



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Patricia D. Cornwell

APR 1 2 2010

Acton, MA 01720-5932

Re: Pre-MUR 500

Dear Ms. Cornwell:

The Federal Election Commission ("Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended ("the Act"), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that you may have violated provisions of the Act, including 2 U.S.C. § 441f, which prohibits any person from making a contribution in the name of another person or knowingly permitting her name to be used to effect such a contribution, and 2 U.S.C. § 441b(a) which prohibits any officer or director of a corporation to consent to any contribution or expenditure by the corporation made in connection with any election to any political office.

Specifically, information in the Commission's possession indicates that in 2007 and 2008 certain reimbursed contributions to federal candidates were made at your direction from your personal and corporate ("CEI Enterprises, Inc.") bank accounts held with Anchin Block Anchin ("ABA"), an accounting and business management firm, in violation of 2 U.S.C. §§ 441f and 441b(a). The information suggests that beginning in March 2008, you solicited a group of nine individuals to make contributions to Hillary Clinton for President and directed Mr. Evan Snapper, a then-partner of ABA, to reimburse these individuals for their contributions from your bank accounts. In addition, the information suggests that you directed Mr. Snapper to identify additional donors, including employees of ABA, their spouses and others, to make contributions to Hillary Clinton for President and then be reimbursed through your bank accounts. Based on the information, it appears that a total of \$48,300 in contributions to the Hillary Clinton for President committee may have been reimbursed through disbursements from your bank accounts at your direction as follows:

Reimbursed Contributions to Hillary Clinton for President

Recruited by Ms. Cornwell

<u>Name</u>	<u>Amount</u>
Coleman, Charla	\$2,300
Coleman, Gloria	\$2,300
Coleman, Kessa	\$2,300
Coleman, Kenda	\$2,300
Coleman, Philip Jr.	\$2,300
Coleman, Philip Sr.	\$2,300
Daniels, Jim	\$2,300

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Daniels, Jimmy	\$2,300
Daniels, Mary	\$2,300
Total	\$20,700

Recruited by Mr. Snapper

<u>Name</u>	<u>Amount</u>
Fasinski, Laurie	\$2,300
Fiks, Alexander	\$2,300
Fiks, Lina	\$2,300
Hodrinkay, Janna	\$2,300
Kohn, Anna	\$2,300
Kohn, Daniel	\$2,300
Miller, Martin	\$2,300
Ort, Diane	\$2,300
Snapper, Evan	\$2,300
Snapper, Michele	\$2,300
Stein, Michael	\$2,300
Stein, Penny	\$2,300
Yohansen, Ira	\$2,300
Total	\$27,600

Grand Total **\$48,300**

The information further suggests that in June 2007 and in November 2007, you directed Mr. Snapper to reimburse a total of \$13,800 in contributions made by Mr. and Mrs. Snapper to Jim Gilmore's 2008 Presidential and 2007 U.S. Senate campaigns with funds from your personal and corporate bank accounts at ABA as follows:

Reimbursed Contributions to Jim Gilmore Campaigns

Jim Gilmore for Senate

<u>Name</u>	<u>Amount</u>
Snapper, Evan	\$4,600 (\$2,300 Primary, \$2,300 General)
Snapper, Michele	\$4,600 (\$2,300 Primary, \$2,300 General)
Total	\$9,200

Jim Gilmore for President

<u>Name</u>	<u>Amount</u>
Snapper, Evan	\$2,300
Snapper, Michele	\$2,300
Total	\$4,600

Grand Total **\$13,800**

Finally, the Third Amended Complaint and Jury Trial Demand filed in *Cornwell Entertainment, Inc., et al v. Anchin Block Anchin LLP, and Evan Snapper*, Civil Action No.

14044352860

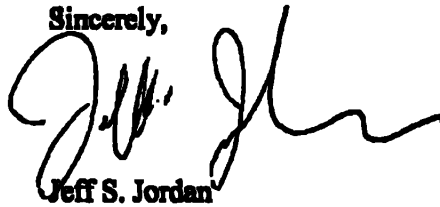
1:09-cv-11708-GAO (D. Mass.) (filed March 31, 2010), contains allegations that Mr. Snapper mishandled your political contributions, misinformed you of requirements regarding the same, and misinformed employees of ABA and others improperly from your personal and corporate bank accounts without your knowledge.

Notification of this matter is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register August 4, 2009 (74 FR 38617). The Commission's Office of the General Counsel is reviewing this information in connection with making a recommendation to the Commission as to whether there is reason to believe that you violated the Act, an initial determination necessary to initiate an investigation into whether a violation has, in fact, occurred. See 2 U.S.C. § 437g(a)(2). Before the General Counsel makes such a recommendation, you may provide in writing any factual or legal materials that you believe are relevant to this matter, including any related documents. Your submission, if you choose to make one, must be submitted within 15 days of receipt of this letter and addressed to the General Counsel's Office. Subsequently, the General Counsel's Office will present its recommendations. The Commission will then consider the recommendations and, if the Commission finds that there is reason to believe that you violated the Act, initiate an enforcement matter.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(2)(A), unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by legal counsel in this matter, please advise the Commission by completing the enclosed form.

If you have any questions, please contact Erik A. Morrison at (202) 694-1650 or toll-free at (800) 424-9530.

Sincerely,



Jeff S. Jordan
Supervisory Attorney
Complaints Examination &
Legal Administration

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