



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 18, 2000

Michael Zinn, President and CEO  
Besicorp Group, Inc.  
1151 Flatbush Road  
Kingston, NY 12401

RE: MUR 4843

Dear Mr. Zinn:

On January 11, 2000, the Federal Election Commission found reason to believe that you individually and Besicorp Group, Inc. knowingly and willfully violated 2 U.S.C. §§ 441b and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act."). The Federal Election Commission also found reason to believe that you individually and Besicorp Group, Inc. knowingly and willfully violated 2 U.S.C. § 441b of the Act by making corporate in-kind contributions to the Friends of Maurice Hinchey committee. However, after considering the circumstances of this matter, the Commission determined to take no further action and closed its file as it pertains to you and Besicorp Group, Inc. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that making and arranging prohibited corporate contributions and contributions in the name of another to a political committee is a violation of 2 U.S.C. §§ 441b and 441f. The Commission also reminds you that making illegal corporate in-kind contributions to a political committee is a violation of 2 U.S.C. § 441b. You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter. If you have any questions, please contact April Sands, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Darryl R. Wold  
Chairman

Enclosure  
Factual and Legal Analysis

21-04-403-0664