



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

D

THIS IS THE BEGINNING OF MUR # 3872

DATE FILMED 12-14-94 CAMERA NO. 2

CAMERAMAN JM H

4043594665

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

Bruce C. Gottwald

Respondent,

COMPLAINT

MUR 3872

RECEIVED
FEDERAL ELECTION COMMISSION
91 JUN 21 PM 4:31

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

GROUND FOR COMPLAINT

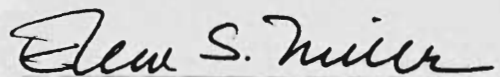
5. According to FEC records, respondent Bruce C. Gottwald made contributions subject to FECA in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent Bruce C. Gottwald made contributions attributed to the 1992 calendar year in the amount of \$32,000. These contributions exceeded by \$7,000 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

RELIEF

7. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,



Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

Date: January 14, 1994

404359468

Ellen S. Miller
Ellen S. Miller

Subscribed and sworn before me this 14th day of January, 1994.

My Commission Expires: _____
and
Public District of Columbia
Commission Expires May 14, 1998

GOTTWALD, BRUCE
Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Allen, George F	\$1,000	09/26/91	91HSE/434/4821
Bateman, Herbert H	\$1,000	10/10/92	92HSE/479/3392
Biley, Thomas J Jr	\$1,000	02/20/91	91HSE/432/0142
Bush, George	\$1,000	12/05/91	92FEC/731/0551
Bush, George	\$1,000	12/05/91	92FEC/731/0625
Butler, Henry N	\$1,000	02/10/92	92HSE/446/3848
Butler, Henry N	\$1,000	03/18/92	92HSE/446/3853
Butler, Henry N	\$500	06/11/92	92HSE/458/0438
Butler, Henry N	\$1,000	10/13/92	92HSE/477/3003
Chemical Manufacturers Assn. PAC	\$500	09/15/92	92FEC/788/0174
Ethyl Corp. PAC	\$2,500	02/06/92	92FEC/748/1022
National Republican Congressional Cmte	\$2,500	10/28/92	92HSE/484/5664
National Republican Senatorial Cmte	\$5,000	04/13/92	92SEN/011/0343
National Republican Senatorial Cmte	\$5,000	05/18/92	92SEN/012/0618
National Republican Senatorial Cmte	\$2,000	10/16/92	92SEN/028/3849
Republican Party of Virginia	\$5,000	10/09/92	92FEC/799/2536
Wolf, Frank R	\$1,000	10/19/92	92HSE/483/1106

Total Contributions Attributed to 1992: \$32,000

Bruce C. Gottwald
Exhibit 2

4043594670

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee:

(Frank Wolf)

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
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Mrs. Eleanor C. Hazel P.O. Box 31 Broad Run VA 22014	Housewife	10/19/92	1000.00
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Receipt for: General Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
----------------------------	---------------------	------	----------

Mr. Ridgway B. Espy 861 Canal Drive McLean VA 22102	Retired	10/20/92	250.00
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Receipt for: General Year-to-Date Total: \$ 600.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
----------------------------	---------------------	------	----------

Mr. Scott E. Sterling 2345 Crystal Drive #10th Arlington VA 22202	University Center Builder	10/19/92	250.00
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Receipt for: General Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
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Mr. Robert E. LaRose P.O. Box 1026 Centreville VA 22020	Universal Systems Inc. Pres. & CEO	10/19/92	1000.00
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Receipt for: General Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
----------------------------	---------------------	------	----------

Mr. Bruce C. Gottwald 4203 Sulgrave Road Richmond VA 23221	Ethyl Corp. Pres.	10/19/92	1000.00
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Receipt for: General Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
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Mr. James W. Hazel 13600 Cartwright Lane Richmond VA 23233	VECTRE Corp. Govt. Affairs	10/17/92	750.00
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Receipt for: General Year-to-Date Total: \$ 1000.00

SUBTOTAL of Receipts This Page 4250.00

TOTAL This Period

1
4
0
4
3
5
9
4
6
7

91014320142

NAME OF EMPLOYEE		NAME OF EMPLOYER	DATE INCOME beg. year	AMOUNT OF EACH PAYMENT THIS PERIOD
A. Full Name, Mailing Address and ZIP Code Mr. Arthur E. Smith, Jr. 1000 Capital Bldg. Richmond, VA 23219 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer Chesapeake Amount Year-to-Date > 0	02/28/91	250.00
B. Full Name, Mailing Address and ZIP Code Mr. Glenn Pigeon Capital Corporation Inc. 2000 Adams Ave. Richmond, VA 23224 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer Capital Corporation Chesapeake Amount Year-to-Date > 0	02/15/91	250.00
C. Full Name, Mailing Address and ZIP Code Mr. R. Gray Douglas 6822 Parkview Avenue Richmond, VA 23226 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer Douglas & Smith Chesapeake Amount Year-to-Date > 0	02/21/91	250.00
D. Full Name, Mailing Address and ZIP Code Mr. Robert Carter 1916 Anthony Road Richmond, VA 23224 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer [REDACTED] Chesapeake Amount Year-to-Date > 0	02/27/91	250.00
E. Full Name, Mailing Address and ZIP Code Mr. Robert Carter 1916 Anthony Road Richmond, VA 23224 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer [REDACTED] Chesapeake Amount Year-to-Date > 0	02/27/91	250.00
F. Full Name, Mailing Address and ZIP Code Mr. E. Franklin Fox, Jr. 2000 Williams Road Richmond, VA 23224 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer [REDACTED] Chesapeake Amount Year-to-Date > 0	02/28/91	250.00
G. Full Name, Mailing Address and ZIP Code Mr. Bruce C. Gilmour 4800 Solgates Road Richmond, VA 23221 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General		Name of Employer Solgates Corporation Chesapeake Amount Year-to-Date > 0 1,000.00	02/28/91	1000.00
SUBTOTAL of Receipts This Page (optional)				
TOTAL, This Period (See page 4b for number only)				

SCHEDULE A

ITEMIZED RECEIPTS

Page 9 of 16
for Line Number 11a

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Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Jennifer Baysinger 1802 Rosebud Court College Station TX 77845	Information Requested Information Requested	06/11/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ashley E. McArthur 3535 S Utah Street Arlington VA 22206	U.S. House of Rep Leg. Asst.	06/16/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Bruce C. Gottwald 4203 Sulgrave Road Richmond VA	Ethyl Corp. Pres.	06/11/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
June A. Williams 715 Potomac Knolls Drive McLean VA 22102	Information Requested Homemaker	06/15/92	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Earle C. Williams 715 Potomac Knolls Drive McLean VA 22102	Information Requested Retired	06/15/92	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James T. Bennett Prof. of Economics Fairfax VA 22030	George Mason Professor	06/29/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 3500.00

TOTAL This Period

SCHEDULE A

ITEMIZED RECEIPTS

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Form Number 11a

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Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Eric S. O'Keefe Rt. 3 P.O. Box 279 Spring Green WI 53568	Information Requested Information Requested	02/01/92	1000.00
Receipt for: Primary		Total: \$ 1000.00	

