



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3336

DATE FILMED 10/18/91 CAMERA NO. 2

CAMERAMAN AS

91040871601

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 24 April 1991

ANALYST: R. TODD GERLOUGH

I. COMMITTEE: Trudy Coxe for Congress Committee
(C00243147)
Mary P. Allard, Treasurer
P.O. Box 6083
Providence, RI 02940

II. RELEVANT STATUTE: A. 2 U.S.C. §434(b)(3)(E)
B. 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

A. Failure to Disclose the Source of Candidate Loans

The Trudy Coxe for Congress Committee ("the Committee") has failed to disclose during 1990 the source of four (4) candidate loans totalling \$104,000.

Schedule C of the Committee's 12 Day Pre-General Report discloses two (2) candidate loans totalling \$85,000 (a loan for \$40,000 received October 8, 1990 and a loan for \$45,000 received October 15, 1990) (Attachment 2). The Committee fails to indicate whether the source of the loans were the candidate's personal funds, or whether the candidate secured the loans from a bank or other lending institution. A Request for Additional Information ("RFAI") was sent on February 1, 1991 asking the Committee to clarify the source of the loans (Attachment 3). As no response was received, a Second Notice was sent on February 21, 1991 (Attachment 4).

Schedule C of the Committee's 30 Day Post-General Report discloses two (2) candidate loans totalling \$19,000 (a loan for \$15,000 received October 22, 1990 and a loan for \$4,000 received October 31, 1990) (Attachment 5). Again, the Committee does not disclose the loan source. An RFAI was

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sent on January 2, 1991 asking the Committee to clarify the source of the loans (Attachment 6). As no response was received, a Second Notice was sent on January 24, 1991 (Attachment 7).

On January 28, 1991, the analyst contacted Mr. Christopher Little (Committee counsel) for help in contacting Mary F. Allard, the treasurer (the analyst had previously left a message on Ms. Allard's answering machine which had not been returned). As a result, the analyst was called by Mr. Gaffney, the candidate's spouse. The contents of the letters were discussed. Mr. Gaffney promised to send in a response immediately (Attachment 8).

On February 1, 1991, Ms. Allard called the analyst. She stated she would send in a response on February 4, 1991 (Attachment 9).

In the absence of any responses, the analyst called the treasurer on February 20, 1991. The treasurer claimed that she had mailed amendments to the Clerk of the House approximately ten days previously. The Clerk of the House, it should be noted, does not report the filing of these amendments. The treasurer stated that she would send copies of the amendments by overnight mail (Attachment 10). To date, no response has been received.

B. Failure to File Forty-Eight Hour Notifications

The Committee has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for eleven (11) contributions/loans totalling \$30,000 received prior to the 1990 General Election.

The candidate was involved in the 1990 General Election held on November 6, 1990. Prior Notice was sent to the Committee on October 1, 1990 (Attachment 11). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices if contributions of \$1,000 or more are received during the period October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt."

Schedule C of the 1990 30 Day Post-General Report indicates that the Committee failed to file eleven (11) 48-Hour Notices for contributions/loans received during the aforementioned period (Attachment 12). The following is a list of the contributions for which no 48-Hour Notices were filed:

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| <u>Contributor Name</u> (As reported by Committee) | <u>Date</u> | <u>Amount</u> |
|---|-------------|---------------|
| Ms. Elizabeth Z. Chace | 11/01/90 | \$ 1,000 |
| Ms. Louise Dunlap | 11/02/90 | \$ 1,000 |
| Bill Thomas Campaign Committee | 11/01/90 | \$ 1,000 |
| Committee for Thorough Agricul | 11/02/90 | \$ 3,000 |
| Dreier for Congress Committee | 11/01/90 | \$ 1,000 |
| Moorhead for Congress | 11/01/90 | \$ 1,000 |
| Auto Dealers and Drivers PAC | 11/02/90 | \$ 1,000 |
| Fleet/Norstar Financial Group | 11/01/90 | \$ 1,000 |
| Pepsico Concerned Citizens Fun | 11/02/90 | \$ 1,000 |
| Gertrude M. Coxe (loan) | 10/22/90 | \$15,000 |
| Gertrude M. Coxe (loan) | 10/31/90 | \$ 4,000 |

On January 2, 1991, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 6). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

In a January 28, 1991 telephone conversation, Mr. Gaffney, the candidate's husband, stated that he didn't believe that the Committee was aware that loans had to be reported as 48 Hour Notices (Attachment 8).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (2)

DATE 8/2/91

PAGE 1

| CANDIDATE/COMMITTEE/DOCUMENT | OFFICE SOUGHT/ | PARTY | RECEIPTS | | DISBURSEMENTS | | COVERAGE DATES | # OF PAGES | MICROFILM LOCATION TYPE OF FILER |
|---|---------------------------|-------|----------|---------|---------------|------------------|------------------|----------------|-------------------------------------|
| | | | PRIMARY | GENERAL | PRIMARY | GENERAL | | | |
| <hr/> | | | | | | | | | |
| DOXE, GERTRUDE Y | HOUSE R2 REPUBLICAN PARTY | | | | RA-COE ISLAND | | 1990 ELECTION | IDA #20224325 | |
| 1. STATEMENT OF CANDIDATE | | | | | | | 20X2290 | 1 | 92-55/391/5135 |
| 1990 STATEMENT OF CANDIDATE | | | | | | | | | |
| 2. PRINCIPAL CAMPAIGN COMMITTEE | | | | | | | | | |
| TRUDY DOXE FOR CONGRESS COMMITTEE | | | | | | | ID #202243147 | HOUSE | |
| 1990 STATEMENT OF ORGANIZATION | | | | | | | 22X4350 | 1 | 92-55/391/5135 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 11SEP90 | 1 | 92-55/407/3315 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 29OCT90 | 2 | 92-55/415/4552 |
| 48 HOUR CONTRIBUTION NOTICE | | | | | | | 31OCT90 | 3 | 92-55/415/5155 |
| APRIL QUARTERLY | | | 13,365 | | 1,916 | | 19X4350 -31X4350 | 5 | 92-55/395/2424 |
| JULY QUARTERLY | | | 138,392 | | 110,075 | | 1APR90 -30OCT90 | 31 | 92-55/401/1503 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | | 1APR90 -30OCT90 | 3 | 92-55/669/3733 |
| REQUEST FOR ADDITIONAL INFORMATION AND PREPARED | | | 95,025 | | 72,052 | | 1APR90 -30OCT90 | 4 | 92-55/669/3733 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | | 1JUL90 -22AUG90 | 33 | 92-55/403/4547 |
| REQUEST FOR ADDITIONAL INFORMATION AND PREPARED | | | | | | | 1JUL90 -22AUG90 | 4 | 92-55/669/3733 |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | | 1JUL90 -22AUG90 | 5 | 92-55/669/3733 |
| OCTOBER QUARTERLY | | | | 82,021 | 66,271 | 23AUG90 -30SEP90 | 25 | 92-55/411/3151 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | 23AUG90 -30SEP90 | 4 | 92-55/669/3733 | |
| REQUEST FOR ADDITIONAL INFORMATION AND PREPARED | | | | | | 23AUG90 -30SEP90 | 5 | 92-55/669/3733 | |
| NOV-GENERAL | | | 132,744 | | 145,955 | 1OCT90 -17OCT90 | 18 | 92-55/415/1943 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | 1OCT90 -17OCT90 | 4 | 92-55/669/3733 | |
| REQUEST FOR ADDITIONAL INFORMATION AND PREPARED | | | | | | 1OCT90 -17OCT90 | 5 | 92-55/669/3733 | |
| NOV-GENERAL | | | 125,547 | | 175,540 | 18OCT90 -25NOV90 | 35 | 92-55/431/2900 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | | | 18OCT90 -25NOV90 | 2 | 92-55/669/3733 | |
| REQUEST FOR ADDITIONAL INFORMATION AND PREPARED | | | | | | 18OCT90 -25NOV90 | 3 | 92-55/669/3733 | |
| NOV-GENERAL | | | | 535 | 601 | 27NOV90 -31DEC90 | 4 | 92-55/431/2718 | |
| TOTAL | | | 247,772 | 332,147 | 182,045 | 399,598 | 197 | TOTAL PAGES | |
| JOINT CAMPAIGN COMMITTEE | | | | | | | | | |
| JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN | | | | | | | | | |

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- 1) All reports have been reviewed.
- 2) Cash on hand as of 12/31/90 is \$6274.
- 3) Debts and obligations owed by the Committee is \$104,000.

