



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1612

Date Filmed 4/4/84 Camera No. --- 3

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FEDERAL ELECTION COMMISSION

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to docket

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| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed Maybeth Tarent
date 3/29/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Simeon Golar
Attorney at Law
90 Broad Street
New York, New York 10004

Re: MUR 1612

Dear Mr. Golar:

The Federal Election Commission has reviewed the allegations of your complaint dated January 3, 1984, and determined that on the basis of the information provided in your complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

3404015332



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

MT
3/27/84



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert O. Tiernan, Esquire
Suite 299
1800 M Street, N.W.
Washington, D.C. 20036

Re: MUR 1612
Congressman Joseph P. Addabbo
Committee for Congressman
Joseph P. Addabbo
Louis F. DeSena, Treasurer
James P. McDonald

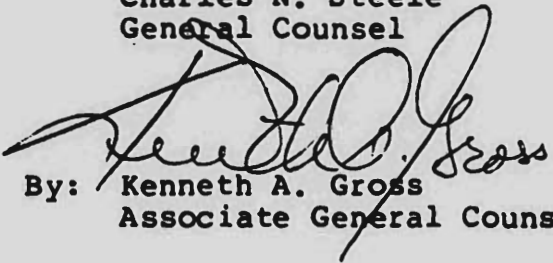
Dear Mr. Tiernan:

On January 10, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 22, 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

3404015334



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Robert O. Tiernan, Esquire
Suite 299
1800 M Street, N.W.
Washington, D.C. 20036

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Committee for Congressman
Joseph P. Addabbo
Louis F. DeSena, Treasurer
James P. McDonald

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Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

MT
3/27/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William M. Elliott, General Counsel
Northrop Corporation
1800 Century Park East
Century City
Los Angeles, California 90067

Re: MUR 1612
Northrop Corporation

Dear Mr. Elliott:

On January 11, 1984, the Commission notified Northrop Corporation of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 22, 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

34710153356



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William M. Elliott, General Counsel
Northrop Corporation
1800 Century Park East
Century City
Los Angeles, California 90067

Re: MUR 1612
Northrop Corporation

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Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

MT
3/27/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott D. Gilbert, Esq.
Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1612
Robert J. Carlson
United Technologies Corporation

Dear Mr. Gilbert:

On January 11, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 22, 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

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Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Scott D. Gilbert, Esq.
Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

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Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

MT
3/27/84

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)

84 MAR 20 All: 28

Congressman Joseph P. Addabbo)

Committee for Congressman Joseph)

P. Addabbo)

MUR 1612

Louis F. DeSena, Treasurer)

James P. McDonald)

Northrop Corporation)

Robert J. Carlson)

United Technologies Corporation)

GENERAL COUNSEL'S REPORT

I. STATEMENT OF THE CASE

On January 4, 1984, Simeon Golar filed a complaint making the following allegations:

1. The Committee for Congressman Joseph P. Addabbo ("Committee") and Louis F. DeSena, as treasurer, have violated 11 C.F.R. § 102.2(a)(2) by failing to amend the Committee's Statement of Organization to designate James P. McDonald as assistant treasurer.
2. Even if the Committee had designated Mr. McDonald as assistant treasurer it still would have been in violation because Mr. McDonald has been signing the reports since 1976 and, therefore, Mr. McDonald is doing more than assuming "... the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable" as provided for in 11 C.F.R. § 102.7(a).
3. The Northrop Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by making in-kind contributions to the Committee by providing the

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4. Mr. McDonald has violated the Act by making illegal in-kind contributions to the Committee because he was not paid by the Committee for his "...invaluable fundraising services."
5. United Technologies Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by paying for a fundraiser for Congressman Addabbo held at the home of one of its employees, Robert J. Carlson.
6. The Committee and Louis F. DeSena, as treasurer, have accepted excessive and prohibited contributions in violation of 2 U.S.C. §§ 441a(f), 441b and 441c and have failed to report these contributions in violation of 2 U.S.C. § 434(b)(2).

The complainant also made the following allegations which do not constitute violations of the Act:

1. Congressman Addabbo allowed James P. McDonald to use congressional office space for campaign purposes.
2. Congressman Addabbo may use his excess campaign funds for personal use (which is permitted by 2 U.S.C. § 439(a) because Congressman Addabbo was a member of Congress as of January 1980).
3. The Committee raised a substantial amount of money prior to the primary election.

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4. Congressman Addabbo is the Chairman of the Defense Subcommittee of the Committee on Appropriations of the House of Representatives and, therefore, solicitations from federal government contractors on behalf of Addabbo raise conflict of interest and other ethical questions.
5. Congressman Addabbo has described the complainant as "wealthy" and "a millionaire", which the complainant denies.

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On January 13, 1984, this Office received a letter from Congressman Addabbo's Administrative Assistant requesting an extension of fifteen days in which to respond to the complaint as Congressman Addabbo was out of the country at the time. This request was also on behalf of Congressman Addabbo's committee, Louis F. DeSena, Treasurer, and James P. McDonald. The Office of General Counsel granted the requested extension. On February 8, 1984, this Office received responses from the aforementioned Respondents' counsel. See Attachments 1 and 2.

On January 25, 1984, this Office received a letter from counsel representing United Technologies Corporation and Robert J. Carlson requesting an extension of fifteen days in which to respond to the complaint as Mr. Carlson was out of the country. The Office of General Counsel granted the requested extension and, on February 14, 1984, a response was filed. See Attachment 3. On January 31, 1984, this Office received a response from the Northrop Corporation. See Attachment 4.

II. FACTUAL AND LEGAL ANALYSIS

According to the Committee's response and Commission records (see Attachment 5), James P. McDonald was designated as Assistant Treasurer on the Committee's original Statement of Organization filed on October 10, 1975. Since that time Mr. McDonald has performed various duties within the scope of 11 C.F.R.

§ 102.7(a), including the signing of Committee reports. Neither the statute nor the regulations place a limit on the period of time a person can serve in the capacity of assistant treasurer. Consequently, the Committee fulfilled its obligation under 11 C.F.R. §§ 102.2(a)(2) and 102.7(a) when it named Mr. McDonald as assistant treasurer in its original filing.

With regard to Mr. McDonald's uncompensated "invaluable fundraising services," both the Committee and Mr. McDonald claim that all his services were provided on a purely personal voluntary basis. The Committee, however, did make payments to him as Custodian of the Committee's petty cash account and from time to time has shown its appreciation for his services by making a gratuitous payment to him. In addition, the Committee, Mr. McDonald and the Northrop Corporation deny that Mr. McDonald was compensated for these services by Northrop.

According to the responses, James P. McDonald was never an employee of the Northrop Corporation. From February 1977 to February 1981, Mr. McDonald was employed by Jack McDonald and Associates ("Associates") (no relation to Respondent McDonald) which paid his salary during those years. Northrop entered into a consulting agreement with Associates and Respondent McDonald provided the services required thereunder as a registered lobbyist on behalf of Northrop. In February 1981, Northrop

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contracted with Respondent McDonald directly as a private consultant, apparently on a part time basis, to track legislation before Congress. Respondent McDonald remained a registered lobbyist on behalf of Northrop until February 1983, when the relationship was terminated. Northrop Corporation claims that at no time did Respondent McDonald's duties include those actions mentioned in the complaint. They further stated that they had no prior knowledge of McDonald's alleged activities on behalf of Congressman Addabbo and if Mr. McDonald performed such activities it was "... not on behalf of or at the behest of Northrop Corporation but in his own personal capacity." According to Mr. McDonald, any compensation from Northrop was for the work and services rendered to Northrop relating to congressional legislative activities. Any services for the Committee were performed on his own time and not on Northrop time.

Congressman Addabbo also denies providing office space in his congressional office to Mr. McDonald in order to conduct campaign and other business activities. While it is noted that Mr. McDonald has from time to time visited the office to obtain information relevant to his duties as Assistant Treasurer or to make a social visit, such contact with his staff did not result in provision of office space.

According to the response filed on behalf of Robert J. Carlson and the United Technologies Corporation, Mr. Carlson, who is President of United Technologies, voluntarily hosted a reception at his home on September 23, 1983, to raise funds for

the Committee. This reception was held without any participation or approval by United Technologies and all costs associated with the reception were billed to, and paid by, the Committee as verified by the documents attached to their response and the Committee's reports. See Attachments 3 and 6. */

The Act specifically excludes from the definition of contribution "the value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee" and the "use of real ... property ... voluntarily provided by an individual to any candidate ... in rendering voluntary personal services on the individual's residential premises ... for candidate-related ... activities" 2 U.S.C. §§ 431(8)(B)(i) and (ii).

In light of that section and the fact that the complainant has provided no evidence that Messrs. McDonald and Carlson were acting in any capacity other than that of a volunteer, the General Counsel recommends that the Commission find no reason to believe that Messrs. McDonald and Carlson and the Northrop Corporation and United Technologies Corporation violated the Act.

In addition, as the Committee did designate Mr. McDonald as Assistant Treasurer and as it appears that the Committee has not accepted any illegal contributions and has reported its activities correctly, the General Counsel recommends that the Commission find no reason to believe that Congressman Joseph P. Addabbo, the Committee and Louis F. DeSena, as treasurer, violated the Act.

*/ As some of the payments were under \$200, the Committee was not required to itemize these costs on its report.

III. RECOMMENDATIONS

1. Find no reason to believe that Congressman Joseph P. Addabbo, the Committee for Congressman Joseph P. Addabbo and Louis F. DeSena, as treasurer, James P. McDonald, Northrop Corporation, Robert J. Carlson and United Technologies Corporation violated the Act.
2. Close the file.
3. Approve the attached letters.

Charles N. Steele
General Counsel

3/19/84
Date

By:

Kenneth A. Gross (Signature)
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response on behalf of Committee, et al.
2. Response on behalf of McDonald.
3. Response on behalf of United Technologies and Carlson.
4. Response from Northrop.
5. Committee's Statement of Organization.
6. Committee's 1983 Year End Report.
7. Proposed letters.

84040153376

LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6817

February 6, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
Joseph P. Addabbo
Louis F. De Sena

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondents appreciate this opportunity to demonstrate, in writing, that no action should be taken on the basis of this complaint, and wish to set forth their reasons, both factual and legal, why the FEC should take no action against them in connection with this matter pursuant to the Act and FEC regulations.

At the outset, Respondents would contend that the complaint in this matter does not meet the factual and legal standards of 2 U.S.C. 437g(a)(1) and 11 CFR 111.4 and should be rejected summarily. It is clear that this complaint is a mere political statement filled with vague, general, nonspecific allegations, most of which are totally out of the purview of the Act and any regulation over which the FEC has jurisdiction. There is no "clear and concise recitation of the facts" which describe a violation of Federal election law, nor is the complaint "accompanied by any documentation supporting the facts alleged". 11 CFR 111.4(d)(3) and (4). In addition, many of the broad unsupported allegations contained in this complaint, even if true in some particular, would not involve any violation of any Federal election law or any other legal proscription.

While entering a general denial to all allegations included in this complaint as violations of any statute or regulation over which the FEC has jurisdiction, Respondents do

Attachment 1

want to specifically address the numbered paragraphs in the complaint and give an appropriate factual and/or legal response.

PARAGRAPH ONE:

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This paragraph merely alleges that Respondent Addabbo's campaign committee, Committee for Congressman Addabbo ("the Committee"), was very successful in its fundraising efforts in the six month period following the 1982 congressional elections. An unspecific general allegation the Committee's fundraising activities over several years have been in violation of Federal election laws and regulations is unsubstantiated by even one factual offering or reference. Respondents would state that they are quite grateful that the hard work and effort which has been devoted by many campaign workers and volunteers has resulted in an enthusiastic response and substantial contributions from political supporters who agree that Congressman Addabbo should be continued in office. All campaign fundraising activities conducted by the Committee have complied with the requirements of the Act and FEC regulations. All campaign contributions and expenditures which were collected and spent during the six month period mentioned in the complaint have been appropriately recorded in the Committee's books and have been set forth on the public record in timely reports filed with the Office of the Clerk, U.S. House of Representatives, and are on file at the FEC. (See, in particular, 1982 Post-General Report at 83HSE/241/0660, 1982 Year-End Report at 83HSE/242/3983, and 1983 Mid-Year Report at 83HSE/248/3400.) In addition, the January 31 Year-End Report covering campaign fundraising activities of the Committee for the period 7/1/83 through 12/31/83 has just been filed in timely fashion for public perusal. In no instance in any of these reports has Complainant - or any other person or the FEC - alleged even one specific citation of a fundraising or contribution violation. Respondents would submit that there has been none.

PARAGRAPH TWO:

Complainant states that a search of FEC records shows no designation of "Jim McDonald" as Assistant Treasurer of the Committee on the Committee's Statement of Organization (Form 1), or any amendment thereto. Complainant is just factually wrong. A cursory review of the FEC microfilm records of the Committee's reports easily accessible to the general public at the FEC Public Records Office would show anyone who inquired that James P. McDonald ("Jim McDonald") has been identified as the Committee's custodian of books and accounts, and as its

Assistant Treasurer, since the original Registration Form and Statement of Organization for the Committee was filed on October 10, 1975. (See 75HSE/85/2740-2741.) Mr. McDonald has remained the Committee's Assistant Treasurer from that time to date.

PARAGRAPH THREE:

Complainant alleges that Mr. McDonald's activities as Assistant Treasurer of the Committee and his signing of Committee reports, whether or not properly designated, constitutes a violation of Federal election law. Respondents would submit that Complainant is legally incorrect and totally misreads the intent and the effect of the applicable rules. FEC regulations specifically state that a political committee may designate "an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable." (emphasis added) 11 CFR 102.7(a). Clearly, a proper designation as Assistant Treasurer under this regulation permits the individual to perform all the activities of the Treasurer, including the signing and filing of FEC reports. In fact, the FEC in its Campaign Guide for Corporations and Labor Organizations (January 1982 at page 4) contemplates a properly designated Assistant Treasurer signing FEC reports and gives this advice to committees while citing 11 CFR 102.7(a): "Assistant Treasurer - Recommended An SSF may name an assistant treasurer who acts as treasurer when the treasurer is unavailable or when there is a vacancy in that office. Note that, in the absence of the treasurer, only a designated assistant treasurer may sign reports and statements and assume other responsibilities of the treasurer. 102.7(a)." (emphasis in the original).

Mr. McDonald has been properly designated as Assistant Treasurer of the Committee and is conducting his various activities for the Committee within the scope of 11 CFR 102.7(a), including the signing of Committee reports.

PARAGRAPH FOUR:

Complainant alleges that James P. McDonald's services to the Committee are illegal campaign contributions by him and the Northrup Corporation in excess of any applicable contribution limits or prohibitions. Complainant cites no specific factual or legal basis for such a charge other than stating that Mr. McDonald has assisted the Committee in

campaign fundraising and other activities.

Respondents have great respect for Mr. McDonald and value his services to the Committee as Assistant Treasurer highly, including his duties as custodian of the books and accounts, as well as his fundraising talents. However, the Committee and Respondents have at all times accepted Mr. McDonald's services on a personal voluntary basis uncompensated by a third party employer. Where, as here, all campaign work has been done on a voluntary basis, and there has been no compensation by any third person or corporation to permit Mr. McDonald to work on campaign recordkeeping and fundraising, there can be no violation of Federal election laws concerning contribution limitations.

There is no statute or regulation which requires the Committee to eschew voluntary personal campaign services and to compensate each and every volunteer with Committee funds. In fact, the applicable law is exactly the opposite and is written to clearly encourage individuals to volunteer their time and energy to the political process. The Act specifically excludes "the value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee" from the definition of a "contribution" 2 U.S.C. 431(8)(B)(i).

Nothing in this paragraph supports an allegation that Mr. McDonald's services have been other than voluntary personal services, or that he has been compensated by a third party such as Northrup Corporation to perform such services.

PARAGRAPH FIVE:

Complainant alleges that Respondent Addabbo has provided "officespace" in his congressional office in Washington, D.C. for Mr. McDonald to "transact his campaign fundraising for ADDABBO and other business activities". While it is unclear as to what specific violation of any statute or regulation within the jurisdiction of the FEC that Complainant alleges, Respondent Addabbo would state categorically that "office space" has not been provided in his Washington, D.C. congressional office to Mr. McDonald in order that Mr. McDonald can conduct "campaign fundraising" and other "business activities". Mr. McDonald is certainly well known to Respondent Addabbo and is familiar with his Washington, D.C. office and staff. He is always welcome in this office. In the course of his duties as Assistant Treasurer of the Committee, Mr. McDonald has from time to time been required to come to the congressional office to obtain some relevant information and/or

documents for the Committee. It is also quite possible that certain of his inquiries in this office have been quite unrelated to the campaign activities of the Committee, and have been appropriate social or professional visits that any public citizen may entertain. There is no basis in the complaint, or in fact or law, to support a finding that this type of irregular, open communication and contact comprises an illegal provision of office space.

PARAGRAPH SIX:

Complainant alleges that the absence of any payment for Mr. McDonald's "invaluable fundraising services" in any filed report, whereas such reports do show Committee payments to Mr. McDonald for expenses in connection with such fundraising activities, constitutes an illegal contribution of services by Mr. McDonald and Northrup Corporation. This paragraph is merely a repetition of the unsubstantiated allegations in PARAGRAPH FOUR. Respondents would offer the same response here as in PARAGRAPH FOUR and would point out again that voluntary personal services are excluded by the Act from the definition of "contribution". 2 U.S.C. 431(8)(B)(i).

It should be noted that those payments to Mr. McDonald which have been made by the Committee and itemized in FEC reports have been made to him for the most part as Custodian of the Committee's petty cash account in accordance with FEC regulations. 11 CFR 102.11 (See, for example, July 31 Mid Year Report for 1983 at 83HSE/247/3921.)

Finally, although the Committee and Respondents have valued Mr. McDonald's services as Assistant Treasurer to the Committee, and have always accepted these services on a personal voluntary basis uncompensated by any third party, the Committee has been able to show its appreciation for these services from time to time by making a single gratuitous payment to Mr. McDonald in lieu of any salary or otherwise agreed upon regular compensation from the Committee. An example of such a payment may be found in the January 31 Year End Report for 1982 at 83HSE/242/3986.

PARAGRAPH SEVEN:

In this paragraph, Complainant merely summarizes extant Federal election law, as set forth in the Act and FEC regulations, applicable to the use of "excess campaign funds". 2 U.S.C. 439a and 11 CFR 113. Complainant states no facts which might constitute a violation of these rules and regulations, nor, in fact, alleges any violation of any legal requirement. Respondents would agree.

PARAGRAPH EIGHT:

Complainant alleges that a fundraising event held at the home of Robert J. Carlson for Respondent Addabbo last year constituted an illegal campaign contribution by Mr. Carlson and United Technologies Corporation, and possible other unidentified individuals and corporations.

Respondents assert that the fundraising event in question was, in fact, an event sponsored and put on by the Committee on September 23, 1983 at the private residence of Mr. Robert J. Carlson in Connecticut - or more precisely, in the backyard of Mr. Carlson's residence. All costs and expenses associated with this fundraiser were billed and paid for by the Committee. The relevant expenditures made by the Committee for this event have been appropriately reported - and where required, itemized - in the January 31 Year End Report for 1983, which was timely filed and is presently available for public inspection in the Public Records Office at the FEC. (See, for example, the itemized entry on page 8 of Schedule B of this report which shows the payment of \$13,005.00 on 10/31/83 to Szabo Food Services, Inc., 400 Main Street, East Hartford, Connecticut 06118 for food services provided in connection with a fundraiser on 9/23/83.)

Likewise, all contributions which were received for the fundraiser were solicited from individuals or persons who are permitted to make contributions under the Act. These contributions have been received and recorded by the Committee, and have been appropriately reported in the January 31 Year End Report for 1983. Complainant makes no specific factual showing or allegation of contributions from identified prohibited sources, and the Respondents would state that there were none.

The Committee and Respondents are most grateful to Mr. Carlson for his support and the use of his backyard for this September 1983 fundraiser. Mr. Carlson is a most respected gentleman, and the Committee and Respondents were most pleased that Mr. Carlson voluntarily provided the Committee with the use of his real property, his residential premises, and his voluntary personal services in connection with the Committee's candidate-related activity. Such voluntary use of real or personal property, - in particular an individual's residential premises, is specifically excluded from the Act's definition of "contribution". 2 U.S.C. 431(8)(B)(ii). The voluntary provision of Mr. Carlson's residence and backyard for this campaign fundraising event is not a prohibited or limited contribution or expenditure under 11 CFR 100.7(b)(4) and 100.8(b)(5), since all other food, beverage and other incidental costs were authorized and paid for by the Committee.

