

29 Oakland Ave
Warwick, NY 10990

May 15, 2000

Lawrence M. Noble, Esq.
General Counsel
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

MUR 5016

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 17 3 04 PM '00

Re: Complaint Against Larry Graham for Congress Exploratory Committee

Dear Mr. Noble:

I, John S. Hicks hereby bring this complaint pursuant to 2 U.S.C. § 437g(a)(1) against the Larry Graham for Congress Exploratory Committee, and Richard Laster as treasurer. I reside at 29 Oakland Ave Warwick NY 10990.

In sum, Larry Graham has created a scheme by which he is able to mask from both public and Commission scrutiny the use of corporate money in his campaign. By so doing, he has frustrated one of the central purposes of Federal election law, namely public disclosure, and has done so knowingly and willfully.

Factual Background

Larry Graham is a candidate for United States Congress from the nineteenth district of New York. Campaign stationary lists the phone number (914) 238-4000 (see attachment "A").

Graham is also the Chief Executive Officer for progressive Management Associates, Inc., a New York corporation that filed a certificate of incorporation on August 2, 1993 (see attached "B"). The local phone directory (see attachment "C") lists Progressive Management Associates, Inc.'s phone number as (914) 238-4000. This is the same phone number listed on campaign stationary.

The Larry Graham for Congress committee filed a statement of organization and a statement of candidacy on August 20, 1999, and reported having \$255,054.64 cash on hand in its first quarter report. Much of the cash on hand originated from the candidate himself. In fact, his campaign committee received a request for additional information regarding these funds. It appears that Graham has failed to respond to Commission inquiries. Also, Graham has failed to file a personal Financial Disclosure Statement with the Clerk of the US House of Representatives, as required by the Ethics in Government Act.

Violations

1. Illegal Corporate Contributions

It is well established that a campaign may not accept contributions from a corporation. 11 C.F.R. § 114.2(a) & (b). A contribution is anything of value given to influence a federal election, and an in-kind contribution occurs when a person or entity pays for services, such as a telephone, on the campaign's behalf. 11 C.F.R. §§ 100.7(a)(1)(iii) & 100.8(a)(1)(iv).

Graham for Congress received a corporate in-kind contribution from Progressive Management Associates, Inc. Use of the corporation's phone number and phone is a service that has value to the Graham Committee. As such, it has violated the law, and Commission action is warranted.

2. Graham's Violations Are Knowing and Willful

On the surface, this may appear to be nothing more than a technicality. Some may believe that using your own corporation's phone number for campaign purposes is harmless. Others might say that Graham has filed reports, so the public is informed.

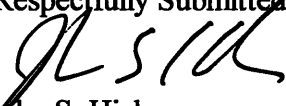
Such thoughts, although understandable, fail to acknowledge the seriousness of what Graham has done. What keeps Graham from funneling his corporation money into his campaign? He can easily mask the true source of the funds, merely by labeling corporate money as his own. He has already demonstrated a willingness to do so, and has trouble differentiating that which are permissible campaign funds, and that which are illegal corporate funds. Similarly, the Commission has already questioned his funds already given to the campaign. It appears as though Graham has hatched a scheme that knowingly evades the prohibitions of Federal law.

Given that Graham has not filed a Financial Disclosure Statement with the House, the public is completely unaware of his total worth or the true source of his funds. Graham is a self-financed candidate who has accepted illegal corporate funds and may be masking additional illegal funds. Absent some sort of disclosure as to the source of his funds, Graham would be free to funnel corporate resources into his campaign. Accordingly, Commission action is warranted.


Conclusion

Larry Graham has knowingly and willfully violated Federal law. He has set up an elaborate scheme designed to mask the source of the funds supporting his campaign. Such a scheme thwarts one of the central purposes of the Federal Election Campaign Act, namely public disclosure. For these reasons, I respectfully ask that the Commission require Graham to immediately amend his reports so as to show the true source of his funding, respond to the previous request for information regarding same, and to refund any funds originating from prohibited sources. I also ask that the Commission find that there exists a reason to believe that Federal law has been violated, promptly investigate the matter, and institute appropriate legal action to secure an appropriate fine for these violations.