SCHEDULE C
(Revised 3/88)

LOANS

Attachment 2
1990 1 Day - General Report

See separate schedules
for each numbered line

Name of Committee (in Full)

TRUDY COXE FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code of Loan Source
Gertrude M. Coxe
38 Cheswick Road
Cranston, RI 02910

Original Amount
of Loan

40,000.00

Cumulative Payments
To Date

0 -

Balance Outstanding at
Close of This Period

40,000.00

Election: ☐ Primary ☒ General ☐ Other (specify):

Term: Date Incurred 10/08/90

Date Due

Interest Rate 10 %

☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

B. Full Name, Mailing Address and ZIP Code of Loan Source
Gertrude M. Coxe
38 Cheswick Road
Cranston, RI 02910

Original Amount
of Loan

45,000.00

Cumulative Payments
To Date

- 0 -

Balance Outstanding at
Close of This Period

45,000.00

Election: ☐ Primary ☒ General ☐ Other (specify):

Term: Date Incurred 10/15/90

Date Due

Interest Rate 10 %

☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding

SUBTOTALS This Period This Page (optional)

85,000.00

TOTALS This Period (next page in this line only)

85,000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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RTG

RTG



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

20-2

FEB -1 1991

Mary F. Allard, Treasurer
Trudy Cox for Congress Committee
P.O. Box 6083
Providence, RI 02940

Identification Number: C00243147

Reference: October Quarterly (8/23/90-9/30/90) and 12 Day Pre-General (10/1/90-10/17/90) Reports

Dear Ms. Allard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. No political committee other than a qualified multicandidate committee may make contributions to a candidate for federal office in excess of \$1,000 per election. The Clean Water Action PAC did not meet the requirements for qualified multicandidate status as of the date the contribution(s) was made to your committee. The term "contribution" includes any gift, subscription, loan, advance or deposit of money and anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limit, you should either refund to the donor(s) the amount in excess of \$1,000 or get the donor(s) to redesignate the contribution(s) in writing. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering

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the period in which they are made. Redesignations are reported as memo entries on Schedule A of this report covering the period in which the authorization for the redesignation is received. (11 CFR §104.8(d)(2) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amount will be taken into consideration.

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this 12 Day Pre-General report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

RTG

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

R. Todd Gerlough

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

20-3

February 21, 1991

Mary F. Allard, Treasurer
Trudy Cox for Congress Committee
P.O. Box 6083
Providence, RI 02940

Identification Number: C00243147

Reference: July Quarterly (4/1/90-6/30/90), 12 Day Pre-Primary
(7/1/90-8/22/90), October Quarterly (8/23/90-9/30/90)
and 12 Day Pre-General (10/1/90-10/17/90) Reports

Dear Ms. Allard:

This letter is to inform you that as of February 20, 1991, the Commission has not received your response to our requests for additional information dated February 1, 1991. Those notices requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Todd Gerlough on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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SCHEDULE C
(Revised 3/83)

Attachment 5
1990 30 Day Post-General Report

LOANS

UP TO \$100,000 PER LENDER

| Name of Committee (in Full) | | | |
|--|--|--------------------------------------|--|
| TRUDY COXE FOR CONGRESS COMMITTEE | | | |
| A. Full Name, Mailing Address and ZIP Code of Loan Source Gertrude M. Coxe 38 Chesvick Street Cranston, RI 02910 | | Original Amount of Loan 15,000.00 | Balance Outstanding at Close of This Period 15,000.00 |
| Election: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | | Cumulative Payments To Date - 0 - | |
| Terms: Date Incurred 10/22/90 Date Due Interest Rate 10 % (april) <input type="checkbox"/> Secured | | | |
| List All Endorsers or Guarantors (if any) to Item A | | | |
| 1. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| 2. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| 3. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| B. Full Name, Mailing Address and ZIP Code of Loan Source Gertrude M. Coxe 38 Chesvick Street Cranston, RI 02910 | | Original Amount of Loan 4,000.00 | Balance Outstanding at Close of This Period 4,000.00 |
| Election: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | | Cumulative Payments To Date - 0 - | |
| Terms: Date Incurred 10/31/90 Date Due Interest Rate 10 % (april) <input type="checkbox"/> Secured | | | |
| List All Endorsers or Guarantors (if any) to Item B | | | |
| 1. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| 2. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| 3. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding | |
| SUBTOTALS This Period This Page (optional) | | | 19,000.00 |
| TOTALS This Period (last page in this line only) | | | 104,000.00 |
| Carry outstanding balance only to LINE 2, Schedule D, for this line. If on Schedule D, carry forward to appropriate line of D. | | | |

RTG

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20063

80-2

JUN 2 1991

Mary F. Allard, Treasurer
Truoy Cox for Congress Committee
P.O. Box 6083
Providence, R.I. 02940

Identification Number: C00243147

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Ms. Allard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Column A, Line 6(c) should equal the difference of Line 6(a) and 6(b). Please amend this figure.

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration must describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation. Under 11 CFR §104.7(b), the solicitation shall consist of a clear request for the required information (i.e., name, mailing address, occupation, and name of employer). The request should also inform the contributor that the reporting of such information is required by law. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this

RTG

report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

RTG

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

R. Todd Gerlough

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

AQ-3

January 24, 1991

Mary F. Allard, Treasurer
Trudy Cox for Congress Committee
P.O. Box 6083
Providence, RI 02940

Identification Number: C00243147

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Ms. Allard:

This letter is to inform you that as of January 23, 1991, the Commission has not received your response to our request for additional information, dated January 2, 1991. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Todd Gerlough on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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21036

MEMORANDUM FOR FILES: TELECON

SUBJECT: No response to RFAI's

FROM: Christopher Little/Mr. Gaffney (sp?)

TO: Todd Gerlough

NAME OF COMMITTEE: Trudy Coxé for Congress Committee (R.I.)

DATE: 1/28/91

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The analyst contacted Mr. Christopher Little (Committee counsel) for his aid in tracking down Mary Allard, committee treasurer. (The analyst had previously left a message on Ms. Allard's answering machine which had not been returned.) As a result, the analyst was called by Mr. Gaffney, the candidate's husband. In this conversation, the contents of the letters were discussed. Mr. Gaffney promised to send in a response immediately. He also stated that he did not believe that the Committee was aware that loans were considered contributions for 48 hour notice purposes.

MEMORANDUM FOR FILES: TELECON

SUBJECT: Pending audit referral and OGC referral because of no responses to letters

FROM:

Todd Gerlough (analyst)

TO:

NAME OF COMMITTEE: Trudy Coxe for Congress (R.I.)

DATE: 2/1/91

Mary Allard, treasurer, finally returned my call. She said she received all the letters last week and would send in responses on 2/4/91.

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MEMORANDUM FOR FILES: TELECON

SUBJECT: Still no response to RFAI's

FROM: Mary Allard

TO: Todd Gerlough

NAME OF COMMITTEE: Trudy Coxé for Congress (R.I.)

DATE: 2/20/91

In the absence of any response to my letters, I called the treasurer. The treasurer claimed that she had already sent in amendments. She then stated that she would "fedex" copies of the amendments to the FEC.

GENERAL ELECTION

Attachment 11
Page 1 of 2

REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL CANDIDATES

October 1, 1990

| Report | Reporting Period | Reg./Cert. | Filing |
|--------------|-----------------------|---------------|----------|
| | | Mailing Date* | Date |
| Pre-General | 10/01/90** - 10/17/90 | 10/22/90 | 10/25/90 |
| Post-General | 10/18/90 - 11/26/90 | 12/06/90 | 12/06/90 |

WHO MUST FILE

All 1990 general election principal campaign committees must file the pre- and post-general election reports.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1990 elections (i.e., committees active in past or future elections) and 1990 campaign committees not participating in the general election do not file the pre- and post-general reports.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Candidate committees use FORM 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on FORM 32.

WHERE TO FILE

Consult the instructions on the back of the FORM 3 Summary Page. Note State filing requirements also.

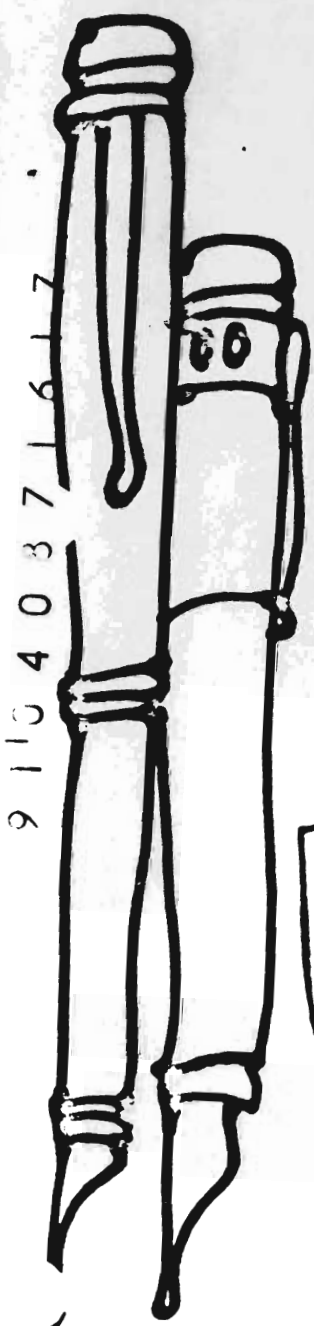
LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions.

