

JOHN J. LYNCH
HAROLD C. HANSON
STEPHEN M. CLEARY
BARTLEY J. COSTELLO III
PETER L. RUPERT
PHILIP T. DUNNE *
WILLIAM F. SHEEHAN
PAUL M. COLLINS
WILLIAM Y. CROWELL III
DAVID J. OAKLEY
BRUCE N. GYORY
EVAN C. REGAL
THOMAS D. LATIN
CHRISTOPHER C. BOOTH
SEAN M. DOOLAN
WILLIAM P. GOLDBERMAN
BEVERLY COHEN
ROBIN LYNCH SISE
JOHN R. SACCOGIO
KIMBERLY C. LAWRENCE
PAULINE R. KINSELLA **
KEVIN P. QUINN
ROBERT E. SCHILLER
MATTHEW P. AMODEO **

HSP&M
HINMAN, STRAUB,
PIGORS & MANNING, P.C.
ATTORNEYS AT LAW

121 State Street
Albany, New York 12207-1693

Tel: 518-436-0751
Fax: 518-436-4751

E-Mail: RECEPTION@HSPM.com

50 E Street, Southeast • Washington, D.C. 20003-4034
Tel: 202-863-0806

CHERYL POTVIN HOGAN
E. RAYMOND KOLARSEY
PAUL A. GILLAN JR. ***
LAWRENCE K.W. BERG PH.D. **
JANE BELLO BURKE
ARTHUR P. SCHEUERMANN
LAWRENCE H. SCHAEFER **
PHILIP J. MURPHY

OF COUNSEL
JOSEPH BOOCHEVER
ALBERT A. MANNING
CAROLYN SHEARER

GOVERNMENTAL REPRESENTATIVE
KEVIN J. CLEARY

* ADMITTED IN NY & FL
** ADMITTED IN NY & MA
*** ADMITTED IN NY, VT & MD

November 2, 1998

Jennifer H. Boyt
General Counsels Office
Federal Election Commission
999 E St., NW
Washington, D.C. 20463

Re: MUR 4821

Dear Ms. Boyt:

Per our discussion, I am writing in response to the complaint received by the Federal Election Commission alleging that I have violated the Federal Election Campaign Act of 1971 ("the Act").

The complaint relates to contributions to Rick Lazio, candidate for the 2nd Congressional District in New York. In reviewing the complaint it appears that the alleged violation relates to contributions made in 1995 and 1996. On "page 5 of 18" of the complaint attachment entitled "Individual Contributor Data 1995-1996 Lazio" there are three entries indicating that I personally contributed a total of \$2,500 to Mr. Lazio's campaign.

This information is erroneous in several respects. First, I only contributed \$500 to Mr. Lazio's campaign (on 9/27/96) during this time period. Separate and apart from this contribution, I forwarded two additional contributions to Mr. Lazio's campaign on behalf of two separate partnerships. On March 31, 1995 I forwarded to Mr. Lazio a \$1,000 contribution on behalf of 121 State Street Associates, a New York partnership. Attached is a copy of the canceled check and a list of each contributing partner and their proportionate share of ownership of the

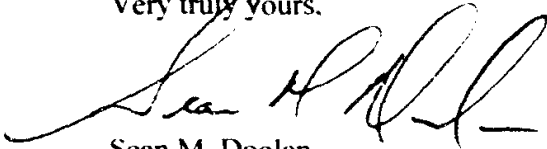
November 2, 1998

partnership. On September 27, 1996, I forwarded to Mr. Lazio's campaign a \$500 contribution on behalf of Arrowhead Commons Partners, also a New York partnership. I have likewise attached a copy of the canceled check and a list of each contributing partner of Arrowhead Commons and their proportionate share of the partnership.

My records reflect only these three contributions during the 1995 and 1996 election cycle. Each of which was in compliance with the Act. It appears that the two "4/21/95" contributions noted in the complaint attachment are actually duplicative of the single March 31, 1995 contribution. In view of the aforementioned, it is quite clear that no action should be taken against myself or any of the individuals who participated in the two partnerships which made said contributions.

