



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3194

DATE FILMED 5/23/91 CAMERA NO. 4

CAMERAMAN AS

91040842750



U.S. Department of Justice

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 MAY 23 PM 12:45

Washington, D.C. 20530

MAY 18 1990

Pre MLK 232

90 MAY 23 PM 3:26

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Mr. Lawrence R. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Noble:

Several months ago, this office requested the Federal Bureau of Investigation to conduct a preliminary inquiry into an allegation that service employees of a restaurant named Captain George's Seafood House, Inc., had been asked by the restaurant's owners to make large contributions to the 1988 presidential campaign of Michael Dukakis, for which they were later reimbursed from corporate funds.

This investigation was predicated on a routine review of public disclosure reports filed under the Federal Election Campaign Act (FECA). It has now revealed that a number of individuals associated with this restaurant gave personal contributions to the 1988 Dukakis campaign, and that with one exception these contributions appear to have been lawfully made. The one exception was a \$840 reimbursed contribution which a service employee named Abdelaziz Gren was apparently asked by his supervisor, Mik Georgeos, to make.

We have declined prosecution of this matter because it involved a violative amount that is less than the statutory floor for criminal violations of the FECA, and because the investigation conducted by the FBI suggests that the Gren/Georgeos incident was an isolated one.

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Enclosed herewith are copies of pertinent FBI interview reports (FD-302's) pertaining to this matter. This material is referred to the Federal Election Commission for such administrative enforcement as you deem appropriate under 2 U.S.C. § 437g(a).

Sincerely,



Craig C. Donsanto  
Director, Election Crimes Branch  
Public Integrity Section  
Criminal Division

Enclosure

91040842752





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 10, 1990

Craig C. Donsanto, Director  
Election Crimes Branch  
Public Integrity Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530

RE: Pre-MUR 232  
Captain George's Seafood House, Inc.

Dear Mr. Donsanto:

On May 23, 1990, the Commission received information from you related to the above-captioned matter. After reviewing your letter and the pertinent FBI interview reports, we seek your assistance in clarifying the following matters:

1. In your letter you indicate that an individual named Mik Georgeos solicited Abdelaziz Gren for his \$840 reimbursed contribution to the Dukakis campaign. You have provided us with an FBI report for an interview with Michael Georgiou. Are Mik Georgeos and Michael Georgiou two different individuals and, if so, do you have an FD-302 for Mr. Georgeos which you could forward to us?

2. You state that there was an allegation, presumably by Mr. Gren, that service employees of Captain George's were reimbursed by the restaurant's owners. We seek any information or written statements relating to Mr. Gren's allegation, and any report of an FBI interview with Mr. Gren. In addition, we seek any information you have relating to Mr. Gren's location.

We appreciate your assistance in this matter.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

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U.S. Department of Justice

066-7630  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 AUG 28 AM 11:56

Washington, D.C. 20530

AUG 22 1990

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 AUG 28 PM 2:30

Mr. Lawrence R. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Noble:

Re: Captain George's Seafood House, Inc., Pre-MUR 232

I have received your letter dated August 10, 1990, seeking additional factual information concerning the captioned matter, which we referred to the Federal Election Commission last May.

I have sent your letter to Federal Bureau of Investigation Headquarters, with a request that, if possible, the Special Agent who conducted this investigation provide the information that you seek directly to Ms. Lerner.

Sincerely,

Craig C. Donsanto  
Director, Election Crimes Branch  
Public Integrity Section  
Criminal Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

90 SEP -3 AM 10:58

August 24, 1990

POSTMASTER  
U.S. Post Office  
P.O. Box 2215  
Virginia Beach, VA.  
23450

RE: PRE-MUR 232

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Abdelaziz Gren. According to our records, the address was 720 Severn Drive, Virginia Beach, Virginia 23455, as of April 8, 1988.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call me at (202) 376-5690.

Thank you for your assistance.