Finally, with regard to Complainant's final sentence in PARAGRAPH EIGHT, Respondents would contend that this is purely a political statement which sets forth no facts nor alleges any violation of any rule or regulation within the jurisdiction of the FEC.

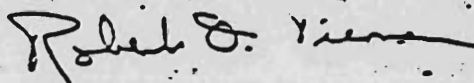
PARAGRAPHS NINE, TEN, ELEVEN & TWELVE:

In response to the final four paragraphs of this complaint, Respondents would merely state that these paragraphs are a continuation of the political hyperbole and campaign rhetoric which make up the body of this complaint. As a practical and legal matter, these paragraphs are devoid of any specific factual offerings which, even if assumed to be true, would constitute a violation of any law or regulation. Furthermore, this final portion of the complaint does not even purport to set forth allegations of any violation of the Act or FEC regulations which are the only standards which are within the enforcement purview of the Federal Election Commission.

Respondents appreciate this opportunity to demonstrate that no action should be taken against them on the basis of this complaint titled MUR 1612. As has been shown in this response, Respondents contend that there is no basis in fact or in law contained in this complaint to support a violation of any statute or regulation within the jurisdiction of the FEC, and therefore this complaint should have been dismissed summarily. Respondents also believe that on the basis of the items set forth in the complaint and the rejoinders in this response, the General Counsel should now forward to the Commission a recommendation that the FEC finds no reason to believe that any of the Respondents in this matter (MUR 1612) have committed, or is about to commit, a violation of statutes or regulations over which the Commission has jurisdiction.
11 CFR 111.7

Should there be any further questions with regard to this matter, Respondents would be happy to answer the FEC's inquiries through their designated Counsel.

Sincerely yours,



ROBERT O. TIERNAN

61471400

(8)

LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M. STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617

February 7, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
James P. McDonald

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violation of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondent appreciates this opportunity to demonstrate in writing that no action should be taken on the basis of this complaint.

First of all, Respondent wishes to associate himself with the written response to these allegations provided to you and the FEC by Respondents Joseph P. Addabbo and Louis F. De Sena. In particular, numbered paragraphs 2 through 6 of the complaint in MUR 1612 make certain allegations directly or indirectly concerning Mr. McDonald's efforts and activities on behalf of the Committee for Congressman Addabbo ("the Committee"). Respondent McDonald would join with Respondents Addabbo and De Sena in their rejoinder to these enumerated paragraphs of the complaint by this specific reference.

Respondent McDonald would like to reiterate and emphasize the point that his various activities over the years for the Committee, acting as custodian of the books and accounts in his role as Assistant Treasurer, providing assistance in fundraising and other campaign tasks, have all been undertaken on a personal voluntary basis without compensation from any third party. Such uncompensated personal voluntary campaign services are, therefore, exempt from the definition of "contribution" in the Act. 2 U.S.C. 431(8)(B)(i). As was pointed out in Co-Respondents' reply,

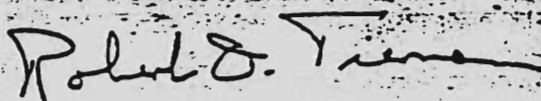
Attachment + 2

certain payments have been made to Mr. McDonald by the Committee. These payments have been either in connection with his control and oversight of the petty cash fund in accordance with 11 CFR 102.11, or as a gratuitous payment by the Committee in lieu of any salary or regular compensation.

Respondent McDonald would also like to respond to the Complainant's apparent allegation that the voluntary contribution of Mr. McDonald's personal services to the Committee was a prohibited corporate contribution to the Committee by the Northrup Corporation. At no time during the period of Respondent McDonald's services to the Committee has Mr. McDonald been an "employee" of the Northrup Corporation. From February 18, 1977 to February 1981, Respondent McDonald (James P. McDonald) was employed by Jack McDonald and Associates (no relation to Respondent McDonald). James P. McDonald's salary during this period was paid by Jack McDonald and Associates. Northrup Corporation was a client of Jack McDonald and Associates, and James P. McDonald followed legislative activities for this client in the House of Representatives and the Senate of the United States as a registered lobbyist. In February 1981, Northrup Corporation contracted with James P. McDonald directly as a private consultant to track legislation before the Congress. Respondent McDonald remained a private consultant to Northrup and a registered lobbyist on their behalf until February 14, 1983, when the relationship was terminated. At no time during the period of Mr. James P. McDonald's association with the Northrup Corporation did he receive any compensation from Northrup for services to the campaign Committee. Any compensation from Northrup to Respondent McDonald was for the work and services rendered to them relating to congressional legislative activities.

Should there be any further questions with regard to this matter, Respondent McDonald would be pleased to answer the FEC's inquiries through his designated Counsel.

Sincerely yours,



ROBERT O. TIERNAN

ROT/deo

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER

662-5498

MUR 1612
Corrent
(10)
TWR: 710 622-6000 (CS WSN)
TELEX: 66-663 (COVING WSN)
TELECOM: (202) 662-6200
CABLE: COVING

February 14, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612

Dear Mr. Steele:

8 4 0 4 0 1 5 3 3 6
This letter is submitted on behalf of Robert J. Carlson and United Technologies Corporation ("Respondents") in response to the written complaint dated January 3, 1984, filed by Simeon Golar in the above-entitled matter. In Paragraph 8 of his complaint, Mr. Golar alleges that Mr. Carlson "gave at his home a 'shrimp and champagne' fundraiser" for Representative Addabbo and that this "amounted to illegal campaign contributions by [Mr. Carlson] and United Technologies and/or other individuals and corporations." This is the only paragraph in Mr. Golar's complaint concerning Mr. Carlson and United Technologies. Mr. Golar sets forth no additional facts relating to, and provides no documentation to support, these allegations.

As shown below, Mr. Golar's complaint against Respondents is without merit. Accordingly, the Federal Election Commission should find no reason to believe that Mr. Carlson or United Technologies has violated the Federal Election Campaign Act ("Act").

FACTS

Robert J. Carlson is President of United Technologies Corporation, a Delaware corporation engaged in the manufacture and sale of products in major market sectors such as power, electronics, and building systems.

On September 23, 1983, Mr. Carlson, acting as a private citizen, without any participation or approval by United

MUR 1 + 2

Charles N. Steele, Esq.
February 14, 1984
Page Two

Technologies, voluntarily hosted a reception at his home in Avon, Connecticut, to raise funds for the Committee For Congressman Joseph P. Addabbo ("Committee"), Representative Addabbo's principal campaign committee. Approximately 125 individuals attended this event, which lasted from 5:30 p.m. to 8:00 p.m., and featured food, liquor and beverages and a banjo performance.

The costs of the September 23 reception were billed to, and paid by, the Committee as follows:

- o Food and beverage catering was provided by Szabo Food Service Inc. of East Hartford, Connecticut, for a fee of \$13,005.70 (a copy of which invoice is attached hereto as Exhibit A). By check No. 3631, dated October 31, 1983 (a copy of which is attached hereto as Exhibit B), the Committee paid Szabo Food Service the amount due.
- o Entertainment at the event was provided by Bob Price, "the Banjo Crackerjack" of Stratford, Connecticut, for a fee of \$195.00. This amount was paid on September 23, 1983, by Mr. L. R. Churchill, an Addabbo campaign volunteer (a copy of the receipt for which is attached hereto as Exhibit C). Mr. Churchill also paid on September 23, the amount of \$60.00 for the services of parking attendants. On October 20, 1983, Mr. Churchill sought reimbursement from the Committee for the amounts so expended for musicians and parking (a copy of Mr. Churchill's letter is attached hereto as Exhibit D). By check No. 3630, dated October 31, 1983 (a copy of which is attached hereto as Exhibit E), the Committee paid Mr. Churchill the requested \$255.00.
- o The A and M Electric Company of Hartford, Connecticut, provided lighting for this event for a fee of \$106.50 (a copy of which invoice is attached as Exhibit F). By check No. 3662, dated November 22, 1983 (a copy of which is attached hereto as Exhibit G), the Committee paid the amount due.
- o The Town of Avon provided police services for traffic control for a fee of \$120.40 (a copy of which invoice is attached hereto as Exhibit H). By check No. 3943, dated October 20, 1983 (a copy of which is attached

84040151137

Charles N. Steele, Esq.
February 14, 1984
Page Three

hereto as Exhibit I) the Committee paid to the Town of Avon the sum of \$120.40.

Mr. Carlson did not incur or pay any expenses in hosting this reception.

Similarly, United Technologies did not incur or pay any expenses in connection with this event. In fact, United Technologies did not participate in any way in the event.

DISCUSSION

The complaint filed by Mr. Golar alleges that the Respondents have made an illegal campaign contribution by virtue of Mr. Carlson's hosting of the September 23, 1983 reception. As the facts described above amply demonstrate, Mr. Golar's complaint against Respondents, which might be most charitably described as entirely inconsistent with the facts, is unfounded and should be dismissed.

Mr. Golar's allegation that Mr. Carlson has somehow made an illegal campaign contribution by voluntarily hosting a reception for the Committee has no basis in fact or law. As described above, all expenses associated with this event were incurred and paid by the Committee; Mr. Carlson made no expenditures in hosting the reception. With respect to Mr. Carlson's use of his real property to host the September 23 event, the Act explicitly excepts from the definition of contribution the "use of real . . . property . . . voluntarily provided by an individual to any candidate . . . in rendering voluntary personal services on the individual's residential premises . . . for candidate-related . . . activities" See 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. § 100.7(b)(4).

Mr. Golar's allegation that United Technologies made an illegal campaign contribution, presumably by virtue of the simple fact that it is the employer of the individual who hosted the September 23 reception, is also unfounded and plainly irresponsible. As stated above, United Technologies played no part in the Committee event; it made no expenditures whatsoever for the holding of the reception.

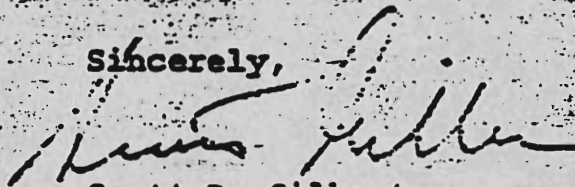
CONCLUSION

For the reasons stated above, the Commission should find no reason to believe that Robert J. Carlson or United

Charles N. Steele, Esq.
February 14, 1984
Page Four

Technologies Corporation violated any provisions of the Act,
and Mr. Golar's complaint against Respondents should be
dismissed.

Sincerely,



Scott D. Gilbert

SW
Enclosures

84040153399

14

BILLING COPY

CHARGE SALES

DATE October 1, 1983

Location
& No. PCW Cafe B 20-327 #032002

SZABO FOOD SERVICE INC.
400 Main St.
East Hartford, Conn. 06118

Bill To:

Name The Congressman Joe Adobo Fundraiser Dinner

Division/Unit _____

Account # _____

Please return white charge sale copy to local Executive Dining Room/Catereria Office

84040153

Outdoor Equipment Rental	\$2,266.80
Buffet	1,000.25
Other	253.50
Food Cost	3,660.00
Liquor & Beverages	651.88
Labor Cost	1,370.00
Floral	1,116.00
Linen Rental	180.40
Paper	22.00
15% Administration	1,569.21
7 1/2% Tax	906.75
Total	\$13,005.70

Amount _____

Tax _____

Total 13,005.70

Authorized and/or received by F. R. Glavin 201

*(Included in cash register reading? Yes No

admission
12 minutes
Nov 17 5
J. R. Glavin

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

3631
1-2/210/100
Oct. 31, 1983

PAY TO THE ORDER OF SZABO FOOD SERVICE INC. \$ 13,005.70
THIRTEEN, THOUSAND AND FIVE-----70/100-----DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, NY 11416

Jim M. ...

AUTH. SIGN.

FOR Fundraiser Dinner Sept. 23rd
⑈00363⑈ ⑆02⑆00002⑆ ⑆05 4 03⑆563⑈ ⑆000⑆3005⑆

100363104048

Re...
...
...
2...
...
...

84040153302

Bob Price

Crackerjack

100 MAUREEN ST.
STRATFORD, CT 06497
(203) 375-7518



October 20, 1983

Congressman Joseph Addabbo
2365 Rayburn Office Building
Washington, DC 20515
Attention: Dick Seelmeyer

Dear Dick:

I have enclosed the total bills for Congressman Joe Addabbo's fund raiser we held on September 23 at Bob Carlson's. In addition to the two enclosed bills, which should be paid directly, I also paid \$195.00 to the musicians, plus \$60.00 for the various parking attendants.

I have enclosed a receipt that the two musicians gave me, (on the back of their business card), but I have no receipt from the parking attendants. I would appreciate it if you could make a check in the amount of \$255.00 payable to me.

I enjoyed working on this personal project, and I just hope it was successful from your standpoint.

Good luck in the future campaign.

Best regards,

L. R. Churchill

Enclosures

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

352

3630

Oct. 31,

1-2/210/100
83

PAY TO THE
ORDER OF

L. R. CHURCHILL

TWO HUNDRED AND FIFTY-FIVE

\$ 255.00



CHASE

The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416



FOR

REIMBURSEMENT FOR Fundraiser Sept. 29

AUTH. DIS.

⑈003630⑈ ⑆021000021⑆ 105 1 031563⑈

⑈000002550⑈

84040153304



ELECTRIC COMPANY Inc.

19

DATE Oct. 19, 1983

Congressman Adabo's Fund Raising Reception

YOUR ORDER NO.

1215

DESCRIPTION

Labor- 6 hours @ \$17.75 per hour.

TOTAL

\$106.50

EXHIBIT F

P.O. Box 2048 Hartford, CT 06145-2048 Phone 247-8125

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO

96-11 101ST AVENUE

OZONE PARK, NY 11416

336

3662

1-2/218/108

Nov. 22, 1983

PAY TO THE
ORDER OF

A AND M ELECTRIC COMPANY

\$ 106.50

ONE HUNDRED AND SIX

50/100

DOLLAR



CHASE

The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

FOR Labor for Fundraiser Sept. 23rd.

Jim McLaughlin

AUTH. SIG.

⑈003662⑈ ⑆021000021⑆ 105 1 031563⑈

⑈0000010650⑈

3104015330

TOWN OF AVON

October 13,

TOWN OFFICES
Avon, Connecticut

(21)

Sold To Congressman Addabbo Reception Fund
c/o Jim McDonald
9311 Woodland Drive
Silver Springs, Maryland 20910

POLICE SERVICE

9-23-83

4

hrs. Officer Barnett - 337 Waterville Rd.

4

" " LeMay

56 00

56 00

112 00

Tax

8 40

Amount Due:

120 40

Kindly remit to:

Town of Avon
60 West Main St.
Avon, CT 06001

Att: M. Kost

8404015337

22

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO

96-11 101ST AVENUE

OSDNE PARK, NY 11418

Oct. 20, 19 83

PAY TO THE
ORDER OF TOWN OF AVON

\$ 120.40

ONE HUNDRED AND TWENTY

40/00



CHASE

The Chase Manhattan Bank, N.A.
101 E. Ave. & 57th St.
Osborne Park, N.Y. 11418

FOR

9/23/83-Fundraiser Reception

Jim Mc Donald

⑆003943⑆ ⑆021000021⑆ 105 1 036863⑆

84040153378

NORTHROP

Senior Vice President and General Counsel

January 30, 1984

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

In response to your letter of January 11, 1984, Northrop Corporation ("Northrop") denies each and every material allegation set forth in Mr. Simeon Golar's complaint filed with the Federal Election Commission, insofar as such allegations do or may relate to Northrop.

It is our understanding that those allegations in Mr. Golar's complaint possibly relating to Northrop are as follows:

1. That James McDonald, as an employee of Northrop, assisted Joseph Addabbo in raising campaign funds, and that such activities constituted illegal campaign contributions by Northrop;
2. That Mr. McDonald was not reimbursed by Mr. Addabbo for his fundraising activities and thus they should be considered illegally donated campaign contributions by Northrop..

Please be advised of the true facts relating to the above allegations, as established in Northrop's normal business records and as reflected in discussions with Northrop employees likely to have knowledge concerning such allegations.

1. James McDonald was never an employee of Northrop Corporation. In February 1977, Northrop entered into a consulting agreement with Jack McDonald Associates, with James McDonald providing the services required thereunder. The agreement described consultant duties as follows: -

Attachment 4

- maintain contact with Congressional leaders and committee staffs, promote Northrop products and services by providing information on programs and proposals made to the agencies and departments of the U.S. Government;
- maintain periodic contact with the committees having jurisdiction over those departments and agencies with which Northrop conducted business;
- have familiarity with Northrop products and programs and maintain a working relationship with Company staff members in the Eastern Regional Office.

The consulting agreement was renewed on an annual basis over a period of six years and each time the above described duties were reviewed. The duties required under the consulting agreement remained unchanged during the six-year period. Beginning in February 1981, James McDonald contracted as a consultant directly with Northrop. Northrop paid the consultant fee in monthly increments under all of the above referenced contracts from February 1977 to February 1983, at which time the contract was not renewed. James McDonald has provided no services to Northrop since that time.

2. The consulting agreement required full compliance with the Company's policies and all applicable laws, rules, regulations and express public policy when rendering services for the Company of which Mr. McDonald was appropriately apprised. Mr. McDonald submitted regular reports to Northrop describing his activities for the Company. Neither the duties required under the contract nor the regular reports reflected in any manner any of the actions alleged by Mr. Golar.
3. The allegations have been discussed with Northrop employees likely to be aware of any of these alleged actions, and we found no Northrop knowledge concerning Mr. McDonald's alleged personal activities.
4. Under the agreement Northrop paid Jack McDonald Associates and James McDonald \$18,000 to \$22,000 annually, depending on the particular year in question. During the time Mr. McDonald rendered services for Northrop we believe he also represented several other clients. Consequently, it is our belief that his relationship with Northrop was on a part-time consultant basis only.

84040153100

- 3-
- 25
5. Based on the above, I conclude that Northrop had no prior knowledge of Mr. McDonald's alleged activities. If he in fact performed such activities, they were not on behalf of or at the behest of Northrop Corporation but in his own personal capacity.

Based on the above facts, any further inquiry involving Northrop is unnecessary and would be unproductive. Therefore, to avoid further burdens on either your office or mine, I would suggest that you review our records personally to satisfy yourself that the file and our due diligence was thorough and complete.

Very truly yours,

William M Elliott

William M. Elliott

WME:jm

84040153101

26



FEDERAL ELECTION COMMISSION

HAND DELIVERED

WASHINGTON, D.C. 20463

1975 OCT 10 PM 10:33
Identification #:
H.R. - 004669

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

FOR A
POLITICAL COMMITTEE

- ☐ New Registration
☐ Registration Amendment

ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Committee for Congressman Addabbo
Mailing address and ZIP code: 96-11 - 101st Avenue
Ozone Park, New York 11416 Telephone number: _____

2. Affiliated or connected organizations: None

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship

3. Area, scope and jurisdiction of the committee:
- (a) Will this committee operate in more than one State? No
 - (b) Will it operate on a statewide basis in one State? No
 - (c) Will it primarily support candidates seeking State or local office? No
 - (d) Will it support candidates for Federal office in an aggregate amount in excess of \$1,000 during the calendar year? Yes

4. List by name, address, office sought, and party affiliation, any candidate for Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Congressman Joseph P. Addabbo	Washington, D.C. 20515	Congressman 7th District New York	Democratic

5. If this committee is supporting the entire ticket of a party, give name of party: NA Attachment 5

7 5 0 0 1 5 2 3 4 4 2

2-7

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
James P. McDonald	9311 Woodland Drive Silver Spring, Md 20910	Assistant Treasurer Office telephone No. 331-1987

7. List by name, address and position of other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Dominick Addabbo	84-30 - 102nd Road Ozone Park, NY 11417	Chairman
Louis F. DeSena	96-11 - 101st Avenue Ozone Park, New York 11416	Treasurer

8. Does this committee plan to stay in existence beyond the current calendar year? Yes If so, how long? Indefinite

9. In the event of dissolution, what disposition will be made of residual funds? Transfer to Educational and Administrative Fund

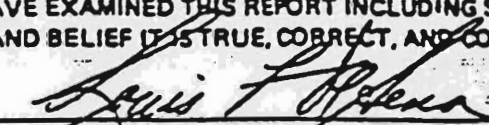
10. List the bank in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank(s) or savings depository	Mailing address and ZIP code
Chase Manhattan Bank	Ozone Park, New York 11416

11. List all reports required to be filed by this committee with States and local jurisdictions, other than reports required under this Act, the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Copy of FEC Reports	Same	Secretary of State New York, New York	Albany, New York

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS REPORT INCLUDING SCHEDULES AND STATEMENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND COMPLETE.