Respectfully Submitted,


John S. Hicks

State of New York
County of Orange
Signed and sworn to before me this
15th day of May, 2000

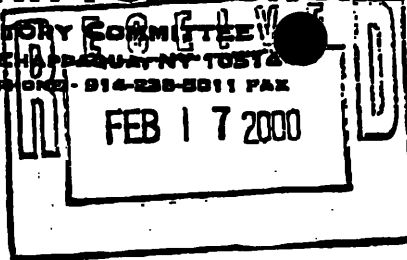

Notary Public

JANET A. HELLER
Notary Public, State of New York
No. 01HE5018155
Qualified in Orange County
Commission Expires Sept. 20, 2001

21 "04" 405 "0015

LARRY GRAHAM FOR CONGRESS

EXPLORATORY COMMITTEE
P.O. Box 80 CHAPPAQUA NY 12512
914-238-4000 PHONE - 914-238-5011 FAX



February 10, 2000

I would like to invite you to be my special guest at your choice of events that I am hosting in Westchester with town committee members and other Democratic friends so that I can share my plans to run for Congress in the 19th Congressional District. As you may know, I have been scheduling visits to each of the town committees. But I hope you will join me in this informal setting where I can discuss my progress and plans and give you an opportunity to ask any questions that you might have as you consider a Democratic candidate for Congress.

Many of you know that I have been working on this full-time since last summer. I therefore am eager to explain what I can bring to Congress and I'd also like to tell you about the professional team of fundraisers, pollsters, election attorneys, public relations and other consultants and volunteers who are a part of my team. We now have in excess of \$200,000 in our campaign fund, and my professional fundraising staff and I continue to host and attend fundraisers held by supporters throughout the District, as well as across the country.

If you can join me next month, I hope you will also feel free to discuss the important issues that are of concern to you and your community. Last June, many town and county chairs in the 19th Congressional District joined me at my home to begin this discussion. I have continued this conversation by sharing my plans with Congresswoman Lowey, Senator Schumer, Comptroller McCall, President Clinton, as well as with advisers at the DCCC in Washington and other Democrats in New York.

I look forward to seeing you. Please be my guest for food and beverages at either event:

Saturday, Feb. 26, 9:30am-12 noon
Calhoun's Restaurant
76 King Street (Route 120)
Chappaqua
(for directions call 238-9290)

Sunday, Feb. 27, 3pm-5pm
Kathleen's Tea Room
979 Main Street (near Division St.)
Peekskill
(for directions call 734-2520)

Please RSVP for either event by Feb. 22 by calling my office at 238-4000 or 238-0005.

Enclosures

Sincerely,


Larry Graham

Exhibit "A"



STATE OF NEW YORK
DEPARTMENT OF STATE
41 STATE STREET
ALBANY, NY 12231-0001

ALEXANDER F. TREADWELL
SECRETARY OF STATE

CUST REF: BF/BG

APRIL 12, 2000

Dear Sir/Madam,

The following represents the most complete and current information available in response to your recent inquiry.

A Certificate of Incorporation of PROGRESSIVE MANAGEMENT ASSOCIATES, INC. was filed on 08/02/1993. Its principal location is WESTCHESTER county.

Status: Active

Biennial Statement: Past due - out of business

Service of Process Address:
LAWRENCE O GRAHAM ESQ
2 OLD FARM CIRCLE
WHITE PLAINS, NY 10605

Registered Agent (optional in NY): None

Chief Executive Officer:
LAWRENCE OTIS GRAHAM
TWO OLD FARM CIRCLE
WHITE PLAINS, NY

Principal Business Location:
THE CORPORATION
TWO OLD FARM CIRCLE
WHITE PLAINS, NY 10605-5405

Current Stock Information:		
Stock Type	Num. Shares	Value/Share
Non Par Value	200	.0000000

There is no requirement that the names and addresses of officers or directors, other than the chief executive officer, be filed with this or any other state agency.