Sincerely,

*Xavier K. McDonnell*  
Xavier K. McDonnell  
Attorney

Enclosure  
Envelope

8/30/90

GOOD AS ADDRESSED, NO CHANGE FILED.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
90 SEP -5 AM 10:11

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90 NOV 29 PM 12:10

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

Pre-MUR 232  
STAFF MEMBER: Xavier K. McDonnell

**SOURCE:** INTERNALLY GENERATED  
**RESPONDENTS:** Michael Georgiou  
Abdelaziz Gren  
**RELEVANT STATUTE:** 2 U.S.C. § 441f  
**INTERNAL REPORTS CHECKED:** Disclosure Reports  
**FEDERAL AGENCIES CHECKED:** U.S. Department of Justice  
Federal Bureau of Investigation

**I. GENERATION OF MATTER**

This matter was referred to the Commission by the U.S. Department of Justice.

**II. FACTUAL AND LEGAL ANALYSIS**

**A. Applicable Law**

The Federal Election Campaign Act of 1971, as amended (the "Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. Under the Commission's regulations, a contribution in the name of another includes giving money or

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anything of value, all or part of which is provided to the contributor by another person without disclosing the source of the money to the recipient committee at the time the contribution is made. 11 C.F.R. § 110.4(b)(2)(i). The regulations also provide that no person shall knowingly help or assist in making a contribution in the name of another. 11 C.F.R. § 110.4(b)(1)(iii).

**B. Analysis**

Abdelaziz Gren and Khalil Amad alleged that the owners and managers of Captain George's Seafood House, Inc. ("Captain George's") engaged in illegal campaign activities on behalf of the Dukakis for President Committee (the "Committee"). Gren and Amad, who were employees of Captain George's, made the allegations during a voluntary appearance to an office of the Federal Bureau of Investigation ("F.B.I.") on August 24, 1988.

Amad and Gren alleged that on January 4 1988, Mik Georgiou, a manager of the Captain George's, gave them each Dukakis campaign shirts, and requested that they each contribute \$10 to the Committee. Attachment 1 at page 7.<sup>1</sup> On January 15, 1988, John Charalambous, an owner of Captain George's, solicited and obtained \$100 contributions from Amad and Gren. Id. In April of 1988,

1. Within the referral, references are made to a Mik Georgios. Attachment 1 at pages 1, 7 and 8. Elsewhere in the referral, references are made to a Michael Georgiou. These two names appear to represent one individual. The confusion may have occurred in translation or may be the result of a misspelling. In any event, the Committee's reports disclose contributions from an individual named Michael Georgiou. That spelling is used throughout this Report.

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Georgiou is alleged to have approached Gren and asked him how much of a contribution he could make to the Committee. Gren told Georgiou he could contribute another \$30. Georgiou informed Gren that he had a \$20 cash contribution from a busboy, and stated that he would give Gren the \$20 in cash if Gren would issue a \$50 check to the Committee. Gren complied with the request. Id.

Almost two weeks later, Georgiou again approached Gren and inquired as to the total amount Gren had contributed. When he learned that Gren's contributions to the Committee totaled \$160, Georgiou told Gren that he had "collected some cash" for the Committee, and asked Gren if he would be willing to issue an \$840 check to the Committee, in exchange for \$850 in cash. Attachment 1 at pages 7 and 8. Gren again complied with Georgiou's request, and thus Gren issued four checks to the Committee, totaling \$1,000.

The Committee's disclosure records do not disclose the receipt of any contributions by Amad, nor were there allegations that he was part of the reimbursement scheme. However, during the interview, Gren stated that Captain George's employs between 100-200 people, and that "he feels there are other employees who have been used by Georges and Charalambous in the same contribution scheme." Attachment 1 at page 8.

At the request of the Justice Department, the F.B.I. attempted to interview some of the restaurant's service employees,

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but the agents were only able to locate and interview three of the restaurant's managers. See Attachment 1 at pages 1, 6 and 9. During the the F.B.I. interviews, the managers all denied the allegations, and Mr. Georgiou specifically denied that anyone was given money to contribute on behalf of Captain George's or anyone else. Id. at pages 3-5. Georgiou also stated that at no time did any manager of Captain George's "threaten, coerce, encourage or suggest that anyone contribute to the campaign." Id. at page 5.<sup>2</sup> On the other hand, according to the referral, the managers were "primarily responsible for employee contributions." Id. at page 9. The managers contend that they worked closely with the Committee's campaign staff, and that the Act's limitations were clearly articulated to those interested in contributing to the Committee. Id. at pages 4, 5 and 9.