Signature of Treasurer of Committee

October 4, 1975
Date

Candidates for the U.S. Senate and political committees solely supporting such candidates should return completed report to:

SECRETARY OF THE SENATE
119 D Street, N.E.
Washington, D.C. 20002

Candidates for the U.S. House of Representatives and Political committees solely supporting such candidates should return completed report to:

CLERK OF THE HOUSE
1036 Longworth Building
Washington, D.C. 20515

7956200543

REPORT OF RECEIPTS AND DISBURSEMENTS For an Authorized Committee

28

(Summary Page)

1. Name of Committee (in Full) COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO	2. FEC Identification Number 004669
Address (Number and Street) 96-11 101st Avenue	3. Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO
City, State and ZIP Code Ozone Park, New York 11416	<input type="checkbox"/> Check if address is different than previously reported.

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding
<input type="checkbox"/> July 15 Quarterly Report	
<input type="checkbox"/> October 15 Quarterly Report	election on _____ in the State of _____
<input checked="" type="checkbox"/> January 31 Year End Report	<input type="checkbox"/> Thirtieth day report following the General Election
<input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	on _____ in the State of _____
	<input type="checkbox"/> Termination Report

This report contains activity for - ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7-1-83</u> Through <u>12-31-83</u>		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e)		\$241,516	\$363,906
(b) Total Contribution Refunds (from Line 20d)		\$ 0	\$ 0
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$241,516	\$363,906
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$116,764	\$187,504
(b) Total Offsets to Operating Expenditures (from Line 14)		\$ 2,574	\$ 2,574
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$114,190	\$184,930
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$431,411	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ 1,000	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4088

Jim McDonald
Type or Print Name of Treasurer

Asst. Treasurer
Signature of Treasurer

1-31-84
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Attachment 6

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

29

Name of Committee (in Full)	Report Covering the Period	
COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO	From 7-1-83	To 12-31-83
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	\$ 01,718	1,53,703
(Memo Entry Unitemized \$42,868)		
(b) Political Party Committees	2,500	2,500
(c) Other Political Committees	17,100	107,703
(d) The Candidates	0	0
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	21,318	163,906
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0
13. LOANS:		
(a) Made or Guaranteed by the Candidates	0	0
(b) All Other Loans	0	0
(c) TOTAL LOANS (add 13a and 13b)	0	0
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	2,578	2,578
15. OTHER RECEIPTS (Gifts, Interest, etc.)	14,565	19,515
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	258,761	386,399
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	116,764	187,504
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidates	0	0
(b) Of All Other Loans	0	0
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	0	0
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	0	0
21. OTHER DISBURSEMENTS	0	0
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	116,764	187,504

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 289,414
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 258,761
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 548,175
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 116,764
	\$ 431,411

SCHEDULE B

ITEMIZED DISBURSMENTS

Page 8 of 12
 LINE NUMBER 11
 (Use separate schedule for each category of the detailed Summary Page)

30

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
 COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Szabo Food Services, Inc. 400 Main Street East Hartford, CT 06118	food services- fundraiser 9/23/83 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-31-83	13,005
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L.R. Churchill 105 Stanley Drive Glastonbury, CT 06033	reimbursement- 9/23/83 fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-31-83	255
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rocky 1-Caterers 105-34 Rockaway Blvd. Ozone Park, NY 11417	Breakfast meeting Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-7-83	233
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Chase Bank Chase Manhattan Plaza New York, NY 10081	Deposit-tax withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-10-83	593
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Johnson Associates, Inc. Fleetwood NY 10552	contract polling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-14-83	5,000
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Thomas Curley 113-18 Cranston Avenue Belle Harbor, NY 11694	reimbursement- photographer Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-22-83	550
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Park Beach Mirror Howard Beach NY 11414	ad Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	288
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
VISA-Chase PO Box 5131 New Hyde Park, NY 11041 TWA	airline tickets- Calif. fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	967
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
VISA-Chase (S.F. Hilton) 2000 Marcus Avenue New Hyde Park, NY 11041	expenses- fundraising activities Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	651
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

84040153177

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 1612

Congressman Joseph P. Addabbo
Committee for Congressman
Joseph P. Addabbo
Louis F. DeSena, Treasurer
James P. McDonald
Northrop Corporation
Robert J. Carlson
United Technologies Corporation

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on March 22,
1984, the Commission decided by a vote of 4-0 to take the
following actions in MUR 1612:

1. Find no reason to believe that
Congressman Joseph P. Addabbo,
the Committee for Congressman
Joseph P. Addabbo and Louis F.
DeSena, as treasurer, James P.
McDonald, Northrop Corporation,
Robert J. Carlson and United
Technologies Corporation violated
the Act.
2. Close the file.
3. Approve the letters as attached
to the General Counsel's Report
signed March 19, 1984.

Commissioners Aikens, Elliott, McDonald and McGarry voted
affirmatively in this matter; Commissioners Harris and Reiche
did not cast a vote.

Attest:

3-23-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

84040153178



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *DK*
DATE: March 20, 1984
SUBJECT: MUR 1612 - GC Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [x]
Sensitive [x]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [x]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

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SENSITIVE
BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)

84 MAR 20 AM: 28

Congressman Joseph P. Addabbo)
Committee for Congressman Joseph)
P. Addabbo)
Louis F. DeSena, Treasurer)
James P. McDonald)
Northrop Corporation)
Robert J. Carlson)
United Technologies Corporation)

MUR 1612

GENERAL COUNSEL'S REPORT

I. STATEMENT OF THE CASE

On January 4, 1984, Simeon Golar filed a complaint making the following allegations:

1. The Committee for Congressman Joseph P. Addabbo ("Committee") and Louis F. DeSena, as treasurer, have violated 11 C.F.R. § 102.2(a)(2) by failing to amend the Committee's Statement of Organization to designate James P. McDonald as assistant treasurer.
2. Even if the Committee had designated Mr. McDonald as assistant treasurer it still would have been in violation because Mr. McDonald has been signing the reports since 1976 and, therefore, Mr. McDonald is doing more than assuming "... the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable" as provided for in 11 C.F.R. § 102.7(a).
3. The Northrop Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by making in-kind contributions to the Committee by providing the services of one of its lobbyists, James P. McDonald.

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4. Mr. McDonald has violated the Act by making illegal in-kind contributions to the Committee because he was not paid by the Committee for his "...invaluable fundraising services."
5. United Technologies Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by paying for a fundraiser for Congressman Addabbo held at the home of one of its employees, Robert J. Carlson.
6. The Committee and Louis F. DeSena, as treasurer, have accepted excessive and prohibited contributions in violation of 2 U.S.C. §§ 441a(f), 441b and 441c and have failed to report these contributions in violation of 2 U.S.C. § 434(b)(2).

The complainant also made the following allegations which do not constitute violations of the Act:

1. Congressman Addabbo allowed James P. McDonald to use congressional office space for campaign purposes.
2. Congressman Addabbo may use his excess campaign funds for personal use (which is permitted by 2 U.S.C. § 439 a because Congressman Addabbo was a member of Congress as of January 1980).
3. The Committee raised a substantial amount of money prior to the primary election.

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4. Congressman Addabbo is the Chairman of the Defense Subcommittee of the Committee on Appropriations of the House of Representatives and, therefore, solicitations from federal government contractors on behalf of Addabbo raise conflict of interest and other ethical questions.
5. Congressman Addabbo has described the complainant as "wealthy" and "a millionaire", which the complainant denies.

On January 13, 1984, this Office received a letter from Congressman Addabbo's Administrative Assistant requesting an extension of fifteen days in which to respond to the complaint as Congressman Addabbo was out of the country at the time. This request was also on behalf of Congressman Addabbo's committee, Louis F. DeSena, Treasurer, and James P. McDonald. The Office of General Counsel granted the requested extension. On February 8, 1984, this Office received responses from the aforementioned Respondents' counsel. See Attachments 1 and 2.

On January 25, 1984, this Office received a letter from counsel representing United Technologies Corporation and Robert J. Carlson requesting an extension of fifteen days in which to respond to the complaint as Mr. Carlson was out of the country. The Office of General Counsel granted the requested extension and, on February 14, 1984, a response was filed. See Attachment 3. On January 31, 1984, this Office received a response from the Northrop Corporation. See Attachment 4.

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II. FACTUAL AND LEGAL ANALYSIS

According to the Committee's response and Commission records (see Attachment 5), James P. McDonald was designated as Assistant Treasurer on the Committee's original Statement of Organization filed on October 10, 1975. Since that time Mr. McDonald has performed various duties within the scope of 11 C.F.R.

§ 102.7(a), including the signing of Committee reports. Neither the statute nor the regulations place a limit on the period of time a person can serve in the capacity of assistant treasurer. Consequently, the Committee fulfilled its obligation under 11 C.F.R. §§ 102.2(a)(2) and 102.7(a) when it named Mr. McDonald as assistant treasurer in its original filing.

With regard to Mr. McDonald's uncompensated "invaluable fundraising services," both the Committee and Mr. McDonald claim that all his services were provided on a purely personal voluntary basis. The Committee, however, did make payments to him as Custodian of the Committee's petty cash account and from time to time has shown its appreciation for his services by making a gratuitous payment to him. In addition, the Committee, Mr. McDonald and the Northrop Corporation deny that Mr. McDonald was compensated for these services by Northrop.

According to the responses, James P. McDonald was never an employee of the Northrop Corporation. From February 1977 to February 1981, Mr. McDonald was employed by Jack McDonald and Associates ("Associates") (no relation to Respondent McDonald) which paid his salary during those years. Northrop entered into a consulting agreement with Associates and Respondent McDonald provided the services required thereunder as a registered lobbyist on behalf of Northrop. In February 1981, Northrop

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contracted with Respondent McDonald directly as a private consultant, apparently on a part time basis, to track legislation before Congress. Respondent McDonald remained a registered lobbyist on behalf of Northrop until February 1983, when the relationship was terminated. Northrop Corporation claims that at no time did Respondent McDonald's duties include those actions mentioned in the complaint. They further stated that they had no prior knowledge of McDonald's alleged activities on behalf of Congressman Addabbo and if Mr. McDonald performed such activities it was "... not on behalf of or at the behest of Northrop Corporation but in his own personal capacity." According to Mr. McDonald, any compensation from Northrop was for the work and services rendered to Northrop relating to congressional legislative activities. Any services for the Committee were performed on his own time and not on Northrop time.

Congressman Addabbo also denies providing office space in his congressional office to Mr. McDonald in order to conduct campaign and other business activities. While it is noted that Mr. McDonald has from time to time visited the office to obtain information relevant to his duties as Assistant Treasurer or to make a social visit, such contact with his staff did not result in provision of office space.

According to the response filed on behalf of Robert J. Carlson and the United Technologies Corporation, Mr. Carlson, who is President of United Technologies, voluntarily hosted a reception at his home on September 23, 1983, to raise funds for

the Committee. This reception was held without any participation or approval by United Technologies and all costs associated with the reception were billed to, and paid by, the Committee as verified by the documents attached to their response and the Committee's reports. See Attachments 3 and 6. */

The Act specifically excludes from the definition of contribution "the value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee" and the "use of real ... property ... voluntarily provided by an individual to any candidate ... in rendering voluntary personal services on the individual's residential premises ... for candidate-related ... activities" 2 U.S.C. §§ 431(8)(B)(i) and (ii).

In light of that section and the fact that the complainant has provided no evidence that Messrs. McDonald and Carlson were acting in any capacity other than that of a volunteer, the General Counsel recommends that the Commission find no reason to believe that Messrs. McDonald and Carlson and the Northrop Corporation and United Technologies Corporation violated the Act.

In addition, as the Committee did designate Mr. McDonald as Assistant Treasurer and as it appears that the Committee has not accepted any illegal contributions and has reported its activities correctly, the General Counsel recommends that the Commission find no reason to believe that Congressman Joseph P. Addabbo, the Committee and Louis F. DeSena, as treasurer, violated the Act.

*/ As some of the payments were under \$200, the Committee was not required to itemize these costs on its report.

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III. RECOMMENDATIONS

1. Find no reason to believe that Congressman Joseph P. Addabbo, the Committee for Congressman Joseph P. Addabbo and Louis F. DeSena, as treasurer, James P. McDonald, Northrop Corporation, Robert J. Carlson and United Technologies Corporation violated the Act.
2. Close the file.
3. Approve the attached letters.

Charles N. Steele
General Counsel

3/19/84
Date

By: Kenneth A. Gross (for)
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response on behalf of Committee, et al.
2. Response on behalf of McDonald.
3. Response on behalf of United Technologies and Carlson.
4. Response from Northrop.
5. Committee's Statement of Organization.
6. Committee's 1983 Year End Report.
7. Proposed letters.

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LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617

February 6, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
Joseph P. Addabbo
Louis F. De Sena

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondents appreciate this opportunity to demonstrate, in writing, that no action should be taken on the basis of this complaint, and wish to set forth their reasons, both factual and legal, why the FEC should take no action against them in connection with this matter pursuant to the Act and FEC regulations.

At the outset, Respondents would contend that the complaint in this matter does not meet the factual and legal standards of 2 U.S.C. 437g(a)(1) and 11 CFR 111.4 and should be rejected summarily. It is clear that this complaint is a mere political statement filled with vague, general, nonspecific allegations, most of which are totally out of the purview of the Act and any regulation over which the FEC has jurisdiction. There is no "clear and concise recitation of the facts" which describe a violation of Federal election law, nor is the complaint "accompanied by any documentation supporting the facts alleged". 11 CFR 111.4(d)(3) and (4). In addition, many of the broad unsupported allegations contained in this complaint, even if true in some particular, would not involve any violation of any Federal election law or any other legal proscription.

While entering a general denial to all allegations included in this complaint as violations of any statute or regulation over which the FEC has jurisdiction, Respondents do

Attachment 1

MUR 1612
February 6, 1984
Page Two

2

want to specifically address the numbered paragraphs in the complaint and give an appropriate factual and/or legal response.

PARAGRAPH ONE:

This paragraph merely alleges that Respondent Addabbo's campaign committee, Committee for Congressman Addabbo ("the Committee"), was very successful in its fundraising efforts in the six month period following the 1982 congressional elections. An unspecific general allegation the Committee's fundraising activities over several years have been in violation of Federal election laws and regulations is unsubstantiated by even one factual offering or reference. Respondents would state that they are quite grateful that the hard work and effort which has been devoted by many campaign workers and volunteers has resulted in an enthusiastic response and substantial contributions from political supporters who agree that Congressman Addabbo should be continued in office. All campaign fundraising activities conducted by the Committee have complied with the requirements of the Act and FEC regulations. All campaign contributions and expenditures which were collected and spent during the six month period mentioned in the complaint have been appropriately recorded in the Committee's books and have been set forth on the public record in timely reports filed with the Office of the Clerk, U.S. House of Representatives, and are on file at the FEC. (See, in particular, 1982 Post-General Report at 83HSE/241/0660, 1982 Year-End Report at 83HSE/242/3983, and 1983 Mid-Year Report at 83HSE/248/3400.) In addition, the January 31 Year-End Report covering campaign fundraising activities of the Committee for the period 7/1/83 through 12/31/83 has just been filed in timely fashion for public perusal. In no instance in any of these reports has Complainant - or any other person or the FEC - alleged even one specific citation of a fundraising or contribution violation. Respondents would submit that there has been none.

PARAGRAPH TWO:

Complainant states that a search of FEC records shows no designation of "Jim McDonald" as Assistant Treasurer of the Committee on the Committee's Statement of Organization (Form 1), or any amendment thereto. Complainant is just factually wrong. A cursory review of the FEC microfilm records of the Committee's reports easily accessible to the general public at the FEC Public Records Office would show anyone who inquired that James P. McDonald ("Jim McDonald") has been identified as the Committee's custodian of books and accounts, and as its

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Assistant Treasurer, since the original Registration Form and Statement of Organization for the Committee was filed on October 10, 1975. (See 75HSE/85/2740-2741.) Mr. McDonald has remained the Committee's Assistant Treasurer from that time to date.

PARAGRAPH THREE:

Complainant alleges that Mr. McDonald's activities as Assistant Treasurer of the Committee and his signing of Committee reports, whether or not properly designated, constitutes a violation of Federal election law. Respondents would submit that Complainant is legally incorrect and totally misreads the intent and the effect of the applicable rules. FEC regulations specifically state that a political committee may designate "an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable." (emphasis added) 11 CFR 102.7(a). Clearly, a proper designation as Assistant Treasurer under this regulation permits the individual to perform all the activities of the Treasurer, including the signing and filing of FEC reports. In fact, the FEC in its Campaign Guide for Corporations and Labor Organizations (January 1982 at page 4) contemplates a properly designated Assistant Treasurer signing FEC reports and gives this advice to committees while citing 11 CFR 102.7(a): "Assistant Treasurer - Recommended An SSF may name an assistant treasurer who acts as treasurer when the treasurer is unavailable or when there is a vacancy in that office. Note that, in the absence of the treasurer, only a designated assistant treasurer may sign reports and statements and assume other responsibilities of the treasurer. 102.7(a)." (emphasis in the original).

Mr. McDonald has been properly designated as Assistant Treasurer of the Committee and is conducting his various activities for the Committee within the scope of 11 CFR 102.7(a), including the signing of Committee reports.

PARAGRAPH FOUR:

Complainant alleges that James P. McDonald's services to the Committee are illegal campaign contributions by him and the Northrup Corporation in excess of any applicable contribution limits or prohibitions. Complainant cites no specific factual or legal basis for such a charge other than stating that Mr. McDonald has assisted the Committee in

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campaign fundraising and other activities.

Respondents have great respect for Mr. McDonald and value his services to the Committee as Assistant Treasurer highly, including his duties as custodian of the books and accounts, as well as his fundraising talents. However, the Committee and Respondents have at all times accepted Mr. McDonald's services on a personal voluntary basis uncompensated by a third party employer. Where, as here, all campaign work has been done on a voluntary basis, and there has been no compensation by any third person or corporation to permit Mr. McDonald to work on campaign recordkeeping and fundraising, there can be no violation of Federal election laws concerning contribution limitations.

There is no statute or regulation which requires the Committee to eschew voluntary personal campaign services and to compensate each and every volunteer with Committee funds. In fact, the applicable law is exactly the opposite and is written to clearly encourage individuals to volunteer their time and energy to the political process. The Act specifically excludes "the value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee" from the definition of a "contribution" 2 U.S.C. 431(8)(B)(i).

Nothing in this paragraph supports an allegation that Mr. McDonald's services have been other than voluntary personal services, or that he has been compensated by a third party such as Northrup Corporation to perform such services.

PARAGRAPH FIVE:

Complainant alleges that Respondent Addabbo has provided "officespace" in his congressional office in Washington, D.C. for Mr. McDonald to "transact his campaign fundraising for ADDABBO and other business activities". While it is unclear as to what specific violation of any statute or regulation within the jurisdiction of the FEC that Complainant alleges, Respondent Addabbo would state categorically that "office space" has not been provided in his Washington, D.C. congressional office to Mr. McDonald in order that Mr. McDonald can conduct "campaign fundraising" and other "business activities". Mr. McDonald is certainly well known to Respondent Addabbo and is familiar with his Washington, D.C. office and staff. He is always welcome in this office. In the course of his duties as Assistant Treasurer of the Committee, Mr. McDonald has from time to time been required to come to the congressional office to obtain some relevant information and/or

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documents for the Committee. It is also quite possible that certain of his inquiries in this office have been quite unrelated to the campaign activities of the Committee, and have been appropriate social or professional visits that any public citizen may entertain. There is no basis in the complaint, or in fact or law, to support a finding that this type of irregular, open communication and contact comprises an illegal provision of office space.

PARAGRAPH SIX:

Complainant alleges that the absence of any payment for Mr. McDonald's "invaluable fundraising services" in any filed report, whereas such reports do show Committee payments to Mr. McDonald for expenses in connection with such fundraising activities, constitutes an illegal contribution of services by Mr. McDonald and Northrup Corporation. This paragraph is merely a repetition of the unsubstantiated allegations in PARAGRAPH FOUR. Respondents would offer the same response here as in PARAGRAPH FOUR and would point out again that voluntary personal services are excluded by the Act from the definition of "contribution". 2 U.S.C. 431(8)(B)(i).

It should be noted that those payments to Mr. McDonald which have been made by the Committee and itemized in FEC reports have been made to him for the most part as Custodian of the Committee's petty cash account in accordance with FEC regulations. 11 CFR 102.11 (See, for example, July 31 Mid Year Report for 1983 at 83HSE/247/3921.)

Finally, although the Committee and Respondents have valued Mr. McDonald's services as Assistant Treasurer to the Committee, and have always accepted these services on a personal voluntary basis uncompensated by any third party, the Committee has been able to show its appreciation for these services from time to time by making a single gratuitous payment to Mr. McDonald in lieu of any salary or otherwise agreed upon regular compensation from the Committee. An example of such a payment may be found in the January 31 Year End Report for 1982 at 83HSE/242/3986.

