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LONDON EC4A 3HD
44-171-413-0011
FACSIMILE 44-171-413-0333

November 2, 1998

VIA MESSENGER

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Subject: MUR 4814

Dear Sir:

Please find enclosed an original and three copies of the Response of the Eugene Buckley to the Complaint in the above-noted matter. Please return an endorsed filed copy of the same.

Sincerely yours,

*Robert P. Charrow by
Anne M. White*

Robert P. Charrow
Counsel to Eugene Buckley

Enclosures

BEFORE THE FEDERAL ELECTION COMMISSION

Connecticut Republican State)	
Central Committee)	
)	
Complainant)	MUR 4814
)	
)	
v.)	
)	
Friends of Jim Maloney Committee)	Response of Eugene Buckley
<i>et al.</i>)	
)	
Respondents)	
)	

Introduction

This response is submitted on behalf of Mr. Eugene Buckley with respect to a complaint filed with the Federal Election Commission ("Commission") by the Connecticut Republican State Central Committee against a congressional campaign committee and two members of Congress. It is submitted that the complaint should be dismissed as to Mr. Buckley for the reasons stated herein.

This complaint is surprising in a number of respects. First, Mr. Buckley is not named as a respondent in the complaint.¹ Second, Mr. Buckley's sole involvement in this matter has been as a contributor through his employer's

¹ The regulations implementing the Federal Election Campaign Act of 1971, as amended, ("FECA") require that a complaint "clearly identify as a respondent each person or entity who is alleged to have committed a violation." 11 CFR § 111.4(d)(1). Here, the complainant presented no evidence indicating that Mr. Buckley had violated FECA and thus, the complainant did not name Mr.

separate segregated fund. He has played no role whatsoever in the Maloney campaign and nothing in the complaint suggests to the contrary. Mr. Buckley has had the apparent misfortune of becoming embroiled, as an innocent bystander, in an inter-party dispute that gave rise to this complaint. Third, the Commission has chosen to treat him as a respondent even though the reporting and designation obligations at issue in the complaint are not the responsibility of any contributor, but rather are the sole responsibility of campaign committees. See 11 CFR Part 104. A campaign committee's ability to accept a post-election contribution, such as the one made by Mr. Buckley, turns on whether it had an outstanding debt, a fact unknown to a typical contributor until after the contribution has been made, the reporting period closed, and disclosures filed with this Commission.

The Commission should find no reason to believe that Mr. Buckley violated the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 *et seq.*, because Mr. Buckley executed the necessary redesignations within the sixty day period, as expressly authorized by the regulations. See 11 CFR § 110.2(b)(3)(i). This sixty day window is critical because a contributor has no way of knowing whether his or her post-election contribution is proper until after the committee has determined whether it is running in debt, and if not, so advises the contributor within the requisite time, as was done here.

(...continued)

Buckley as a respondent. Since he has not been named as a respondent, the complaint as to him should be dismissed.

Statement of Facts

United Technologies Corporation maintains a separate segregated fund known as the "United Technologies Corporation Employee Political Action Committee" ("UTC PAC"). UTC PAC is registered with the Federal Election Commission as a multicandidate political committee.² The respondent, Mr. Eugene Buckley, as President and Chief Executive Officer of the Sikorsky Aircraft Corporation, a subsidiary of UTC, was eligible to contribute to the UTC PAC.

On July 24, 1998, Mr. Buckley contributed \$5,000 to the UTC PAC and earmarked that contribution as follows: (1) \$2,000—Congressman James Maloney; (2) \$1,000---Congresswoman Rosa DeLauro; (3) \$1,000---Congressman Terry Everett; and (4) \$1,000---Senator Richard Shelby. *See* Enrollment Card, Earmark Instructions (July 24, 1998), and copy of \$5,000 check executed on July 24, 1998 by Mr. Buckley and payable to UTC PAC, all attached as Exhibit 1.