The Justice Department declined prosecution in this matter because Gren's alleged reimbursement appeared to be an isolated incident, and involved a violative amount less than the statutory floor for criminal violations under FECA. See Attachment 1 at pages 1 and 8. However, the incident may not have been isolated as the Committee's reports disclose that Captain George's employees, managers and owners made substantial contributions to

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2. Those interviewed also indicated that Gren became disgruntled and quit when Georgiou's cousin was promoted, that Gren had a personality conflict with Georgiou, and that he suffered from "burnout." Id. at pages 3-5. During the F.B.I. interviews the managers stated that Gren was a waiter, but the Committee's public disclosure reports indicate he was a kitchen manager. See Attachment 2 at page 1.



the Committee.<sup>3</sup>

In any event, from the information provided by the Justice Department, it appears that Michael Georgiou collected cash contributions from various individuals which were then forwarded as a contribution in the name of Abdelaziz Gren. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Abdelaziz Gren violated 2 U.S.C. § 441f by knowingly permitting his name to be used to effect a contribution in the name of another. This Office further recommends that the Commission find reason to believe that Michael Georgiou violated 2 U.S.C. § 441f by assisting in the making of contributions in the name of another.<sup>4</sup>

3. Reports filed by the Dukakis for President Committee disclose the receipt of the following contributions from employees of Captain George's: Janice C. Lee, secretary (\$1000); Gregory F. Beehner, manager, (\$500); Michael Georgiou, manager (\$2,000) John P. Apera, manager (\$1,990); and Andreas Caravas, manager (\$2,000). See Attachment 2, pages 2-15. Additionally, persons who appear to be related to the three managers contributed \$6,950 to the Dukakis for President Committee. Id. at pages 3-15. Furthermore, three persons identified as owners or "restauranteurs" of Captain George's, and apparently members of their families, contributed a total of \$17,000 to the Dukakis for President Committee. Id. In addition, one of the owners, Mr. Charalambous, and apparently his spouse, contributed a total of \$30,000 to the Democratic National Committee ("DNC"). See Attachment 2 at pages 16-17. Mr. Georgiou also made a \$10,000 contribution to the DNC. Id. at page 18.

4. The information contained in the referral suggests that Michael Georgiou had Abdelaziz Gren write the contribution checks to the Committee as a means of transmitting cash contributions collected from others. However, even if Michael Georgiou used his own funds to effectuate the transaction, he still would have made a contribution in the name of another in violation of 2 U.S.C. § 441f.

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**III. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that Abdelaziz Gren violated 2 U.S.C. § 441f.
3. Find reason to believe that Michael Georgiou violated 2 U.S.C. § 441f.
4. Approve the attached factual and legal analysis, and appropriate letters.

Lawrence M. Noble  
General Counsel

Date

11/28/90

BY:



Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Referral Materials
2. Additional Disclosure Reports.
3. Factual and Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Michael Georgiou;  
Abdelaziz Gren.

Pre-MUR 232

(MUR 3194)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 3, 1990, the Commission decided by a vote of 6-0 to take the following actions in Pre-MUR 232:

1. Open a MUR.
2. Find reason to believe that Abdelaziz Gren violated 2 U.S.C. § 441f.
3. Find reason to believe that Michael Georgiou violated 2 U.S.C. § 441f.
4. Approve the factual and legal analysis, and appropriate letters, as recommended in the General Counsel's Report dated November 28, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12-3-90  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Thurs., November 29, 1990 12:10 p.m.  
Circulated to the Commission: Thurs., November 29, 1990 4:00 p.m.  
Deadline for vote: Mon., December 3, 1990 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 11, 1990

Michael Georgiou  
909 Eastern Shore Road  
Virginia Beach, VA 23454

RE: MUR 3194  
Michael Georgiou

Dear Mr. Georgiou:

On December 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Michael Georgiou  
Page 2

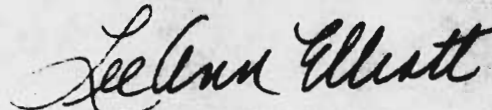
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Xavier R. McDonnell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

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FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

MUR: 3194

RESPONDENT: Michael Georgiou

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The Federal Election Campaign Act of 1971, as amended (the "Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution. 2 U.S.C. § 441f. Under the Commission's regulations, a contribution in the name of another includes giving money or anything of value, all or part of which is provided to the contributor by another person without disclosing the source of the money to the recipient Committee at the time the contribution is made. 11 C.F.R. § 110.4(b)(2)(i). The regulations also provide that no person shall knowingly help or assist in making a contribution in the name of another. 11 C.F.R. § 110.4(b)(1)(iii).