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Howard S. Rich	Information Requested Information Requested	02/01/92	1000.00
Receipt for: Primary		Total: \$ 1000.00	

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Andrea Rich	Information Requested Information Requested	02/03/92	1000.00
Receipt for: Primary		Total: \$ 1000.00	

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
R.W. Cook U. of Richmond Richmond VA 23173	Dept. of Economics professor	02/05/92 03/06/92	500.00 100.00
Receipt for: Primary		Total: \$ 600.00	

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William & Jo Haraf 2018 N. 23rd St. Arlington VA 22201	Information Requested	02/01/92	250.00
Receipt for: Primary		Total: \$ 250.00	

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Bruce C. Gottwald 4203 Sulgrave Road Richmond VA 23221	Information Requested Information Requested	02/10/92	1000.00
Receipt for: Primary		Total: \$ 1000.00	

SUBTOTAL of Receipts This Page 4850.00

TOTAL This Period

SCHEDULE A

ITEMIZED RECEIPTS

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for Line Number 11a

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Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Stephen Hartwell 1101 Vermont Ave. Washington DC 20005	Information Requested Information Requested	03/06/92	500.00

Receipt for: Primary Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ken Altshuler 3237 Hearers Dallas TX 75204	Information Requested Information Requested	03/13/92	250.00

Receipt for: Primary Total: \$ 250.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Bruce C. Gottwald 4203 Sulgrave Rd. Richmond VA 23221	Information Requested Information Requested	03/18/92	1000.00

Receipt for: Primary Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William J. Lomen 160 27th St., SE Roanoke VA 24014	Information Requested Information Requested	03/18/92	300.00

Receipt for: Primary Total: \$ 300.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Robert C. Dullavan 4000 Legate Rd. #1100 Fairfax VA 22033	Information Requested Information Requested	03/18/92	250.00

Receipt for: Primary Total: \$ 250.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
John M. Toups 1209 Stuart Robinson Dr. McLean VA 22101	Information Requested Information Requested	03/18/92	500.00

Receipt for: Primary Total: \$ 500.00

SUBTOTAL of Receipts This Page 2800.00

TOTAL This Period

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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LINE 11 A

Any information copied from such Reports or 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.

REPORT COVERING PERIOD FROM 10/15/92 THRU 11/23/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR TO-DATE
MR. P. E. GOTH, JR. 1604 LARIAT DRIVE BARTLESVILLE, OK 74006-5319	10/29/92	\$25.00	\$270.00
CHEMICAL ENGINEER			
DR. ALEXANDER W. GOTTA 29 ASCOT RIDGE GREAT NECK, NY 11021	10/16/92	\$120.00	\$440.00
PHYSICIAN			
MR. JACOB GOTTLIEB 2355 MADRONA DR PALM SPRINGS, CA 92264-9514	10/16/92	\$180.00	\$1295.00
RETIRED			
MR. SAM GOTTLIEB EIGHT BRIGHTON 15TH STREET BROOKLYN, NY 11235	10/16/92	\$10.00	\$205.00
INFORMATION REQUESTED	10/20/92	\$10.00	
	10/26/92	\$25.00	
MR. EDWARD W. GOTTLIEB, C.P.A. 22 BLOOMFIELD AVE. DENVER, NJ 07834	11/ 5/92	\$10.00	\$275.00
CPA			
MR. HENRY D. GOTTMANN 208 HEATHER LANE RAMSEY, NJ 07446-1035	10/23/92	\$200.00	\$325.00
UNEMPLOYED			
MR. BRUCE C. GOTTWALD 4203 SULGRAVE ROAD RICHMOND, VA 23221	10/16/92	\$2000.00	\$12000.00
PRESIDENT			
MRS. FRANCES L. GOULD 1500 WHEELER LANE ST HELENA, CA 94574	10/19/92	\$105.00	\$335.00
HOMEMAKER			

SCHEDULE A-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

Use separate schedule for each category of the detailed summary page	PAGE	OF THIS REPORT
	548	1299
LINE NUMBER 17a		

NAME OF COMMITTEE (in Full)		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
BUSH-BARTLE '92 PRIMARY COMMITTEE			
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 ADDRESS CITY STATE ZIP CODE Repsdale, Mr. Richard E. 2300 Woodmont Blvd. Nashville, TN 37215	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	11/26/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE French, Mrs. Dana S. 901 Main Street Dallas, TX 75202	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/25/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Ward, Mr. J. K. Box 130 Midland, TX 79702	NAME OF EMPLOYER Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/25/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Soderstrom, Mr. Charles V. Jr. 10330 Regency Parkway Dr. Omaha, NE 68114	NAME OF EMPLOYER Self OCCUPATION Attorney AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	10/25/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Gibbons, Mr. Wayne 4439 North 33rd Street Arlington, VA 22207	NAME OF EMPLOYER Mid-Continent Oil & Gas Assn. OCCUPATION Attorney/President AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/05/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Connafe, Mr. Stephen R. 5161 Yuma St., N.W. Washington, DC 20016	NAME OF EMPLOYER Jones, Day, Reuels OCCUPATION Attorney AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/05/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Gottwald, Mr. Bruce C. Jr. 3540 Long Lane Richmond, VA 23221	NAME OF EMPLOYER Ethyl Chemical Corp. OCCUPATION Sales Manager AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/05/91	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Smith, Mr. Robert D. 1000 Aggregate Rd. Arlington, VA 22207	NAME OF EMPLOYER Ethyl Chemical Corp. OCCUPATION Sales Manager AGGREGATE YEAR TO DATE \$1,000.00 RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/04/91	\$1,000.00

PRINTED NAME PTS THIS PAGE

TOTAL (SEE REPT) Last page this form

Redesignated

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 1
2
1181

All information on this schedule and Statements may not be sold or used by any person for the purpose of soliciting contributions from such committee.