Mr. Buckley's \$2,000 earmarked contribution was transmitted to the Friends of Maloney ("Committee"), the Congressman's authorized campaign committee, on or about August 10, 1998, and was received by the Committee on or about August 15, 1998. *See* Friends of Jim Maloney, Twelfth Day Report, Schedule A, Page 12 of 22 (September 2, 1998), attached as Exhibit 2. The contribution was allocated \$1,000 to the 1998 primary election and \$1,000 to the 1998 general election. *Id.*

² UTC PAC's FEC identification number is C00035683.

According to the complainant, Connecticut held a primary election on September 15, 1998. However, Congressman Maloney had received his party's nomination at a state party nominating convention on or about July 13, 1998. Therefore, according to the complainant, his name would not appear on the September 15, primary ballot. As such, complainant asserts that Maloney's primary cycle ended on July 13, 1998, the day on which he was nominated by his party.

Inasmuch as Mr. Buckley's \$1,000 contribution, earmarked on July 24, and transmitted on or about August 10, was allocated to a "primary election" that had already been held on July 13, the Committee could only retain that contribution if "the contribution [did] not exceed net debts outstanding from such election." 11 CFR § 110.2(b)(3)(i).³ However, a putative contributor to the Maloney campaign had no way of publicly learning of the financial status of the campaign until that campaign had filed its disclosures with this Commission. The financial status of the primary cycle campaign Committee, *i.e.*, whether it had an indebtedness with respect to the July 13 convention, was not available to the public until after September 2, 1998, the date on which Friends of Maloney filed its report for the period July 1, 1998 through August 26, 1998. *See* Exhibit 2.

On September 30, 1998, Friends of Maloney advised Mr. Buckley via facsimile that its primary committee did not have an outstanding debt and,

³ According to the complainant, "such election" is the July 13, 1998 state nominating convention.

therefore, it offered Mr. Buckley the choice of either accepting a refund of the \$1,000 contribution or, in the alternative, agreeing to designate the \$1,000 contribution as one to Mr. Maloney's 1996 campaign which according to the September 30 letter still had "a small debt that remains outstanding." Letter from Meg Tansey (Friends of Jim Maloney) to Mr. Eugene Buckley (September 30, 1998), attached as Exhibit 3.

On that same day, Mr. Buckley signed the authorization permitting the campaign to designate the \$1,000 primary contribution as a contribution to retire the 1996 campaign debt. *Id.* Three days later, on October 3, 1998, Mr. Buckley received a copy of the instant complaint. The Committee has since filed an amended disclosure redesignating Mr. Buckley's contribution in accord with his wishes as indicated on the September 30 facsimile. *See Friends of Jim Maloney, Twelve-Day Pre-Election Report for Primary, Amended Schedule A, Page 12 of 22* (October 14, 1998), attached as Exhibit 4.

Argument

The Commission should find no reason to believe that Mr. Buckley violated the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 *et seq.* At issue in this case is whether Mr. Buckley adhered to the regulations that govern post-election contributions. In that regard, the facts are undisputed: everything that Mr. Buckley was required to do, he did and he did so well within the time frames set forth in the regulations.

The Commission's regulations properly place the primary burden of implementing the "no indebtedness" rule on the campaign committee, not the contributor. This is so because the candidate's committee is the only entity likely to know in a timely fashion the status of its indebtedness, and hence, whether it is in a position to accept an otherwise lawful contribution. Specifically, the regulations provide that:

[t]o the extent that such contribution exceeds net debts outstanding, the candidate or the candidate's authorized political committee shall . . . if deposited, then within sixty days from the date of the treasurer's receipt the treasurer shall take the following action, as appropriate:

- (A) Refund the contribution using a committee check or draft;
or
- (B) Obtain a written redesignation by the contributor for another election in accordance with 11 CFR 110.2(b)(5).