Sincerely,

DIVISION OF CORPORATIONS
(518) 473-2492

200004130269 54

21.04.405.0018



Yellow Pages

Westchester – Putnam Counties

White Plains Edition
Elmsford, Hartsdale, Scarsdale, Valhalla

Area Code 914

March 2000 – February 2001

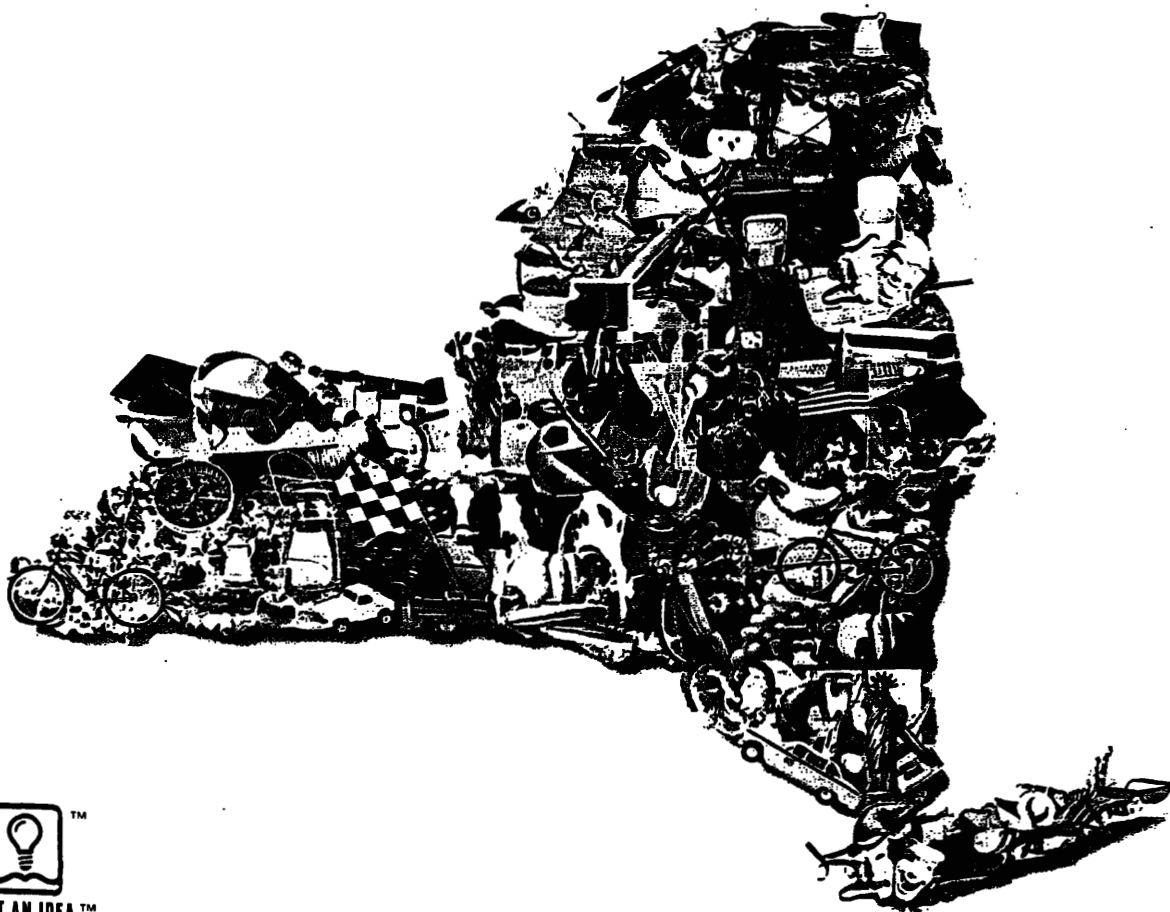
NEW!
INTERNET GUIDE!
LOOK FOR THE
SECTION INSIDE!

SAVE MONEY
WITH COUPONS!
SEE GREEN PAGES!

LOCAL RECYCLING
INFORMATION
& ZIP CODES!



Includes customer listing
of all local telephone
companies



Life. Listed Alphabetically.