In the normal course of carrying out its supervisory responsibilities, the Commission obtained information regarding allegations that persons employed by Captain George's Seafood House, Inc. ("Captain George's") made illegal contributions to the Dukakis for President Committee (the "Committee").

Specifically, two individuals who were employed by Captain George's during the time in question, Abdelaziz Gren and another employee, contend that they were solicited by Michael Georgiou, a manager of Captain George's. On January 4, 1988, Georgiou allegedly gave them each Dukakis campaign shirts, and requested



that they each contribute \$10 to the Committee. Then, on January 15, 1988, John Charalambous, an owner of Captain George's, solicited and obtained \$100 contributions from Gren and another employee. In April of 1988, Georgiou is alleged to have approached Gren and asked him how much of a contribution he could make to the Committee. Gren told Georgiou he could contribute another \$30. Georgiou informed Gren that he had a \$20 cash contribution from a busboy, and stated that he would give Gren the \$20 in cash if Gren would issue a \$50 check to the Committee. Gren is alleged to have complied with the request.

Almost two weeks later, Georgiou allegedly again approached Gren and inquired as to the total amount Gren had contributed. When he learned that Gren's contributions to the Committee totaled \$160, Georgiou told Gren that he had collected some cash for the Committee, and asked Gren if he would be willing to issue an \$840 check to the Committee, in exchange for \$850 in cash. Gren is alleged to have again complied with Georgiou's request, and thus Gren issued four checks to the Committee, totaling \$1,000. From the information at hand, it appears that Michael Georgiou assisted in making a contribution in the name of Abdelaziz Gren. 11 C.F.R. § 110.4(b)(1)(iii). Accordingly, there is reason to believe that Michael Georgiou violated 2 U.S.C. § 441f.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

) MUR 3194

INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

TO: Michael Georgiou  
909 Eastern Shore Rd.  
Virginia Beach, VA 23454

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1 through November 30, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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QUESTIONS

1. State your occupation, and describe your position and interest in Captain George's Seafood House, Inc. ("Captain George's").

2. State whether you solicited or collected contributions on behalf of the Dukakis for President Committee (the "Committee") from Abdelaziz Gren.

If your answer to either question #2 is in the affirmative.

a. State the dates such solicitations or collections occurred.

b. State the amount of each contribution you collected from Mr. Gren on behalf of the Committee.

c. State whether you gave Mr. Gren cash in exchange for contribution checks issued to the Committee.

d. Describe in detail all circumstances surrounding these solicitations.

e. Describe how these contributions were forwarded to the Committee, i.e., were they collected in person or were they sent directly to the Committee by the contributor? Identify the persons who collected or forwarded these contributions to the Committee.

3. State whether you solicited or collected any contributions on behalf of the Committee from any other persons employed by or associated with Captain George's.

a. If the answer to question #3 is in the affirmative, identify all persons from whom you collected such contributions.

b. State the amount contributed by each person solicited.

c. Describe how such contributions were solicited and obtained.

d. Describe how such contributions were forwarded to the Committee, i.e., were they collected in person or were they sent directly to the Committee by the contributors? Identify the persons who collected or forwarded such contributions to the Committee.

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e. State whether you gave any of these contributors funds in connection with their contributions to the Committee.

4. Describe all fundraising or other activities which you engaged in on behalf of the Committee.

a. State what title or titles you held within the Committee.

b. State whether you sold or distributed any campaign materials on behalf of the Committee at any location of Captain George's.

c. Identify all persons who were employed by or associated with the Committee with whom you consulted or interacted in connection with these fundraising activities.

d. Describe how you became involved in raising funds for the Committee.