11 CFR § 110.2(b)(3)(i).

The primary contribution at issue was received by the Committee on or about August 15, 1998. On September 30, 1998, less than sixty days after it received and deposited Mr. Buckley's contribution, Friends of Maloney transmitted via facsimile a letter to Mr. Buckley advising him of the fact that the Committee had no outstanding debt with respect to the July 13, 1998 state convention and, therefore, his contribution could not be allocated to the primary cycle. See Exhibit 3. The Committee provided Mr. Buckley with two options. The Committee would refund his \$1,000 contribution or, if he so authorized in writing, the Committee would allocate his contribution to Congressman Maloney's 1996 campaign committee,

which according to the letter had a small outstanding indebtedness. On September 30, 1998, Mr. Buckley executed and returned the document authorizing the Committee to allocate his contribution to the 1996 Committee.⁴ *Id.* In short, Mr. Buckley fully complied with the regulatory requirements.

This Commission has consistently held that the redesignation regulations are designed to comport with the realities of a campaign and that neither individuals nor campaigns are to be held liable for the unknowable or the undoable. This Commission recently articulated this view in Advisory Opinion 1992-15. In that case, an incumbent Member of Congress lost his party's primary. Before the primary, though, the incumbent received significant contributions designated for his general election campaign. Under the redesignation rule, the incumbent had 60 days from the date that the contributions were received either to refund those contributions or to obtain redesignations toward other campaigns. The Commission noted that applying the rule literally meant that the 60-day period could well lapse before anyone knows that there is a need to redesignate. "It is not until the results of the primary election are announced that the treasurer has actual notice of the need to obtain redesignations" *Id.* As result, the Commission permitted the 60-day period to run from the date of the primary election rather than the earlier date of receipt of the contributions even though the rule requires the opposite. Here, of course, Mr. Buckley only had "actual notice" of the campaign committee's

⁴ As noted above, on October 14, 1998, the Committee filed an amended report confirming the redesignation. See Exhibit 4.

lack of indebtedness on September 30, 1998 and on that same day he redesignated his contribution.

In short, Mr. Buckley not only complied with the letter of the law but also with its spirit. He should not be held responsible for the unknowable nor liable for unascertainable.

Conclusion

The sole issue before this Commission is whether there is sufficient evidence to support a "reason to believe" finding with respect to Eugene Buckley. The complaint contains no such evidence. Mr. Buckley complied fully with all regulatory requirements, including the sixty-day redesignation rule. Specifically, he executed the appropriate designation form less than sixty days from the date on which the contribution was received by the Committee. Therefore, the Commission should find that there is no reason to believe that Eugene Buckley violated any provision of the FECA and the complaint should be dismissed as to him.

Respectfully submitted,

Robert P. Charrow by Anne M. Wheeler

Robert P. Charrow
CROWELL & MORING, LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 624-2500
Counsel for Eugene Buckley

EXHIBIT 1

Enrollment Card

Please fill out entire form and mail

Current payroll deduction contributors will continue their contribution and PACMATCH charity designation automatically. They should only use this form to change their contribution level, charity designation or address.

Two Options To Contribute To The UTC Employee PAC

☐ Payroll Deduction (\$5,000 maximum)
I authorize a deduction of \$_____ from my paycheck each semi-monthly payday until further written notice beginning on the first day of _____ (month), 19____

☒ Cash Contribution (\$5,000 maximum)
Enclosed is my contribution to the United Technologies Corporation Employee Political Action Committee in the amount of \$ See Encl. Instructions
Please make check payable to UTC Employee PAC. Attached

☐ Change of Address

☐ Change of Payroll Deduction Amount

Signature Eugene Buckley Date 7-24-98

Name Eugene Buckley Occupation Title Pres. + CEO

Home Address 25 Adirondack Trail

City Easton

State CT Zip 06612

Social Security Number _____ Employee Number 521638

Business Name Sikorsky Aircraft Office Telephone 203-386-4473

Business Mailing Address P.O. Box 9129-6900 Main St.

City Stamford

State CT Zip 06615-9129

E-Mail Address _____

"PAC contributions are not deductible for federal tax purposes. Participation in the United Technologies Corporation Employee Political Action Committee is entirely voluntary and you have the right to refuse to contribute without reprisal. Participation is confidential within UTC except as

PACMATCH

☐ No match requested.

☐ Have my PAC contribution matched to my business unit location's United Way campaign (We will inform your United Way coordinator of your pledge.)

☒ Have my PAC contribution matched by UTC to the following US charity.