Exhibit "C" (12)

► **Make-Up & Beauty Consultants**

- Pennylane Bridal Cosmetics
70 Gateway Rd Yonkers — 964-0428
Rave Revues Salons 480 Main Armonk — 273-2343
Sales Impressions
84 Business Park Dr Armonk — 273-3500
Westchester School Of Beauty Culture Inc
6 Gramatan Av Mount Vernon — 664-2144

► **Malls**

See "Shopping Centers & Malls"

► **Mammography**

- Medical Center At Cold Spring The
Paulding Av Cold Spring — 265-3642
Medical Center At Croton
35 S Riverside Av Croton-On-Hudson — 271-9481
Mobile Mammography
42 Hilltop Av Stamford CT — 203 968-9894
NAVIX DIAGNOSTIC SVC INC
Call For Local Services Or
www.navixrad.com
Toll Free Dial 1 — 800 543-7275
Women's Screening Services Of
Westchester 170 Maple Av Whi Pins — 949-2391

► **Managed Care Plans**

- Enviro Pest Managmnt
641 N Broadway Whi Pins — 997-7150

► **Management Consultants**

- A F B Consulting Inc
5 Trapping Wy Pleasantville — 773-0664
Advance Marketing Group
213 Cleveland Rd Croton-On-Hudson — 271-2000
Call — Chappaqua 238-2623
Alexander Group The
695 E Main Stamford CT — 203 975-9344
All Risk Management Inc
Depot Plz New Rochelle — 633-4022
Amen Robert Consultants
55 Railroad Av Greenwich CT — 203 629-2244
American Chase
19 Cliffdale Rd Greenwich CT — 203 622-6295
Amherst Group Ltd The
7 Riversville Rd Greenwich CT — 203 531-8500
Argyle Associates Inc
49 Locust Av New Canaan CT — 203 966-7015
Argyll Corporation
2001 W Main Stamford CT — 203 324-0313
Ask Managmnt 400 King Chappaqua — 238-6999
Ask Management
2 Turner Dr S Chappaqua — 241-0323
Atlantic Energy Inc
1 Executive Blvd Yonkers — 968-5265
Axe Houghton Assoc
1100 King Port Chester — 933-3200
B K International Insurance Brokers Ltd
35 Mason Greenwich CT — 203 622-1188
Barclay Consulting Assocs
734 E Boston Post Rd Mamaroneck — 698-8100
44 Iselin Terr Larchmont — 834-9300
Barnum Assocs Jerome
423 Westchstr Av Whi Pins — 428-3700
Baron Murray Assocs 20 Chestnut Rye — 967-8600
Beate Barton & Hans-Juergen Barton
29 Mulligan Ln Irvington — 478-7678
Bedford Management Group Inc
60 Goldens Bridge Rd Katonah — 232-0101
Blair & Co LLC
60 Arch Greenwich CT — 203 661-8790
Breakthrough Ent Ltd 24 Ray Pl Scrdl — 723-3232
Burke W Warner Assocs Inc
201 Wolf's Ln Pelham — 738-0080
Business Boomers 80 Hayward Yonkers — 964-5978
C P I Consulting Assoc Inc
244 Westchstr Av Whi Pins — 949-4402
Cambridge Group East Ltd
10 Glenville Greenwich CT — 203 532-0200
Canaan Parish Group Inc The
Ogden Rd New Canaan CT — 203 972-2859
Cane-Powers Consulting
122 Eagle Dr Stamford CT — 203 329-3238
Capital Consulting & Research Group Inc
51 Locust Av New Canaan CT — 203 966-3200
Career Relocation Corp Of America
80 Business Park Dr Armonk — 273-2500
Career Resource Center
660 White Plains Rd Tarrytown — 332-7131
Carmichael R S & Co Inc
1025 Westchester Av Whi Pins — 761-8200
Center For Training & Development
15 Garden Rd Chappaqua — 238-9210
Chem Systems Inc
303 S Broadway Tarrytown — 631-2828
Civitech Corp 200 Summit Lake Dr Valhalla — 773-1525
CMAC Consulting
36 Duncan Dr Greenwich CT — 203 531-5100

