

RECEIVED
FEDERAL ELECTION
COMMISSION

Michael Chernus

2010 OCT -1 PM 1:28

San Pedro Ca 90731

OFFICE OF GENERAL
COUNSEL

September 29, 2010

Christopher Hughes Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

MUR # 6388

Re: Complaint against Mattie Fein and Mattie Fein for Congress Committee

Dear Mr. Hughey,

I write this letter to file a complaint against Mattie Fein, a candidate for the 36th Congressional District in the state of California, and her principal campaign committee, Mattie Fein for Congress. Although reports filed with the Commission indicate substantial loans and contributions made by Ms. Fein to the Committee between December 2009 and March 2010, the candidate's financial disclosure statement does not reflect the assets or income necessary to support that level of investment. If Ms. Fein has used resources other than her own personal funds to make contributions or loans to the campaign, then she and the committee have acted in violation of the Federal Election Campaign Act of 1971.

THE FACTS

The record demonstrates that Mattie Fein loaned her campaign committee \$50,000 in personal funds and contributed an additional \$58,221.48 to the Committee. Two loans totaling \$50,000 were made to the Committee on March 31, 2010, and reported from the candidate on line 13a of the Committee's April Quarterly report. The loans were also reported on Schedule C, where the source of the loan is identified as the candidate's "personal funds." Between December 31, 2009 and March 1, 2010, Ms. Fein made a series of contributions to the Committee totaling an additional \$58,222. The first of these contributions was reported on the Committee's 2009 year-end report; these additional contributions were reported on the 2010 April Quarterly report.

Pursuant to the Ethics in Government Act, Ms. Fein filed a financial disclosure statement with the Clerk of the U.S. House of Representatives on August 9, 2010. The statute requires that the filer disclose the source, type and amount of earned and unearned income received during the year of filing preceding calendar year as well as the "identity And category of value of any interest in property held...in a trade or business, or for investment or the production of income." Interest-bearing checking or savings accounts held by the filer must be disclosed if the total value exceeds \$5,000 as of the end of the reporting period.

The only 2009 or 2010 income disclosed on Ms. Fein's statement is a \$3,000 honorarium from the Litchfield Group, Inc. in 2009 and income in the amount of \$15,001-\$50,000 in both 2009 and 2010 from a separation agreement with her former husband, Bruce Fein. No other assets or sources of income are listed on the report. The financial

11044291518

disclosure statement filed by Ms. Fein simply does not reflect the income or assets that would have permitted her make such a significant investment of personal funds to her campaign.

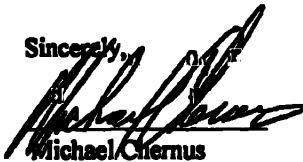
ARGUMENT

The F.E.C. Act and Commission regulations permit federal candidates to make "unlimited expenditures" from personal funds. The "personal funds of a candidate are defined to include amounts derived from any asset that the candidate had "legal right of access to or control over" and with respect to which the candidate had "legal and right-full title" or an "equitable interest." Personal funds also include any income received by candidate during the election cycle, including income from a salary and other earned income, income from the candidate's stocks or investments, bequests to the candidate, income from trusts, and gifts of a personal nature that had been customarily received by the candidate prior to candidacy.

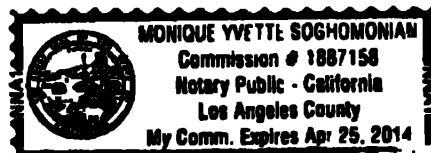
Here, the Committee's reports indicate that Ms. Fein loaned and contributed to her campaign an aggregate amount of \$108,222 in the three-month period between December 31, 2009 and March 31, 2010. Yet, according to her financial disclosure statement, the total income that Ms. Fein received between January 1, 2009 and August 9, 2010 was between \$33,000 and \$103,000. Even if she received the maximum amount, it is still less than the total amount she contributed and loaned to her campaign in a three-month period. And her financial disclosure statement indicates no additional assets or savings.

If Ms. Fein did not have the personal funds necessary to contribute or loan the Committee over \$100,000 to her campaign, then she and the Committee have acted in violation in the Act.