Name of Charity _____

Address _____

City See Attached

State _____ Zip _____

The UTC PACMATCH check will be mailed directly to the charity with a copy of the letter provided to you. PACMATCH checks are mailed in the first quarter of the year for payroll deduction contributors and within thirty days of receipt for cash contributors. Any charity selected must be tax-exempt under 26 U.S.C. §501 (c)(3).

If you would like the UTC PACMATCH split among more than one charity in two increments, please supply this information for each charity. You receive no income tax benefits as a result of UTC's charitable contribution to the charity of your choice.

Name of Charity _____

Address _____

City See Attached

State _____ Zip _____

Signature Eugene Buckley Date 24 Jan

Questions? Please contact the UTC Employee PAC Administrator at 202-336-7470 (Telex 545-7470)

required for administration of the PAC and the United Way campaign. Federal law requires political committees to re the name, mailing address, amount of donation, occupa and name of employer for each individual whose contrib tions aggregate in excess of \$200 in a calendar year."

← Tear Here

** TOTAL PAGE 34 **

EARMARK INSTRUCTIONS:

\$2,000 - Congressman James Maloney
 \$1,000 - Congresswoman Rosa DeLauro
 \$1,000 - Congressman Terry Everett
 \$1,000 - Senator Richard Shelby

PACMATCH:

1. St. Catherine of Siena Catholic Church (\$2,000)
 200 Shelton Road
 Trumbull, CT 06611
2. St. Joseph's Manor (\$1,000)
 6448 Main Street
 Trumbull, CT 06612
3. Notre Dame Catholic High School (\$1,000)
 220 Jefferson Street
 Fairfield, CT 06432
 Attn: Father Bill Sangiovanni
4. 1998 Annual Bishops Appear (\$1,000)
 Catholic Center Development Office
 238 Jewett Avenue
 Bridgeport, CT 06606
 Note: Earmarked to: Priests Retirement Fund

Eugene Buckley
 7/24/98

ANN T. BUCKLEY EUGENE BUCKLEY 10 OVERHILL DR. - 25A01RONDALTE TRUMBULL CT 06611 GASTON CT 06612		51-7218/2211 2515
DATE 24 July 98		
PAY TO THE ORDER OF	UTC PAC	\$ 5000.00
Five thousand dollars no cents		DOLLARS
people's bank CONNECTICUT		
Eugene Buckley		

P.34/34

203 966 788 TO 84397881

OCT 05 '98 10:38 FR EXEC SUITE ADMIN

** TOTAL PAGE 34 **

EXHIBIT 2

2025-04-10 09:04:00

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

**USE FEC MAILING LABEL
OR
TYPE OR PRINT**

1. NAME OF COMMITTEE (in full)		FEDERAL ELECTION COMMISSION MAIL ROOM	
Friends of Jim Maloney		SEP 2 10 00 AM '90	
ADDRESS (number and street)	<input checked="" type="checkbox"/> Check if different than previously reported.	2. FEC IDENTIFICATION NUMBER	
1325 E. Main Street, Suite 12		C00327924	
CITY, STATE and ZIP CODE	STATE/DISTRICT	3. IS THIS REPORT AN AMENDMENT?	
Waterbury, CT 06705	CT/05	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

4. TYPE OF REPORT

☐ April 15 Quarterly Report
 ☒ Twelfth day report preceding Primary
 (Type of Election)
 election on 9/15/98 in the State of Connecticut

☐ July 15 Quarterly Report
 ☐ Thirtieth day report following the General Election on _____
 in the State of _____


☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid-Year Report (Non-election Year Only)
 ☐ Termination Report

This report contains activity for
 ☒ Primary Election
 ☐ General Election
 ☐ Special Election
 ☐ Runoff Election