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*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.



CONGRESSIONAL CANDIDATES

GENERAL ELECTION

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Correction should be made on the label.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

91040871618

SCHEDULE A

ITEMIZED RECEIPTS

1990 30 Day Post-General Report

Detailed Summary Page

FOR LINE NUMBER

11-A

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)

Trudy Cox for Congress Committee

| | | | |
|--|---|--|--|
| A. Full Name, Mailing Address and ZIP Code Mr. Matthew F. Callaghan, Jr. 50 South Pier Road Narragansett RI 02882 | Name of Employer Best Effort | Date (month, day, year) 11/01/90 | Amount of Each Receipt this Period 100.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Attorney | Aggregate Year-to-Date > 8 350.00 | |
| B. Full Name, Mailing Address and ZIP Code Mr. Richard F. Carlson 295 Rumstick Road Barrington RI 02806 | Name of Employer Best Effort | Date (month, day, year) 11/06/90 | Amount of Each Receipt this Period 200.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 200.00 | |
| C. Full Name, Mailing Address and ZIP Code Mr. John T. Casale 77 South Street Barrington RI 02806 | Name of Employer Associates in Anest | Date (month, day, year) 10/24/90 11/23/90 | Amount of Each Receipt this Period 100.00 20.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Accountant | Aggregate Year-to-Date > 8 370.00 | |
| D. Full Name, Mailing Address and ZIP Code Ms. Elizabeth S. Chase 67 Oriole Ave Providence RI 02906 | Name of Employer Best Effort | Date (month, day, year) 11/01/90 | Amount of Each Receipt this Period 1,000.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 2,000.00 | ATC |
| E. Full Name, Mailing Address and ZIP Code Ms. Dorothy H. Chatterton 112 Slater Ave Providence RI 02906 | Name of Employer Retired | Date (month, day, year) 11/01/90 | Amount of Each Receipt this Period 100.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Retired | Aggregate Year-to-Date > 8 200.00 | |
| F. Full Name, Mailing Address and ZIP Code Mr. Henry V. Collins, Jr. P.O. Box 2398 99 Gano Street Providence RI 02903 | Name of Employer Best Effort | Date (month, day, year) 10/24/90 | Amount of Each Receipt this Period 500.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 500.00 | |
| G. Full Name, Mailing Address and ZIP Code Mrs. Elfrida A. Collins 233 Rumstick Pt. Road Barrington RI 02806 | Name of Employer Best Effort | Date (month, day, year) 10/29/90 | Amount of Each Receipt this Period 100.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 200.00 | |

SUBTOTAL of Receipts This Page (optional)

2,120.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

1990 30 Day Post-General Report

For each category of the
Detailed Summary Page5 17
FOR LINE NUMBER
11-A

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

Trudy Coxo for Congress Committee

| | | | |
|--|---|--|---|
| A. Full Name, Mailing Address and ZIP Code Ms. Vanessa P. DeLong 6 Sand Hill Drive North Kingstown RI 02852 | Name of Employer Syscon Corporation | Date (month, day, year) 11/02/90 | Amount of Each Receipt this Period 250.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Systems Analyst | Aggregate Year-to-Date > 8 350.00 | |
| B. Full Name, Mailing Address and ZIP Code Mr. Norman J. DeLaca Providence RI 02906 | Name of Employer Fleet National Bank | Date (month, day, year) 10/24/90 | Amount of Each Receipt this Period 50.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation | Aggregate Year-to-Date > 8 200.00 | |
| C. Full Name, Mailing Address and ZIP Code Mr. Steven R. Detoy 54 Church Lane Wickford RI 02852 | Name of Employer Best Effort | Date (month, day, year) 10/24/90 | Amount of Each Receipt this Period 100.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 200.00 | |
| D. Full Name, Mailing Address and ZIP Code Mr. Ronald F. Dick "Ocean View" Bellevue Ave Newport RI 02840 | Name of Employer Belgravia Imports | Date (month, day, year) 10/29/90 | Amount of Each Receipt this Period 250.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation President | Aggregate Year-to-Date > 8 450.00 | |
| E. Full Name, Mailing Address and ZIP Code Ms. Nina Dimeo 625 Love Lane East Greenwich RI | Name of Employer Trudy Coxo For Cong | Date (month, day, year) 11/02/90 | Amount of Each Receipt this Period 250.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Fundraiser | Aggregate Year-to-Date > 8 250.00 | |
| F. Full Name, Mailing Address and ZIP Code Ms. Louise C. Dunlap 477 Yarihaven Road Tracy's Landing MD 20779 | Name of Employer Best Effort | Date (month, day, year) 11/02/90 | Amount of Each Receipt this Period 1,000.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Best Effort | Aggregate Year-to-Date > 8 1,000.00 | ATD |
| G. Full Name, Mailing Address and ZIP Code Mr. John P. Early 13 Cedar Pond Drive Apt. 2 Warwick RI 02886 | Name of Employer Early Cloud & Co. | Date (month, day, year) 11/01/90 | Amount of Each Receipt this Period 100.00 |
| Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | Occupation Vice Chairman | Aggregate Year-to-Date > 8 650.00 | |
| SUBTOTAL of Receipts This Page (optional) | | | 2,000.00 |
| TOTAL This Period (last page this line number only) | | | |

SCHEDULE A

ITEMIZED RECEIPTS

1990 30 Day Post-General Report

For each category of the
Detailed (Summary) PageFOR LINE NUMBER
11-B

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

NAME OF COMMITTEE IN FULL

Trudy Cox for Congress Committee

A. Full Name, Mailing Address and ZIP Code

Bill Thomas Campaign Committee
P.O. Box 395
Bakersfield CA 93302

Name of Employer

Political Committee

Date (month,
day, year)

11/01/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

ATC

B. Full Name, Mailing Address and ZIP Code

Bob Davis For Congress

Name of Employer

Political Committee

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

C. Full Name, Mailing Address and ZIP Code

Bob Walker For Congress Commit

Name of Employer

Political Committee

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
200.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

200.00

D. Full Name, Mailing Address and ZIP Code

Committee for Thorough Agricul

Name of Employer

Political Committee

Date (month,
day, year)

11/02/90

Amount of Each
Receipt this Period
3,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

3,000.00

ATV

E. Full Name, Mailing Address and ZIP Code

Dreier For Congress Committee
P.O. Box 1110
Covina CA 91722

Name of Employer

Political Committee

Date (month,
day, year)

11/01/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

ATC

F. Full Name, Mailing Address and ZIP Code

Friends & Neighbors of Steve G
P.O. Box 1988
Osseo WI 54758

Name of Employer

Political Committee

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

G. Full Name, Mailing Address and ZIP Code

Friends For Houghton
P.O. Box 1107
Corning NY 14830

Name of Employer

Political Committee

Date (month,
day, year)

11/06/90

Amount of Each
Receipt this Period
500.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

500.00

SUBTOTAL of Receipts This Page (optional)

7,700.00

TOTAL This Period (last page this line number only)

1990 30 Day Post-General Report

Detailed Summary Page

FOR LINE NUMBER

11-B

SCHEDULE A

ITEMIZED RECEIPTS

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 committees.

NAME OF COMMITTEE (In Full)

Trudy Cox for Congress Committee

A. Full Name, Mailing Address and ZIP Code

Friends of Newt Gingrich
P.O. Box 870606
Morrow GA 30287

Name of Employer

Political Committee

Date (month, day, year)

10/27/90

Amount of Each Receipt this Period

1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

B. Full Name, Mailing Address and ZIP Code

Michel For Congress Committee
1029 W. Glenwood Ave
Peoria IL 61606

Name of Employer

Political Committee

Date (month, day, year)

10/29/90

Amount of Each Receipt this Period

1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

C. Full Name, Mailing Address and ZIP Code

Moorhead For Congress
420 N. Brand Blvd
Glendale CA 91203

Name of Employer

Political Committee

Date (month, day, year)

11/01/90

Amount of Each Receipt this Period

1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

D. Full Name, Mailing Address and ZIP Code

Paxon for Congress
P.O. Box 1995
Williamsville NY 14231

Name of Employer

Political Committee

Date (month, day, year)

10/26/90

Amount of Each Receipt this Period

500.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

500.00

E. Full Name, Mailing Address and ZIP Code

Ravenal For Congress Committee

Name of Employer

Political Committee

Date (month, day, year)

10/29/90

Amount of Each Receipt this Period

1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

1,000.00

F. Full Name, Mailing Address and ZIP Code

Republican Leaders Fund
1730 Rhode Island Ave., N.W.
No. 210
Washington DC 20036

Name of Employer

Political Committee

Date (month, day, year)

10/27/90

Amount of Each Receipt this Period

1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

Political Committee

Aggregate Year-to-Date > 8

2,000.00

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For:

☐ Primary☐ General☐ Other (specify):

Occupation

Aggregate Year-to-Date > 8

SUBTOTAL of Receipts This Page (optional)

6,500.00

TOTAL This Period (last page this line number only)

14,200.00

9340401807912622

1990 30 Day Post-General Report

SCHEDULE A

ITEMIZED RECEIPTS

For each category of the
Detailed Summary Page1
POST-LINE NUMBER
11-C

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 committees.