NAME OF COMMITTEE OR FUND

C00277118

Chemical Manufacturers Association Political Action Committee (CMA PAC)

A Full Name, Mailing Address and ZIP Code Mark Nichols 16305 Swingley Ridge Dr. Chesterfield, MO 63017 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Mallinckrodt Occupation President, CEO Aggregate Year-to-Date \$ 500.00	Date (month, day, year) 8/11/92 Amount of Each Receipt for this Period 500.00
B Full Name, Mailing Address and ZIP Code S. Jay Stewart 100 N. Riverside Plaza Chicago, IL 60606 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Morton Int'l Occupation President & CEO Aggregate Year-to-Date \$ 750.00	Date (month, day, year) 8/13/92 Amount of Each Receipt for this Period 750.00
C Full Name, Mailing Address and ZIP Code Arnold Webre 2000 West Loop South, Suite 700 Houston, TX 77027 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Texas Brine Occupation President Aggregate Year-to-Date \$ 1000.00	Date (month, day, year) 8/25/92 Amount of Each Receipt for this Period 1000.00
D Full Name, Mailing Address and ZIP Code Tom Gilroy 3027 Seven Oaks Place Falls Church, VA 22042 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Chemical Mfrs. Assn.. Occupation Communications Aggregate Year-to-Date \$ 200.00	Date (month, day, year) 8/27/92 Amount of Each Receipt for this Period 200.00
E Full Name, Mailing Address and ZIP Code Ralph Cunningham 3040 Post Oak Blvd. Houston, TX 77056 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Texaco Chemical Occupation President Aggregate Year-to-Date \$ 500.00	Date (month, day, year) 8/31/92 Amount of Each Receipt for this Period 500.00
F Full Name, Mailing Address and ZIP Code Bruce Gottwald 4203 Sulgrave Rd. Richmond, VA 23221 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Ethyl Corporation Occupation CEO Aggregate Year-to-Date \$ 500.00	Date (month, day, year) 9/15/92 Amount of Each Receipt for this Period 500.00
G Full Name, Mailing Address and ZIP Code Thomas Gossage Hercules Plaza Wilmington, DE 19894 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Hercules Inc. Occupation Chairman, CEO, President Aggregate Year-to-Date \$ 1000.00	Date (month, day, year) 9/17/92 Amount of Each Receipt for this Period 1000.00

SUBTOTAL

4,450.00

TOTAL

4043594614
103738J174

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

1 1 0
Page 1 of 1
11.8.1.

Any information received from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for any other purpose. The filer must not use the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

ETHYL CORPORATION POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code

Charles B. Walker
Rt. 2, Box 1215
Manover, VA 23069

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/03/92

Amount of Each Receipt this Period
\$ 550

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
Exec. V.P. & CFO
Aggregate Year-to-Date **> \$ 550.00**

B. Full Name, Mailing Address and ZIP Code

Arthur W. Melwig
8511 Highfield Road
Richmond, VA 23229

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/03/92

Amount of Each Receipt this Period
750

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
Vice President - Planning
Aggregate Year-to-Date **> \$ 750.00**

C. Full Name, Mailing Address and ZIP Code

Bruce C. Gettsald
6203 Sulgrave Road
Richmond, VA 23221

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/06/92

Amount of Each Receipt this Period
2,000

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
President & CEO
Aggregate Year-to-Date **> \$ 2,000.00**

D. Full Name, Mailing Address and ZIP Code

Floyd B. Gettsald, Jr.
300 Norndon Road
Richmond, VA 23229

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/10/92

Amount of Each Receipt this Period
2,000

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
Chairman of Board & CEO
Aggregate Year-to-Date **> \$ 2,000.00**

E. Full Name, Mailing Address and ZIP Code

E. Gary Cook
778 Locust Grove Road
West Chester, PA 19382

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/13/92

Amount of Each Receipt this Period
1,000

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
Sr. V.P./Pres. Chemicals Group
Aggregate Year-to-Date **> \$ 1,000.00**

F. Full Name, Mailing Address and ZIP Code

Edward G. Woods
6177 Moss Side Lane
Baton Rouge, LA 70808

Name of Employer
Ethyl Corporation

Date (month, day, year)
02/14/92

Amount of Each Receipt this Period
400

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
Tech. Dir. - ICD/EMD
Aggregate Year-to-Date **> \$ 400.00**

G. Full Name, Mailing Address and ZIP Code

Barry J. Grossman
401 E. 34th Street, Apt. 16A
New York, NY 10016

Name of Employer
American Mayflower Life Insurance Company

Date (month, day, year)
02/18/92

Amount of Each Receipt this Period
400

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation
President
Aggregate Year-to-Date **> \$ 400.00**

Subtotal of Receipts This Page (only)

\$ 5,100

TOTAL (Enter on last page and the number only)

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 220 OF 679
LINE 11 A

Any information copied from such Reports or 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.

REPORT COVERING PERIOD FROM 4/ 1/92 THRU 4/30/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. KEITH H. GORNICK POST OFFICE BOX 556 GAYLORD, MI 49735			\$250.00
EXECUTIVE	4/29/92	\$250.00	
MR. ABRAHAM D. GOSMAN 128 TECHNOLOGY CENTER WALTHAM, MA 02154			\$1000.00
	4/20/92	\$1000.00	
C.R.O.			
MR. CLARENCE E. GOSS 632 WIMBISH ROAD Macon, GA 31210			\$280.44
PUBLIC EDUCATION	4/14/92	\$25.00	
	4/21/92	\$15.00	
	4/22/92	\$15.00	
	4/23/92	\$10.00	
	4/28/92	\$15.00	
MR. THOMAS GOSS 409 W. 144TH STREET RIVERDALE, IL 60627-2646			\$210.00
TRAIN DIRECTOR	4/ 3/92	\$20.00	
	4/27/92	\$12.50	
MR. JACOB GOTTLIEB 2355 MADRONA DR PALM SPRINGS, CA 92264-9514			\$580.00
RETIREED	4/14/92	\$110.00	
MR. BRUCE C. GOTTMALD 4203 SULGRAVE ROAD RICHMOND, VA 23221			\$5000.00
PRESIDENT	4/13/92	\$5000.00	
MR. DONNELL H. GOULD 807 WASHINGTON STREET KERRVILLE, TX 78028			\$315.00
RETIREED	4/ 7/92	\$50.00	

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

PAGE 226 OF 708
LINE 11 A

Any information copied from such Reports or 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.

REPORT COVERING PERIOD FROM 5/ 1/92 THRU 5/31/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR TO-DATE
MR. CLARENCE E. GOSS 632 WIMBISH ROAD MACON, GA 31210			\$380.44
PUBLIC EDUCATION	5/ 1/92	\$15.00	
	5/ 8/92	\$20.00	
	5/ 8/92	\$25.00	
	5/13/92	\$20.00	
	5/26/92	\$20.00	
MR. THOMAS GOSS 409 W. 144TH STREET REVERDALE, IL 60627-2646			\$242.50
TRAIN DIRECTOR	5/ 5/92	\$20.00	
	5/26/92	\$12.50	
MR. JACOB GOTTLIEB 2265 MADRONA DR PALM SPRINGS, CA 92264-9514			\$765.00
RETIRED	5/ 8/92	\$125.00	
	5/ 8/92	\$60.00	
MR. BRUCE C. GOTTWALD 4203 SULGRAVE ROAD RICHMOND, VA 23221			\$10000.00
PRESIDENT	5/18/92	\$5000.00	
MR. DONNELL H. GOULD 807 WASHINGTON STREET KERRVILLE, TX 78028			\$385.00
RETIRED	5/21/92	\$70.00	
MR. BYRON W. GOULDING 3 OAK BROOK CLUB DRIVE D108 OAK BROOK, IL 60521-1329			\$262.50
CHAIRMAN	5/11/92	\$12.50	
MRS. DORIS GOVE 9221 WEST BROWARD BLVD. PLANTATION, FL 33324-2443			\$815.00
RETIRED	5/27/92	\$50.00	