5. Produce each and every document concerning, relating to, or pertaining to your fundraising activities on behalf of the Committee, including but not limited to all documents identified, used or referenced in response to the above interrogatories.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 11, 1990

Abdelaziz Gren  
720 Severn Drive  
Virginia Beach, VA 23455

RE: MUR 3194  
Abdelaziz Gren

Dear Mr. Gren:

On December 3, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

91040842772

Abdelaziz Gren  
Page 2

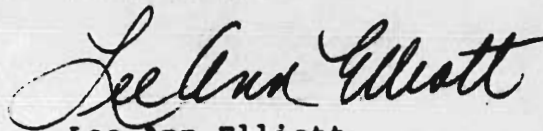
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lee Ann Elliott  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Questions

91040842773



FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

MUR: 3194

RESPONDENT: Abdelaziz Gren

The Federal Election Campaign Act of 1971, as amended (the "Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution. 2 U.S.C. § 441f.

In the normal course of carrying out its supervisory responsibilities, the Commission obtained information regarding allegations that persons employed by Captain George's Seafood House, Inc. ("Captain George's") made illegal contributions on behalf of the Dukakis for President Committee (the "Committee").

Specifically, two individuals who were employed by Captain George's during the time in question, Abdelaziz Gren and another employee, were apparently solicited by Michael Georgiou, a manager of Captain George's. On January 4, 1988, Georgiou gave them each Dukakis campaign shirts, and requested that they each contribute \$10 to the Committee. Then, on January 15, 1988, John Charalambous, an owner of Captain George's, solicited and obtained \$100 contributions from Gren and another employee. In April of 1988, Georgiou is alleged to have approached Gren and asked him how much of a contribution he could make to the Committee. Gren told Georgiou he could contribute another \$30. Georgiou informed Gren that he had a \$20 cash contribution from a busboy, and stated that he would give Gren the \$20 in cash if Gren would issue a \$50

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check to the Committee. Gren complied with the request.

Almost two weeks later, Georgiou again approached Gren and inquired as to the total amount Gren had contributed. When he learned that Gren's contributions to the Committee totaled \$160, Georgiou told Gren that he had collected some cash for the Committee, and asked Gren if he would be willing to issue an \$840 check to the Committee, in exchange for \$850 in cash. Gren again complied with Georgiou's request, and thus Gren issued four checks to the Committee, totaling \$1,000.

Georgiou apparently has denied that anyone at the restaurant was given money to contribute on behalf of Captain George's or anyone else. It appears that the managers worked closely with the Committee's campaign staff and that they conveyed the Act's limitations to those interested in contributing to the Committee. From the information at hand, it appears that Abdelaziz Gren knowingly permitted his name to be used to effect a contribution made in the name of another, in violation of Section 441f. Accordingly, there is reason to believe that Abdelaziz Gren violated 2 U.S.C. § 441f.

91040842775



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

) MUR 3194

INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

TO: Abdelaziz Gren  
720 Severn Drive  
Virginia Beach, VA 23455

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1 through November 30, 1988.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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QUESTIONS

1. State the dates you were employed at Captain George's Seafood House, Inc. ("Captain George's").

If you are no longer employed at Captain George's, state the reason you left such employment, and state your current employer and occupation.

2. State whether you made any contributions to the Dukakis for President Committee (the "Committee").

If your answer to either question in #2 is in the affirmative.

a. State the dates and amounts of such contributions.

b. Identify who solicited such contributions from you.

c. State whether you were given cash or were otherwise reimbursed for issuing checks/making contributions to the Committee. Identify all persons involved in such activities, and describe in detail all the circumstances surrounding these solicitations.

d. Identify where you sent your contribution checks, i.e., did you send the contributions to the Committee or did you give them to another individual? Identify all persons who collected or forwarded your checks.

3. State whether Michael Georgiou or any other manager, owner or other employee of Captain George's solicited or collected any contributions on behalf of the Committee from persons employed by or associated with Captain George's. Identify all such individuals.

a. Describe any other fundraising activities that the owners or managers of Captain George's engaged in on behalf of the Committee, including the sale or distribution of any Committee campaign material.

b. Identify all persons who were employed by Captain George's whom you know made contributions to the Committee, state whether such persons were reimbursed or given cash in exchange for such contributions, and state the basis for your belief that such reimbursements occurred.