NAME OF COMMITTEE (in Full)

Trudy Coxe for Congress Committee

A. Full Name, Mailing Address and ZIP Code
3M Political Action Committee
1101 15th Street, N.W.
Washington DC 20005

Name of Employer

PAC

Date (month,
day, year)
10/29/90Amount of Each
Receipt this Period
500.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 500.00

B. Full Name, Mailing Address and ZIP Code
AHM - PAC
1201 New York Avenue, N.W.
6th Floor
Washington DC 20005

Name of Employer

PAC

Date (month,
day, year)
11/08/90Amount of Each
Receipt this Period
500.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 500.00

C. Full Name, Mailing Address and ZIP Code
Allied-Signal PAC
1001 Pennsylvania Ave., N.W.
Suite 700
Washington DC 20004

Name of Employer

PAC

Date (month,
day, year)
10/29/90Amount of Each
Receipt this Period
500.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 500.00

D. Full Name, Mailing Address and ZIP Code
American Health Care Assoc PAC
1201 L Street, N.W.
Washington DC 20005

Name of Employer

PAC

Date (month,
day, year)
11/08/90Amount of Each
Receipt this Period
500.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 500.00

E. Full Name, Mailing Address and ZIP Code
Auto Dealers and Drivers PAC
153-12 Hillside Avenue
Jamaica NY 11432

Name of Employer

PAC

Date (month,
day, year)
11/02/90Amount of Each
Receipt this Period
1,000.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 2,500.00

F. Full Name, Mailing Address and ZIP Code
Boating - PAC
2550 M Street, N.W. 425
Washington DC 20037

Name of Employer

PAC

Date (month,
day, year)
10/29/90Amount of Each
Receipt this Period
500.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 500.00

G. Full Name, Mailing Address and ZIP Code
Bowling Proprietors' Associati
615 Six Flags Drive
Arlington TX 76011

Name of Employer

PAC

Date (month,
day, year)
11/23/90Amount of Each
Receipt this Period
300.00Receipt For: ☐ Primary ☒ General
☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 300.00

SUBTOTAL of Receipts This Page (optional)

3,800.00

TOTAL This Period (last page this line number only)

1990 30 Day Post-General Report

For each category of the
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11-C

SCHEDULE A

ITEMIZED RECEIPTS

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

Trudy Cox for Congress Committee

A. Full Name, Mailing Address and ZIP Code

Fleet/Norstar Financial Group
50 Kennedy Plaza
Providence RI 02903

Name of Employer

PAC

Date (month,
day, year)

11/01/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

1,550.00

ATC

B. Full Name, Mailing Address and ZIP Code

Fluor Public Aff. Committee
3333 Michelson Dr.
Irvine CA 92730

Name of Employer

PAC

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
500.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

700.00

C. Full Name, Mailing Address and ZIP Code

General Mills Restaurants, Inc
P.O. Box 593330
Orlando FL 32839

Name of Employer

PAC

Date (month,
day, year)

11/06/90

Amount of Each
Receipt this Period
500.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

1,500.00

D. Full Name, Mailing Address and ZIP Code

General Mills, Inc. - PAC
555 13th Street, N.W.
Suite 490 West
Washington DC 20004

Name of Employer

PAC

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
2,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

2,000.00

E. Full Name, Mailing Address and ZIP Code

Hook-Superx, Inc. - PAC
2800 Enterprises Street
Indianapolis IN 46219

Name of Employer

PAC

Date (month,
day, year)

10/27/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

1,000.00

F. Full Name, Mailing Address and ZIP Code

The Dow Chemical Company - PAC
2020 Dow Center
Midland MI 48640

Name of Employer

PAC

Date (month,
day, year)

11/06/90

Amount of Each
Receipt this Period
1,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

1,000.00

G. Full Name, Mailing Address and ZIP Code

Eunin Rights Campaign Fund PAC
P.O. Box 1396
Washington DC 20013

Name of Employer

PAC

Date (month,
day, year)

10/29/90

Amount of Each
Receipt this Period
5,000.00

Receipt For:

☐ Primary☒ General☐ Other (specify):

Occupation

PAC

Aggregate Year-to-Date > 8

10,000.00

SUBTOTAL of Receipts This Page (optional)

11,000.00

TOTAL This Period (last page this line number only)

1990 30 Day Post-General Report

SCHEDULE A

ITEMIZED RECEIPTS

Continued Summary Page

FOR LINE NUMBER

11-C

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)

Trudy Cox for Congress Committee

A. Full Name, Mailing Address and ZIP Code

NWPC Victory Fund
1275 K Street, N.W.
Suite 750
Washington DC 20005

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

11/01/90
11/23/90

Amount of Each Receipt this Period

500.00
1,000.00

Occupation

PAC

Aggregate Year-to-Date > 8

1,999.99

B. Full Name, Mailing Address and ZIP Code

Pepco Concerned Citizens Fun

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

11/02/90

Amount of Each Receipt this Period

1,000.00

Occupation

PAC

Aggregate Year-to-Date > 8

1,000.00

C. Full Name, Mailing Address and ZIP Code

Pro-Choice America - PAC
Box 18866
Washington DC 20036

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

10/26/90

Amount of Each Receipt this Period

750.00

Occupation

PAC

Aggregate Year-to-Date > 8

750.00

D. Full Name, Mailing Address and ZIP Code

Propane PAC
1301 W. 22nd Street
Suite 610
Oak Brook IL 60521

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

10/29/90

Amount of Each Receipt this Period

250.00

Occupation

PAC

Aggregate Year-to-Date > 8

250.00

E. Full Name, Mailing Address and ZIP Code

Raytheon Political Action Comm
141 Spring Street
Lexington MA 02173

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

11/23/90

Amount of Each Receipt this Period

200.00

Occupation

PAC

Aggregate Year-to-Date > 8

1,400.00

F. Full Name, Mailing Address and ZIP Code

RIHT Financial Govt Fund PAC
One Hospital Trust Plaza
Providence RI 02903

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

10/24/90

Amount of Each Receipt this Period

500.00

Occupation

PAC

Aggregate Year-to-Date > 8

1,575.00

G. Full Name, Mailing Address and ZIP Code

RIHTA - PAC

East Greenwich RI 02818

Receipt For: ☐ Primary ☒ General☐ Other (specify):

Name of Employer

PAC

Date (month, day, year)

11/06/90

Amount of Each Receipt this Period

100.00

Occupation

PAC

Aggregate Year-to-Date > 8

100.00

SUBTOTAL of Receipts This Page (optional)

4,300.00

TOTAL This Period (last page this line number only)

1990 30 Day Post-General Report

SCHEDULE B
(Revised 2/88)

LOANS

Page 2 of 2 for
LINE NUMBER 12
Use separate schedules
for each numbered line

| | | | |
|---|--|---|---|
| Name of Committee (in Full) TRUDY COXE FOR CONGRESS COMMITTEE | | | |
| A. Full Name, Mailing Address and ZIP Code of Loan Source Gertrude H. Cox 38 Chesvick Street Cranston, RI 02910 | | Original Amount of Loan 15,000.00 | Balance Outstanding at Close of This Period 15,000.00 |
| Section: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | | Cumulative Payments To Date - 0 - | ATP |
| Term: Date Incurred 10/22/90 Date Due _____ Interest Rate 10 % <input type="checkbox"/> Secured | | | |
| List All Endorsers or Guarantors (if any) to Item A | | | |
| 1. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| 2. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| 3. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| B. Full Name, Mailing Address and ZIP Code of Loan Source Gertrude H. Cox 38 Chesvick Street Cranston, RI 02910 | | Original Amount of Loan 4,000.00 | Balance Outstanding at Close of This Period 4,000.00 |
| Section: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): | | Cumulative Payments To Date - 0 - | ATP |
| Term: Date Incurred 10/31/90 Date Due _____ Interest Rate 10 % <input type="checkbox"/> Secured | | | |
| List All Endorsers or Guarantors (if any) to Item B | | | |
| 1. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| 2. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| 3. Full Name, Mailing Address and ZIP Code | | Name of Employer | |
| | | Occupation | |
| | | Amount Guaranteed Outstanding: \$ | |
| SUBTOTALS This Period This Page (optional) | | | 19,000.00 |
| TOTALS This Period (last page in this line only) | | | 104,000.00 |
| Carry outstanding balances only to LINE 2, Schedule B, for this line. If on Schedule B, carry forward to appropriate line of Summary. | | | |

991794013426

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 91L-47
STAFF MEMBER: Xavier K. McDonnell

Source of MUR: Internally Generated
Respondents: Trudy Coxé for Congress Committee,
and Mary F. Allard, as treasurer
Relevant Statutes: 2 U.S.C. § 434(a)(6)
2 U.S.C. § 434(b)(3)(E)
11 C.F.R. § 104.5

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Trudy Coxé for Congress Committee (the "Committee"), and Mary F. Allard, as treasurer, ("Respondents") to the Office of General Counsel for failing to file 48 hour notices for eleven contributions before the 1990 general election, and for failing to properly disclose the source of four candidate loans. See 2 U.S.C. § 434(a)(6)(A); 2 U.S.C. § 434(b)(3)(E).