SCHEDULE A

ITEMIZED RECEIPTS

Page 19 of 32
for Line Number 11a

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Full Name of Committee: (General Allen)

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Bruce C. Gottwald 4203 Sulgrave Rd. Richmond VA 23221	Ethyl Corp. executive	09/26/91	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
M. K. Lansdale P. O. Box 27 Seal Beach CA 90740	Lansdale Co. Owner	09/26/91	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
J. M. Jarvis P. O. Box 6788 Richmond VA 23230	self-employed consultant	09/30/91	250.00

Receipt for: General Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James W. Hazel 13600 Cartwright Ln. Richmond VA 23233	Vectre Corp. consultant	09/30/91	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William A. Forrest Jr. 203 Banbury Rd. Richmond VA 23221	self-employed attorney	09/30/91	250.00

Receipt for: General Year-to-Date Total: \$ 250.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Barbara N. Forrest 203 Banbury Rd. Richmond VA 23221	homemaker homemaker	09/30/91	250.00

Receipt for: General Year-to-Date Total: \$ 250.00

SUBTOTAL of Receipts This Page 3750.00

TOTAL This Period

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 14
for Line Number 11a

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Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. W. S. Moore 1415 Laburnum Street McLean VA 22101	Commonwealth of Va. Attorney	10/12/92	100.00

Receipt for: General Year-to-Date Total: \$ 300.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Ogden O. Allsbrook Jr. 115 Tillman Lane Athens GA 30606	Information Requested Information Requested	10/14/92	50.00

Receipt for: General Year-to-Date Total: \$ 388.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Anthony R. Tringale CLU 7700 Little River TnPk. Annandale VA 22003	Information Requested Information Requested	10/05/92	50.00

Receipt for: General Year-to-Date Total: \$ 350.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Lt. Col Irving L. Denton 7124 Dale Court Annandale VA 22003	Retired	10/05/92	25.00

Receipt for: General Year-to-Date Total: \$ 475.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ms. Maria A. Balenger 4302 Greenberry Lane Annandale VA 22003	Information Requested Information Requested	10/05/92 10/05/92 10/09/92	50.00 25.00 100.00

Receipt for: General Year-to-Date Total: \$ 230.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Bruce C. Gottwald 4203 Sulgrave Road Richmond VA 23221	Information Requested Information Requested	10/13/92	1000.00

Receipt for: General Year-to-Date Total: \$ 2000.00

SUBTOTAL of Receipts This Page 1400.00

TOTAL This Period

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

 PAGE 1
 FOR LINE NUMBER 1101

Any information received from such Reports and Schedules may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes other than using the name and address of any political committee to obtain contributions from such contributors

NAME OF COMMITTEE (in Full)

Republican Party of Virginia

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Chapman, Willis F. 6511 Jaymiller Dr. Falls Church, VA 22041	retired	10/5/92	25.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	225.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Ermer, James 13705 Hickory Nut Point Midlothian, VA 23112	INFORMATION REQUESTED	10/9/92	2500.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	2500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Gay, Henry H. P. O. Box 11908 Lynchburg, VA 24506	INFORMATION REQUESTED	10/2/92	100.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	225.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Gottwald, Bruce 4203 Sulgrave Road Richmond, VA 23221	Ethyl Corp. Executive	10/9/92	5000.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	5000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Monette, David G. 879 Mustang Trail Suffolk, VA 23435	INFORMATION REQUESTED	10/6/92	250.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Koutier, Robert J. 3925 Colonel Ellis Ave. Alexandria, VA 22304	Attorney	10/2/92	100.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	250.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Snow, John W. 2625 Monument Ave. Richmond, VA 23220	CSX Corp. Executive	10/9/92	5000.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$	5000.00	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (from page this line number only)

94204833924563805

ANY INFORMATION COPIED FROM SUCH REPORTS OR 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, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT	INFO
		DATE	AMOUNT
GEORGE DR BORST 1201 ST CHRISTOPHER DR ASHLAND KY 41101	SELF EMPLOYED PHYSICIAN	11/23/92	125.00
		10/23/92	75.00
		10/23/92	150.00
	AGGREGATE YTD	575.00	
MORRIS, MR B. C. MIDDLEBURG KY 42541	INFORMATION REQUESTED	11/23/92	100.00
	AGGREGATE YTD	300.00	
PETERS, MRS BARBARA 22 HILLCREST DR GREAT NECK NY 11021	HOMEMAKER	11/20/92	150.00
	AGGREGATE YTD	1,175.00	
LUTZ, MRS BETTY H 133 NO 28TH ST CAMP HILL PA 17011	INFORMATION REQUESTED	10/26/92	100.00
	AGGREGATE YTD	550.00	
BOURNE, MRS BONNIE 18 E 75TH ST NEW YORK NY 10021	SELF EMPLOYED	10/19/92	150.00
	AGGREGATE YTD	400.00	
COTTRELL, MR BRUCE 1201 HOLGATE RD RICHMOND VA 23221	MILK CORP EXECUTIVE	10/20/92	2,500.00
	AGGREGATE YTD	2,500.00	
PETERSON, MR BIRDELL A. 1710 BIRDELL AVE EAU CLAIRE WI 54701	INFORMATION REQUESTED	11/06/92	25.00
	AGGREGATE YTD	260.00	

SUBTOTAL OF RECEIPTS THIS PAGE
 COPYRIGHT 1992 NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

RECEIPT AMOUNT
 3,525.00

ITEMIZED RECEIPTS

Page 3 of 15
For Line Number 11a

Any items copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial interest, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Bateman for Congress Committee

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. George R. Goodson Jr. 1216 Mallicotte Lane Newport News VA 23606	Warwick Plumbing & Heat President	10/09/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Jerome Gordon 14 Mill Creek Terrace Hampton VA 23663	Gordon Enterprises Executive	10/14/92	500.00

Receipt for: General Year-to-Date Total: \$ 650.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Bruce C. Gottwald 4203 Sulerave Road Richmond VA 23221	Ethyl Corporation President	10/10/92	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Gorin F. Hatchett 7 Acorn Street Hampton VA 23669	Gorin Felix Hatchett Lawyer	10/14/92	15.00

Receipt for: General Year-to-Date Total: \$ 485.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. C. K. Hutchens Jr. 32 Ferguson Cove Newport News VA 23612	Hutchens Chevrolet Owner	10/09/92	600.00

Receipt for: General Year-to-Date Total: \$ 800.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Kenneth C. Jones 222 James River Drive Newport News VA 23601	Carpenter Bros., Inc. Real Estate	10/06/92 10/06/92	100.00 15.00

Receipt for: General Year-to-Date Total: \$ 325.00

SUBTOTAL of Receipts This Page 2730.00

TOTAL This Period

92014193392



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3872

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Bruce C. Gottwald. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3872. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

4043594688



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bruce C. Gottwald
4203 Sulgrave Road
Richmond, VA 23221