Sincerely,


Michael Chernus

SUBSCRIBED & SWORN to me this 20th day of September 2010





11044291519

11044291520

RECEIVED
FEDERAL ELECTION
COMMISSION

Michael Wm Chernus

2010 OCT -1 PM 1:28

San Pedro, Ca, 90731

OFFICE OF GENERAL
COUNSEL

Sept 10, 2010

Christopher Hughes Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

MUR # 6388

Re: Complaint against Mattie Fein & Mattie Fein for Congress Committee

I believe an investigation into Mattie Fein; a Candidate for the California's 36th Congressional seat & her Campaign Committee, Mattie Fein for Congress is warranted.

The reports filed with the Federal Election Commission (F.E.C.) indicate substantial loans & contributions were made by Ms Fein to her Committee between 12/09 & 3/10 yet the candidates (Ms Fein) own financial disclosure statement does not reflect the assets or income necessary to support her level of investment.

If Ms Fein has used resources (funds) other than her own to make contributions or loans to her campaign then I believe she is in violation of Federal law & I would hope that you would take appropriate action.

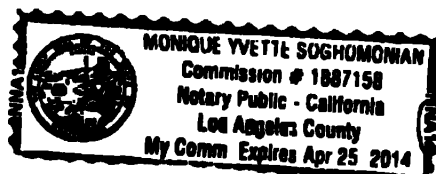
As the election is less than five & 1/2 weeks away your prompt attention to this troubling matter will be appreciated.

Please keep me posted; you may e-mail your progress regarding this matter @

Very Truly Yours,

Michael Wm Chernus

Subscribed & Sworn to before me on this 20th day of September, 2010



UNITED STATES HOUSE OF REPRESENTATIVES		FORM B
FINANCIAL DISCLOSURE STATEMENT		For use by candidates and new employees
a: Period covered: January 1, 2002 - <u>Present</u>		

Name: Mattie Fein Daytime Telephone: 301-92-5736

File Status	<input checked="" type="checkbox"/> Candidate for the House of Representatives	State: <u>MD</u> Date of Birth: <u>11-2-10</u>	Check if Amendment <input type="checkbox"/>	(Other Use Only)
	<input type="checkbox"/> New officer or employee	Employing Office:		A \$500 penalty shall be assessed against anybody who files more than 30 days late.

In all sections, please type or print clearly in black ink.

PRELIMINARY INFORMATION -- ANSWER EACH OF THESE QUESTIONS

I. Did you or your spouse have "unearned" income (not salary or fees) of \$500 or more from any source in the reporting period? If yes, complete and attach Schedule I.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	IV. Did you hold any reportable positions on or before the date of filing in the current calendar year or in the prior year? If yes, complete and attach Schedule II.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
II. Did you, your spouse, or a dependent child receive "unearned" income of more than \$100 in the reporting period or hold any reportable asset worth more than \$1,000 at the end of the period? If yes, complete and attach Schedule III.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	V. Did you have any reportable agreement or arrangement with an outside entity? If yes, complete and attach Schedule IV.	Yes <input type="checkbox"/> No <input type="checkbox"/>
III. Did you, your spouse, or a dependent child have any reportable liability (more than \$10,000 during the reporting period)? If yes, complete and attach Schedule V.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	VI. Did you receive compensation of more than \$5,000 from a single source in the prior year? If yes, complete and attach Schedule VI.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Each question in this part must be answered and the appropriate schedule attached for each "Yes" response.

EXCLUSION OF SPOUSE, DEPENDENT, OR TRUST INFORMATION -- ANSWER EACH OF THESE QUESTIONS

TRUSTS--Do you have any "Qualified Blind Trusts" approved by the Committee on Standards of Official Conduct and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or a dependent child? (See Instructions, page 6.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
EXCLUDED--Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption? Do not answer "yes" unless you have first consulted with the Committee on Standards of Official Conduct.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

SCHEDULE 1 -- EARNED INCOME (INCLUDING HONORARIA)

Maths Fern

Page 2 of 2

List the source, type and amount of earned income from any source (other than the filer's current employment by the U.S. Government) including \$200 or more during the preceding calendar year. For a spouse, list the source and amount of any handicap; list only the source for other spouse earned income exceeding \$1,000. See instructions below.