- Compensation Consultancy
4 Lake Av Bronxville — 793-7334
Compensation Solutions
1177 High Ridge Rd Stamford CT — 203 329-3292
Concinnity Svcs
445 N Broadway Hastings-On-Hudson — 478-9000
Connecticut Small Business Development
Center 1 Landmark Sq Stamford CT — 203 323-1883
Consultech 1 Atlantic Stamford CT — 203 359-1278
Cowin Associates
388 Wahackme Rd New Canaan CT — 203 972-2813
Creative Market Place The
1717 Shippin Av Stamford CT — 203 964-8006
Cromwell Foote Partners LLC
62 Southfield Av Stamford CT — 203 359-3745
Culture Change Consultants
11 Eden Av Larchmont — 834-7686
Curtis Reid Enterprises
178 Myrtle Blvd Larchmont — 834-0622
D M A Associates
463 Old Sleepy Hollow Rd Pleasantville — 524-9822
Davidson Associates
36 Deacons Way New Canaan CT — 203 966-6670
Diamond Technology Partners
12 Guilford Ln Greenwich CT — 203 531-8680
Doyle Farley & Co 34 Mead Pl Rye — 921-4077
Drake Beam Morin Inc
One Station Pl Stamford CT — 203 348-6616
Solari Joseph 60 Arch Greenwich CT — 203 618-0216
Easton Consultants Inc
263 Tresser Blvd Stamford CT — 203 348-8774
Edu-Mark Management Inc
1234 Summer Stamford CT — 203 323-4811
Edwards & Assocs
19 Fenciliff Rd Cos Cob CT — 203 629-0707
Elliot Solutions 104 S Broadway Tarrytown — 332-9555
Emerald Enterprise Service
25 Main Mount Kisco — 244-1335
Excel Consulting Inc
220 White Plains Rd Tarrytown — 366-4600
Excelsior At Westchester
572 N Broadway Whi Pins — 946-6111
Executive Development Int'l-E D I
1450 Washington Blvd Stamford CT — 203 327-0027
F G I Managmnt Corp Court Rd Bedford — 234-9517
Facilities Management Consultants
81 Main Whi Pins — 686-8936
First Management Group Inc
29 Pleasant Run Rd Pleasantville — 741-5148
First Management Services
209 Dunn Av Stamford CT — 203 329-0853
Foley Brian & Co Inc
1 N Broadway Whi Pins — 946-9700
Foley Lawrence C Park Dr N Rye — 967-2345
Four Siblings Inc
693 Locust Mount Vernon — 665-9627
Franklin Covey
125 Westchester Av Whi Pins — 683-6410
Greenwich Consulting Group Inc
309 Greenwich Av Greenwich CT — 203 625-4500
Greenwich Strategy Consultants
360 W Putnam Av Greenwich CT — 203 618-0500
Greenwich Treasury Advisors Inc
14A Weavers Hill Greenwich CT — 203 531-0835
H & W Management Science Consultants
H & W Systems Inc
3 Charlotte Ln Scrdl — 722-0854
Hamilton Business Svcs Inc
20 Lebanon Rd Scrdl — 723-6334
Hendry Corp
1 Scenic Dr Croton-On-Hudson — 271-4767