RE: MUR 3872

Dear Mr. Gottwald:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3872. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

4043594689

Bruce C. Gottwald
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

4043594690



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street
Suite 200
Alexandria, VA 22314

RE: MUR 3872

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the Bush-Quayle '92 Primary Committee, Inc. ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3872. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

14043594691

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3400. For your information, we have enclosed a brief
description of the Commission's procedures for handling
complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

14043594692



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

7-11-72

Robert Carlson, Treasurer
Butler for Congress
3329 Grass Hill Terrace
Falls Church, VA 22044

RE: MUR 3872

Dear Mr. Carlson:

The Federal Election Commission received a complaint which indicates that the Butler for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3872. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

4043594693

Robert Carlson, Treasurer
Butler for Congress
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

4043594694

WILEY, REIN & FIELDING

1778 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

February 15, 1994

JAN WITOLD BARAN
(202) 429-7330

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

FEB 16 11 40 AM '94

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Mary L. Taksar, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3872 (Bruce C. Gottwald)

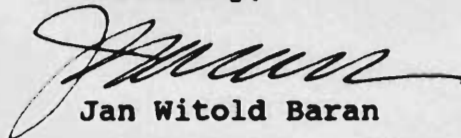
Dear Ms. Taksar:

This office has just been retained to represent Mr. Bruce C. Gottwald in the above-captioned matter. Enclosed please find an executed Statement of Designation of Counsel.

Mr. Gottwald has received your undated letter which transmitted a copy of the complaint in this matter. According to our calculation, a response would be due on February 22, 1994. I respectfully request an extension of fourteen (14) days up to and including March 8, 1994, within which to file a response on behalf of Mr. Gottwald. This extension is necessary in order to allow me, as recently retained counsel, to confer with my client and investigate the facts of this case.

Your favorable consideration of this request will be appreciated.

Sincerely,


Jan Witold Baran

Encl.

94 FEB 16 PM 2:20

RECEIVED
FEDERAL ELECTION COMMISSION

4043594625

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3872

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20463

TELEPHONE: (202) 429-7330

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.

Date

Bruce C. Gottwald
Signature

RESPONDENT'S NAME: Bruce C. Gottwald

ADDRESS: 4203 Sulgrave Road

Richmond, VA 23221

TELEPHONE: HOME()

BUSINESS()

94 FEB 16 PM 2:20

RECEIVED
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

4043594696



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 18 1994

Jan Witold Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20463

RE: MUR 3872
Bruce C. Gottwald

Dear Ms. Baran:

This is in response to your letter dated February 15, 1994, which we received on February 16, 1994, requesting an extension of 14 days to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on March 8, 1994.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Karen White
for
Joan McEnery
Paralegal

14043594697

Bob Carlson
P.O. Box 4954
Falls Church, VA 22044
(703) 941-2032

06C#237
FEDERAL ELECTION
COMMISSION
MAIL ROOM
Feb 24 9 51 AM '94

February 22, 1994

Office of the General Counsel
Federal Election Commission
999 E Street N.W.
Washington D.C. 20463

RE: MUR 3872

To Whom It May Concern:

I am writing in my capacity as Treasurer of the Butler For Congress Committee and am responding to the Commission's letter dated Feb. 15, 1994, signed by Mary L. Taksar, regarding the MUR identified above.

Allegations: The Complainant alleges that the Butler for Congress Committee violated the Federal Election Campaign Act of 1971, as amended, by accepting excess contributions from Bruce C. Gottwald of Richmond, Virginia.

Facts: a. The contributions dated 2/10/92 and 3/18/92 were already addressed by the Commission and the Committee. The Commission, based on preliminary reviews of the Committee's original reports, raised the issue of Mr. Gottwald's contributions in a letter dated Sept. 25, 1992. Upon investigation the Committee discovered that its campaign software did not print the titles of contributors, such as "Dr." and "Mrs." on its reports. Consequently, separate checks from Mr. and Mrs. Gottwald were incorrectly reported as being solely from Mr. Gottwald. The Committee filed an appropriate amendment with the Clerk of the House. Copies of relevant pages from that amendment are enclosed.

The Complainant apparently used copies of the Committee's original reports in drafting the Complaint and failed to review the Committee's amended reports. Therefore, the facts regarding these two contributions clearly are incorrectly stated in the Complaint and are contradicted by prior filings of the Committee.

b. The contribution dated 6/11/92 apparently was misreported for the same reason described in the paragraph above. Our contributor database identifies the contribution as being made by Mrs. Gottwald, but the title "Mrs." was not printed on the Committee's report. The Committee should have caught this error earlier and filed an amendment. The Committee is prepared to file an amendment if the Commission agrees that is the appropriate action to take.

Note: This contribution was reported as being for the Primary Election on the initial report. The Commission's preliminary review expressed concern about that, and the Committee promptly checked its records and filed an amendment verifying that the contribution was intended for the General Election. That amendment also should have added the missing title to the name.

Conclusion: The allegations made against the Butler for Congress Committee in MUR 3872 are incorrect. The Committee did not accept excess contributions. Any errors by the Committee were made in the data entry by Committee volunteers and resulted in contributions being improperly attributed to

94 FEB 24 PM 4:12

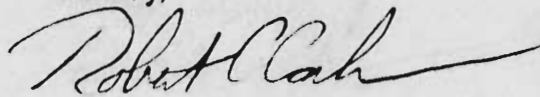
RECEIVED
FEDERAL ELECTION
COMMISSION

4043594698

Mr. Gottwald instead of Mrs. Gottwald.

Let me know if you have any questions or need additional information.

Cordially,

A handwritten signature in cursive script, appearing to read "Robert C. Carlson". The signature is fluid and extends to the right with a long horizontal stroke.

Robert C. Carlson
Treasurer, Butler for Congress

4043594699

Henry
BUTLER
U.S. CONGRESS

Clerk of the House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

Identification Number: C00257113

Reference: April Quarterly Report (1/1/92-3/31/92)

To the Clerk:

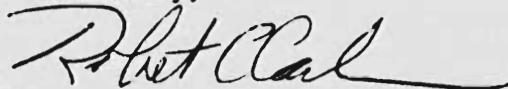
This letter and the enclosed amendment to the above-referenced report of the Butler for Congress Committee are prompted by the Federal Election Commission's preliminary review of the report.

The following responses to the FEC's questions are made:

1. The contributions highlighted by the Commission do not exceed the limits set forth in the Act. The Committee received one \$1,000 contribution from Bruce C. Gottwald and one \$1,000 contribution from Mrs. Bruce C. Gottwald on separate checks. One of the listings in Schedule A did not include the title "Mrs." The report is amended to clarify this contribution.
2. The missing figure on Line 13(c) is provided in the amendment.
3. The treatment of the candidate's out of pocket expenses is reported as instructed in the letter from the Commission.
4. The Committee uses "best efforts" to obtain the occupation and employer of the contributors itemized on Schedule A. When the Committee receives a contribution without the required information, a solicitation for the information is promptly sent to the contributor requesting the information and stating that it is required by federal election law. A copy of that solicitation is enclosed.
5. An amendment to correct the aggregate year-to-date totals was filed approximately one week after the original report was filed.