Excludes Military (such as National Guard or Reserve pay, federal retirement) earnings and benefits received under the Social Security Act.

[illegible]

SCHEDULE II — ASSETS AND "UNEARNED" INCOME[illegible]

SCHEDULE III -- LIABILITIES

Name Mohr Ten Page 5 of 6

Report liabilities of over \$10,000 at any one creditor at any time during the reporting period by you, your spouse, or dependent child. Mark the highest amount owed during the reporting period. Do not include any mortgage on your personal residence (unless there is rental income); loans secured by automobiles, household furniture, credit cards, or other personal property; or a business in which you own an interest and liabilities owed to a spouse, or the child, parent, or sibling of you or your spouse. Report revolving credit accounts (i.e., credit cards) only if the balance at the close of the previous calendar year exceeded \$10,000.

SP, DC, JT	Creditor	Type of Liability	Amount of Liability				
			G	H	I	J	K
	Example: First Bank of Washington, Baltimore	Mortgage on 123 Main Street, Dover, Del.					
	Weisman - Marcus	Leasehold 5000 Pending Credit Card		X			

SCHEDULE IV -- POSITIONS

Report all positions, compensated or uncompensated, held on or before the date of filing during the current calendar year and in the two prior years as an officer, director, trustee of an organization, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, or any educational or other institution other than the United States.

Exclude: Positions listed on Schedule III; positions held in any religious, social, fraternal, or political entities (such as a political party or campaign organization); and positions solely with respect to the reporting person's spouse or dependent child.

Position	Name of Organization
Vice-President	The Lichfield Group, Inc.

Name Matthe Sen page 6 of 6

SCHEDULE V - AGENTS

Identify the date, parties, nature of the agreement or arrangement with respect to future employment, a leave of absence during the period of government service, continuation of employment, or current employer other than the U.S. Government or continuing participation in an employee welfare or benefit plan maintained by the U.S. Government.

Date	Description of Agreement
8/7/08	Separation agreement in terms of support and re-employment for family for funds brought into the marriage
9/25/08	re-payment of funds brought into marriage and dissolution of my 43 ownership in the corporation.

SCHEDULE VI - COMPENSATION IN EXCESS OF \$5,000 PAID BY ONE SOURCE

Report sources of such compensation received by you or your business affiliation for services provided directly by you during the two year years. This includes the names of clients and customers of any enterprise, firm, partnership, or other business enterprise, or any nonprofit organization if you directly provided the services generating a fee or payment of money or in kind. This includes payments by the U.S. Government and any information considered confidential as a result of a privileged relationship recognized by law. Do not include compensation reported in Schedule I.

Source	Description of Duties
U.S. - Indian Affairs, U.S. Chamber of Commerce, Wash, DC	Public advocacy p n Henry Hyde Act
Tamil's Against Corruption	public advocacy



FEDERAL ELECTION COMMISSION

[About the FEC](#) [Press Office](#) [Quick Answers](#) [Site Map](#)
[HOME / NATIONAL MAP / CA MAP / CANDIDATE LIST / CONTRIBUTIONS](#)

2010 House and Senate Campaign Finance for California

Candidate Contributions - FEIN, MATTIE

Page 1 of 1 (6 records)

Contributor Name (+)	Description	City	State	Zip	Receipt Date	Amount	Code
FEIN, MATTIE		REDONDO BEACH	CA	90278	12/31/2009	\$17,500	
FEIN, MATTIE		REDONDO BEACH	CA	90278	03/01/2010	\$12,301	
FEIN, MATTIE		REDONDO BEACH	CA	90278	02/14/2010	\$13,421	
FEIN, MATTIE		REDONDO BEACH	CA	90278	01/12/2010	\$15,000	
FEIN, MATTIE		REDONDO BEACH	CA	90278	03/31/2010	\$40,000	
FEIN, MATTIE		REDONDO BEACH	CA	90278	03/31/2010	\$10,000	

\$108,222

[What's New](#) [Library](#) [En Español](#) [FOIA](#) [USA.gov](#) [Privacy](#) [Links](#) [eFiling](#) [Register To Vote](#)

Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (800) 424-9536 In Washington (202) 694-1000
 For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to the web manager.

11044291527