states that there are possibly 300 families that belong to the association, and that the enclosed invitation is typical of the ones that "we" would send to the association members. However, based on his response, there also appears to be a larger group of association members beyond the Greater Hartford area that were solicited for contributions by Mr. Huang. He apparently raised money through his

membership in the organization from individuals in the New York and Houston areas as well as the Connecticut area. As evidenced by the invitation which Mr. Huang submitted along with his response, it appears that Mr. Huang, Frank S. Chuang, Ho-Tien Shu, Joe JuGer and Mark Lin held a fund-raiser on behalf of Rep. Gejdenson on October 5, 1996 at Mr. Chuang's residence.

In his response, Mr. Huang admits that the solicitation to the fund-raiser that he co-hosted was sent to members of the TAA. Thus, it appears that as many as 300 copies of the solicitation were produced and directly mailed to families that belong to the Taiwanese American Association. Since he incurred some of the expenses for the production and distribution of the solicitation on behalf of a federal candidate, the solicitation should have contained a disclaimer as required by 2 U.S.C. § 441d(a). The invitation did not contain a disclaimer indicating who paid for it and whether it was authorized by the Gejdenson Committee. Therefore, there is reason to believe that Andrew Huang violated 2 U.S.C. § 441d(a)(3).