II. FACTUAL AND LEGAL ANALYSIS

See Factual and Legal Analysis, Attachment 2.

III. DISCUSSION OF CONCILIATION AGREEMENT AND PROPOSED CIVIL PENALTY

91040871627

IV. RECOMMENDATIONS

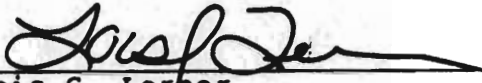
1. Open a MUR.
2. Find reason to believe the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).
3. Find reason to believe the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, violated 2 U.S.C. § 434(b)(3)(E).
4. Enter into pre-probable cause conciliation with the Trudy Coxe for Congress Committee, and Mary F. Allard, as treasurer.
5. Approve the attached Factual and Legal analysis and Conciliation Agreement and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

6/4/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. RAD Referral.
2. Factual and Legal Analysis.
3. Proposed Conciliation Agreement

91040871628

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR)
3336

In the Matter of)
Trudy Coxe for Congress Committee,) RAD Referral #91L-47
and Mary F. Allard, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 7, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 91L-47:

1. Open a MUR.
2. Find reason to believe the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).
3. Find reason to believe the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, violated 2 U.S.C § 434(b)(3)(E).
4. Enter into pre-probable cause conciliation with the Trudy Coxe for Congress Committee, and Mary F. Allard, as treasurer.

(continued)

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Federal Election Commission
Certification of RAD Referral #91L-47
June 7, 1991

Page 2

5. Approve the Factual and Legal analysis and Conciliation Agreement and the appropriate letter, as recommended in the General Counsel's Report dated June 4, 1991.

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

Attest:

6-7-91
Date

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

Received in the Secretariat: Wed., June 5, 1991 9:40 a.m.
Circulated to the Commission: Wed., June 5, 1991 4:00 p.m.
Deadline for vote: Fri., June 7, 1991 4:00 p.m.

bjf

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 14, 1991

Mary F. Allard, Treasurer
Trudy Coxe for Congress Committee
P.O. Box 6083
Providence, RI 02940

RE: MUR 3336
Trudy Coxe for Congress
Committee, and
Mary F. Allard, as treasurer

Dear Ms. Allard:

On June 7, 1991, the Federal Election Commission found that there is reason to believe the Trudy Coxe for Congress Committee (the "Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(6)(A) and 434(b)(3)(E), provisions 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 findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

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MUR 3336

Mary F. Allard, Treasurer

Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

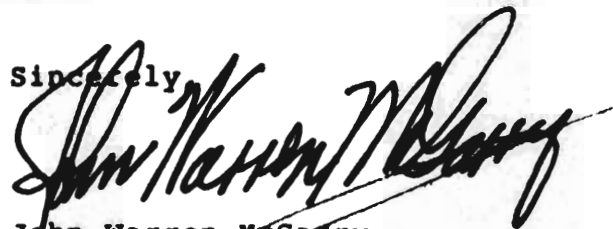
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures

Designation of Counsel Form
Conciliation Agreement

91040871632

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

MUR: 3336

Respondents: Trudy Coxe for Congress Committee,
and Mary F. Allard, as treasurer

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission (the "Commission") in the normal course of carrying out its supervisory responsibilities.

See 2 U.S.C. § 437g(a)(2).

II. ANALYSIS

48 Hour Notices

The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk of the House, the Secretary of the Senate, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the 20th day, but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B). The term "contribution" includes any gift, subscription, loan, loan endorsement, advance or deposit or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C. § 431(8)(A)(i).

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Trudy Coxe was a candidate in the November 6, 1990, general election for the Second Congressional District in Rhode Island. In order to comply with the 48 hour reporting requirement for this election, the Committee was required to file "special notices," within 48 hours of receipt, for all contributions of \$1,000 or more received from October 18 through November 3, 1990.

The Respondents' 30 day post-general election report indicates that the Committee accepted eleven contributions, totaling \$30,000, within the 48 hour reporting period, from individuals and political committees. Specifically, special notices were not filed for the following contributions:

| | | |
|---------------------------------|----------|----------|
| Ms. Elizabeth L. Chace | 11/01/90 | \$1,000 |
| Ms. Louise Dunlap | 11/02/90 | \$1,000 |
| Bill Thomas Campaign Committee | 11/01/90 | \$1,000 |
| Committee for Thorough Argricul | 11/02/90 | \$3,000 |
| Dreier for Congress Committee | 11/01/90 | \$1,000 |
| Moorhood for Congress | 11/01/90 | \$1,000 |
| Auto Dealers and Drivers PAC | 11/02/90 | \$1,000 |
| Fleet/Nortsar Financial Group | 11/01/90 | \$1,000 |
| Pepsico Concerned Citizen Fund | 11/02/90 | \$1,000 |
| Gertrude M. Coxe (loan) | 10/22/90 | \$15,000 |
| Gertrude M. Coxe (loan) | 10/31/90 | \$4,000 |

Accordingly, there is reason to believe that the Trudy Coxe for Congress Committee, and Mary F. Allard, as treasurer violated 2 U.S.C. § 434(a)(6)(A).

Disclosure of Source of Candidate Loans

The Act requires that each committee disclose the identification of each person who makes a loan to the reporting committee during the reporting period, together with the identification on any endorser or guarantor of such loan, and the date and amount or value of such loan. 2 U.S.C. § 434(b)(3)(E).

The Respondents' 12 day pre-general report discloses the

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receipt of two candidate loans, totaling \$85,000. As noted above, the Respondents' 30 day post general election report also discloses the receipt of two candidate loans, totaling \$19,000. Thus the Respondents' reports disclose the receipt of four loans, totaling \$104,000, reportedly made to the Committee by the candidate. Reports Analysis Division ("RAD") made several written requests that the Respondents clarify whether these four loans were from the candidate's personal funds or were from some other source. Although in a telephone conversation the treasurer informed a RAD analyst that amendments to these reports would be filed by February 4, 1991, amended reports were not received. Accordingly, there is reason to believe that the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, violated 2 U.S.C. § 434(b)(3)(E).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1991

Mary F. Allard, Treasurer
Trudy Cox for Congress Committee
29 Prospect Street
Barrington, R.I. 02806

RE: MUR 3336
Trudy Cox for Congress Committee,
and Mary F. Allard, as treasurer

Dear Ms. Allard:

Enclosed please find a letter and other materials which were sent to the Committee's post office box on June 14, 1991. As you were recently informed by Xavier K. McDonnell, the enclosed materials were returned to the Commission, and the Commission was notified that the Committee's post office box was closed.

Please note that the Federal Election Campaign Act of 1971, as amended, requires all registered committees to report any changes in information submitted in a statement of organization, including any change in a committee's address, within 10 days of the change. See 2 U.S.C. § 431(c).

Thank you for your cooperation in this matter. If you have any questions, please call Xavier K. McDonnell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely

Lisa E. Klein
Assistant General Counsel

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To: Mr. Xavier K. McDonnell

From: Mary F. Allard, Treasurer, Trudy Coxé for Congress Committee

Date: July 18, 1991

RE: MUR 3336

91 JUL 18 PM 3:01

This is to acknowledge that I have requested an extension of time to reply to the charges made by the Federal Election Commission. The information has been turned over to Christopher Little, attorney for the Trudy Coxé for Congress Committee. You will be hearing from him before the end of next week.

Thank you for your cooperation in this matter.

Sincerely,

Mary F. Allard

Mary F. Allard

Treasurer

Trudy Coxé for Congress Committee

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RECEIVED
F.E.C.
SECRETARIAT

91 JUL 25 PM 12:02

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the matter of)

Trudy Cox for Congress Committee)
and Mary F. Allard, as treasurer)

MUR 3336

GENERAL COUNSEL'S REPORT

BACKGROUND

On June 7, 1991, the Commission found reason to believe the Trudy Cox for Congress Committee ("Committee") and Mary F. Allard, as treasurer ("Respondents"), violated 2 U.S.C. §§ 434(a)(6)(A) and 434(b)(3)(E). By same date, the Commission agreed to enter into preprobable cause conciliation with the Respondents and approved a conciliation agreement in settlement of the matter.