PARAGRAPH SEVEN:

In this paragraph, Complainant merely summarizes extant Federal election law, as set forth in the Act and FEC regulations, applicable to the use of "excess campaign funds". 2 U.S.C. 439a and 11 CFR 113. Complainant states no facts which might constitute a violation of these rules and regulations, nor, in fact, alleges any violation of any legal requirement. Respondents would agree.

PARAGRAPH EIGHT:

Complainant alleges that a fundraising event held at the home of Robert J. Carlson for Respondent Addabbo last year constituted an illegal campaign contribution by Mr. Carlson and United Technologies Corporation, and possible other unidentified individuals and corporations.

Respondents assert that the fundraising event in question was, in fact, an event sponsored and put on by the Committee on September 23, 1983 at the private residence of Mr. Robert J. Carlson in Connecticut - or more precisely, in the backyard of Mr. Carlson's residence. All costs and expenses associated with this fundraiser were billed and paid for by the Committee. The relevant expenditures made by the Committee for this event have been appropriately reported - and where required, itemized - in the January 31 Year End Report for 1983, which was timely filed and is presently available for public inspection in the Public Records Office at the FEC. (See, for example, the itemized entry on page 8 of Schedule B of this report which shows the payment of \$13,005.00 on 10/31/83 to Szabo Food Services, Inc., 400 Main Street, East Hartford, Connecticut 06118 for food services provided in connection with a fundraiser on 9/23/83.)

Likewise, all contributions which were received for the fundraiser were solicited from individuals or persons who are permitted to make contributions under the Act. These contributions have been received and recorded by the Committee, and have been appropriately reported in the January 31 Year End Report for 1983. Complainant makes no specific factual showing or allegation of contributions from identified prohibited sources, and the Respondents would state that there were none.

The Committee and Respondents are most grateful to Mr. Carlson for his support and the use of his backyard for this September 1983 fundraiser. Mr. Carlson is a most respected gentleman, and the Committee and Respondents were most pleased that Mr. Carlson voluntarily provided the Committee with the use of his real property, his residential premises, and his voluntary personal services in connection with the Committee's candidate-related activity. Such voluntary use of real or personal property, in particular an individual's residential premises, is specifically excluded from the Act's definition of "contribution". 2 U.S.C. 431(8)(B)(ii). The voluntary provision of Mr. Carlson's residence and backyard for this campaign fundraising event is not a prohibited or limited contribution or expenditure under 11 CFR 100.7(b)(4) and 100.8(b)(5), since all other food, beverage and other incidental costs were authorized and paid for by the Committee.

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Finally, with regard to Complainant's final sentence in PARAGRAPH EIGHT, Respondents would contend that this is purely a political statement which sets forth no facts nor alleges any violation of any rule or regulation within the jurisdiction of the FEC.

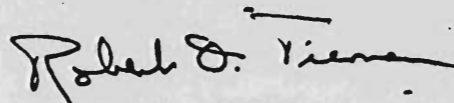
PARAGRAPHS NINE, TEN, ELEVEN & TWELVE:

In response to the final four paragraphs of this complaint, Respondents would merely state that these paragraphs are a continuation of the political hyperbole and campaign rhetoric which make up the body of this complaint. As a practical and legal matter, these paragraphs are devoid of any specific factual offerings which, even if assumed to be true, would constitute a violation of any law or regulation. Furthermore, this final portion of the complaint does not even purport to set forth allegations of any violation of the Act or FEC regulations which are the only standards which are within the enforcement purview of the Federal Election Commission.

Respondents appreciate this opportunity to demonstrate that no action should be taken against them on the basis of this complaint titled MUR 1612. As has been shown in this response, Respondents contend that there is no basis in fact or in law contained in this complaint to support a violation of any statute or regulation within the jurisdiction of the FEC, and therefore this complaint should have been dismissed summarily. Respondents also believe that on the basis of the items set forth in the complaint and the rejoinders in this response, the General Counsel should now forward to the Commission a recommendation that the FEC finds no reason to believe that any of the Respondents in this matter (MUR 1612) have committed, or is about to commit, a violation of statutes or regulations over which the Commission has jurisdiction.
11 CFR 111.7

Should there be any further questions with regard to this matter, Respondents would be happy to answer the FEC's inquiries through their designated Counsel.

Sincerely yours,


ROBERT O. TIERNAN

62-1600 (8)

LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617

February 7, 1984

Tarrant

FEB 8 A10:54

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
James P. McDonald

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violation of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondent appreciates this opportunity to demonstrate in writing that no action should be taken on the basis of this complaint.

First of all, Respondent wishes to associate himself with the written response to these allegations provided to you and the FEC by Respondents Joseph P. Addabbo and Louis F. De Sena. In particular, numbered paragraphs 2 through 6 of the complaint in MUR 1612 make certain allegations directly or indirectly concerning Mr. McDonald's efforts and activities on behalf of the Committee for Congressman Addabbo ("the Committee"). Respondent McDonald would join with Respondents Addabbo and De Sena in their rejoinder to these enumerated paragraphs of the complaint by this specific reference.

Respondent McDonald would like to reiterate and emphasize the point that his various activities over the years for the Committee, acting as custodian of the books and accounts in his role as Assistant Treasurer, providing assistance in fundraising and other campaign tasks, have all been undertaken on a personal voluntary basis without compensation from any third party. Such uncompensated personal voluntary campaign services are, therefore, exempt from the definition of "contribution" in the Act. 2 U.S.C. 431(8)(B)(i). As was pointed out in Co-Respondents' reply,

Attachment 2

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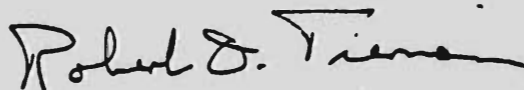
9

certain payments have been made to Mr. McDonald by the Committee. These payments have been either in connection with his control and oversight of the petty cash fund in accordance with 11 CFR 102.11, or as a gratuitous payment by the Committee in lieu of any salary or regular compensation.

Respondent McDonald would also like to respond to the Complainant's apparent allegation that the voluntary contribution of Mr. McDonald's personal services to the Committee was a prohibited corporate contribution to the Committee by the Northrup Corporation. At no time during the period of Respondent McDonald's services to the Committee has Mr. McDonald been an "employee" of the Northrup Corporation. From February 18, 1977 to February 1981, Respondent McDonald (James P. McDonald) was employed by Jack McDonald and Associates (no relation to Respondent McDonald). James P. McDonald's salary during this period was paid by Jack McDonald and Associates. Northrup Corporation was a client of Jack McDonald and Associates, and James P. McDonald followed legislative activities for this client in the House of Representatives and the Senate of the United States as a registered lobbyist. In February 1981, Northrup Corporation contracted with James P. McDonald directly as a private consultant to track legislation before the Congress. Respondent McDonald remained a private consultant to Northrup and a registered lobbyist on their behalf until February 14, 1983, when the relationship was terminated. At no time during the period of Mr. James P. McDonald's association with the Northrup Corporation did he receive any compensation from Northrup for services to the campaign Committee. Any compensation from Northrup to Respondent McDonald was for the work and services rendered to them relating to congressional legislative activities.

Should there be any further questions with regard to this matter, Respondent McDonald would be pleased to answer the FEC's inquiries through his designated Counsel.

Sincerely yours,



ROBERT O. TIERNAN

ROT/deo

84040153425

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER
662-5498

TWR: 710 662-6000 (CS WSH)
TLEN: 80-662 (BURLING WSH)
TELETYPE: (202) 662-6290
CABLE: COVLING

MUR 1612
Garrant

10

February 14, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612

Dear Mr. Steele:

This letter is submitted on behalf of Robert J. Carlson and United Technologies Corporation ("Respondents") in response to the written complaint dated January 3, 1984, filed by Simeon Golar in the above-entitled matter. In Paragraph 8 of his complaint, Mr. Golar alleges that Mr. Carlson "gave at his home a 'shrimp and champagne' fundraiser" for Representative Addabbo and that this "amounted to illegal campaign contributions by [Mr. Carlson] and United Technologies and/or other individuals and corporations." This is the only paragraph in Mr. Golar's complaint concerning Mr. Carlson and United Technologies. Mr. Golar sets forth no additional facts relating to, and provides no documentation to support, these allegations.

As shown below, Mr. Golar's complaint against Respondents is without merit. Accordingly, the Federal Election Commission should find no reason to believe that Mr. Carlson or United Technologies has violated the Federal Election Campaign Act ("Act").

FACTS

Robert J. Carlson is President of United Technologies Corporation, a Delaware corporation engaged in the manufacture and sale of products in major market sectors such as power, electronics, and building systems.

On September 23, 1983, Mr. Carlson, acting as a private citizen, without any participation or approval by United

Attachment 3

84040153426

Charles N. Steele, Esq.
February 14, 1984
Page Two

Technologies, voluntarily hosted a reception at his home in Avon, Connecticut, to raise funds for the Committee For Congressman Joseph P. Addabbo ("Committee"), Representative Addabbo's principal campaign committee. Approximately 125 individuals attended this event, which lasted from 5:30 p.m. to 8:00 p.m., and featured food, liquor and beverages and a banjo performance.

The costs of the September 23 reception were billed to, and paid by, the Committee as follows:

- o Food and beverage catering was provided by Szabo Food Service Inc. of East Hartford, Connecticut, for a fee of \$13,005.70 (a copy of which invoice is attached hereto as Exhibit A). By check No. 3631, dated October 31, 1983 (a copy of which is attached hereto as Exhibit B), the Committee paid Szabo Food Service the amount due.
- o Entertainment at the event was provided by Bob Price, "the Banjo Crackerjack" of Stratford, Connecticut, for a fee of \$195.00. This amount was paid on September 23, 1983, by Mr. L. R. Churchill, an Addabbo campaign volunteer (a copy of the receipt for which is attached hereto as Exhibit C). Mr. Churchill also paid on September 23, the amount of \$60.00 for the services of parking attendants. On October 20, 1983, Mr. Churchill sought reimbursement from the Committee for the amounts so expended for musicians and parking (a copy of Mr. Churchill's letter is attached hereto as Exhibit D). By check No. 3630, dated October 31, 1983 (a copy of which is attached hereto as Exhibit E), the Committee paid Mr. Churchill the requested \$255.00.
- o The A and M Electric Company of Hartford, Connecticut, provided lighting for this event for a fee of \$106.50 (a copy of which invoice is attached as Exhibit F). By check No. 3662, dated November 22, 1983 (a copy of which is attached hereto as Exhibit G), the Committee paid the amount due.
- o The Town of Avon provided police services for traffic control for a fee of \$120.40 (a copy of which invoice is attached hereto as Exhibit H). By check No. 3943, dated October 20, 1983 (a copy of which is attached

84040153407

Charles N. Steele, Esq.
February 14, 1984
Page Three

hereto as Exhibit I) the Committee paid to the Town of Avon the sum of \$120.40.

Mr. Carlson did not incur or pay any expenses in hosting this reception.

Similarly, United Technologies did not incur or pay any expenses in connection with this event. In fact, United Technologies did not participate in any way in the event.

DISCUSSION

The complaint filed by Mr. Golar alleges that the Respondents have made an illegal campaign contribution by virtue of Mr. Carlson's hosting of the September 23, 1983 reception. As the facts described above amply demonstrate, Mr. Golar's complaint against Respondents, which might be most charitably described as entirely inconsistent with the facts, is unfounded and should be dismissed.

Mr. Golar's allegation that Mr. Carlson has somehow made an illegal campaign contribution by voluntarily hosting a reception for the Committee has no basis in fact or law. As described above, all expenses associated with this event were incurred and paid by the Committee; Mr. Carlson made no expenditures in hosting the reception. With respect to Mr. Carlson's use of his real property to host the September 23 event, the Act explicitly excepts from the definition of contribution the "use of real . . . property . . . voluntarily provided by an individual to any candidate . . . in rendering voluntary personal services on the individual's residential premises . . . for candidate-related . . . activities" See 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. § 100.7(b)(4).

Mr. Golar's allegation that United Technologies made an illegal campaign contribution, presumably by virtue of the simple fact that it is the employer of the individual who hosted the September 23 reception, is also unfounded and plainly irresponsible. As stated above, United Technologies played no part in the Committee event; it made no expenditures whatsoever for the holding of the reception.

CONCLUSION

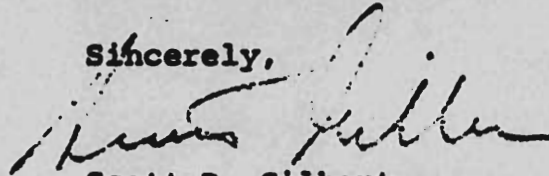
For the reasons stated above, the Commission should find no reason to believe that Robert J. Carlson or United

84040153428

Charles N. Steele, Esq.
February 14, 1984
Page Four

Technologies Corporation violated any provisions of the Act,
and Mr. Golar's complaint against Respondents should be
dismissed.

Sincerely,



Scott D. Gilbert

SW
Enclosures

84040153429

CHARGE SALES

BILLING COPY

DATE October 1, 1983

Location & No. P&W Cafe B 20-327 #032002

SZABO FOOD SERVICE INC.
400 Main St.
East Hartford, Conn. 06118

Bill To:

Name The Congressman Joe Adobo Fundraiser Dinner

Division/Unit _____

Account # _____

Please return white charge sale copy to local Executive Dining Room/Catereria Office

Outdoor Equipment Rental	\$2,266.80
Buffet	1,000.25
Other	253.50
Food Cost	3,660.00
Liquor & Beverages	651.88
Labor Cost	1,370.00
Floral	1,116.00
Linen Rental	180.40
Paper	22.00
15% Administration	1,569.21
7 1/2% Tax	906.75
Total	\$13,005.70

Amount _____
Tax _____
Total 23,005.70

Authorized and/or received by *L. R. Glavin*

*(Included in cash register reading? Yes No

Form 124

*Received for
admission tickets
on Sept. 23
12 admission
Nov. 17
\$175.00
J. R. Glavin + Office*

EXHIBIT A

15

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

PAYED 323 3631
BLK

1-2/215/105
Oct. 31, 1983

PAY TO THE
ORDER OF SZABO FOOD SERVICE INC. \$ 13,005.70

THIRTEEN, THOUSAND AND FIVE-----70/100----- DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, N.Y. 11416

John M. ...

AUTH. SIG.

FOR Fundraiser Dinner Sept. 23rd

⑈003631⑈ ⑆021000021⑆ 105 4 031563⑈ ⑆0001300570⑆

81010153131

*Respectfully
submitted to
the Honorable
Judge
Robert J. Brown*

84010153132

Bob Price

Drumstick

100 MAUREEN ST.
STRATFORD, CT 06497
(203) 375-7516



October 20, 1983

Congressman Joseph Addabbo
2365 Rayburn Office Building
Washington, DC 20515
Attention: Dick Seelmeyer

Dear Dick:

I have enclosed the total bills for Congressman Joe Addabbo's fund raiser we held on September 23 at Bob Carlson's. In addition to the two enclosed bills, which should be paid directly, I also paid \$195.00 to the musicians, plus \$60.00 for the various parking attendants.

I have enclosed a receipt that the two musicians gave me, (on the back of their business card), but I have no receipt from the parking attendants. I would appreciate it if you could make a check in the amount of \$255.00 payable to me.

I enjoyed working on this personal project, and I just hope it was successful from your standpoint.

Good luck in the future campaign.

Best regards,

L. R. Churchill

Enclosures

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COMM. FOR CONGRESSMAN,
JOSEPH P. ADDASSO
96-11 101ST AVENUE
OZONE PARK, NY 11416

352 3630

Oct. 31, 1983 1-2/212/106

PAY TO THE
ORDER OF L.R. CHURCHILL

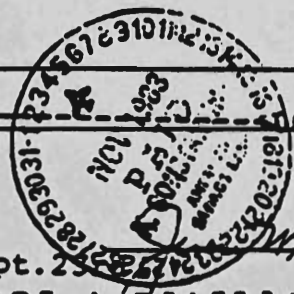
\$ 255.00

TWO HUNDRED AND FIFTY-FIVE

100/100 DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

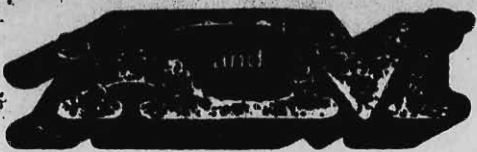


AUTH. SIG.

FOR REIMBURSEMENT FOR Fundraiser Sept. 25

⑈003630⑈ ⑆021000021⑆ 105 1 031563⑈ ⑈0000025500⑈

84040153134



ELECTRIC COMPANY Inc.

19

DATE Oct. 19, 1983

Congressman Adabo's Fund Raising Reception

YOUR ORDER NO.
1215

DESCRIPTION

Labor- 6 hours @ \$17.75 per hour.

TOTAL

\$106.50

EXHIBIT F

20

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

334 3662

1-2/218/198
Nov. 22, 1983

PAY TO THE ORDER OF A AND M ELECTRIC COMPANY \$ 106.50

ONE HUNDRED AND SIX-----50/100----- DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

FOR Labor for Fundraiser Sept. 23rd.

Jim McDonald AUTH. SIG.

⑈003662⑈ ⑆021000021⑆ 105 1 031563⑈ ⑆0000010650⑆

84040156436

TOWN OF AVON

October 13,

TOWN OFFICES
Avon, Connecticut

(21)

Sold To Congressman Addabbo Reception Fund
c/o Jim McDonald
9311 Woodland Drive
Silver Springs, Maryland 20910

POLICE SERVICES

9-23-83

"

4

4

hrs. Officer Barnett - 337 Waterville Rd.

" " LeMay

56 00

56 00

112 00

Tax

8 40

Amount Due:

120 40

Kindly remit to:

Town of Avon
60 West Main St.
Avon, CT 06001

Att: M. Kost

84040153437

EXHIBIT H

22

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

394

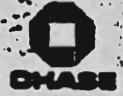
1-2/218/1

Oct. 20, 19 83

PAY TO THE
ORDER OF TOWN OF AVON

\$ 120.40

ONE HUNDRED AND TWENTY-----40/00-----DOLL



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, N.Y. 11416

FOR

9/23/83-Fundraiser Reception

Jim McDonald

⑆003943⑆ ⑆021000021⑆ 105 1 034863⑆

84040153178

NORTHROP

Senior Vice President and General Counsel

January 30, 1984

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

In response to your letter of January 11, 1984, Northrop Corporation ("Northrop") denies each and every material allegation set forth in Mr. Simeon Golar's complaint filed with the Federal Election Commission, insofar as such allegations do or may relate to Northrop.

It is our understanding that those allegations in Mr. Golar's complaint possibly relating to Northrop are as follows:

1. That James McDonald, as an employee of Northrop, assisted Joseph Addabbo in raising campaign funds, and that such activities constituted illegal campaign contributions by Northrop;
2. That Mr. McDonald was not reimbursed by Mr. Addabbo for his fundraising activities and thus they should be considered illegally donated campaign contributions by Northrop.

Please be advised of the true facts relating to the above allegations, as established in Northrop's normal business records and as reflected in discussions with Northrop employees likely to have knowledge concerning such allegations.

1. James McDonald was never an employee of Northrop Corporation. In February 1977, Northrop entered into a consulting agreement with Jack McDonald Associates, with James McDonald providing the services required thereunder. The agreement described consultant duties as follows: -

Attachment 4

- maintain contact with Congressional leaders and committee staffs, promote Northrop products and services by providing information on programs and proposals made to the agencies and departments of the U.S. Government;
- maintain periodic contact with the committees having jurisdiction over those departments and agencies with which Northrop conducted business;
- have familiarity with Northrop products and programs and maintain a working relationship with Company staff members in the Eastern Regional Office.

The consulting agreement was renewed on an annual basis over a period of six years and each time the above described duties were reviewed. The duties required under the consulting agreement remained unchanged during the six-year period. Beginning in February 1981, James McDonald contracted as a consultant directly with Northrop. Northrop paid the consultant fee in monthly increments under all of the above referenced contracts from February 1977 to February 1983, at which time the contract was not renewed. James McDonald has provided no services to Northrop since that time.

2. The consulting agreement required full compliance with the Company's policies and all applicable laws, rules, regulations and express public policy when rendering services for the Company of which Mr. McDonald was appropriately apprised. Mr. McDonald submitted regular reports to Northrop describing his activities for the Company. Neither the duties required under the contract nor the regular reports reflected in any manner any of the actions alleged by Mr. Golar.
3. The allegations have been discussed with Northrop employees likely to be aware of any of these alleged actions, and we found no Northrop knowledge concerning Mr. McDonald's alleged personal activities.
4. Under the agreement Northrop paid Jack McDonald Associates and James McDonald \$18,000 to \$22,000 annually, depending on the particular year in question. During the time Mr. McDonald rendered services for Northrop we believe he also represented several other clients. Consequently, it is our belief that his relationship with Northrop was on a part-time consultant basis only.