HEWITT ASSOCIATES LLC

- Compensation Consultants And Actuaries
40 Highland Ave Rowayton CT — 203 852-1100
Hines Interest Limited Partnership
225 High Ridge Rd Stamford CT — 203 323-2255
Hoppenfeld Peter
714 Stuart Av Mamaroneck — 698-3440
Human Resource Partnership
1011 High Ridge Rd Stamford CT — 203 321-1500
IMTEC 1 Dock Stamford CT — 203 964-9619
IPM Inc 100 Executive Blvd Ossining — 944-4100
Integrated Consulting Ltd
11 W Prospect Av Mount Vernon — 667-9348
Inteltech International Inc
39 Fields Ln North Salem — 276-6500
International Management Services Inc
362 South Av New Canaan CT — 203 972-1139
JCG International
20 Kingsbury Rd New Rochelle — 833-2406
JMA Capital LLC
111 Elm New Canaan CT — 203 966-7753
JNB Associates
59 Grave New Canaan CT — 203 966-0947
Jaakko Poyry Consulting
580 White Plains Rd Tarrytown — 332-4000
Jordan Group The 25 Main Tarrytown — 366-8264
KMA LLC 116 Mason Greenwich CT — 203 869-0785
Kearney At Inc
1 Landmark Sq Stamford CT — 203 969-2222
Koren Rogers Assoc Inc
701 Westchester Av Whi Pins — 686-5800
Kriya Associates
1100 Warburton Av Yonkers — 375-5443
Laurel Enterprises Ltd
49 Danforth Dr New Canaan CT — 203 972-2889
Lishier & Co Inc
20 Sturbridge Hill Rd New Canaan CT — 203 972-3519
Loventhal Managmnt Co
22 Sheridan Av Mount Vernon — 664-0933
Lyre Co 635 S Colms Av Mount Vernon — 665-9784
M C M Consultants 28 Dunham Rd Hrtstl — 693-1613
Management Affiliates
75 Taconic Rd Greenwich CT — 203 869-7333
Management Alternatives
208 Riverbank Dr Stamford CT — 203 322-4927
Management Consultants For The Arts
132 East Putnam Av Cos Cob CT — 203 661-3003
Management & Marketing Corp
1 Landmark Sq Stamford CT — 203 961-9100
Managerial Techniques Inc
7 Heritage Ln Rye — 967-4279
Managing People Productivity Inc
100 Manhattanville Rd Pchse — 697-2999
Manley Frank B & Co
94 Field Point Cir Greenwich CT — 203 661-3800
MAP Tech Inc 32 Stebbins Av Tuckahoe — 961-8514
Marketing Group The Inc
74 Rogers Rd Stamford CT — 203 359-8888
Marketing & Planning Group Inc
28 N Salem Rd Katonah — 232-6481
Mars & Co 124 Mason Greenwich CT — 203 629-9292
124 Mason Greenwich CT — 203 862-5200
Matte & Company Inc
124 W Putnam Av Greenwich CT — 203 661-2224
Mc Creight & Company
39 Beacon Hill Rd New Canaan CT — 203 972-4949
McGlynn & Assocs Inc
Route 6 & Mahopac Av Baldwin Place — 248-6572
McKinsey & Company
3 Landmark Sq Stamford CT — 203 977-6700
McLagan Partners Inc
107 Elm Stamford CT — 203 359-2878

MERCER WILLIAM M

- 301 Tresser Blvd Stamford CT — 203 973-2000
Montagnesi Dante V
97 Indian Field Dr Greenwich CT — 203 661-3282
New Day Enterprises
2 Osborn Ct Shannock — 248-8434
Newport Consulting Group
163 Highland Av Tarrytown — 332-9246
Nightingale & Associates Inc
1266 E Main Stamford CT — 203 359-3855
Northeast Consulting Assocs
25 Lewis Greenwich CT — 203 869-1375
O A Systems Inc 26 Slocum New Rochelle — 576-3542
OTS Inc 800 Scandale Av Scrdl — 723-1333
Paradigm Partners Intl
411 W Putnam Av Greenwich CT — 203 618-1939
Parker Consultants
67 Mason Greenwich CT — 203 869-9400
Patricia N Hunter & Associates
237 Elm New Canaan CT — 203 966-6114
Paul Sherman & Assocs
26 Club Points Dr Whi Pins — 948-0767
Peak Performance
Old Albany Post Rd Garrison — 265-2084
Personal Performance Consultants
3010 Westchester Av Pchse — 694-1333
Personnel Lab Inc The
733 Summer Stamford CT — 203 325-4348
Practice Management
Van Rensselaer Rd Katonah — 232-4536
Practice Resource Svcs Inc
72 Post Office Rd Waccabuc — 763-3552
Prescott Bush Resources Ltd
151 Railroad Av Greenwich CT — 203 661-5060
Productivity Systems Ltd
100 Melrose Av Greenwich CT — 203 869-2911
Professional Insight
41 Londrny Dr Greenwich CT — 203 661-9506
Progressive Managmnt Assocs Inc
233 S Greeley Av Chappaqua — 238-4000
Project Administration Institute The
47 Echo Ln Larchmont — 834-4162