On June 14, 1991, a packet containing the Commission's notification letter, factual and legal analysis, conciliation agreement and other materials was mailed to the Committee's post office box. However, the packet was returned to the Commission with a note from the postal authorities which indicated that the Committee's post office box was closed. This Office subsequently obtained the treasurer's home address, and the packet was mailed to that location on June 28, 1991. According to the treasurer, the packet was received on or around July 5, 1991. On July 18, 1991, the Committee requested an extension until the end of the week of July 22, 1991 to respond to the Commission's findings and

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-2-

proposal. That extension has been granted. After the Committee's response has been submitted, the Office of General Counsel will submit a report to the Commission.

Lawrence M. Noble
General Counsel

Date 7/23/41

BY:

LG Lerner
Lois G. Lerner
Associate General Counsel

Staff Assigned: Xavier K. McDonnell

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TILLINGHAST COLLINS & GRAHAM

COUNSELORS AT LAW

July 26, 1991

Xavier K. McDonnell, Esquire
 Federal Election Commission
 Washington, DC 20463

RE: MUR 3336
Trudy Coxe for Congress Committee and
Mary Allard as Treasurer

Dear Mr. McDonnell:

I thank you for your courtesy in extending the time for us to file a response to the materials mailed June 28, 1991 to Mary Allard and received by her on July 8, 1991. You will find enclosed a statement of designation of counsel, which I am filing with this letter. You will also find enclosed affidavits of Mary Allard and James Gaffney which substantiate the position that is generally set forth below.

It appears to me that this case has involved primarily a failure of communication which may be attributable to various reasons. In the Statement of Organization, the Trudy Coxe for Congress Committee established its address as being 38 Chiswick Road, Cranston, Rhode Island 02905. That address has not changed. That address also is the residence of the candidate and her husband, James P. Gaffney. Documents occasionally have been mailed by the Commission to various other addresses and returned. The only proper and authorized address on the Commission's records has been that as set forth in the FEC Form 1.

91 JUL 30 AM 10:43

RECEIVED
 FEDERAL ELECTION COMMISSION
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91 JUL 31 AM 11:37

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 FEDERAL ELECTION COMMISSION
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In any event, we have gone through facts underlying this matter and it seems to us that there is only one small issue than truly warrants attention by the FEC. According to the records of the treasurer, which are included with her affidavit, three 48 hour notices were provided. The last notice (Exhibit C) includes some of the contributions alleged by the Commission as not having been reported. Of the balance, the largest sum of dollars in issue came in the form of loans from the candidate herself from her personal funds; the balance came from proper and lawful contributions. It should be noted that none of these contributions were of the kind that would be potentially embarrassing to this candidate. In fact, some of the earlier contributions properly noted were potentially much more difficult for her. The last 48 hour notice apparently was not provided because the treasurer sold her accounting and bookkeeping business on October 31, 1990 and moved her records from her office to her home. In this process she apparently simply neglected to file the last report. The report was ultimately included in the December post-election report of receipts and disbursements.

Outside of the apparent failure to comply with the 48 hour notice rule, it appears that the principal focus of the Commission's complaint concerns loans from the candidate to herself. Late in the campaign, the candidate advanced money from her personal assets to help fund the Committee's operations. She chose to treat these advances as loans from herself to the Committee. The statute alleged to have been violated, i.e., section 434 (3)(e) requires that the person who makes the loan be identified "together with the identification of any endorser or guarantor of such loan and the date and amount of value of such loan." Inasmuch as there was no endorser or guarantor, there was nothing to be provided with respect to that information. The other information was in fact provided.

In early February 1991, Todd Gerlough contacted James Gaffney, Mary Allard and me with questions about the loans and other bookkeeping questions. I advised Mr. Gerlough of the fact that the loan was from the candidate's personal funds. The same advice was provided by James Gaffney and by Mary Allard. He had other questions that were characterized of a bookkeeping nature. These questions were answered on the telephone and in a memorandum sent by Mary Allard back to Mr. Gerlough on February 5, 1991. A copy of that memorandum is included. There were three letters from the Commission dated February 1 to which no additional response was provided. Inasmuch as those letters came subsequent to her memorandum to Mr. Gerlough and asked the same questions as had been asked in their telephone conversation, Ms. Allard reasonably assumed that her responses addressed those questions.

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Xavier K. McDonnell, Esquire
July 26, 1991
Page 3

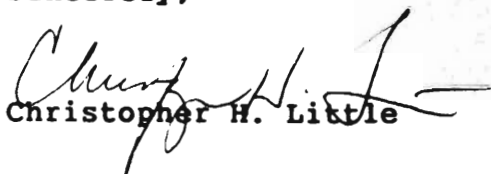
It is therefore our position that there is no violation of the Act with respect to reporting candidate loans and that there is a perfectly understandable, albeit apparent violation of the Act with respect to one 48 hour notice. In these circumstances, we do not believe a conciliation agreement is warranted, particularly an agreement as proposed by the Commission.

Several other points warrant further notation. In a letter dated May 30, 1991, Ms. Allard was advised that she was again to file additional information. On June 20 a letter was sent to Ms. Allard saying that information was still requested and if nothing was done within 15 days, the Commission may choose to initiate legal or enforcement action. Notwithstanding both of these letters, the Commission had already commenced its legal action, as is evidenced by the statements of the Chairman in his letter dated June 14, 1991. This letter was not received until July 8, 1991.

We look forward to discussing this with you further. We are prepared to try to work out a reasonable resolution and to discuss the facts in order to insure that both parties are proceeding based upon an accurate factual record.

As you may be aware, I contacted your office on Friday to discuss this with you and was advised that you were out ill. I look forward to hearing from you when you are feeling better. I will generally be out of my office from August 5 to August 16.

Sincerely,


Christopher H. Little

CHL:dmz
Enclosure
1181f

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3336

NAME OF COUNSEL: Christopher H. Little

ADDRESS: TILLINGHAST COLLINS & GRAHAM
One Old Stone Square

Providence, RI 02903

TELEPHONE: (401) 456-1200

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.

7/26/91
Date

Mary F. Allard
Signature

RESPONDENT'S NAME: Mary F. Allard

ADDRESS: 29 Prospect Street

Barrington, RI 02806

HOME PHONE: _____

BUSINESS PHONE: _____

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Trudy Coxe for Congress
Committee, and Mary F. Allard,
as treasurer

)
)
)
)
)

MUR 3336

AFFIDAVIT

I, James P. Gaffney, having been duly sworn state as follows:

1. I am the husband of Trudy Coxe, who was a candidate for Congress in the Second Congressional District during 1990. I reside at 38 Chiswick Road in Cranston, Rhode Island, which has been at all material times the authorized address of the Committee as well as the candidate;

2. I am aware of the contributions received by the Committee and have reviewed those contributions which apparently were not reported in accordance with the 48 hour notice requirement. To my understanding, those contributions are as follows: Louise Dunlap, Committee for Thorough Agriculture; Auto Dealers and Drivers PAC, Pepsico Concerned Citizen PAC, Gertrude M. Coxe (loan), Gertrude M. Coxe (loan). There was nothing about any of these contributions which was potentially embarrassing to the Committee or to the candidate inasmuch as these contributors did not stand for any principles that were adverse to the candidate's personal positions and there was no reason at all for failing to disclose these contributions in accordance with

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the 48 hour rule other than the inadvertence caused by the relocation of financial records which occurred when the treasurer moved her records from her office to her home;

3. I spoke with Todd Gerlough in February 1990 in response to questions he had. He reviewed the questions and explained that the information he was seeking was essentially of a minor bookkeeping nature. I referred him to Mary Allard, the treasurer;

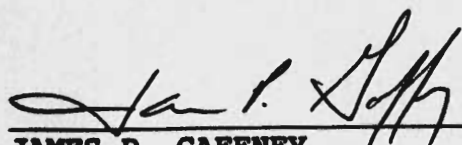
4. I did receive the letter attached as Exhibit E from Todd Gerlough in June 1991. I do not remember the specific date. I also received some time around July 4 the letter attached as Exhibit F. It should be noted I did not immediately respond to these letters because I was personally aware that each issue had in fact been responded to by Mary Allard in the past;

5. The documents reveal that this matter was submitted to the Commission on June 7, before the compliance date set forth in these two exhibits;

6. Because Trudy Coxe was not elected, the campaign organization was dismantled immediately following the November 1990 election and the Committee was not able to respond as promptly and thoroughly to each request as had been the case before the election or would have been the case had a professional staff continued to be in effect;

7. Nonetheless, we asserted our best efforts to
comply promptly and thoroughly with all requests that were made.

STATE OF RHODE ISLAND
COUNTY OF *Providence*


JAMES P. GAFFNEY

Subscribed and sworn to before me this 26 day
of July, 1991.