Please contact me if there are any other questions about this report.

Sincerely,



Robert C. Carlson
Treasurer

4043594700

SCHEDULE A

ITEMIZED RECEIPTS

Page 13 of 16
for Line Number 11a

Any info. copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Stephen Hartwell 1101 Vermont Ave. Washington DC 20005	Information Requested Information Requested	03/06/92	500.00

Receipt for: Primary Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Ken Altshuler 5227 Mearers Dallas TX 75204	Information Requested Information Requested	03/13/92	250.00

Receipt for: Primary Total: \$ 250.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Bruce C. Gottwald, Mrs. 4203 Sulgrave Rd. Richmond VA 23221	Information Requested Information Requested	03/18/92	1000.00

Receipt for: Primary Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William J. Lemon 160 27th St., SE Roanoke VA 24014	Information Requested Information Requested	03/18/92	300.00

Receipt for: Primary Total: \$ 300.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Robert C. DeHaven 4000 Legato Rd. #1100 Fairfax VA 22033	Information Requested Information Requested	03/18/92	250.00

Receipt for: Primary Total: \$ 250.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
John M. Toups 1209 Stuart Robeson Dr. McLean VA 22101	Information Requested Information Requested	03/18/92	500.00

Receipt for: Primary Total: \$ 500.00

SUBTOTAL of Receipts This Page 2800.00

TOTAL This Period



RECEIVED
FEDERAL ELECTION COMMISSION

94 MAR -3 PM 12:27

Stan Huckaby
Treasurer

February 23, 1994

Ms. Mary Taksar
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3872

Dear Ms. Taksar:

The Bush-Quayle '92 Primary Committee, Inc., ("the Committee") received on February 17, 1994 your letter dated February 15, 1994, regarding this MUR.

The information contained in Exhibit 1 accompanying the MUR is inaccurate. As indicated in Exhibit 2, Mr. Bruce C. Gottwald and Mr. Bruce C. Gottwald, Jr. each made a \$ 1,000 contribution to the Committee on December 5, 1991. Neither one made any other contributions to the Committee. Therefore, the Committee is not in violation of any FEC regulation with respect to the contributions made by Mr. Bruce C. Gottwald and by Mr. Bruce C. Gottwald, Jr.

The documentation necessary to support the activity referenced above has already been provided to, and verified by, the Commission's Audit Division. As a result, I request that the Commission determine that no action should be taken against the Committee with respect to MUR 3872.

Sincerely:

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.

14043594702

RECEIVED
FEDERAL ELECTION COMMISSION
94 MAR 8 PM 4:11
06C 428

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

March 8, 1994

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Mary L. Taksar, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3872 (Bruce C. Gottwald)

Dear Ms. Taksar:

4043594703

This letter and attached exhibits constitute the response of Bruce C. Gottwald to the complaint filed by the Center for Responsive Politics denominated Matter Under Review ("MUR") 3872. Mr. Gottwald respectfully requests that the Federal Election Commission ("FEC") find no reason to believe that he violated the Federal Election Campaign Act of 1971, as amended ("Act").

DISCUSSION

The Complaint alleges that Mr. Gottwald exceeded the 1992 annual contribution limit of 2 U.S.C. § 441a(a)(3). That limit is \$25,000. In support of that allegation, the complainant appends to the complaint an exhibit which purports to list all of Mr. Gottwald's contributions subject to the limit. Attached as Respondent's Exhibit A. The aggregate of those alleged contributions is \$32,000. However, numerous contributions on this list are attributed erroneously either to the 1992 limit or to Mr.

WILEY, REIN & FIELDING

Mary L. Taksar, Esq.
March 8, 1994
Page 2

Gottwald. For the reasons set forth below, Mr. Gottwald's 1992 contributions subject to the limit total \$24,500 and, therefore, are in compliance with the Act.

1. George F. Allen Contribution (\$1,000).

The complaint refers to a contribution dated September 26, 1991, to George F. Allen. Mr. Allen was a candidate for election to Congress with respect to a special election held in November, 1991. Accordingly, this contribution was with respect to an election held in 1991 (not 1992). Pursuant to section 441a(a)(3), this donation counts toward the 1991 annual limit. There is no suggestion that Mr. Gottwald exceeded the 1991 limit and, in fact, he has not. Thus, this donation should be deducted from the alleged 1992 annual figure of \$32,000.

2. Republican Party of Virginia Donation (\$5,000).

The complaint refers to a contribution dated October 9, 1992, to the Republican Party of Virginia. This donation was mistakenly deposited by the recipient in its federal account. Enclosed please find a copy of a letter dated February 23, 1994, to Mr. Gottwald from John H. Hager, Treasurer of the Republican Party of Virginia, in which Mr. Hager acknowledges "our mistake in depositing your check into the federal account." Respondent's Exhibit B. Mr. Gottwald's donation was not intended to be a federal contribution subject to the Act and should not be treated as one by the FEC

WILEY, REIN & FIELDING

Mary L. Taksar, Esq.
March 8, 1994
Page 3

because of the donee's admitted mistake. Moreover, the Virginia Party has corrected its error by transferring a sum equal to Mr. Gottwald's donation to the appropriate account. Id. Therefore, this contribution should not be included in Mr. Gottwald's 1992 limit.

3. Butler Contributions (\$1,500).

The complaint refers to four contributions totalling \$3,500 to Henry N. Butler. While the complaint does not mention it, there is a fifth contribution in the amount of \$500 reported by the Butler committee as from Mrs. Gottwald dated October 13, 1992. Regrettably, the Butler campaign failed to report the entire \$2,000 of the total \$4,000 of contributions coming from Mrs. Gottwald. The Gottwalds at all times intended their five donations to be allocated between them. Enclosed please find a Statement of Bruce C. and Nancy H. Gottwald (Respondent's Exhibit C) which sets forth in detail how the Gottwalds contributed to the campaign of Mr. Butler, a personal friend, in response to his specific individual requests. All donations were made on the Gottwalds' personal joint checking account and were at all times intended to be treated as joint contributions. They were aware of a \$1,000 limit. Thus, no check is for more than \$1,000. If the donations had been reported by the Butler campaign as intended by the Gottwalds and presumably understood by Mr. Butler, the Gottwalds would be recorded as having

WILEY, REIN & FIELDING

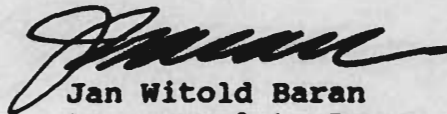
Mary L. Taksar, Esq.
March 8, 1994
Page 4

donated \$1,000 each to the primary and general elections in 1992. Accordingly, \$1,500 attributed to Mr. Gottwald in the complaint should have been attributed to Mrs. Gottwald. Thus attributed, the Gottwald contributions comply with all applicable limits of the Act.