SUMMARY

5. Covering Period <u>7/1/98</u> through <u>8/26/98</u>		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (from Line 11(e))		166,390.50	530,982.89
(b) Total Contribution Refunds (from Line 20(d))		-0-	250.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))		166,390.50	530,732.89
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		128,535.26	416,923.44
(b) Total Offsets to Operating Expenditures (from Line 14)		-0-	216.30
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))		128,535.26	416,707.14
8. Cash on Hand at Close of Reporting Period (from Line 27)		167,815.71	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)			For further information contact: Federal Election Commission 999 E. Street, NW Washington, DC 20453 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		81,433.21	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer Margaret Tansey, Assistant Treasurer			
Signature of Treasurer 			Date 9/2/98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

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FEC FORM 3

(redacted 4/87)

②

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	12	22
	FOR LINE NUMBER	
11a1		

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Friends of Jim Maloney

FEC ID No. C00327924

A. Full Name, Mailing Address and ZIP Code Thomas F. Draper, MD 41 Tauton Lake Road Newtown, CT 06470	Name of Employer Self Employed	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period 900.00
	Occupation Physician	Aggregate Year-To-Date \$ 1,500.00	
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code Allyne Kadish 178 Roseland Avenue Waterbury, CT 06710	Name of Employer Cohen, Kadish O'Bernier & Rice	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period 300.00
	Occupation Bookkeeper	Aggregate Year-To-Date \$ 300.00	
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code Eugene Buckley 25 Adirondack Trail Easton, CT 06612	Name of Employer United Technologies	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period *** 2,000.00
	Occupation Executive	Aggregate Year-To-Date \$ 2,000.00	
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): PS1,000,GS1,000			
D. Full Name, Mailing Address and ZIP Code *** Above contri earmarked thru: United Technologies Corp PAC 1401 Eye Street, NW, Ste 600 Washington, DC 20005	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	Aggregate Year-To-Date \$	
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code Anthony Borrelli 2 old New Milford Road Brookfield, CT 06804	Name of Employer Self Employed	Date (month, day, year) 8/4/98	Amount of Each Receipt this Period 100.00
	Occupation Physician	Aggregate Year-To-Date \$ 350.00	
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code Frances Dibner 8 Powder Horn Hill Road Wilton, CT 06897	Name of Employer	Date (month, day, year) 8/3/98	Amount of Each Receipt this Period 150.00
	Occupation Retired	Aggregate Year-To-Date \$ 400.00	
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code Julian Gregory 190 old Ridgefield Road Wilton, CT 06897	Name of Employer Self Employed	Date (month, day, year) 8/4/98 8/25/98	Amount of Each Receipt this Period 200.00 200.00
	Occupation Attorney	Aggregate Year-To-Date \$ 750.00	
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional)

3,850.00

TOTAL This Period (last page this line number only)

EXHIBIT 3

FRIENDS OF Jim Maloney

September 30, 1998

Mr. Eugene Buckley

VIA FACSIMILE: (203) 386-3555

Dear Mr. Buckley:

Thank you for your recent earmarked contribution of \$2,000 to Congressman Maloney's re-election effort. Your continuing help and support are greatly appreciated.

As this contribution was received after the cutoff date for the primary campaign, we can only accept the \$1,000 maximum contribution for the general election. These resources are still very valuable to us. Your signature below will authorize our committee to designate the remaining portion of your contribution to the small debt that remains outstanding from the victorious Maloney-Congress-96 campaign. Please be aware that if you do not wish to redesignate the remaining \$1,000, you are entitled to a refund.

As our fundraising quarter ends today, I would ask that you sign this and return it by fax to (203) 757-4614, if possible. The original copy should be returned via mail to: Friends of Jim Maloney, 1325 E. Main Street, Suite 12, Waterbury, CT 06705.

Please do not hesitate to call me at (203) 757-4683 should you have any questions, or need any additional information. Once again, thank you for your support.