Notary Public
My Commission Expires

4919P

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Trudy Coxe for Congress
Committee, and Mary F. Allard,
as treasurer

)
)
)
)
)

MUR 3336

AFFIDAVIT

I, Mary F. Allard, having been duly sworn state as follows:

1. At all material times I have been the treasurer of the Trudy Coxe for Congress Committee. The Statement of Organization filed on behalf of the Committee on March 19, 1990 sets forth the address of the Committee as being 38 Chiswick Road, Cranston, Rhode Island 02905. The address of the Committee was not changed thereafter. The Statement of Candidacy likewise provided a mailing address of 38 Chiswick Road, Cranston, Rhode Island 02905;

2. From March 1990 until October 31, 1990, I maintained the books and records for the Committee out of the office of my private accounting and bookkeeping firm located in Barrington, Rhode Island;

3. On October 31, 1990, I sold my business and thereafter moved the books and records of the Committee to my home in Barrington, Rhode Island;

4. As treasurer I was responsible for filing all reports of receipts and disbursements on behalf of the Committee and I was also responsible for issuing the 48 hour

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notice reports. Attached hereto as Exhibits A and B, are copies of 48 hour notice reports which I filed with the Federal Election Commission relative to receipts received by the Committee on October 27 and October 29, 1990, respectively. Based upon the telephone conversations I had with Commission staff, I was led to believe that submitting information in this format was sufficient to satisfy the record keeping requirements of the Commission;

5. My procedure for filing the documents consisted of preparing these documents on my own computer and sending the information by facsimile transmission;

6. Attached as Exhibit C is a copy of a 48 hour notice report that I issued to the Federal Election Commission relative to donations received on October 31, 1990;

7. Exhibit C provides notice of the receipt of contributions from Dreier for Congress Committee, Elizabeth Z. Chace, Bill Thomas Campaign Committee, Moorhead for Congress Committee and Fleet/Norstar Financial Group Federal PAC. To the best of my records and knowledge; this report was provided to the Federal Election Commission in the same manner as Exhibits A and B;

8. The contributions reflected on Exhibit C are alleged by the Commission in the factual and legal analysis as not having been properly and timely noticed;

9. The following additional contributions were, in fact, received by the Committee within the 48 hour notice

period; Louise Dunlap, Committee for Thorough Agriculture, Auto Dealers and Drivers PAC, Pepsico Concerned Citizen Fund, Gertrude M. Coxe (loan) and Gertrude M. Coxe (loan). Although my records do indicate that these contributions were received, I failed to file a 48 hour notice for those contributions. My inadvertence was the result of the confusion caused by the sale of my accounting and bookkeeping office and the transfer of documents;

10. Additionally, with respect to the loans from Gertrude M. Coxe, the funds were wired into the Committee's accounts and, unfortunately, the banks neglected to advise the Committee of precisely when those funds were received;

11. In the report that I issued on behalf of the Committee, dated December 5, 1990, I accurately reflected, among other contributions, all contributions received in the 48 hour reporting period;

12. I had no intention of failing to report the \$6,000 in additional contributions and \$19,000 in loans; my failure to make the report is solely the result of confusion caused by the sale of my business and the movement of records from my office to my home;

13. During the first week of February 1991, I had telephone conversations with R. Todd Gerlough, who identified himself as an employee of the Federal Election Commission. Mr. Gerlough told me that he had a series of questions, which he characterized as minor, relating to the reports that had been

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filed. We reviewed a number of the questions and he asked for my responses. I provided him with verbal answers and he indicated that those answers addressed his concerns;

14. Mr. Gerlough told me in the conversation that he needed for me to file something in writing to supplement the records. He stated that a simple memorandum to that effect would satisfy the requirements. Attached as Exhibit D is a copy of a memorandum which I sent by facsimile to Mr. Gerlough on February 5, 1991 responding to each of the questions that he asked in our telephone conversation. It should be noted ^{that n/a} in our telephone conversation, I had reaffirmed that all loans from the candidate had come from her personal funds;

15. I did later receive letters from Mr. Gerlough requesting information. Because these letters were dated prior to my discussions, and because the information sought was same as that requested in our conversations, I assumed no additional response was necessary.

STATE OF RHODE ISLAND
COUNTY OF *Providence*

Mary F. Allard
MARY F. ALLARD

Subscribed and sworn to before me this 26th day
of July, 1991.

Christopher H. L.
Notary Public
My Commission Expires

To: Federal Election Commission
From: Trudy Coxo for Congress Committee, RI District 02,
Mary F. Allard, Treasurer

The following donations were received by Trudy Coxo for Congress Committee on October 27, 1990. FEC I.D. #134953.

| | |
|---|----------|
| Inalee Foldes Conynsham, PA | 1000.00 |
| Eli Lilly and Co. PAC Indianapolis, Indiana | 1000.00 |
| Bristol-Myers Squibb Co. PAC New York, NY | 1000.00 |
| Women's Campaign Fund Washington, DC | 3000.00 |
| Republican Leader's Fund Washington, DC | 1000.00 |
| Friends of Newt Gingrich Morrow, GA | 1000.00 |
| NOW/PAC Washington, DC | 1000.00 |
| Clean Water Action Washington, DC | 1840.85* |
| *1840.85 was returned to Clean Water Action as an overpayment of a primary contribution. | |
| Hook-Sperx, Inc. PAC Indianapolis, IN | 1000.00 |
| Nat'l Assoc. of Life Underwriters-PAC Washington, DC | 3000.00 |

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To: Federal Election Commission
From: Trudy Coxo for Congress Committee, RI District 02,
Mary F. Allard, Treasurer

The following donations were received by Trudy Coxo for Congress Committee on October 29, 1990. FEC I.D. #134953.

Maria Teresista Coxo
Providence, RI 1000.00

Laurance Rockefeller
New York, NY 1000.00

Mary Viscountess Rothemere
Palm Beach, FL 1000.00

Terrence P. Moran
Cranston, RI 1000.00

Bob Davis For Congress 1000.00

Andy Ireland 1000.00

Ravenel for Congress Committee 1000.00

General Mills Inc. PAC 2000.00

Carmen K. Marandola
East Greenwich, RI 1000.00

Human Rights Campaign Fund PAC
Washington, DC 5000.00

Republican Leader's Fund
Washington, DC 1000.00 ✓

Barbara Barre Seid
Chicago, IL 1000.00

Friends & Neighbors of Steve Gunderson
Osseo, WI 1000.00

Michel for Congress Committee
Peoria, ILL 1000.00

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To: Federal Election Commission
From: Trudy Coxo for Congress Committee, RI District 02,
Mary F. Allard, Treasurer

The following donations were received by Trudy Coxo for Congress Committee on October 31, 1990. FEC I.D. #134953.

| | |
|--|----------|
| Dreier For Congress Committee | 1,000.00 |
| Elizabeth Z. Chace | 1,000.00 |
| Bill Thomas Campaign Committee | 1,000.00 |
| Moorhead For Congress Committee | 1,000.00 |
| Fleet/Norstar Financial Group Federal PAC | 1,000.00 |

91040871653

To: Mr. Todd Gerlough, Federal Election Committee
From: Mary Allard, Treasurer, Trudy Coxe for Congress Committee
Re: Request for Information FEC# 134953
Date: February 5, 1991

In response to your request for further information:

July Quarterly Report - Contributions made by Mr & Mrs. Robert H.I. Goddard should have been noted as \$ 1000.00 for primary election, \$ 500.00 for general election.

The detailed listing of operating expenditures does not equal the amount on the summary page because aggregate disbursements were not detailed. The sum of the detail was added incorrectly.

12 Day Pre-Primary Report - Contributions made by Mr. Thomas P. Dimeo should have been noted \$1000.00 for primary election, \$800.00 for general election.

Column B, Line 17 of the detailed summary page was reported in error and should equal Column B, Line 7 of the Summary Page.

October Quarterly Report - The excess contribution made by Clean Water Action was refunded in the amount of \$1840.85. (please refer to year end report dated January 31.)

All loans made from the candidate were from her personal funds.

Please feel free to contact me if I can provide any more information.

Thank You.