84040153110

5. Based on the above, I conclude that Northrop had no prior knowledge of Mr. McDonald's alleged activities. If he in fact performed such activities, they were not on behalf of or at the behest of Northrop Corporation but in his own personal capacity.

Based on the above facts, any further inquiry involving Northrop is unnecessary and would be unproductive. Therefore, to avoid further burdens on either your office or mine, I would suggest that you review our records personally to satisfy yourself that the file and our due diligence was thorough and complete.

Very truly yours,

William M Elliott

William M. Elliott

WME:jm

84040153411

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FEDERAL ELECTION COMMISSION

HAND DELIVERED

WASHINGTON, D.C. 20463

1975 OCT 10 AM 10:33
Identification #: H.R. - 004669

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

FOR A
POLITICAL COMMITTEE

☐ New Registration
☐ Registration Amendment

ALL QUESTIONS MUST BE ANSWERED FOR NEW REGISTRATIONS

1. Full name of committee: Committee for Congressman Addabbo
Mailing address and ZIP code: 96-11 - 101st Avenue
Ozone Park, New York 11416 Telephone number: _____

2. Affiliated or connected organizations: None

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship

3. Area, scope and jurisdiction of the committee:
(a) Will this committee operate in more than one State? No
(b) Will it operate on a statewide basis in one State? No
(c) Will it primarily support candidates seeking State or local office? No
(d) Will it support candidates for Federal office in an aggregate amount in excess of \$1,000 during the calendar year? Yes

4. List by name, address, office sought, and party affiliation, any candidate for Federal or public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
Congressman Joseph P. Addabbo	Washington, D.C. 20515	Congressman 7th District New York	Democratic

5. If this committee is supporting the entire ticket of a party, give name of party: NA

Attachment 5

*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

754000023412

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
James P. McDonald	9311 Woodland Drive Silver Spring, Md 20910	Assistant Treasurer Office telephone No. 331-1987

7. List by name, address and position of other principal officers of the committee, including the chairman and treasurer if not identified in Question 6 above and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Dominick Addabbo	84-30 - 102nd Road Ozone Park, NY 11417	Chairman
Louis F. DeSena	96-11 - 101st Avenue Ozone Park, New York 11416	Treasurer

8. Does this committee plan to stay in existence beyond the current calendar year? Yes If so, how long? Indefinite

9. In the event of dissolution, what disposition will be made of residual funds? Transfer to Educational and Administrative Fund

10. List the bank in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank(s) or campaign depository	Mailing address and ZIP code
Chase Manhattan Bank	Ozone Park, New York 11416

11. List all reports required to be filed by this committee with States and local jurisdictions, other than reports required under this Act, the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
Copy of FEC Reports	Same	Secretary of State New York, New York	Albany, New York

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS REPORT INCLUDING SCHEDULES AND STATEMENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND COMPLETE.

Louis F. DeSena
Signature of Treasurer of Committee

October 4, 1975
Date

Candidates for the U.S. Senate and political committees solely supporting such candidates should return completed report to:

SECRETARY OF THE SENATE
119 D Street, N.E.
Washington, D.C. 20002

Candidates for the U.S. House of Representatives and Political committees solely supporting such candidates should return completed report to:

CLERK OF THE HOUSE
1036 Longworth Building
Washington, D.C. 20515

REPORT OF RECEIPTS AND DISBURSEMENTS For an Authorized Committee

28

MAILED

(Summary Page)

1. Name of Committee (in Full) COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO		2. FEC Identification Number 004669
Address (Number and Street) 96-11 101st Avenue		3. Is this Report on Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and ZIP Code Ozone Park, New York 11416		

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election
<input checked="" type="checkbox"/> January 31 Year End Report	on _____ in the State of _____
<input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for - ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>7-1-83</u> Through <u>12-31-83</u>		
6. Net Contributions (other than loans):		
(a) Total Contributions (other than loans) (from Line 11e)	\$241,516	\$363,906
(b) Total Contribution Refunds (from Line 20d)	\$ 0	\$ 0
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	\$241,516	\$363,906
7. Net Operating Expenditures:		
(a) Total Operating Expenditures (from Line 17)	\$116,764	\$187,504
(b) Total Offsets to Operating Expenditures (from Line 14)	\$ 2,574	\$ 2,574
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	\$114,190	\$184,930
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$431,411	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 1,000	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-6630
Local 202-523-4008

Jim McDonald
Type or Print Name of Treasurer

Asst. Jim McDonald
SIGNATURE OF TREASURER

1-31-84
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

Attachment 6

FEC FORM 3 (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

29

Name of Committee (in Full)	Report Covering the Period	
COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO	From 7-1-83	To 12-31-83
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	\$ 101,718	\$ 143,703
(Memo Entry Unitemized \$42,868)		
(b) Political Party Committees	2,500	2,500
(c) Other Political Committees	17,300	107,703
(d) The Candidate	0	0
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	121,518	163,906
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0
13. LOANS:		
(a) Made or Guaranteed by the Candidate	0	0
(b) All Other Loans	0	0
(c) TOTAL LOANS (add 13a and 13b)	0	0
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	2,578	2,578
15. OTHER RECEIPTS (Dividends, Interest, etc.)	14,665	19,915
16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)	258,761	386,399
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	116,764	187,504
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	0	0
(b) Of All Other Loans	0	0
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	0	0
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0	0
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	0	0
21. OTHER DISBURSEMENTS	0	0
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	116,764	187,504

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$ 289,414
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 258,761
25. SUBTOTAL (Add Line 23 and Line 24)	\$ 548,175
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 116,764
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 431,411

SCHEDULE B

ITEMIZED DISBURSMENTS

Page 8 of 12 for
 LINE NUMBER 17
 (Use separate schedule for each
 category of the listed
 Summary Page)

30

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)
COMMITTEE FOR CONGRESSMAN JOSEPH P. ADDABBO

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Szabo Food Services, Inc. 400 Main Street East Hartford, CT 06118	food services- fundraiser 9/23/83 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-31-83	13,005
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L.R. Churchill 105 Stanley Drive Glastonbury, CT 06033	reimbursement- 9/23/83 fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-31-83	255
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rocky I-Caterers 105-34 Rockaway Blvd. Ozone Park, NY 11417	Breakfast meeting Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-7-83	233
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Chase Bank Chase Manhattan Plaza New York, NY 10081	Deposit-tax withholding Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-10-83	593
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Johnson Associates, Inc. Fleetwood NY 10552	contract polling Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-14-83	5,000
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Thomas Curley 113-18 Cranston Avenue Belle Harbour, NY 11694	reimbursement- photographer Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-22-83	550
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Park Beach Mirror Howard Beach NY 11414	ad Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	288
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
VISA-Chase PO Box 5131 New Hyde Park, NY 11041 TWA	airline tickets- Calif. fundraiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	967
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
VISA-Chase (S.F. Hilton) 2000 Marcus Avenue New Hyde Park, NY 11041	expenses- fundraising activities Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11-28-83	651
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

31

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Simeon Golar
Attorney at Law
90 Broad Street
New York, New York 10004

Re: MUR 1612

Dear Mr. Golar:

The Federal Election Commission has reviewed the allegations of your complaint dated January 3, 1984, and determined that on the basis of the information provided in your complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

Attachment 7

84040153417



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William M. Elliott, General Counsel
Northrop Corporation
1800 Century Park East
Century City
Los Angeles, California 90067

Re: MUR 1612
Northrop Corporation

Dear Mr. Elliott:

On January 11, 1984, the Commission notified Northrop Corporation of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

84040153118



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott D. Gilbert, Esq.
Covington and Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044

RE: MUR 1612
Robert J. Carlson
United Technologies Corporation

Dear Mr. Gilbert:

On January 11, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

84040153419



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert O. Tiernan, Esquire
Suite 299
1800 M Street, N.W.
Washington, D.C. 20036

Re: MUR 1612
Congressman Joseph P. Addabbo
Committee for Congressman
Joseph P. Addabbo
Louis F. DeSena, Treasurer
James P. McDonald

Dear Mr. Tiernan:

On January 10, 1984, the Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1984, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

84040153470



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 23, 1984

Simeon Golar
Attorney at Law
90 Broad Street
New York, New York 10004

Dear Mr. Golar:

This is in response to your letter of February 16, 1984, in which you request information pertaining to the complaint filed by you with the Commission.

The Federal Election Campaign Act prohibits any person from making public the fact of any notification or investigation by the Commission unless the party being investigated has agreed in writing that the matter be made public. (See 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(a)). Because there has been no written agreement that the matter be made public, we are not in a position to release any information at this time.

As you were informed by letter of January 6, 1984, (copy attached) we will notify you as soon as the Commission takes final action on your complaint.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosure

84040153451



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 6, 1984

Simeon Golar
Attorney at Law
90 Broad Street
New York, New York 10004

Dear Mr. Golar:

This letter is to acknowledge receipt of your complaint which we received on January 4, 1984, against Congressman Joseph P. Addabbo, Louis F. DeSena, James P. McDonald, Robert J. Carlson and United Technologies Corporation which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Cheryl Thomas at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross
By Kenneth A. Gross
Associate General Counsel

Enclosure

34040153452

6 CC# 1707
MUR 1612
Tarrant

SIMEON GOLAR
ATTORNEY AT LAW
90 BROAD STREET
NEW YORK, N.Y. 10004

GENERAL COUNSEL

4 FEB 21 P 3: 23

(212) 425-4480

February 16, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Complaint against
Congressman Joseph P. Addabbo

Dear Sir:

On January 3, 1984, I filed with your commission
the above-referenced complaint.

Please advise me as to the status of this matter.

Very truly yours,


Simeon Golar

SG:cjo

84040453433

84040154

SIMEON GOLAR
90 BROAD STREET
NEW YORK, N.Y. 10004



84 FEB 21 PM 12:00

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463



COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER
662-5498

TW: 710 662-6000 (CS WSH)
TELE: 66-662 (COVING WSH)
TELECOPIER: (202) 662-6200
CABLE: COVING

662-1659
MUR 1612
Warrant

February 14, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612

Dear Mr. Steele:

This letter is submitted on behalf of Robert J. Carlson and United Technologies Corporation ("Respondents") in response to the written complaint dated January 3, 1984, filed by Simeon Golar in the above-entitled matter. In Paragraph 8 of his complaint, Mr. Golar alleges that Mr. Carlson "gave at his home a 'shrimp and champagne' fundraiser" for Representative Addabbo and that this "amounted to illegal campaign contributions by [Mr. Carlson] and United Technologies and/or other individuals and corporations." This is the only paragraph in Mr. Golar's complaint concerning Mr. Carlson and United Technologies. Mr. Golar sets forth no additional facts relating to, and provides no documentation to support, these allegations.

As shown below, Mr. Golar's complaint against Respondents is without merit. Accordingly, the Federal Election Commission should find no reason to believe that Mr. Carlson or United Technologies has violated the Federal Election Campaign Act ("Act").

FACTS

Robert J. Carlson is President of United Technologies Corporation, a Delaware corporation engaged in the manufacture and sale of products in major market sectors such as power, electronics, and building systems.

On September 23, 1983, Mr. Carlson, acting as a private citizen, without any participation or approval by United

34040153175

15
3:00

Charles N. Steele, Esq.
February 14, 1984
Page Two

Technologies, voluntarily hosted a reception at his home in Avon, Connecticut, to raise funds for the Committee For Congressman Joseph P. Addabbo ("Committee"), Representative Addabbo's principal campaign committee. Approximately 125 individuals attended this event, which lasted from 5:30 p.m. to 8:00 p.m., and featured food, liquor and beverages and a banjo performance.

The costs of the September 23 reception were billed to, and paid by, the Committee as follows:

- o Food and beverage catering was provided by Szabo Food Service Inc. of East Hartford, Connecticut, for a fee of \$13,005.70 (a copy of which invoice is attached hereto as Exhibit A). By check No. 3631, dated October 31, 1983 (a copy of which is attached hereto as Exhibit B), the Committee paid Szabo Food Service the amount due.
- o Entertainment at the event was provided by Bob Price, "the Banjo Crackerjack" of Stratford, Connecticut, for a fee of \$195.00. This amount was paid on September 23, 1983, by Mr. L. R. Churchill, an Addabbo campaign volunteer (a copy of the receipt for which is attached hereto as Exhibit C). Mr. Churchill also paid on September 23, the amount of \$60.00 for the services of parking attendants. On October 20, 1983, Mr. Churchill sought reimbursement from the Committee for the amounts so expended for musicians and parking (a copy of Mr. Churchill's letter is attached hereto as Exhibit D). By check No. 3630, dated October 31, 1983 (a copy of which is attached hereto as Exhibit E), the Committee paid Mr. Churchill the requested \$255.00.
- o The A and M Electric Company of Hartford, Connecticut, provided lighting for this event for a fee of \$106.50 (a copy of which invoice is attached as Exhibit F). By check No. 3662, dated November 22, 1983 (a copy of which is attached hereto as Exhibit G), the Committee paid the amount due.
- o The Town of Avon provided police services for traffic control for a fee of \$120.40 (a copy of which invoice is attached hereto as Exhibit H). By check No. 3943, dated October 20, 1983 (a copy of which is attached

841040153136

Charles N. Steele, Esq.
February 14, 1984
Page Three

hereto as Exhibit I) the Committee paid to the Town of Avon the sum of \$120.40.

Mr. Carlson did not incur or pay any expenses in hosting this reception.

Similarly, United Technologies did not incur or pay any expenses in connection with this event. In fact, United Technologies did not participate in any way in the event.

DISCUSSION

The complaint filed by Mr. Golar alleges that the Respondents have made an illegal campaign contribution by virtue of Mr. Carlson's hosting of the September 23, 1983 reception. As the facts described above amply demonstrate, Mr. Golar's complaint against Respondents, which might be most charitably described as entirely inconsistent with the facts, is unfounded and should be dismissed.

Mr. Golar's allegation that Mr. Carlson has somehow made an illegal campaign contribution by voluntarily hosting a reception for the Committee has no basis in fact or law. As described above, all expenses associated with this event were incurred and paid by the Committee; Mr. Carlson made no expenditures in hosting the reception. With respect to Mr. Carlson's use of his real property to host the September 23 event, the Act explicitly excepts from the definition of contribution the "use of real . . . property . . . voluntarily provided by an individual to any candidate . . . in rendering voluntary personal services on the individual's residential premises . . . for candidate-related . . . activities" See 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. § 100.7(b)(4).

Mr. Golar's allegation that United Technologies made an illegal campaign contribution, presumably by virtue of the simple fact that it is the employer of the individual who hosted the September 23 reception, is also unfounded and plainly irresponsible. As stated above, United Technologies played no part in the Committee event; it made no expenditures whatsoever for the holding of the reception.

CONCLUSION

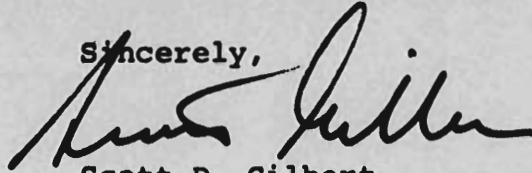
For the reasons stated above, the Commission should find no reason to believe that Robert J. Carlson or United

84040153137

Charles N. Steele, Esq.
February 14, 1984
Page Four

Technologies Corporation violated any provisions of the Act,
and Mr. Golar's complaint against Respondents should be
dismissed.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott D. Gilbert", written over the word "Sincerely,".

Scott D. Gilbert

SW
Enclosures

84040453438

BILLING COPY

CHARGE SALES

DATE October 1, 1983

Location

& No. P&W Cafe B 20-327 #032002

SZABO FOOD SERVICE INC.

400 Main St.

East Hartford, Conn. 06118

Bill To:

Name The Congressman Joe Adobo Fundraiser Dinner

Division/Unit _____

Account # _____

Please return white charge sale copy to local Executive Dining Room/Cafeteria Office

Outdoor Equipment Rental	\$2,266.80
Buffet	1,000.25
Other	253.50
Food Cost	3,660.00
Liquor & Beverages	651.88
Labor Cost	1,370.00
Floral	1,116.00
Linen Rental	180.40
Paper	22.00
15% Administration	1,569.21
7 1/2% Tax	906.75
Total	\$13,005.70

Amount _____

Tax _____

Total 13,005.70Authorized and/or received by *F. R. Glueckert*

*(Included in cash register reading? Yes No)

Form 124

*Received for
amount paid
on Sept. 23
12 minutes
from CT.
\$175.00
S. R. Glueckert + J. R. Glueckert*

EXHIBIT A

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

PAID 322 3631
1-2/210/100
Oct. 31, 1983

PAY TO THE
ORDER OF SZABO FOOD SERVICE INC. \$ 13,005.70
THIRTEEN, THOUSAND AND FIVE-----70/100-----DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

Jim McManis

AUTH. SIG.

FOR Fundraiser Dinner Sept. 23rd

⑈00363⑈ ⑈02100002⑈ 105 ⑈031563⑈

⑈0001300570⑈

34040153150

EXHIBIT B

84040153451

Recd
at
12 (minutes)
Ave. 12
Bob Price

Bob Price

100 MAUREEN ST.
STRATFORD, CT 06497
(203) 375-7516



EXHIBIT C

October 20, 1983

Congressman Joseph Addabbo
2365 Rayburn Office Building
Washington, DC 20515
Attention: Dick Seelmeyer

Dear Dick:

I have enclosed the total bills for Congressman Joe Addabbo's fund raiser we held on September 23 at Bob Carlson's. In addition to the two enclosed bills, which should be paid directly, I also paid \$195.00 to the musicians, plus \$60.00 for the various parking attendants.

I have enclosed a receipt that the two musicians gave me, (on the back of their business card), but I have no receipt from the parking attendants. I would appreciate it if you could make a check in the amount of \$255.00 payable to me.

I enjoyed working on this personal project, and I just hope it was successful from your standpoint.

Good luck in the future campaign.

Best regards,

L. R. Churchill

Enclosures

EXHIBIT D

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

252

3630

Oct. 31,

19

1-2/210/105
83

PAY TO THE
ORDER OF

L.R. CHURCHILL

\$ 255.00

TWO HUNDRED AND FIFTY-FIVE

100/100

DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, N.Y. 11416



 ELECTRIC COMPANY Inc.

DATE Oct. 19, 1983

Congressman Adabo's Fund Raising Reception

YOUR ORDER NO.

1215

DESCRIPTION

Labor- 6 hours @ \$17.75 per hour.

TOTAL

\$106.50

EXHIBIT F

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

336

3662

Nov. 22, 1983 1-2/310/105

PAY TO THE ORDER OF A AND M ELECTRIC COMPANY \$ 106.50

ONE HUNDRED AND SIX-----50/100----- DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

FOR Labor for Fundraiser Sept. 23rd.

Jim McDonald AUTH. SIG.

⑈003662⑈ ⑆021000021⑆ 105 1 031563⑈ ⑆0000010650⑈

34040153133

EXHIBIT G

TOWN OF AVON

October 13, 19

TOWN OFFICES
Avon, Connecticut

Sold To Congressman Addabbo Reception Fund
c/o Jim McDonald
9311 Woodland Drive
Silver Springs, Maryland 20910

POLICE SERVICES

9-23-83
"

4
4

hrs. Officer Barnett - 337 Waterville Rd.
" " LeMay

56 00

56 00

112 00

Tax

8 40

Amount Due:

120 40

Kindly remit to:

Town of Avon
60 West Main St.
Avon, CT 06001

Att: M. Kost

84040153456

EXHIBIT H

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

3943

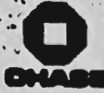
1-2/210/100

Oct. 20, 19 83

PAY TO THE
ORDER OF TOWN OF AVON

\$ 120.40

ONE HUNDRED AND TWENTY-----40/00-----DOLLAR



The Chase Manhattan Bank, N.A.
101st Ave. & 57th St.
Ozone Park, N.Y. 11416

FOR

9/23/83-Fundraiser Reception

Jim McDonald

⑈003943⑈ ⑆021000021⑆ 105 1 031863⑈

84040156157

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-8000

WRITER'S DIRECT DIAL NUMBER

662-5498

TWX: 710 622-0008 (CS WSH)
TELEX: 88-883 (COVLING WSH)
TELECOPIER: (202) 662-8280
CABLE: COVLING

February 14, 1984

BY HAND

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612

Dear Mr. Steele:

This letter is submitted on behalf of Robert J. Carlson and United Technologies Corporation ("Respondents") in response to the written complaint dated January 3, 1984, filed by Simeon Golar in the above-entitled matter. In Paragraph 8 of his complaint, Mr. Golar alleges that Mr. Carlson "gave at his home a 'shrimp and champagne' fundraiser" for Representative Addabbo and that this "amounted to illegal campaign contributions by [Mr. Carlson] and United Technologies and/or other individuals and corporations." This is the only paragraph in Mr. Golar's complaint concerning Mr. Carlson and United Technologies. Mr. Golar sets forth no additional facts relating to, and provides no documentation to support, these allegations.