Yours truly,



Meg Pansey
Finance Director

Signature: _____

Eugene Buckley

Date: _____

30 Sept 98

Paid for by Friends of Jim Maloney

1325 East Main Street • Suite 12 • Waterbury, CT 06705 • Tel. (203) 757-4683 • Fax (203) 757-4614

SEP 30 '98 12:28

P.32/34

203 386 6780 TO 8439/881

ADMIN SUITE EXEC FR 37:10 05 SEP

PAGE 02

3

EXHIBIT 4

For Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)		2. FEC IDENTIFICATION NUMBER C00327924
Friends of Jim Maloney		
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 1325 E. Main Street, Suite 12		
CITY, STATE and ZIP CODE	STATE/DISTRICT	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Waterbury, CT 06705	CT / 05	

☐ April 15 Quarterly Report

☒ 12-Day Pre-Election Report for the Primary (Type of Election)

☐ July 15 Quarterly Report

election on 9/15/98 in the State of Connecticut

☐ October 15 Quarterly Report

☐ 30-Day Post-Election Report following the General Election

☐ January 31 Year End Report

on _____ in the State of _____


☐ July 31 Mid-Year Report (Non-election Year Only)

☐ Termination Report

This report contains activity for ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

Covering Period <u>7/1/98</u> through <u>8/26/98</u>		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.	Net Contributions (other than loans)		
(a)	Total Contributions (other than loans) (from Line 11(a))	166,390.50	530,982.89
(b)	Total Contribution Refunds (from Line 20(d))	-0-	250.00
(c)	Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	166,390.50	530,732.89
7.	Net Operating Expenditures		
(a)	Total Operating Expenditures (from Line 17)	128,535.26	416,923.44
(b)	Total Offsets to Operating Expenditures (from Line 14)	-0-	216.30
(c)	Net Operating Expenditures (subtract Line 7(b) from 7(a))	128,535.26	416,707.14
8.	Cash on Hand at Close of Reporting Period (from Line 27)	167,815.71	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	81,433.21	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Margaret Tansey, Assistant Treasurer	
Signature of Treasurer 	Date 10/14/95

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3
(revised 4/87)

④

SCHEDULE A

UNRECORDED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page
 PAGE 12 OF 22
 FOR LINE NUMBER 11a1

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Friends of Jim Maloney

FEC ID No. C00327924

A	A. Full Name, Mailing Address and ZIP Code Thomas F. Draper, MD 41 Tauton Lake Road Newtown, CT 06470	Name of Employer Self Employed	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period 900.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician	Aggregate Year-To-Date \$ 1,500.00	
A	B. Full Name, Mailing Address and ZIP Code Allyne Kadish 178 Roseland Avenue Waterbury, CT 06720	Name of Employer Cohen, Kadish O'Bernier & Rice	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period 300.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Bookkeeper	Aggregate Year-To-Date \$ 300.00	
A	C. Full Name, Mailing Address and ZIP Code Eugene Buckley 25 Adirondack Trail Easton, CT 06612	Name of Employer United Technologies	Date (month, day, year) 8/15/98	Amount of Each Receipt this Period *** 2,000.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): 1,000 96 debt, 1000 genl	Occupation Executive	Aggregate Year-To-Date \$ 2,000.00	
***	D. Full Name, Mailing Address and ZIP Code Above contri earmarked thru: United Technologies Corp PAC 1401 Eye Street, NW, Ste 600 Washington, DC 20005	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-To-Date \$	
A	E. Full Name, Mailing Address and ZIP Code Anthony Borrelli 2 old New Milford Road Brookfield, CT 06804	Name of Employer Self Employed	Date (month, day, year) 8/4/98	Amount of Each Receipt this Period 100.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician	Aggregate Year-To-Date \$ 350.00	
A	F. Full Name, Mailing Address and ZIP Code Frances Dibner 8 Powder Horn Hill Road Wilton, CT 06897	Name of Employer	Date (month, day, year) 8/3/98	Amount of Each Receipt this Period 150.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-To-Date \$ 400.00	
A	G. Full Name, Mailing Address and ZIP Code Julian Gregory 190 old Ridgefield Road Wilton, CT 06897	Name of Employer Self Employed	Date (month, day, year) 8/4/98 8/25/98	Amount of Each Receipt this Period 200.00 200.00
	Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-To-Date \$ 750.00	

SUBTOTAL of Receipts This Page (optional)

3,850.00

TOTAL This Period (last page this line number only)

OCT 16 '98 17:30

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** TOTAL PAGE.03 **