RHI MANAGEMENT RESOURCES

- 1 Canterbury Green — 203 356-1012
RM Consulting 6 Chatfield Rd Bronxville — 961-5482
R S F Enterprises Inc
1 West Purdy Av Rye — 967-4503
Ralph E Austin & Assoc Inc
1075 Central Av Scrdl — 472-0700
Renaissance Solutions Inc
100 First Stamford Pl Stamford CT — 203 975-0000
Resource Evaluation Inc
2975 E Westchester Av Pchse — 696-7300
Resource Planning Group
195 Waccabuc Rd Goldens Bridge — 232-5052
Retail Search Of America Corp
32 Cremer Road Armonk — 273-6876
Robbins Lawrence
Rosenberg Consultants Inc
18 N Central Av Hrtstl — 946-0505
Rye Transaction Consultants Inc
23 Dorchester Rd Rye — 967-4700
Schaffner Robert H & Associates
4 High Ridge Pl Stamford CT — 203 322-1604
SCS Consulting Group Inc
344 Main Mount Kisco — 244-8683
Shapiro Enterprises
220 White Plains Rd Tarrytown — 366-0803
Silberstein William Assoc

- SMA Management Systems
560 White Plains Rd Tarrytown
SMILK Inc
6 Mountain Laurel Dr Greenwich
Sparacino Associates Inc
175 Blackberry Dr Stamford
Specialized Risk Mgt Inc
305 Old Tarrytown Rd Whi Pins
Stamwich Benefits Group Inc
3 Manhattanville Rd Pchse
Star Management & Consul
106 Corporate Park Dr Whi Pins
Stark Management Co
455 Central Park Av Scrdl
Strategic Planning Svcs Inc
37 Duncan Dr Greenwich CT
Strategic Process Solutions
43 Ridge Rd Ardsley
Synchronous Manufacturing
Inc Ridgefield Av South Lake
Technology Leadership Inc
15 Pondfield Pkwy Mount V
Todd Organization The Sta
Trinity Associates
52 Mason Greenwich CT —
Uniglobe Kisco Inc
709 Westchstr Av Whi Pins
Unitech Corp
132 Brook Farm Rd E Bedf
Urban Dental Managmnt I
11 Martine Av Whi Pins —
Urban Initiatives
1596 Washington Blvd Stan
WED Associates Inc
52 Old Stone Hill Rd Pounc
Wear Spencer Assocs
145 Cooper Dr New Rochel
Weissman Debra C
2 Gannett Dr Whi Pins —
Werner Gershon Associate
156 Ridgecrest Rd Stamford
Werner-Gershon Associates
915 Sylvan Ln Mamaroneck
Westchester Plaza
40 E Sidney Av Mount Ver
Whitney Young 358 Nephri
Woodside Group Inc
733 Summer Stamford CT
YZ Associates Inc 33 Warr

► **Management Train**

- Selbst Group Inc 10 New
Stackhouse Garber Asso.
11 Forest New Canaan C

► **Manholes**See "Concrete Bloc
Products"; "Foundr."► **Manicure Equip.**

- Best Salon Equipment
444 Saw Mill River Rd E
Columbia Manicure Mf
1 Seneca Pl Greenwich
Los Mains Jolies
289 Greenwich Av Gree
Unique Nail Supt Corp
28 Joyce Rd Hrtstl —

► **Manicuring**

See "Beauty Salon"

► **Mannequins-Living**

See "Models-Livin"

► **Mantels**

See "Fireplaces"

► **Manufactured I**

- C & T Industrial Tool
172 Lisperand Av New

► **Manufacturers
& Representat**

- BLC Marketing
804 Bronx River Rd E
Brimmekamp Carl G
64 Main New Canaan
Christie S D Assocs
424 Central Av Peek
Comlam Inc
27 Old Post Rd S Cr
Commercial Flooring
1005 Post Rd Scrs
Construction Svcs