4. Produce each and every document concerning, relating to, or pertaining to your contributions to the Committee, including but not limited to copies of canceled contribution checks, and all documents identified, used or referenced in response to the above interrogatories.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 4, 1991

Michael Georgiou  
909 Eastern Shore Road  
Virginia Beach, VA 23454

RE: MUR 3194  
Michael Georgiou

Dear Mr. Georgiou:

This letter is in reference to our recent telephone conversation in which we agreed, at your request, to hold a meeting in discuss the facts at issue in MUR 3194. As agreed, the meeting shall be at 1:00 p.m. on January 22, 1991, at the Federal Election Commission, Office of General Counsel, 6th Floor, 999 E Street, N.W., Washington, D.C. In order to adhere to the Commission's document request, please bring to the meeting all documents in your possession which relate to your fundraising activities on behalf of the Dukakis for President Committee. If you intend to be represented by counsel, please complete the enclosed designation of counsel form and send it to the Commission prior to the meeting.

Thank you for your cooperation in this matter. We look forward to meeting with you. If you have any questions, please call me at (202) 376-8200.

Sincerely

*Xavier K. McDonnell*

Xavier K. McDonnell  
Staff Attorney

Enclosure  
Designation of Counsel

91040842780

OGC 9199

RECEIVED  
FEDERAL ELECTION COMMISSION

91 JAN -2 PM 12:28

Abdelaziz Gren  
2915 W Leland Ave #3A  
Chicago IL 60625

Federal Election Commission  
c/o Chairman: Lee A ELLIOTT.  
Washington DC 20463.

RE: MUR 3194 (2-11-88)  
Abdelaziz Gren

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
91 JAN -3 AM 11:18

Dear Mr. ELLIOTT,

I received your letter on Tuesday  
December 18 - 1990 at 2915 W Leland Ave  
Chicago IL. I have been living at  
this address for few months, but lack  
of a job is making me move back to  
Virginia.

Once I get there I will be sending  
the Commission my new address and phone  
number and whether I will be presented  
by a Consul.

In this letter I am asking the  
Commission to give me an extension  
of two more weeks so I can move  
and find a place to live.

Thank you

Sincerely  
*Abdelaziz Gren*  
Abdelaziz Gren.

Enclosure:  
A proof copie of  
my adress in Chicago.



PAID ELECTION COMMISSION  
WASHINGTON, D.C. 20543  
OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300

CT 79A

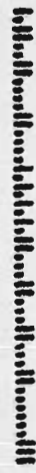
JOHN T. ATKINSON  
TREASURER  
CTY OF VIRGINIA BEACH  
VIRGINIA BEACH, VIRGINIA 23466

AM 1  
GREN ABDELATIZ  
720 SEVERN DRIVE  
VIRGINIA BEACH VA 23455

PRESORTED  
FIRST CLASS



IF INV. DATE \_\_\_\_\_  
MAIL PERMIT \_\_\_\_\_  
GREN/ABDELATIZ 234553009 1890 12/15/90  
NOTIFY SENDER OF NEW ADDRESS  
GREN/ABDELATIZ  
2915 W LELAND AVE #3A  
CHICAGO IL 60625



Abdelaziz Gren  
720 Severn Drive  
Virginia Beach, VA 23455

GREN720 234553009 1890 12/14/90  
NOTIFY SENDER OF NEW ADDRESS  
GREN/ABDELATIZ  
2915 W LELAND AVE #3A  
CHICAGO IL 60625





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1991

Abdelaziz Gren  
2915 W. Leland Avenue, #3A  
Chicago, IL 60625

RE: MUR 3194

Dear Mr. Gren:

This is in response to your letter dated December 20, 1990, which we received on January 2, 1991, requesting an extension of 14 days to respond to the above-captioned matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 16, 1991.