As shown below, Mr. Golar's complaint against Respondents is without merit. Accordingly, the Federal Election Commission should find no reason to believe that Mr. Carlson or United Technologies has violated the Federal Election Campaign Act ("Act").

FACTS

Robert J. Carlson is President of United Technologies Corporation, a Delaware corporation engaged in the manufacture and sale of products in major market sectors such as power, electronics, and building systems.

On September 23, 1983, Mr. Carlson, acting as a private citizen, without any participation or approval by United

84040153458

Charles N. Steele, Esq.
February 14, 1984
Page Two

Technologies, voluntarily hosted a reception at his home in Avon, Connecticut, to raise funds for the Committee For Congressman Joseph P. Addabbo ("Committee"), Representative Addabbo's principal campaign committee. Approximately 125 individuals attended this event, which lasted from 5:30 p.m. to 8:00 p.m., and featured food, liquor and beverages and a banjo performance.

The costs of the September 23 reception were billed to, and paid by, the Committee as follows:

- o Food and beverage catering was provided by Szabo Food Service Inc. of East Hartford, Connecticut, for a fee of \$13,005.70 (a copy of which invoice is attached hereto as Exhibit A). By check No. 3631, dated October 31, 1983 (a copy of which is attached hereto as Exhibit B), the Committee paid Szabo Food Service the amount due.
- o Entertainment at the event was provided by Bob Price, "the Banjo Crackerjack" of Stratford, Connecticut, for a fee of \$195.00. This amount was paid on September 23, 1983, by Mr. L. R. Churchill, an Addabbo campaign volunteer (a copy of the receipt for which is attached hereto as Exhibit C). Mr. Churchill also paid on September 23, the amount of \$60.00 for the services of parking attendants. On October 20, 1983, Mr. Churchill sought reimbursement from the Committee for the amounts so expended for musicians and parking (a copy of Mr. Churchill's letter is attached hereto as Exhibit D). By check No. 3630, dated October 31, 1983 (a copy of which is attached hereto as Exhibit E), the Committee paid Mr. Churchill the requested \$255.00.
- o The A and M Electric Company of Hartford, Connecticut, provided lighting for this event for a fee of \$106.50 (a copy of which invoice is attached as Exhibit F). By check No. 3662, dated November 22, 1983 (a copy of which is attached hereto as Exhibit G), the Committee paid the amount due.
- o The Town of Avon provided police services for traffic control for a fee of \$120.40 (a copy of which invoice is attached hereto as Exhibit H). By check No. 3943, dated October 20, 1983 (a copy of which is attached

84040153459

Charles N. Steele, Esq.
February 14, 1984
Page Three

hereto as Exhibit I) the Committee paid to the Town of Avon the sum of \$120.40.

Mr. Carlson did not incur or pay any expenses in hosting this reception.

Similarly, United Technologies did not incur or pay any expenses in connection with this event. In fact, United Technologies did not participate in any way in the event.

DISCUSSION

The complaint filed by Mr. Golar alleges that the Respondents have made an illegal campaign contribution by virtue of Mr. Carlson's hosting of the September 23, 1983 reception. As the facts described above amply demonstrate, Mr. Golar's complaint against Respondents, which might be most charitably described as entirely inconsistent with the facts, is unfounded and should be dismissed.

Mr. Golar's allegation that Mr. Carlson has somehow made an illegal campaign contribution by voluntarily hosting a reception for the Committee has no basis in fact or law. As described above, all expenses associated with this event were incurred and paid by the Committee; Mr. Carlson made no expenditures in hosting the reception. With respect to Mr. Carlson's use of his real property to host the September 23 event, the Act explicitly excepts from the definition of contribution the "use of real . . . property . . . voluntarily provided by an individual to any candidate . . . in rendering voluntary personal services on the individual's residential premises . . . for candidate-related . . . activities" See 2 U.S.C. § 431(8)(B)(ii); 11 C.F.R. § 100.7(b)(4).

Mr. Golar's allegation that United Technologies made an illegal campaign contribution, presumably by virtue of the simple fact that it is the employer of the individual who hosted the September 23 reception, is also unfounded and plainly irresponsible. As stated above, United Technologies played no part in the Committee event; it made no expenditures whatsoever for the holding of the reception.

CONCLUSION

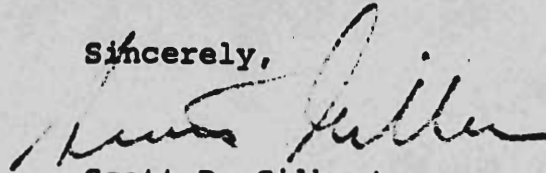
For the reasons stated above, the Commission should find no reason to believe that Robert J. Carlson or United

84040153170

Charles N. Steele, Esq.
February 14, 1984
Page Four

Technologies Corporation violated any provisions of the Act,
and Mr. Golar's complaint against Respondents should be
dismissed.

Sincerely,



Scott D. Gilbert

SW
Enclosures

84040453471

BILLING COPY

CHARGE SALES

DATE October 1, 1983

Location

& No. P&W Cafe B 20-327 #032002SZABO FOOD SERVICE INC.
400 Main St.
East Hartford, Conn. 06118

Bill To:

Name The Congressman Joe Adobo Fundraiser Dinner

Division/Unit _____

Account # _____

2

Please return white charge sale copy to local Executive Dining Room/Cafeteria Office

840101531

Outdoor Equipment Rental

\$2,266.80

Buffet

1,000.25

Other

253.50

Food Cost

3,660.00

Liquor & Beverages

651.88

Labor Cost

1,370.00

Floral

1,116.00

Linen Rental

180.40

Paper

22.00

15% Administration

1,569.21

7 1/2% Tax

906.75

Total

\$13,005.70

Amount _____

Tax _____

Total 13,005.70

Authorized and/or received by

F. R. Glavin 204

*(Included in cash register reading? Yes No)

Form 124

Received for
 amount of
 \$13,005.70
 on Sept 1, 1983
 from
 12 minutes
 from CT.
 \$175.00
 J. R. Glavin + J. R.

EXHIBIT A

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

3631
PAID 323
1-2/218/105
Oct. 31, 1983

PAY TO THE
ORDER OF SZABO FOOD SERVICE INC. \$ 13,005.70

THIRTEEN, THOUSAND AND FIVE-----70/100-----DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, N.Y. 11416

FOR Fundraiser Dinner Sept. 23rd

John M. Donald

AUTH. SIG.

⑈003631⑈ ⑆021000021⑆ 105 4 031563⑈ ⑆0001300570⑆

84040153473

EXHIBIT B

84040153474

Recd
at Stratford
Conn
(2 Williams)
Ave
Edith Davis

Bob Price

Stratford

100 MAUREEN ST.
STRATFORD, CT 06497
(203) 375-7516



October 20, 1983

Congressman Joseph Addabbo
2365 Rayburn Office Building
Washington, DC 20515
Attention: Dick Seelmeyer

Dear Dick:

I have enclosed the total bills for Congressman Joe Addabbo's fund raiser we held on September 23 at Bob Carlson's. In addition to the two enclosed bills, which should be paid directly, I also paid \$195.00 to the musicians, plus \$60.00 for the various parking attendants.

I have enclosed a receipt that the two musicians gave me, (on the back of their business card), but I have no receipt from the parking attendants. I would appreciate it if you could make a check in the amount of \$255.00 payable to me.

I enjoyed working on this personal project, and I just hope it was successful from your standpoint.

Good luck in the future campaign.

Best regards,


L. R. Churchill

Enclosures

EXHIBIT D

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

352

3630

Oct. 31,

1-3/210/106
83

19

PAY TO THE
ORDER OF

L. R. CHURCHILL

\$ 255.00

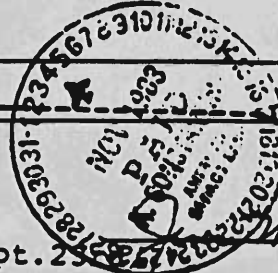
TWO HUNDRED AND FIFTY-FIVE

100/100

DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416



AUTH. SIG.

FOR REIMBURSEMENT FOR Fundraiser Sept. 25

⑈003630⑈

⑈021000021⑈

105 1 031563⑈

⑈0000025500⑈

84040153476

EXHIBIT E

ELECTRIC COMPANY Inc.

DATE Oct. 19, 1983

Congressman Adabo's Fund Raising Reception

YOUR ORDER NO.
1215

DESCRIPTION	TOTAL
Labor- 6 hours @ \$17.75 per hour.	\$106.50

EXHIBIT F

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABO
96-11 101ST AVENUE
OZONE PARK, NY 11416

239

3662

Nov. 22, 1983 1-2/210/100

PAY TO THE
ORDER OF A AND M ELECTRIC COMPANY

\$ 106.50

ONE HUNDRED AND SIX-----50/100----- DOLLARS



The Chase Manhattan Bank, N.A.
101st Ave. & 97th St.
Ozone Park, N.Y. 11416

FOR Labor for Fundraiser Sept. 23rd.

Jim McDonald AUTH. SIG.

⑈003662⑈ ⑆021000021⑆ 105 1 031563⑈ ⑆0000010650⑆

84040153178

EXHIBIT G

TOWN OF AVON

October 13, 19

TOWN OFFICES
Avon, Connecticut

Sold To Congressman Addabbo Reception Fund
c/o Jim McDonald
9311 Woodland Drive
Silver Springs, Maryland 20910

POLICE SERVICES

9-23-83

"

4
4

hrs. Officer Barnett - 337 Waterville Rd.
" " LeMay

56 00

56 00

112 00

Tax

8 40

Amount Due:

120 40

Kindly remit to:

Town of Avon
60 West Main St.
Avon, CT 06001

Att: M. Kost

84040153479

EXHIBIT H

COMM. FOR CONGRESSMAN,
JOSEPH P. ADDABBO
96-11 101ST AVENUE
OZONE PARK, NY 11416

394

1-2/218/1

Oct. 20, 19 83

PAY TO THE
ORDER OF TOWN OF AVON

\$ 120.40

ONE HUNDRED AND TWENTY-----40/00-----DOLL



The Chase Manhattan Bank, N.A.
101st Ave. & 87th St.
Ozone Park, N.Y. 11416

FOR

9/23/83-Fundraiser Reception

Jim McDonald

⑆003943⑆ ⑆021000021⑆ 105 1 034863⑆

84040153130

8 4 0 4 0 4 5 3 4 8 1

72

PLEASE FILE AND RETURN

ONE COPY STAMPED

"Filed" or "Received"

to Scott Gilbert, Rm 1117-A.

Thank you.

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Tel 523-4073

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS / JODY C. RANSOM *JCR*

DATE: FEBRUARY 17, 1984

SUBJECT: MUR 1612 - First General Counsel's Report
signed February 15, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, February 16, 1984.

There were no objections to the First General Counsel's Report at the time of the deadline.

84040153432



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CW*
DATE: February 16, 1984
SUBJECT: MUR 1612 - First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection [X]
Sensitive [X]
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

84040153493

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT 84 FEB 16 AIO: 17

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2/16/84 - 10:15

MUR # 1612
DATE COMPLAINT RECEIVED
BY OGC 1/4/84
DATE OF NOTIFICATION TO
RESPONDENTS 1/10/84
1/11/84

STAFF MEMBER
Marybeth Tarrant

COMPLAINANT'S NAME: Simeon Golar

RESPONDENTS' NAMES: Congressman Joseph P. Addabbo,
Committee for Congressman Joseph P.
Addabbo,
Louis F. DeSena, Treasurer,
James P. McDonald,
United Technologies Corporation,
Robert J. Carlson,
Northrop Corporation

RELEVANT STATUTE: 2 U.S.C. §§ 439a, 441b, 441c
11 C.F.R. §§ 100.7(b)(6), 102.7(a),
104.14(a), 102.2(a)(2)

INTERNAL REPORTS CHECKED: Reports filed by Committee for
Congressman Joseph P. Addabbo

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Mr. Golar has made the following allegations:

1. The Committee for Congressman Joseph P. Addabbo ("Committee") has violated 11 C.F.R. § 102.2(a)(2) by failing to amend its statement of organization designating James P. McDonald as Assistant Treasurer.
2. Since Mr. McDonald has been signing the reports since 1976, Mr. McDonald is doing more than

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merely assuming "... the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable" pursuant to 11 C.F.R. § 102.7(a).

3. The Northrop Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by making in-kind contributions to the Committee by providing the services of one of its lobbyists, James P. McDonald.
4. Mr. McDonald has violated the Act by making illegal in-kind contributions to the Committee as he was not paid by the Committee for his "...invaluable fundraising services."
5. United Technologies Corporation, a government contractor, has violated 2 U.S.C. §§ 441b and 441c by paying for a fundraiser for Congressman Addabbo, held at the home of one of its employees, Robert J. Carlson.

The complainant also made the following allegations which do not appear to constitute violations of the Act:

1. Congressman Addabbo allowed James P. McDonald to use congressional office space for campaign purposes.
2. Congressman Addabbo may use his excess campaign funds for personal use (which is permitted by 2 U.S.C. § 439(a) since Congressman Addabbo was a member of Congress as of January 1980).
3. The Committee raised a substantial amount of money prior to the primary election.

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4. Congressman Addabbo has described the complainant as "wealthy" and "a millionaire", which the complainant denies.

On January 13, 1984, this Office received a letter from Congressman Addabbo's Administrative Assistant requesting an extension of fifteen days in which to respond to the complaint as Congressman Addabbo was out of the country at the time. This request was also on behalf of Congressman Addabbo's committee, Louis F. DeSena, Treasurer and James P. McDonald. The Office of General Counsel granted the requested extension. On February 8, 1984, this Office received responses from the aforementioned Respondents' counsel.

On January 25, 1984, this Office received a letter from counsel representing United Technologies Corporation and Robert J. Carlson requesting an extension of fifteen days to respond to the complaint as Mr. Carlson was out of the country. The Office of General Counsel granted the requested extension and, accordingly, their response is due on February 15, 1984.

On January 31, 1984, this Office received a response from the Northrop Corporation.

Upon receipt of all responses from the Respondents and analysis of those responses, this Office will make its recommendations to the Commission.

Charles N. Steele
General Counsel

February 15, 1984
Date

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

94040153196

600#1600

LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617

Tarrant

February 7, 1984

34 FEB 8 A10:54

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
James P. McDonald

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violation of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondent appreciates this opportunity to demonstrate in writing that no action should be taken on the basis of this complaint.

First of all, Respondent wishes to associate himself with the written response to these allegations provided to you and the FEC by Respondents Joseph P. Addabbo and Louis F. De Sena. In particular, numbered paragraphs 2 through 6 of the complaint in MUR 1612 make certain allegations directly or indirectly concerning Mr. McDonald's efforts and activities on behalf of the Committee for Congressman Addabbo ("the Committee"). Respondent McDonald would join with Respondents Addabbo and De Sena in their rejoinder to these enumerated paragraphs of the complaint by this specific reference.

Respondent McDonald would like to reiterate and emphasize the point that his various activities over the years for the Committee, acting as custodian of the books and accounts in his role as Assistant Treasurer, providing assistance in fundraising and other campaign tasks, have all been undertaken on a personal voluntary basis without compensation from any third party. Such uncompensated personal voluntary campaign services are, therefore, exempt from the definition of "contribution" in the Act. 2 U.S.C. 431(8)(B)(i). As was pointed out in Co-Respondents' reply,

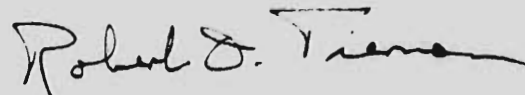
84040153137

certain payments have been made to Mr. McDonald by the Committee. These payments have been either in connection with his control and oversight of the petty cash fund in accordance with 11 CFR 102.11, or as a gratuitous payment by the Committee in lieu of any salary or regular compensation.

Respondent McDonald would also like to respond to the Complainant's apparent allegation that the voluntary contribution of Mr. McDonald's personal services to the Committee was a prohibited corporate contribution to the Committee by the Northrup Corporation. At no time during the period of Respondent McDonald's services to the Committee has Mr. McDonald been an "employee" of the Northrup Corporation. From February 18, 1977 to February 1981, Respondent McDonald (James P. McDonald) was employed by Jack McDonald and Associates (no relation to Respondent McDonald). James P. McDonald's salary during this period was paid by Jack McDonald and Associates. Northrup Corporation was a client of Jack McDonald and Associates, and James P. McDonald followed legislative activities for this client in the House of Representatives and the Senate of the United States as a registered lobbyist. In February 1981, Northrup Corporation contracted with James P. McDonald directly as a private consultant to track legislation before the Congress. Respondent McDonald remained a private consultant to Northrup and a registered lobbyist on their behalf until February 14, 1983, when the relationship was terminated. At no time during the period of Mr. James P. McDonald's association with the Northrup Corporation did he receive any compensation from Northrup for services to the campaign Committee. Any compensation from Northrup to Respondent McDonald was for the work and services rendered to them relating to congressional legislative activities.

Should there be any further questions with regard to this matter, Respondent McDonald would be pleased to answer the FEC's inquiries through his designated Counsel.

Sincerely yours,



ROBERT O. TIERNAN

ROT/deo

LAW OFFICES

9 ROBERT O. TIERNAN

7 SUITE 299

1800 M STREET, N.W.

WASHINGTON, D.C. 20036

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Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

Cc# 1608

LAW OFFICES
ROBERT O. TIERNAN
SUITE 200
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617

Tiernan

31 FEB 8 A10:54

February 6, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612
Joseph P. Addabbo
Louis F. De Sena

Dear Mr. Gross:

This letter is in response to the General Counsel's notice of January 10, 1984 that a complaint had been filed with the Federal Election Commission ("FEC") which alleges that there may have been violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondents appreciate this opportunity to demonstrate, in writing, that no action should be taken on the basis of this complaint, and wish to set forth their reasons, both factual and legal, why the FEC should take no action against them in connection with this matter pursuant to the Act and FEC regulations.

At the outset, Respondents would contend that the complaint in this matter does not meet the factual and legal standards of 2 U.S.C. 437g(a)(1) and 11 CFR 111.4 and should be rejected summarily. It is clear that this complaint is a mere political statement filled with vague, general, nonspecific allegations, most of which are totally out of the purview of the Act and any regulation over which the FEC has jurisdiction. There is no "clear and concise recitation of the facts" which describe a violation of Federal election law, nor is the complaint "accompanied by any documentation supporting the facts alleged". 11 CFR 111.4(d)(3) and (4). In addition, many of the broad unsupported allegations contained in this complaint, even if true in some particular, would not involve any violation of any Federal election law or any other legal proscription.

While entering a general denial to all allegations included in this complaint as violations of any statute or regulation over which the FEC has jurisdiction, Respondents do

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want to specifically address the numbered paragraphs in the complaint and give an appropriate factual and/or legal response.

PARAGRAPH ONE:

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This paragraph merely alleges that Respondent Addabbo's campaign committee, Committee for Congressman Addabbo ("the Committee"), was very successful in its fundraising efforts in the six month period following the 1982 congressional elections. An unspecific general allegation the Committee's fundraising activities over several years have been in violation of Federal election laws and regulations is unsubstantiated by even one factual offering or reference. Respondents would state that they are quite grateful that the hard work and effort which has been devoted by many campaign workers and volunteers has resulted in an enthusiastic response and substantial contributions from political supporters who agree that Congressman Addabbo should be continued in office. All campaign fundraising activities conducted by the Committee have complied with the requirements of the Act and FEC regulations. All campaign contributions and expenditures which were collected and spent during the six month period mentioned in the complaint have been appropriately recorded in the Committee's books and have been set forth on the public record in timely reports filed with the Office of the Clerk, U.S. House of Representatives, and are on file at the FEC. (See, in particular, 1982 Post-General Report at 83HSE/241/0660, 1982 Year-End Report at 83HSE/242/3983, and 1983 Mid-Year Report at 83HSE/248/3400.) In addition, the January 31 Year-End Report covering campaign fundraising activities of the Committee for the period 7/1/83 through 12/31/83 has just been filed in timely fashion for public perusal. In no instance in any of these reports has Complainant - or any other person or the FEC - alleged even one specific citation of a fundraising or contribution violation. Respondents would submit that there has been none.