I hope this provides assistance in your review of this matter. If I can be of any further assistance, please do not hesitate to contact me.

Very truly yours,



Sean M. Doolan

SMD:kmw
Attachment

Arrowhead Commons Partners - \$500.00

John J. Lynch -	10%	\$50.00	121 State Street Albany, NY 12207
Stephen M. Cleary -	10%	\$50.00	121 State Street Albany, NY 12207
Bartley J. Costello -	10%	\$50.00	121 State Street Albany, NY 12207
Philip T. Dunne -	13%	\$65.00	121 State Street Albany, NY 12207
Harold C. Hanson -	7%	\$35.00	121 State Street Albany, NY 12207
William F. Sheehan -	8%	\$40.00	121 State Street Albany, NY 12207
David J. Oakley -	9%	\$45.00	121 State Street Albany, NY 12207
Paul M. Collins -	6%	\$30.00	121 State Street Albany, NY 12207
Peter L. Rupert -	5%	\$25.00	121 State Street Albany, NY 12207
Linda C. Maffia -	5%	\$25.00	121 State Street Albany, NY 12207
Evan C. Regal -	5%	\$25.00	121 State Street Albany, NY 12207
Bruce N. Gyory -	4%	\$20.00	121 State Street Albany, NY 12207
Christopher C. Booth -	2%	\$10.00	121 State Street Albany, NY 12207
Michael E. Vacek -	4%	\$20.00	121 State Street Albany, NY 12207
Thomas D. Latin -	2%	\$10.00	121 State Street Albany, NY 12207

Total: 100% \$500.00

121 State Street Associates - \$1,000.00

John J. Lynch -	18.5%	\$185.00	121 State Street Albany, NY 12207
Stephen M. Cleary -	18.5%	\$185.00	121 State Street Albany, NY 12207
Bartley J. Costello -	9.5%	\$ 95.00	121 State Street Albany, NY 12207
Philip T. Dunne -	6.5%	\$ 65.00	121 State Street Albany, NY 12207
Harold C. Hanson -	12.5%	\$125.00	121 State Street Albany, NY 12207
William F. Sheehan -	5.5%	\$ 55.00	121 State Street Albany, NY 12207
Joseph Boochever -	18.5%	\$185.00	121 State Street Albany, NY 12207
Paul M. Collins -	5%	\$ 50.00	121 State Street Albany, NY 12207
Peter L. Rupert -	5.5%	\$ 55.00	121 State Street Albany, NY 12207
<u>Total:</u>	100%	\$1,000.00	

121 STATE STREET ASSOCIATES
121 STATE STREET
ALBANY, NEW YORK 12207

REMITTANCE ADVICE					

3163

50-46
213

DOLLARS

CHECK AMOUNT
1000.00

PAY One thousand & 00/100

DATE	TO THE ORDER OF
3/31/95	LAZIO for Congress

3163

CHASE LINCOLN FIRST BANK, N.A.
120 STATE ST - ALBANY, NEW YORK 12207

James C. Maffia

ARROWHEAD COMMONS PARTNERS
121 STATE STREET
ALBANY, NEW YORK 12207

REMITTANCE ADVICE					

29-7079/2213

668

PAY Five Hundred & 00/100

DATE	TO THE ORDER OF	CHECK NUMBER	CHECK AMOUNT
9/13/96	Lazio for Congress	668	500

☒ NATIONAL SAVINGS BANK MAIN OFFICE
ALBANY, NEW YORK 12207

[Signature]

PAY TO THE
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FOR DEPOSIT
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JNT

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M & T BANK
BUFFALO, NY
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LAZIO FOR
GENERAL
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LAZIO FOR
GENERAL
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PROCESSED BY
09/30/96
PAYOR BANK
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