91040371654



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EXHIBIT E
RQ-2

MAY 7 1991

Mary F. Allard, Treasurer
Trudy Coxe for Congress
38 Chiswick Rd.
Cranston, RI 02905

Re:mailed
MAY 30 1991

Identification Number: C00243147

Reference: Year End Report (11/27/90-12/31/90)

Dear Ms. Allard:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Commission Regulations require the continuous reporting of all outstanding loans. This report omits the loan(s) itemized on your previous report(s). Please amend your report(s) to indicate the current status of the following loan(s): Trudy Coxe, \$104,000. (11 CFR §§104.3(d) and 104.11)

-Your report does not include a Schedule C. Certain information disclosed in your report indicates that a loan(s) should be itemized on Schedule C. Please provide the missing schedule.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

R. Todd Gerlough

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

91040871655



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

June 20, 1991

Mary F. Allard, Treasurer
Trudy Coxe for Congress
38 Chiswick Road
Cranston, RI 02905

Identification Number: C00243147

Reference: Year End Report (11/27/90-12/31/90)

Dear Ms. Allard:

This letter is to inform you that as of June 12, 1991, the Commission has not received your response to our request for additional information, dated May 30, 1991. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact R. Todd Gerlough on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

91040871656

RECEIVED
F.E.C.
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION
91 SEP -9 PM 12:42

In the matter of)

Trudy Coxe for Congress Committee)
and Mary F. Allard, as treasurer)

MUR 3336

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 7, 1991, the Commission found reason to believe the Trudy Coxe for Congress Committee ("Committee") and Mary F. Allard, as treasurer ("Respondents"), violated 2 U.S.C. §§ 434(a)(6)(A) and 434(b)(3)(E). By same date, the Commission agreed to enter into preprobable cause conciliation with the Respondents and approved a conciliation agreement in settlement of the matter.

II. DISCUSSION OF PREPROBABLE CAUSE CONCILIATION

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III. RECOMMENDATIONS

1. Accept the attached agreement with the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 9/9/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Response.
2. Proposed Conciliation Agreement.
3. Additional Report.

Staff Assigned: Xavier K. McDonnell

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Trudy Coxe for Congress Committee) MUR 3336
and Mary F. Allard, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 11, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 3336:

1. Accept the agreement with the Trudy Coxe for Congress Committee and Mary F. Allard, as treasurer, as recommended in the General Counsel's Report dated September 9, 1991.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 9, 1991.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast votes.

Attest:

9-12-91
Date

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

Received in the Secretariat: Mon., Sept. 9, 1991 12:42 p.m.
Circulated to the Commission: Mon., Sept. 9, 1991 4:00 p.m.
Deadline for vote: Wed., Sept. 11, 1991 4:00 p.m.

dr

91040871660



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 17, 1991

Christopher Little, Esquire
Tillinghast Collins & Graham
Counselors at Law
One Old Stone Square
Providence, Rhode Island 02903

RE: MUR 3336
Trudy Coxe for Congress Committee
and Mary F. Allard, as treasurer

Dear Mr. Little:

On September 11, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Xavier K. McDonnell, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

FILED

91040871661

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3336
 Trudy Coxé for Congress Committee)
 and Mary F. Allard, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Trudy Coxé for Congress Committee (the "Committee") and Mary F. Allard, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(6)(A).

NOW THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Trudy Coxé for Congress Committee is the principal campaign committee of Gertrude M. Coxé (the "candidate") and is a

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-2-

political committee within the meaning of 2 U.S.C. § 431(4).

2. Mary F. Allard is the treasurer of the Trudy Coxé for Congress Committee.

3. Pursuant to 2 U.S.C. § 434(a)(1), each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434. Pursuant to 2 U.S.C. § 434(a)(6)(A), the candidate's principal campaign committee must notify the Clerk of the House, the Secretary of the Senate, or the Commission and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received after the 20th day, but more than 48 hours before any election. This notification must be made within 48 hours of receipt. 2 U.S.C. § 434(a)(6)(B).

4. The candidate was involved in the general election in the Second Congressional District in Rhode Island, held on November 6, 1990.

5. In order to comply with 2 U.S.C. § 434(a)(6)(A) with respect to the general election, the Respondents were required to file notices for all contributions of \$1,000 or more received from October 18 through November 3, 1990.

6. The Respondents' 30 day post general election report discloses that the Committee received 11 contributions within the 48 hour reporting period, for which special notices were not filed. Specifically, special notices were not filed for the

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-3-

following contributions:

| | | |
|---------------------------------|----------|----------|
| Ms. Elisabeth Z. Chace | 11/01/90 | \$1,000 |
| Ms. Louise Dunlap | 11/02/90 | \$1,000 |
| Bill Thomas Campaign Committee | 11/01/90 | \$1,000 |
| Committee for Thorough Argricul | 11/02/90 | \$3,000 |
| Dreier for Congress Committee | 11/01/90 | \$1,000 |
| Moorhood for Congress | 11/01/90 | \$1,000 |
| Auto Dealers and Drivers PAC | 11/02/90 | \$1,000 |
| Fleet/Nortsar Financial Group | 11/01/90 | \$1,000 |
| Pepsico Concerned Citizen Fund | 11/02/90 | \$1,000 |
| Gertrude M. Cox (loan) | 10/22/90 | \$15,000 |
| Gertrude M. Cox (loan) | 10/31/90 | \$4,000 |

V. Respondents failed to file notices, within 48 hours of receipt, for \$30,000 in contributions of \$1,000 or more, received after the 20th day but more than 48 hours before the November 6, 1990 general election, and thereby violated 2 U.S.C. § 434(a)(6)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of \$1,500 (fifteen hundred dollars), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the

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-4-

date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

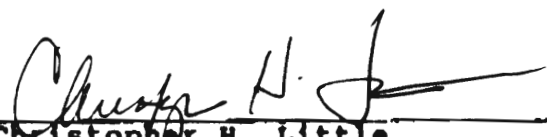
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

9/16/91
Date

FOR THE RESPONDENTS:


Christopher H. Little
Counsel for Respondents

August 9, 1991
Date

91040871665



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3336

DATE FILMED 10/18/91 CAMERA NO. 2

CAMERAMAN AS

91040871666



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3336.

10/22/91

91040871700

FOUNDED 1818

TILLINGHAST COLLINS & GRAHAM

COUNSELORS AT LAW

Please reply to: One Old Stone Square
Providence, Rhode Island 02905
Telephone 401 456-1200
Fax 401 456-1210
Telex 952166

305 Congress Street, 5th floor
Boston, Massachusetts 02210
Telephone 617 261-0555
Fax 617 261-9709

Continental Law Plaza
750 Southeast Third Avenue
Suite 1100
Fort Lauderdale, Florida 33316
Telephone 305 467-5700
Fax 305 767-0109

CLOSED

September 19, 1991

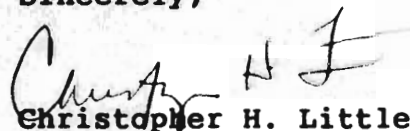
Xavier K. McDonnell, Esquire
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, DC 20463

RE: MUR 3336
Trudy Coxe for Congress Committee and Mary F.
Allard, as Treasurer

Dear Mr. McDonnell:

By letter dated September 17, we have received a fully executed copy of the conciliation agreement in the above-entitled matter. In accordance with the terms of the agreement, we have enclosed a check in the amount of \$1,500. I trust that this will conclude this matter. If not, please so advise me.

Sincerely,


Christopher H. Little

CHL:dmz
Enclosure
cc: James Gaffney
Mary F. Allard
5557f

91 SEP 24 AM 10:43

RECEIVED
FEDERAL ELECTION COMMISSION

91 SEP 23 PM 12:03

RECEIVED
FEDERAL ELECTION COMMISSION

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COMMISSION

FEDERAL
WASHINGTON

Sept 24, 1991

TWO WAY MEMORANDUM

TO:

F. B. I.
Docket

FROM:

Phena Brooks *PB*
Accounting Technician

SUBJECT:

Account Determination for Funds Received

Recently received a check from James P. Saffney, check number 1890, dated Dec. 16, 1991, and in the amount of \$ 1,500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO:

Philomena Brooks
Accounting Technician

FROM:

Fabrae Brunson *JB*
OGC, Docket

In reference to the above check in the amount of \$ 1,500, the MUR number is 3336 and in the name of Study Core for Congress Center. The account into which it should be deposited is indicated below:

☐ Budget Clearing Account (OGC), 95F3875.16

☒ Civil Penalties Account, 95-1099.160

☐ Other: _____

Fabrae Brunson
Signature

Sept. 24, 1991
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sept 24, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *PB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from James P. Saffrey, check number 1890, dated Aug. 16, 1991, and in the amount of \$ 1,500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *PB*
OGC, Docket

In reference to the above check in the amount of \$ 1,500, the MUR number is 3336 and in the name of Study Core for Congress Center. The account into which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
- ☒ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Fabrae Brunson
Signature

Sept. 24, 1991
Date

9104 087 1702



JAMES P. GAFFNEY 3-82
38 CHISWICK ROAD
CRANSTON, RI 02905

1890

Aug 16, 1991

57-12/115

PAY TO THE
ORDER OF

Federal Election Commission \$ 1,500.00

One Thousand Five Hundred DOLLARS



PAID TO ORDER OFFICE - 25
CITIZENS BANK
CITIZENS TRUST COMPANY
PROVIDENCE, RHODE ISLAND

Re: Code for Congress

[Signature]

+10115001201 49 594 1# 01 1890

BAKSTONE

91040871703