PARAGRAPH TWO:

Complainant states that a search of FEC records shows no designation of "Jim McDonald" as Assistant Treasurer of the Committee on the Committee's Statement of Organization (Form 1), or any amendment thereto. Complainant is just factually wrong. A cursory review of the FEC microfilm records of the Committee's reports easily accessible to the general public at the FEC Public Records Office would show anyone who inquired that James P. McDonald ("Jim McDonald") has been identified as the Committee's custodian of books and accounts, and as its

Assistant Treasurer, since the original Registration Form and Statement of Organization for the Committee was filed on October 10, 1975. (See 75HSE/85/2740-2741.) Mr. McDonald has remained the Committee's Assistant Treasurer from that time to date.

PARAGRAPH THREE:

Complainant alleges that Mr. McDonald's activities as Assistant Treasurer of the Committee and his signing of Committee reports, whether or not properly designated, constitutes a violation of Federal election law. Respondents would submit that Complainant is legally incorrect and totally misreads the intent and the effect of the applicable rules. FEC regulations specifically state that a political committee may designate "an assistant treasurer who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable." (emphasis added) 11 CFR 102.7(a) Clearly, a proper designation as Assistant Treasurer under this regulation permits the individual to perform all the activities of the Treasurer, including the signing and filing of FEC reports. In fact, the FEC in its Campaign Guide for Corporations and Labor Organizations (January 1982 at page 4) contemplates a properly designated Assistant Treasurer signing FEC reports and gives this advice to committees while citing 11 CFR 102.7(a): "Assistant Treasurer - Recommended An SSF may name an assistant treasurer who acts as treasurer when the treasurer is unavailable or when there is a vacancy in that office. Note that, in the absence of the treasurer, only a designated assistant treasurer may sign reports and statements and assume other responsibilities of the treasurer. 102.7(a)." (emphasis in the original).

Mr. McDonald has been properly designated as Assistant Treasurer of the Committee and is conducting his various activities for the Committee within the scope of 11 CFR 102.7(a), including the signing of Committee reports.

PARAGRAPH FOUR:

Complainant alleges that James P. McDonald's services to the Committee are illegal campaign contributions by him and the Northrup Corporation in excess of any applicable contribution limits or prohibitions. Complainant cites no specific factual or legal basis for such a charge other than stating that Mr. McDonald has assisted the Committee in

campaign fundraising and other activities.

Respondents have great respect for Mr. McDonald and value his services to the Committee as Assistant Treasurer highly, including his duties as custodian of the books and accounts, as well as his fundraising talents. However, the Committee and Respondents have at all times accepted Mr. McDonald's services on a personal voluntary basis uncompensated by a third party employer. Where, as here, all campaign work has been done on a voluntary basis, and there has been no compensation by any third person or corporation to permit Mr. McDonald to work on campaign recordkeeping and fundraising, there can be no violation of Federal election laws concerning contribution limitations.

There is no statute or regulation which requires the Committee to eschew voluntary personal campaign services and to compensate each and every volunteer with Committee funds. In fact, the applicable law is exactly the opposite and is written to clearly encourage individuals to volunteer their time and energy to the political process. The Act specifically excludes "the value of services provided without compensation by any individual who volunteers on behalf of a candidate or political committee" from the definition of a "contribution" 2 U.S.C. 431(8)(B)(i).

Nothing in this paragraph supports an allegation that Mr. McDonald's services have been other than voluntary personal services, or that he has been compensated by a third party such as Northrup Corporation to perform such services.

PARAGRAPH FIVE:

Complainant alleges that Respondent Addabbo has provided "officespace" in his congressional office in Washington, D.C. for Mr. McDonald to "transact his campaign fundraising for ADDABBO and other business activities". While it is unclear as to what specific violation of any statute or regulation within the jurisdiction of the FEC that Complainant alleges, Respondent Addabbo would state categorically that "office space" has not been provided in his Washington, D.C. congressional office to Mr. McDonald in order that Mr. McDonald can conduct "campaign fundraising" and other "business activities". Mr. McDonald is certainly well known to Respondent Addabbo and is familiar with his Washington, D.C. office and staff. He is always welcome in this office. In the course of his duties as Assistant Treasurer of the Committee, Mr. McDonald has from time to time been required to come to the congressional office to obtain some relevant information and/or

documents for the Committee. It is also quite possible that certain of his inquiries in this office have been quite unrelated to the campaign activities of the Committee, and have been appropriate social or professional visits that any public citizen may entertain. There is no basis in the complaint, or in fact or law, to support a finding that this type of irregular, open communication and contact comprises an illegal provision of office space.

PARAGRAPH SIX:

Complainant alleges that the absence of any payment for Mr. McDonald's "invaluable fundraising services" in any filed report, whereas such reports do show Committee payments to Mr. McDonald for expenses in connection with such fundraising activities, constitutes an illegal contribution of services by Mr. McDonald and Northrup Corporation. This paragraph is merely a repetition of the unsubstantiated allegations in PARAGRAPH FOUR. Respondents would offer the same response here as in PARAGRAPH FOUR and would point out again that voluntary personal services are excluded by the Act from the definition of "contribution". 2 U.S.C. 431(8)(B)(i).

It should be noted that those payments to Mr. McDonald which have been made by the Committee and itemized in FEC reports have been made to him for the most part as Custodian of the Committee's petty cash account in accordance with FEC regulations. 11 CFR 102.11 (See, for example, July 31 Mid Year Report for 1983 at 83HSE/247/3921.)

Finally, although the Committee and Respondents have valued Mr. McDonald's services as Assistant Treasurer to the Committee, and have always accepted these services on a personal voluntary basis uncompensated by any third party, the Committee has been able to show its appreciation for these services from time to time by making a single gratuitous payment to Mr. McDonald in lieu of any salary or otherwise agreed upon regular compensation from the Committee. An example of such a payment may be found in the January 31 Year End Report for 1982 at 83HSE/242/3986.

PARAGRAPH SEVEN:

In this paragraph, Complainant merely summarizes extant Federal election law, as set forth in the Act and FEC regulations, applicable to the use of "excess campaign funds". 2 U.S.C. 439a and 11 CFR 113. Complainant states no facts which might constitute a violation of these rules and regulations, nor, in fact, alleges any violation of any legal requirement. Respondents would agree.

PARAGRAPH EIGHT:

Complainant alleges that a fundraising event held at the home of Robert J. Carlson for Respondent Addabbo last year constituted an illegal campaign contribution by Mr. Carlson and United Technologies Corporation, and possible other unidentified individuals and corporations.

Respondents assert that the fundraising event in question was, in fact, an event sponsored and put on by the Committee on September 23, 1983 at the private residence of Mr. Robert J. Carlson in Connecticut - or more precisely, in the backyard of Mr. Carlson's residence. All costs and expenses associated with this fundraiser were billed and paid for by the Committee. The relevant expenditures made by the Committee for this event have been appropriately reported - and where required, itemized - in the January 31 Year End Report for 1983, which was timely filed and is presently available for public inspection in the Public Records Office at the FEC. (See, for example, the itemized entry on page 8 of Schedule B of this report which shows the payment of \$13,005.00 on 10/31/83 to Szabo Food Services, Inc., 400 Main Street, East Hartford, Connecticut 06118 for food services provided in connection with a fundraiser on 9/23/83.)

Likewise, all contributions which were received for the fundraiser were solicited from individuals or persons who are permitted to make contributions under the Act. These contributions have been received and recorded by the Committee, and have been appropriately reported in the January 31 Year End Report for 1983. Complainant makes no specific factual showing or allegation of contributions from identified prohibited sources, and the Respondents would state that there were none.

The Committee and Respondents are most grateful to Mr. Carlson for his support and the use of his backyard for this September 1983 fundraiser. Mr. Carlson is a most respected gentleman, and the Committee and Respondents were most pleased that Mr. Carlson voluntarily provided the Committee with the use of his real property, his residential premises, and his voluntary personal services in connection with the Committee's candidate-related activity. Such voluntary use of real or personal property, in particular an individual's residential premises, is specifically excluded from the Act's definition of "contribution". 2 U.S.C. 431(8)(B)(ii). The voluntary provision of Mr. Carlson's residence and backyard for this campaign fundraising event is not a prohibited or limited contribution or expenditure under 11 CFR 100.7(b)(4) and 100.8(b)(5), since all other food, beverage and other incidental costs were authorized and paid for by the Committee.

Finally, with regard to Complainant's final sentence in PARAGRAPH EIGHT, Respondents would contend that this is purely a political statement which sets forth no facts nor alleges any violation of any rule or regulation within the jurisdiction of the FEC.

PARAGRAPHS NINE, TEN, ELEVEN & TWELVE:

In response to the final four paragraphs of this complaint, Respondents would merely state that these paragraphs are a continuation of the political hyperbole and campaign rhetoric which make up the body of this complaint. As a practical and legal matter, these paragraphs are devoid of any specific factual offerings which, even if assumed to be true, would constitute a violation of any law or regulation. Furthermore, this final portion of the complaint does not even purport to set forth allegations of any violation of the Act or FEC regulations which are the only standards which are within the enforcement purview of the Federal Election Commission.

Respondents appreciate this opportunity to demonstrate that no action should be taken against them on the basis of this complaint titled MUR 1612. As has been shown in this response, Respondents contend that there is no basis in fact or in law contained in this complaint to support a violation of any statute or regulation within the jurisdiction of the FEC, and therefore this complaint should have been dismissed summarily. Respondents also believe that on the basis of the items set forth in the complaint and the rejoinders in this response, the General Counsel should now forward to the Commission a recommendation that the FEC finds no reason to believe that any of the Respondents in this matter (MUR 1612) have committed, or is about to commit, a violation of statutes or regulations over which the Commission has jurisdiction.
11 CFR 111.7

Should there be any further questions with regard to this matter, Respondents would be happy to answer the FEC's inquiries through their designated Counsel.

Sincerely yours,



ROBERT O. TIERNAN

3 1 0 1 0 1 5 3 4 9 7

ROBERT O. TIERNAN
1800 M Street, N.W.
Suite 299
Washington, D.C. 20036

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

NORTHROP

Senior Vice President and General Counsel

January 30, 1984

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Steele:

In response to your letter of January 11, 1984, Northrop Corporation ("Northrop") denies each and every material allegation set forth in Mr. Simeon Golar's complaint filed with the Federal Election Commission, insofar as such allegations do or may relate to Northrop.

It is our understanding that those allegations in Mr. Golar's complaint possibly relating to Northrop are as follows:

1. That James McDonald, as an employee of Northrop, assisted Joseph Addabbo in raising campaign funds, and that such activities constituted illegal campaign contributions by Northrop;
2. That Mr. McDonald was not reimbursed by Mr. Addabbo for his fundraising activities and thus they should be considered illegally donated campaign contributions by Northrop.

Please be advised of the true facts relating to the above allegations, as established in Northrop's normal business records and as reflected in discussions with Northrop employees likely to have knowledge concerning such allegations.

1. James McDonald was never an employee of Northrop Corporation. In February 1977, Northrop entered into a consulting agreement with Jack McDonald Associates, with James McDonald providing the services required thereunder. The agreement described consultant duties as follows:

Call 1532
Tarrant
Mik 1612
10:07

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- maintain contact with Congressional leaders and committee staffs, promote Northrop products and services by providing information on programs and proposals made to the agencies and departments of the U.S. Government;
- maintain periodic contact with the committees having jurisdiction over those departments and agencies with which Northrop conducted business;
- have familiarity with Northrop products and programs and maintain a working relationship with Company staff members in the Eastern Regional Office.

The consulting agreement was renewed on an annual basis over a period of six years and each time the above described duties were reviewed. The duties required under the consulting agreement remained unchanged during the six-year period. Beginning in February 1981, James McDonald contracted as a consultant directly with Northrop. Northrop paid the consultant fee in monthly increments under all of the above referenced contracts from February 1977 to February 1983, at which time the contract was not renewed. James McDonald has provided no services to Northrop since that time.

2. The consulting agreement required full compliance with the Company's policies and all applicable laws, rules, regulations and express public policy when rendering services for the Company of which Mr. McDonald was appropriately apprised. Mr. McDonald submitted regular reports to Northrop describing his activities for the Company. Neither the duties required under the contract nor the regular reports reflected in any manner any of the actions alleged by Mr. Golar.
3. The allegations have been discussed with Northrop employees likely to be aware of any of these alleged actions, and we found no Northrop knowledge concerning Mr. McDonald's alleged personal activities.
4. Under the agreement Northrop paid Jack McDonald Associates and James McDonald \$18,000 to \$22,000 annually, depending on the particular year in question. During the time Mr. McDonald rendered services for Northrop we believe he also represented several other clients. Consequently, it is our belief that his relationship with Northrop was on a part-time consultant basis only.

94040153179

5. Based on the above, I conclude that Northrop had no prior knowledge of Mr. McDonald's alleged activities. If he in fact performed such activities, they were not on behalf of or at the behest of Northrop Corporation but in his own personal capacity.

Based on the above facts, any further inquiry involving Northrop is unnecessary and would be unproductive. Therefore, to avoid further burdens on either your office or mine, I would suggest that you review our records personally to satisfy yourself that the file and our due diligence was thorough and complete.

Very truly yours,

William M Elliott

William M. Elliott

WME:jm

84040153500

Northrop Corporation
1800 Century Park East
Century City
Los Angeles, California 90067

84 JAN 31 AM 11:37

HAND DELIVERED

Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20463

VIA: BURLINGTON AIR EXPRESS - RUSH - OVERNIGHT DELIVERY

NORTHROP

RECEIVED AT THE FED

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84 FEB 2 A8: 24 1544

Mur 1612
Varrant

LAW OFFICES
ROBERT O. TIERNAN
SUITE 800
1800 M STREET, N.W.
WASHINGTON, D.C. 20036
(202) 638-6617
January 31, 1984

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1612

Dear Mr. Gross:

Enclosed you will find appropriate Statement(s) of Designation of Counsel for Respondents James P. McDonald and Louis F. De Sena in the above referenced matter.

As designated counsel for these two Respondents, a response to the complaint in MUR 1612 will be filed on their behalf on or before February 9, 1984.

Thanking you for your attention in this matter, I am,

Sincerely,

Robert O. Tiernan

ROBERT O. TIERNAN

ROT/deo
Enclosures

84040153372

STATEMENT OF DESIGNATION OF COUNSEL

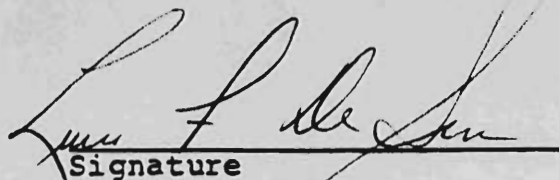
NAME OF COUNSEL: Robert O. Tiernan
David E. Osterhout

ADDRESS: 1800 M Street, N.W.
Suite 299
Washington, D.C. 20036

TELEPHONE: (202) 638-6617 _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

January 31, 1984
Date


Signature

NAME: Louis F. De Sena

ADDRESS: 96-11 101st Avenue
Ozone Park, New York 11416

HOME PHONE:

BUSINESS PHONE:

9404015353

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Robert O. Tiernan
David E. Osterhout

ADDRESS: 1800 M Street, N.W.
Suite 299
Washington, D.C. 20036

TELEPHONE: (202) 638-6617

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

January 27, 1984
Date

James P. McDonald
Signature

NAME: James P. McDonald

ADDRESS: 1120 - 20th Street, N.W.
Suite S-520
Washington, D.C. 20036

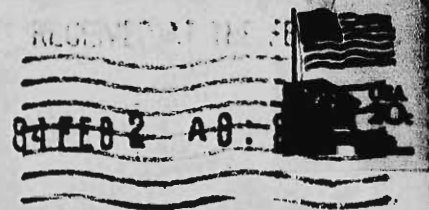
HOME PHONE: 301 588 2485

BUSINESS PHONE: 202 887 0256

81040153574

340401505

LAW OFFICES
ROBERT O. TIERNAN
SUITE 299
1800 M STREET, N.W.
WASHINGTON, D.C. 20036



Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 27, 1984

Scott D. Gilbert, Esq.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044

Re: MUR 1612
United Technologies Corporation
Robert J. Carlson

Dear Mr. Gilbert:

This is in reference to your letter dated January 25, 1984, requesting an extension of fifteen days to respond to the complaint filed with the Federal Election Commission which alleges violations of the Federal Election Campaign Act of 1971, as amended, by the above named Respondents.

The General Counsel has granted the extension and, therefore, this office will expect your response on or before February 15, 1984. If you have any questions, please contact Marybeth Tarrant at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name.

By: Kenneth A. Gross
Associate General Counsel

94040153506



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert O. Tiernan, Esquire
1800 M Street, N.W.
Washington, D.C. 20036

Re: MUR 1612
Congressman Joseph P. Addabbo
Committee for Congressman
Joseph P. Addabbo
Louis F. DeSena, Treasurer
James P. McDonald

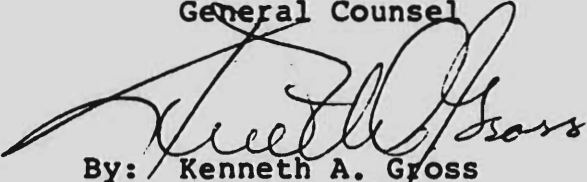
Dear Mr. Tiernan:

This is in reference to Mr. Dick Seelmeyer's letter, dated January 9, 1984, requesting an extension of fifteen days to respond to the complaint filed with the Federal Election Commission which alleges violations of the Federal Election Campaign Act of 1971, as amended, by the above-named Respondents.

The General Counsel has granted the requested extension and, therefore, this office will expect your response on or before February 9, 1984. If you have any questions, please contact Marybeth Tarrant at 523-4057.

Sincerely,

Charles N. Steele
General Counsel


By: **Kenneth A. Gross**
Associate General Counsel

cc: Dick Seelmeyer

8404015377

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P. O. BOX 7566

WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-8600

WRITER'S DIRECT MAIL NUMBER

202/662-5498

BY HAND

TWX: 710 662-8600 (CS WSH)
TELEX: 66-662 (COVLINE WSH)
TELECOPIER: (202) 662-8600
CABLE: COVLINE

January 25, 1984

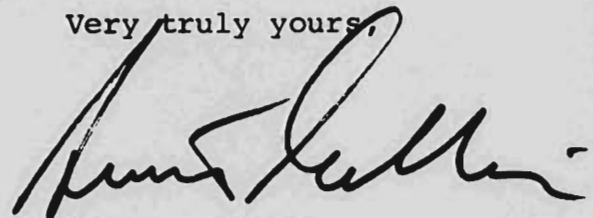
Marybeth Tarrant, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1612

Dear Ms. Tarrant:

This firm represents the respondents United Technologies Corporation and Robert J. Carlson in the above-entitled MUR. United Technologies received the complaint in this matter on January 16, 1984, and Mr. Carlson received the complaint on January 23, 1984. Due to recent traveling by Mr. Carlson outside of the United States, we will be unable to respond on behalf of either respondent within the initial 15-day period. I therefore request an additional 15 days from the due date of United Technologies' response in which to file a response on behalf of Mr. Carlson and United Technologies Corporation. Given the unavailability of our client and the fact that the alleged questionable conduct by Mr. Carlson and United Technologies already has occurred, we believe that such an extension of the time in which we are to respond will enable the Commission more fully to consider this matter and thereby serve the public interest.

Very truly yours,



Scott D. Gilbert

SDG:lk

9404015358

25 P 3:45

62-1489

8 4 0 4 0 4 5 3 5 0 9

PLEASE RETURN ONE COPY

STAMPED "Filed" or

"Received" to Scott Gilbert.

Thank you. L.

BY HAND

Scott D. Gilbert
COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044

Marybeth Tarrant, Esq.
Federal Election Commission
1325 K Street, N.W.
Seventh Floor
Washington, D.C. 20463

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044

STATEMENT OF DESIGNATION OF COUNSEL

GCC#1450

MURK 12
TANANT

NAME OF COUNSEL: Richard Brady
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044

ADDRESS:

TELEPHONE: (202) 662-6000

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

UNITED TECHNOLOGIES CORPORATION

January 16, 1984
Date

By R. M. Bougie
Signature
Roger M. Bougie

NAME: UNITED TECHNOLOGIES CORPORATION

ADDRESS: United Technologies Building
Hartford, Connecticut 06101

HOME PHONE:

BUSINESS PHONE: (203) 728-7000

84040153510

8 4 0 4 4 5 3 5 1 1



**UNITED
TECHNOLOGIES**

United Technologies Building
Hartford, Connecticut 06101 U.S.A.

**Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463**

**Attention: Kenneth A. Gross
Associate General Counsel**

EASTERN CONNECTION

BILL OF LADING

H11857

PICK UP DATE <i>1/18/84</i>	PICK UP AGENT <i>C. J. [unclear]</i>	ACCOUNT NO.
--------------------------------	---	-------------

SHIPPING INFORMATION	
FROM (SHIPPER): R. M. Dougie UNITED TECHNOLOGIES	

PICKUP ADDRESS ONE FINANCIAL PLAZA	ROOM/FLOOR
--	------------

HARTFORD, CT 06103	
---------------------------	--

TELEPHONE NO.

SPECIAL INSTRUCTIONS DELIVER FRIDAY A.M. 1/20/84
--

(54-65)	
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NO. OF PIECES	TYPE OF SERVICE		WEIGHT	SHIPPER REFERENCE
1	LOCAL	OVERNIGHT	1#	Printed Matter

DELIVERY INFORMATION

TO (CONSIGNEE COMPANY) Federal Election Commission
--

COMPANY NAME (TO CONSIGNEE INDIVIDUAL): Attention: Kenneth A. Gross Associate Gen'l Counsel

DELIVERY ADDRESS 1325 K Street, N.W.	ROOM/FLOOR
--	------------

Washington, D. C. 20463

TIME OF DELIVERY	DELIVERY AGENT
------------------	----------------

CONSIGNEE SIGNATURE (RECEIVED IN GOOD ORDER)
--

BASE CHARGE

EXCESS WEIGHT

EXTRA MILEAGE

WAITING TIME

SPECIAL REQUEST

INSURANCE CHARGE

**CALL FOR
PICK-UP**
BETWEEN 9:00 AM-6:00PM
MONDAY through FRIDAY
525-8666

TERMS
SHIPMENTS ARE INSURED AGAINST LOSS OR DAMAGE DURING ANY TYPE OF TRANSPORTATION FOR THE ACTUAL VALUE OF THE PACKAGE UP TO A LIMIT OF \$300
SHIPPER IS REQUIRED PRIOR TO TENDERING PACKAGE TO OBTAIN ADDITIONAL INSURANCE FOR COVERAGE IN EXCESS OF \$300
A VALUE IN EXCESS OF \$300 SHALL BE AT THE RISK OF SHIPPER UNLESS OTHERWISE PROVIDED AND ADDITIONAL CHARGES PAID FOR BY THE SHIPPER

**TOTAL
CHARGES**

RECIPIENT COPY

8 4 0 4 0 1 5 3 5 1 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

RETURNED TO SENDER

REASON: ☐ Unclaimed ☐ Refused
☐ Addressee unknown
☐ Insufficient Address
☐ No such street number
☐ No such office in state
☐ Do not remain in this envelope

over 1 year



Postage and Fees Paid
Federal Election Commission

CERTIFIED

943970

Robert J. Carlson
Clatter Valley Ridge
Metacomet Road
Farmington, CT 06032

Letter resent to Mr. Carlson
at his business address

1/16/84 - Warrant - Rec'd 1/17/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



REASON FOR RETURN
Unclaimed _____
Addressee unknown _____
Insufficient Address _____
No such street _____ number _____
No such office in state _____
Do not re-mail in this envelope

over 1 year

CERTIFIED

94587

~~Robert J. Carlson
Clatter Valley Ridge
Metacomet Road
Farmington, CT 06032~~



Postage and Fees Paid
Federal Election Commission

1612 - Warrant - Rec'd 1/17/84

CERTIFIED

PS Form 3811, July 1962

- **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☒ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..
 2. ☐ **RESTRICTED DELIVERY**
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. **ARTICLE ADDRESSED TO:** Robert J. Carlson
 Clatter Valley Ridge
 Metacomb Road
 Farmington, CT 06032

4. **TYPE OF SERVICE:**

- ☐ REGISTERED ☐ INSURED
☒ **CERTIFIED** ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

S43973

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent5. **DATE OF DELIVERY****POSTMARK**
(may be on reverse side)6. **ADDRESSEE'S ADDRESS** (Only if requested)7. **UNABLE TO DELIVER BECAUSE:**7b. **EMPLOYEE'S INITIALS**

RETURN RECEIPT

MUR 1612 - Varrant



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harry J. Gray, President
United Technologies Corporation
United Technologies Building
Hartford, CT 06101

Re: MUR 1612

Dear Mr. Gray:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that your corporation may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your corporation in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

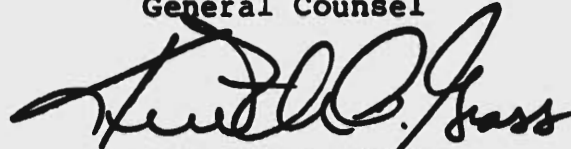
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marybeth Tarrant the attorney assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

PS Form 3811, July 1982

• **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☒ Show to whom and date delivered
☐ Show to whom, date, and address of delivery

2. ☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.)

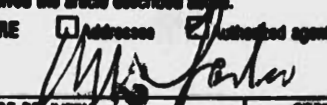
TOTAL \$

3. ARTICLE ADDRESSED TO: Harry J. Gray, Pres
United Technologies Corp.
United Technologies Building
Hartford, CT 06101

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COO
☐ EXPRESS MAIL

ARTICLE NUMBER
84-570

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent


5. DATE OF DELIVERY
JAN 16 1984

POSTMARK
(only to be on reverse side)

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

MJR 1612 - Tarrant

★ GPO: 1982-570-503

840153517



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Carlson
Clatter Valley Ridge
Metacomet Road
Farmington, CT 06032

Re: MUR 1612

Dear Mr. Carlson:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Marybeth Tarrant the attorney assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

MUR 1612 - Tarrant

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery
(CONSULT POSTMASTER FOR RESTRICTED DELIVERY)

2. ARTICLE ADDRESSED TO:
*Robert J. Carlson, Exec VP
United Technologies Corp.
Building
Hartford, CT 06101*

3. ARTICLE DESCRIPTION:
REGISTERED NO. _____ CERTIFIED NO. *943997* INSURED NO. _____

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
M. Tarrant

4. DATE OF DELIVERY *JAN 23 1984* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas V. Jones, Chairman
Northrop Corporation
1800 Century Park East
Los Angeles, CA 90067

Re: MUR 1612

Dear Mr. Jones:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that your corporation may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your corporation in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

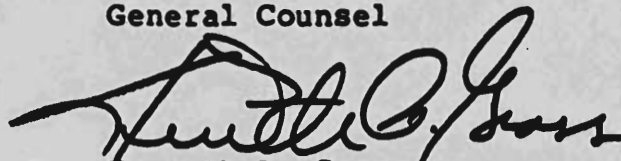
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marybeth Tarrant the attorney assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

PA Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.	
(CONSULT POSTMASTER FOR FEES)	
1. The following service is requested (check one): <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery	
2. <input type="checkbox"/> RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)	
TOTAL \$	
3. ARTICLE ADDRESSED TO: Thomas V. Jones, Chair Northrop Corp. - 1800 Century Park East Los Angeles, CA 90067	
4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
5. DATE OF DELIVERY 1-16-84	POSTMARK (may be on reverse side)
6. ADDRESSEE'S ADDRESS (Only if requested) Art 3 letter	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

Mur 1612 - Tarrant



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 10, 1984

HAND DELIVERY

Congressman Joseph P. Addabbo
2365 Rayburn House Office Building
Washington, D.C. 20515

Re: MUR 1612

Dear Congressman Addabbo:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

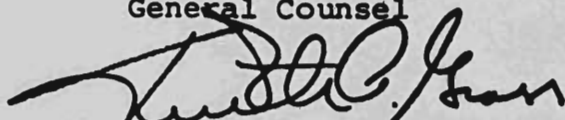
Page -2-

Letter to Congressman Joseph P. Addabbo

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040153523



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 10, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James P. McDonald, Assistant Treasurer
Committee for Congressman
Joseph P. Addabbo
96-11 101st Avenue
Ozone Park, New York 11416

Re: MUR 1612

Dear Mr. McDonald:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Page -2-
Letter to James P. McDonald,
Assistant Treasurer

If you have any questions, please contact Marybeth Tarrant,
the staff member assigned to this matter at (202) 523-4057. For
your information, we have attached a brief description of the
Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

PS Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.	
(CONSULT POSTMASTER FOR FEES)	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery .. 2. <input type="checkbox"/> RESTRICTED DELIVERY <small>(The restricted delivery fee is charged in addition to the return receipt fee.)</small>	
TOTAL \$	
3. ARTICLE ADDRESSED TO: James McDonald Asst Treas Cmte for Congressman Addabbo 96-11 101st Avenue Ozone, New York 11416	
4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER 943975
<small>(Always obtain signature of addressee or agent)</small>	
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent	
5. DATE OF DELIVERY 1/15	POSTMARK <small>(May be different date)</small> JAN 15 1983 ST. NICK
6. ADDRESSEE'S ADDRESS (Only if required)	
7. UNABLE TO DELIVER BECAUSE:	

RETURN RECEIPT

U.S. POSTAL SERVICE
© 1982-870-600

MUR 1612 - Tarrant (1-10-84)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 10, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis F. DeSena, Treasurer
Committee for Congressman
Joseph P. Addabbo
96-11 101st Avenue
Ozone Park, New York 11416

Re: MUR 1612

Dear Mr. DeSena:

This letter is to notify you that on January 4, 1984 the Federal Election Commission received a complaint which alleges that the Committee for Congressman Joseph P. Addabbo and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1612. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

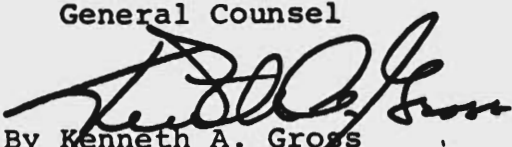
If you and your committee intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Page -2-
Letter to Louis F. DeSena, Treasurer

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

cc: Congressman Joseph P. Addabbo

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statemen

PS Form 3811, July 1982

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.	
(CONSULT POSTMASTER FOR FEES)	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery .. 2. <input type="checkbox"/> RESTRICTED DELIVERY <small>(The restricted delivery fee is charged in addition to the return receipt fee.)</small>	
TOTAL \$	
3. ARTICLE ADDRESSED TO: Louis DeSena, Treas Cmte for Congressman Addabbo 96-11 101st Avenue Ozone, New York 11416	
4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER 063876
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent	
5. DATE OF DELIVERY 1/16	POSTMARK JAN 16 1984
6. ADDRESSEE'S ADDRESS (Only if requested)	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS JC

RETURN RECEIPT

* GPO: 1982-379-583

MUR 1612 - Tarrant

8404015337

JOSEPH P. ADDABBO
9TH DIST., NEW YORK

REPLY TO:
2308 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-3461

DISTRICT OFFICE:
96-11 101ST AVENUE
OZONE PARK, NEW YORK 11416

Congress of the United States
House of Representatives
Washington, D.C. 20515

January 10, 1983

PERSONAL AND UNOFFICIAL

Mr. Kenneth Gross, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D. C.

Dear Mr. Gross:

Please be advised that via a transatlantic telephone conversation with Congressman Addabbo he has authorized me to ask Attorney Robert O. Tiernan of Washington, D. C., to prepare a response on his behalf before the F.E.C.

Until Mr. Tiernan and the Congressman can meet upon the Congressman's return to the United States, Mr. Tiernan will be restricted to collecting background which will be necessary for filing an adequate response. Nevertheless, Congressman Addabbo would appreciate it if the F.E.C. would consider Mr. Tiernan as acting on his behalf until such time as the Congressman can sign the proper form and return it to your office.

With best regards, I remain

Sincerely yours,

Dick Seelmeier
RICHARD SEELMEYER,
ADMINISTRATIVE ASSISTANT

600 1434
ADMINISTRATIVE ASSISTANT
DICK SEELMEYER

COMMITTEE ON
APPROPRIATIONS
SUBCOMMITTEE:
CHAIRMAN, DEFENSE
TREASURY-POST OFFICE
MILITARY CONSTRUCTION
COMMITTEE ON
SMALL BUSINESS

MUR 1612
Tarrant

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Congress of the United States

House of Representatives

Washington, D.C. 20515

~~XXXXXXXXXXXX~~

PERSONAL AND UNOFFICIAL

Mr. Kenneth Gross, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D. C.



ALWAYS
USE ZIP
RECEIVED

Joseph P. ...

84 JAN 17 MAB:



JOSEPH P. ADDABBO
6TH DIST., NEW YORK

REPLY TO:
2305 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-3461

DISTRICT OFFICE:
96-11 101ST AVENUE
CRONE PARK, NEW YORK 11416

Congress of the United States
House of Representatives
Washington, D.C. 20515

January 9, 1984

PERSONAL AND UNOFFICIAL

Mr. Kenneth Gross, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D. C.

Dear Mr. Gross:

As a follow up to our telephone conversation this morning, this letter is to request a fifteen day extension period for Congressman Addabbo to respond to the charges filed by his primary opponent, Simeon Golar.

As I indicated, Mr. Addabbo is leading a Congressional fact-finding mission overseas, which is not due back until January 22nd. It would be impossible for him to learn the specific charges, consult with counsel and respond to the complaint in the standard period.

It is probable the Congressman and his campaign will be able to respond to the charges filed against him in a shorter period, but in deference to the importance these sorts of things might play in the eventual outcome of the campaign, I would request in his name the entire fifteen day period.

With best personal regards, I remain

Sincerely yours,

Dick Seelmeier

DICK SEELMEYER
ADMINISTRATIVE ASSISTANT

ADMINISTRATIVE ASSISTANT
DICK SEELMEYER

COMMITTEE ON
APPROPRIATIONS

SUBCOMMITTEES:
CHAIRMAN, DEFENSE
TREASURY-POST OFFICE
MILITARY CONSTRUCTION

COMMITTEE ON
SMALL BUSINESS

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Summit

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Congress of the United States

House of Representatives

Washington, D.C. 20515

XXXXXXXXXXXX

PERSONAL AND UNOFFICIAL

Mr. Kenneth Gross, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D. C.





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 6, 1984

Simeon Golar
Attorney at Law
90 Broad Street
New York, New York 10004

Dear Mr. Golar:

This letter is to acknowledge receipt of your complaint which we received on January 4, 1984, against Congressman Joseph P. Addabbo, Louis F. DeSena, James P. McDonald, Robert J. Carlson and United Technologies Corporation which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Cheryl Thomas at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

By

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Enclosure

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RECEIVED AT THE FEC
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mur 1612

SIMEON GOLAR
ATTORNEY AT LAW
90 BROAD STREET
NEW YORK, N.Y. 10004

(212) 425-4460

January 3, 1983

Charles N. Steele, Esq.,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: Complaint against
Congressman Joseph P. Addabbo

Dear Sir:

Enclosed please find the original and three copies
of my complaint against Congressman Joseph P. Addabbo,
Sixth Congressional District, Queens County, New York,
and others.

Very truly yours,



Simeon Golar

SG:cjo
Encls.

8404015333

FEDERAL ELECTION COMMISSION
WASHINGTON, DISTRICT OF COLUMBIA

-----X

SIMEON GOLAR,

Complainant,

-against-

COMPLAINT

JOSEPH P. ADDABBO, LOUIS F. DE SENA,
JAMES P. McDONALD a/k/a JIM McDONALD,
ROBERT J. CARLSON and UNITED TECHNOLOGIES
CORPORATION,

Respondents.

-----X

TO THE GENERAL COUNSEL:

Complainant, SIMEON GOLAR, residing at 85-08 Avon Street,
County of Queens, City and State of New York alleges as follows:

1. On information and belief, respondent JOSEPH A. ADDABBO's campaign committee had in the first six months following the 1982 elections raised more money than any other member of the House. The source of complainant's information and the basis for his belief is the New York Times of September 19, 1983. Complainant believes that the campaign fundraising activities by and on behalf of Congressman ADDABBO for a period of several years have been in violation of federal election laws and regulations promulgated thereunder.

2. Respondent ADDABBO's campaign committee heretofore designated LOUIS F. DE SENA committee treasurer. However, since January 1976, one "JIM McDONALD" has filed all reports as "assistant treasurer." A search of the records of the Federal Election Commission by complainant's agents reveals no prior designation of an assistant treasurer on the committee's Statement of Organization or any amendment thereto.

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3. While the Regulations provide for the possible designation of an assistant treasurer "who shall assume the duties and responsibilities of the treasurer in the event of a temporary or permanent vacancy in the office or in the event the treasurer is unavailable," (Sec. 103.7(a)), clearly the regular performance of the duties of treasurer and the filing of reports over a period of years by an assistant treasurer, whether or not properly designated, is in violation of the law.

4. Complainant believes the JIM McDONALD referred to above to be JAMES P. McDONALD, heretofore employed by NORTHRUP CORPORATION as a registered lobbyist from April 7, 1977 to April 1983. Said McDONALD has conducted fundraisers and otherwise assisted JOSEPH P. ADDABBO in raising campaign funds from NORTHRUP CORPORATION and other defense contractors over a period of years. The source of complainant's information is the Congressional Quarterly, dated May 18, 1980, and the Clerk of the House Records. Complainant believes such services by McDONALD to ADDABBO while he was employed by NORTHRUP CORPORATION to have been illegal campaign contributions by McDONALD and by NORTHRUP CORPORATION well in excess of the federal limits for such contributions.

5. On information and belief, JOSEPH P. ADDABBO illegally provided office space in his Washington, D. C. congressional office for JAMES P. McDONALD to transact his campaign fundraising for ADDABBO and other business activities. The source of this information as to McDONALD's use of the ADDABBO congressional office and the basis for complainant's belief is a telephone conversation by complainant's agent with office staff of the said ADDABBO congressional office.

6. According to filed financial reports of the ADDABBO campaign committee, the committee has made financial payments to JAMES P. Mc-

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DONALD from time to time in connection with his said fundraising activities, for reimbursement of expenses. Since no record of payment by the committee for McDONALD's invaluable fundraising services appears in any filed report, such services were illegally-donated campaign contributions by McDONALD and NORTHROP.

7. Pursuant to the Federal Election Law, since Congressman ADDABBO was a congressman prior to January 1980, he is able to retain for his personal use "excess campaign funds." Mr. ADDABBO has from time to time made personal use of excess campaign funds. (See New York Times on or about August 19, 1982.) Further, at this time, more than eight months before any election, Mr. ADDABBO has on hand, according to his filed reports, nearly \$300,000, mostly from the defense industry, which he at will may choose to keep as his personal property.

8. According to the New York Times of December 31, 1983, ROBERT J. CARLSON, president of United Technologies Corporation, gave at his home a "shrimp and champagne" fundraiser for respondent ADDABBO. United Technologies and its subsidiaries are federal defense contractors. Complainant believes the action of CARLSON in the giving of a fundraiser for ADDABBO to have amounted to illegal campaign contributions by himself and United Technologies and/or other individuals and corporations. Further, complainant believes the soliciting and acceptance of such fundraising activities by ADDABBO and his agents from officials of federal defense contracting corporations is an abuse by ADDABBO of his official position, a violation of the public trust, is grossly unethical and represents a clear conflict of interest.

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9. Respondent ADDABBO is the chairman of the Defense Subcommittee of the Appropriations Committee of the House, and as such he has oversight responsibility for congressional defense appropriations. Complainant believes that McDONALD's and others' solicitations from federal defense contractors on behalf of ADDABBO, coupled with ADDABBO's ability to personally retain such funds, is in gross and blatant violation of the law and poses the gravest conflict of interest and other ethical questions.

10. Complainant ran against respondent ADDABBO in the Democratic primary in September, 1982. The campaign period fixed by the State legislature was approximately six weeks. During that period, complainant raised approximately \$10,000 of contributions and spent additional sums from his own funds. However, during the entire campaign, complainant spent less than one-half of the amount the ADDABBO campaign committee had on hand prior to the primary election and before ADDABBO had reason to believe that he would have any opposition. Further, ADDABBO raised substantial additional sums during the primary campaign, and he has raised substantial sums as set forth above.

11. Complainant further states that: During my entire life, I have lived modestly; and I have spent most of my professional career in government. Since 1976, I have enjoyed a fair amount of business success as a practicing lawyer and a developer of government-aided housing in New York City and Atlanta. However, I do not believe that I can be regarded as wealthy; and I certainly cannot begin to match the amounts of money Mr. ADDABBO has on hand and can raise from defense contractors and otherwise for a political campaign, as evidenced by his record to date.

Notwithstanding the foregoing, Mr. ADDABBO has variously re-

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WHEREFORE, complainant requests that a prompt investigation of the fundraising activities of and on behalf of Congressman JOSEPH P. ADDABBO be conducted by the Commission and that any and all other appropriate action be taken.

DOROTHY FARBEN
Notary Public, State of New York
No. 24-4883652
Qualified in Kings County
Commission Expires March 30, 1984



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1612

Date Filmed 4/4/84 Camera No. ---3

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