CONCLUSION

For the reasons set forth in detail above, Bruce C. Gottwald donated \$24,500 in contributions subject to the annual limitation of the Act with respect to 1992. Therefore, there is no reason to believe that he violated the Act.

Sincerely,



Jan Witold Baran
As counsel to Bruce C. Gottwald

Attachments

GOTTWALD, BRUCE C

Contributions Attributed to 1992

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Allen, George F	\$1,000	09/26/91	91HSE/434/4821
Bateman, Herbert H	\$1,000	10/10/92	92HSE/479/3392
Biley, Thomas J Jr	\$1,000	02/20/91	91HSE/432/0142
Bush, George	\$1,000	12/05/91	92FEC/731/0551
Bush, George	\$1,000	12/05/91	92FEC/731/0625
Butler, Henry N	\$1,000	02/10/92	92HSE/446/3848
Butler, Henry N	\$1,000	03/18/92	92HSE/446/3853
Butler, Henry N	\$500	06/11/92	92HSE/458/0438
Butler, Henry N	\$1,000	10/13/92	92HSE/477/3003
Chemical Manufacturers Assn. PAC	\$500	09/15/92	92FEC/788/0174
Ethyl Corp. PAC	\$2,500	02/06/92	92FEC/748/1022
National Republican Congressional Cmte	\$2,500	10/28/92	92HSE/484/5664
National Republican Senatorial Cmte	\$5,000	04/13/92	92SEN/011/0343
National Republican Senatorial Cmte	\$5,000	05/18/92	92SEN/012/0618
National Republican Senatorial Cmte	\$2,000	10/16/92	92SEN/028/3849
Republican Party of Virginia	\$5,000	10/09/92	92FEC/799/2536
Wolf, Frank R	\$1,000	10/19/92	92HSE/483/1106

Total Contributions Attributed to 1992: \$32,000

B



● REPUBLICAN PARTY OF VIRGINIA

PATRICK M. McSWINEY, CHAIRMAN

February 23, 1994

Mr. Bruce Gottwald
4203 Sulgrave Road
Richmond, Virginia 23221

Dear Bruce:

Recently, you have brought to our attention that the Federal Election Commission is questioning your 1992 personal contributions, including an October 9, 1992 contribution of \$5,000 to the Republican Party of Virginia. The \$5,000 contribution was deposited into the Party's federal account and reported to the FEC.

On reviewing this contribution and your history of making annual contributions to support the state operations of the Party, we have concluded that the \$5,000 should have been deposited into our non-federal account. Therefore, the Party has transferred \$5,000 from its federal account to its non-federal account. Our next report to the Federal Election Commission, due on April 15, will report the transfer and will include a memorandum entry to explain why the transfer was made.

We are very grateful to you for your past annual contributions to support the Party. We hope this action corrects our mistake in depositing your check into the federal account and we apologize for any inconvenience to you.

Sincerely,

REPUBLICAN PARTY OF VIRGINIA

John H. Hager
Treasurer

1/2

RICHARD D. O'BRYEN CENTER
180 EAST GLADE STREET RICHMOND, VIRGINIA 23218 (804)786-0111 FAX (804)343-1000
PAID FOR AND AUTHORIZED BY THE REPUBLICAN PARTY OF VIRGINIA. CONTRIBUTIONS ARE NOT TAX-Deductible.

FEB 23 '94 11:25

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PAGE.003

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C

STATEMENT OF BRUCE C. AND NANCY H. GOTTWALD

The purpose of this statement is to provide some background information concerning the political contributions we made in 1991 and 1992 which have been questioned in Federal Election Commission Matter 3872.

For most of our adult lives, we have supported financially candidates for political office in local, state and federal elections. We use a joint bank account to cover these contributions. We were conscious of the \$1,000 limit on individual contributions to candidates in federal elections. Our intention was to treat each check drawn on our joint account as a joint contribution, not realizing that (as we have recently been advised) the technical requirements are that each of us should have signed each check or some other writing in order for it to be deemed a joint contribution.

In addition, there is another reason that motivated us in utilizing a joint account. We both wanted to be eligible to attend fundraising events, particularly sessions held in Washington for contributors to Republican Party campaigns. We understood that the use of the joint bank account would enable us to be treated as making joint contributions to these fundraisers.

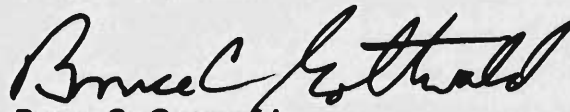
Attached for your review are five cancelled checks that we used to make contributions to the Congressional primary and general election campaigns of Henry Butler, a candidate from the 11th Congressional District of Virginia. These

contributions were made in response to specific individual requests from the candidate, who is a personal friend of ours. Each check was intended to represent a joint contribution, and our objective was to make the maximum permitted contributions in support of Mr. Butler for the primary and the general elections.

We intend to take precautionary steps in the future to ensure total compliance with the technical requirements of the Act.

Our attorney of record, Jan W. Baran, will deliver this and other materials regarding our contributions, but we wanted to make this statement to indicate our intent with respect to joint contributions.

Very truly yours,


Bruce C. Gottwald


Nancy H. Gottwald

March 7, 1994

4043594710

MR. OR MRS. BRUCE C. GOTTWALD
[REDACTED]

SOVRAN BANK, N.A.
RICHMOND, VIRGINIA 23261
68-1/510 1178

3990
3990

PAY***** ONE THOUSAND ***** 00/100 Dollars
TO THE ORDER OF Butler For Congress DATE Feb 6 92 AMOUNT **\$1,000.00*

Bruce C. Gottwald
[REDACTED]

MR. OR MRS. BRUCE C. GOTTWALD
[REDACTED]

SOVRAN BANK, N.A.
RICHMOND, VIRGINIA 23261
68-1/510 1178

4042
4042

PAY***** ONE THOUSAND ***** 00/100 Dollars
TO THE ORDER OF Butler For Congress DATE Mar 9 92 AMOUNT **\$1,000.00*

404359
[Handwritten marks]

Bruce C. Gottwald
[REDACTED]

MR. OR MRS. BRUCE C. GOTTWALD
[REDACTED]

SOVRAN BANK, N.A.
RICHMOND, VIRGINIA 23261
68-1/510 1178

4304
4304

PAY***** FIVE HUNDRED ***** 00/100 Dollars
TO THE ORDER OF Butler For Congress DATE Jun 2 92 AMOUNT ****\$500.00*

Bruce C. Gottwald
[REDACTED]

MR. OR MRS. BRUCE C. GOTTWALD

NATIONS BANK
RICHMOND, VIRGINIA 23261
68-1/510 1178

4744

4744

PAY ***** FIVE HUNDRED ***** DATE ***** 00/100 AMOUNT Dollars
THE ORDER OF Butler For Congress Oct 8 92 *****\$500.00*