If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lisa E. Klein  
Assistant General Counsel

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RECEIVED  
FEDERAL ELECTION COMMISSION  
06C 9835  
91 JAN 14 PM 4:42

Abdelaziz Gren  
720 Severn Dr  
VA Beach VA 23455

1/10/91

Federal Election Commission  
C/O Chairman: Lee A ELLIOTT  
Washington DC 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 JAN 15 AM 11:16

RE: MUR 3194 (12-11-1990)  
Abdelaziz Gren

Dear Mr ELLIOTT,

Thank you for the passion and time  
the commission gave me in order to  
move from Chicago to Virginia Beach  
Virginia.

I am temporarily living in my  
old address which you will find above  
of this page.

I am also taking this opportunity  
to answer all your questions and  
if there is any more help that I  
can give please let me know.

You will find the answers to  
all your questions on pages 2 & 3  
of this letter.

2

I was employed by Capt George's Restaurant from 1983 to 1988.

- I left Capt George's looking for a better job. I usually work at "Seaford Harbor" Restaurant during summer season. At this time I am looking for a job.

2 - Yes, I made four contributions to Dukakis for President campaign.

5 a - \$10 - \$100 - \$50 and \$840. I do  
8 not remember the dates.

7 b - the person who solicited me  
2 for the contribution was Mr Michel  
4 Georgiou.

8 c - I was not given cash or  
0 reimbursed for issuing checks.

4 d - I gave all my contributions  
0 to Mr Michel Georgiou.

9

3 - I do not know whether Mr Michel Georgiou or any other manager or other employee of Capt George's solicited persons for contributions or not.

a - I did buy one T-shirt at the beginning of campaigning. Few days before Governor Dukakis visited Virginia there was a meeting that I believe was organized by Susan "Campaign manager". I went to a dinner for the campaign when Mr Dukakis visited Williamsburg, Virginia.



3

be The only person that I know who made a contribution is Mr Khalil Amad. I do not believe he was given cash back.

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4 - I have received your letter about 2 years after the event. I usually discard my document at the end of every year, therefore I no longer carry the canceled checks that I contributed to the "Committee", but if your commission needs any more help, I will be happy to do so.

Thank you

Sincerely yours

Abdelaziz Jem



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1991

Abdelaziz Gren  
720 Severn Drive  
Virginia Beach, VA 23455

RE: MUR 3194

Dear Mr. Gren:

I have reviewed your responses to the Commission's questions in the above-referenced matter. Although your responses were quite helpful, a few questions remain. I would appreciate it if you would call me at your earliest convenience so that we may informally clarify the remaining questions. You may reach me at (800) 424-9530.

Again, thank you for your cooperation.

Sincerely,

Xavier K. McDonnell  
Staff Attorney

91040842787



91 APR 24 AM 10:11

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Abdelaziz Gren  
Michael Georgiou

MUR 3194

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by a referral from the U.S. Department of Justice, which indicated that Michael Georgiou and Abdelaziz Gren (the "Respondents"), may have participated in the making of contributions in the name of another. On December 3, 1990, the Commission found reason to believe the Respondents violated 2 U.S.C. § 441(f). Mr. Gren submitted a response to the Commission's findings, and on January 22, 1990, a staff member of the Office of General Counsel met with Michael Georgiou to discuss the facts in this matter. See Attachment.

II. ANALYSIS

During the meeting, Mr. Georgiou acknowledged that in 1988 he was involved in raising contributions for the Michael Dukakis for President Committee ("the Committee"). Georgiou indicated that he became involved in the Committee after he was approached by John Charalambous, an owner of Captain George's Seafood House, a restaurant where Georgiou was employed as a kitchen manager.<sup>1</sup> Georgiou acknowledged that as part of his fundraising efforts, he solicited contributions from employees of the restaurant,

1. According to Georgiou, Charalambous was involved in arranging two fundraising events in Virginia at which Mr. Dukakis was present.

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including Gren, who at that time worked in the kitchen under the supervision of Mr. Georgiou. According to Georgiou, he never gave Gren any cash in exchange for the checks Gren issued to the Committee. In his response, Gren states that Mr. Georgiou solicited contributions from him, but that he was not given cash for his contributions and that he was not reimbursed for issuing the checks to the Committee. See Attachment.

Gren's written answers to the Commission's questions contradict the statements he had made to the Federal Bureau of Investigation ("FBI") back in 1988. According to the FBI summary, Gren had stated that Georgiou had given him cash on two occasions, totaling \$870, in exchange for checks issued to the Committee. See General Counsel's Report, dated November 29, 1990, Attachment 1 at pages 7-8. Gren now claims that the contributions were entirely from his own funds. See Attachment at page 2. In addition, during the meeting with a staff member of this Office, Mr. Georgiou revealed information which further calls into question Gren's credibility. According to Georgiou, Gren approached Mr. Charalambous and threatened to go to the authorities to report the alleged contribution reimbursement if Mr. Charalambous would not give Gren a large sum of cash.<sup>2</sup>

---

2. A staff member of this Office later called Mr. Charalambous to check the veracity of Mr. Georgiou's statements. During that call, Mr. Charalambous indicated that while he did not personally solicit Gren, he does not believe that Georgiou gave any cash to Gren in exchange for his contributions. Charalambous also remembered that Gren did mention that he might report the alleged reimbursement by Georgiou, and that during the same conversation Gren requested money. However, Charalambous stated that he had a problem communicating with Gren, and he was unsure whether Gren actually made a threat.



The investigation in this matter has not yielded any evidence to substantiate the allegations contained in the referral, and in fact contradicts them. Given the lack of evidence to support the allegations and given the size of the contribution at issue as well as the number of years that have elapsed since the alleged violation occurred, the Office of General Counsel recommends that the Commission, consistent with the proper ordering of its priorities and resources, take no further action against Abdelaziz Gren and Michael Georgiou and close the file. See Heckler v. Chaney, 470 U.S. 821 (1985).

III. RECOMMENDATIONS

1. Take no further action against Abdelaziz Gren.
2. Take no further action against Michael Georgiou.
3. Close the file.
4. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date 4/23/91

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments

Response from Gren.

Staff Assigned: Xavier K. McDonnell

91040842790

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Abdelaziz Gren; ) MUR 3194  
Michael Georgiou. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 26, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3194:

1. Take no further action against Abdelaziz Gren.
2. Take no further action against Michael Georgiou.
3. Close the file.
4. Approve the appropriate letter, as recommended in the General Counsel's Report dated April 23, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-26-91  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Wed., April 24, 1991 10:11 a.m.  
Circulated to the Commission: Wed., April 24, 1991 4:00 p.m.  
Deadline for vote: Fri., April 26, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1991

Abdelaziz Gren  
720 Severn Drive  
Virginia Beach, VA 23455

RE: MUR 3194

Dear Mr. Gren:

On December 11, 1990, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. On January 15, 1991, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on April 24, 1991, to take no further action against you and closed the file. The file will be made part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel. The Commission reminds you that making a contribution in the name of another is a violation of 2 U.S.C. § 441f.

If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

91040842792



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1991

**CLOSED**

Michael Georgiou  
909 Eastern Shore Road  
Virginia Beach, VA 23454

RE: MUR 3194

Dear Mr. Georgiou:

On December 11, 1990, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f a provision of the Federal Election Campaign Act of 1971, as amended. On January 22, 1991, you met with a staff member of the Office of General Counsel to discuss the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on April 26, 1991, to take no further action against you, and closed the file. The file will be made part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel. The Commission reminds you that making a contribution in the name of another is a violation of 2 U.S.C. § 441f.

If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3194

DATE FILMED 5/23/91 CAMERA NO. 4

CAMERAMAN AS

91040842794



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3194.

7/31/91

91040855249





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

May 20, 1991

**Craig Donsanto  
Director, Elections Crimes Branch  
Public Integrity Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530**

**RE: MUR 3194  
Abdelaziz Gren  
Michael Georgiou**

**Dear Mr. Donsanto:**

**This is in reference to the matter involving the above-captioned individuals, which your office referred to the Federal Election Commission on May 23, 1990.**

**On December 3, 1990, the Commission found that there was reason to believe Abdelaziz Gren and Michael Georgiou violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act, as amended ("the Act"). However, following an investigation in this matter, the Commission determined on April 26, 1991, to take no further action and closed the file.**

**We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Act. If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-8200.**

**Sincerely,**

**Lawrence M. Noble  
General Counsel**

**BY:   
Lois G. Lerner  
Associate General Counsel**

91040355250