Memo: NANCY H. GOTTWALD

Nancy H. Gottwald

MR. OR MRS. BRUCE C. GOTTWALD

NATIONS BANK
RICHMOND, VIRGINIA 23261
68-1/510 1178

4743

4743

4043592
PAY ***** ONE THOUSAND ***** DATE ***** 00/100 AMOUNT Dollars
TO THE ORDER OF Butler For Congress Oct 8 92 ***\$1,000.00*

Bruce C. Gottwald

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

SENSITIVE

I. INTRODUCTION

This report is the second Enforcement Priority System Monthly Report. The purpose of this September Monthly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 44 cases which do not warrant further pursuit

4043594713

relative to the other pending cases.¹ A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-44. For the Commission's convenience, the narratives for the externally-generated matters are immediately followed by the complaint and response(s) and the narrative for the internally-generated matter is immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 2 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is

1. These matters are: PM 299; MUR 3856; MUR 3859; MUR 3860; MUR 3861; MUR 3863; MUR 3864; MUR 3865; MUR 3868; MUR 3869; MUR 3870; MUR 3871; MUR 3872; MUR 3873; MUR 3874; MUR 3875; MUR 3877; MUR 3878; MUR 3880; MUR 3881; MUR 3882; MUR 3883; MUR 3884; MUR 3885; MUR 3887; MUR 3888; MUR 3889; MUR 3897; MUR 3900; MUR 3901; MUR 3906; MUR 3909; MUR 3910; MUR 3913; MUR 3914; MUR 3915; MUR 3916; MUR 4029; MUR 4030; MUR 4034; MUR 4035; MUR 4038; MUR 4039; and MUR 4040.

2. These matters are RAD 93L-66 and RAD 93L-69.

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based on staleness, this Office has not prepared separate narratives for these cases. However, the referrals for these internally-generated matters are attached. See Attachments 45-46.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective November 14, 1994. By closing the cases effective November 14, 1994, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for this fairly large number of cases.

14043594715

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective November 14, 1994 in RAD 93L-66 and RAD 93L-69.

B. Decline to open a MUR, close the file effective November 14, 1994, and approve the appropriate letter in PM 299.

C. Take no action, close the file effective November 14, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3856
- 2) MUR 3859
- 3) MUR 3860
- 4) MUR 3861
- 5) MUR 3863
- 6) MUR 3864
- 7) MUR 3865
- 8) MUR 3868
- 9) MUR 3869
- 10) MUR 3870
- 11) MUR 3871
- 12) MUR 3872
- 13) MUR 3873
- 14) MUR 3874
- 15) MUR 3875
- 16) MUR 3877
- 17) MUR 3878
- 18) MUR 3880
- 19) MUR 3881
- 20) MUR 3882
- 21) MUR 3883
- 22) MUR 3884
- 23) MUR 3885
- 24) MUR 3887
- 25) MUR 3888
- 26) MUR 3889
- 27) MUR 3897
- 28) MUR 3900
- 29) MUR 3901
- 30) MUR 3906
- 31) MUR 3909
- 32) MUR 3910
- 33) MUR 3913
- 34) MUR 3914
- 35) MUR 3915

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- 36) MUR 3916
- 37) MUR 4029
- 38) MUR 4030
- 39) MUR 4034
- 40) MUR 4035
- 41) MUR 4038
- 42) MUR 4039
- 43) MUR 4040

10'26'94
Date

Lawrence M. Noble
Lawrence M. Noble
General Counsel

Attachments

4043594717

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Bruce C. Gottwald.

)
)
)

MUR 3872

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 2, 1994, the Commission decided by a vote of 6-0 to take no action, close the file in MUR 3872 effective November 14, 1994, and approve the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1994.

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

Attest:

11-3-94
Date

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

Received in the Secretariat:	Thurs., Oct. 27, 1994	3:16 p.m.
Circulated to the Commission:	Fri., Oct. 28, 1994	2:00 p.m.
Deadline for vote:	Wed., Nov. 02, 1994	4:00 p.m.

bjr

4043594718



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

NOV 21 1994

RE: MUR 3872

Dear Ms. Miller:

On January 21, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043594719

MUR 3872

BRUCE C. GOTTWALD

The Center for Responsive Politics filed a complaint alleging that Bruce Gottwald exceeded his 1992 \$25,000 annual contribution limit by \$7,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$32,000. The contributions identified in the complaint raised the issue of whether some of the recipient committees, the Butler for Congress Committee and the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

Mr. Gottwald responds that the \$1,000 contribution made to George Allen was for a 1991 Special Election and therefore not attributable to 1992. He states that the \$5,000 contribution made to the Republican Party of Virginia was mistakenly deposited in its federal account and that the Committee corrected its error by transferring the \$5,000 into its non-federal account. According to Mr. Gottwald, the \$4,000 contribution made to the Butler for Congress Committee was written on the Gottwald's joint account and should have been allocated equally between him and his wife, instead of being attributed solely to him. Mr. Gottwald states that these actions brings his 1992 contributions to \$24,500.

The Butler for Congress Committee responds that its software failed to print the titles of contributors and therefore, it incorrectly reported contributions from the Gottwalds as being solely from Mr. Gottwald. The Committee states further that it did not receive excessive contributions from Mr. Gottwald and that it amended its reports to reflect the correct information. In response to the complaint, the Bush-Quayle '92 Primary Committee states that Mr. Gottwald and his son, Bruce Gottwald, Jr., each contributed \$1,000 to the Committee.

This matter involves less significant issues relative to other matters pending before the Commission and the respondents took remedial action.

4043594720



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

NOV 21 1994

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20463

RE: MUR 3872
Bruce C. Gottwald

Dear Mr. Baran:

On January 28, 1994, the Federal Election Commission notified your client, Bruce C. Gottwald, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

14043594721

NUR 3872
BRUCE C. GOTTWALD

The Center for Responsive Politics filed a complaint alleging that Bruce Gottwald exceeded his 1992 \$25,000 annual contribution limit by \$7,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$32,000. The contributions identified in the complaint raised the issue of whether some of the recipient committees, the Butler for Congress Committee and the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

Mr. Gottwald responds that the \$1,000 contribution made to George Allen was for a 1991 Special Election and therefore not attributable to 1992. He states that the \$5,000 contribution made to the Republican Party of Virginia was mistakenly deposited in its federal account and that the Committee corrected its error by transferring the \$5,000 into its non-federal account. According to Mr. Gottwald, the \$4,000 contribution made to the Butler for Congress Committee was written on the Gottwald's joint account and should have been allocated equally between him and his wife, instead of being attributed solely to him. Mr. Gottwald states that these actions brings his 1992 contributions to \$24,500.

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This matter involves less significant issues relative to other matters pending before the Commission and the respondents took remedial action.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

NOV 21 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 3872

Dear Mr. Huckaby:

On February 15, 1994, the Federal Election Commission notified Bush-Quayle '92 Primary Committee, Inc. ("Committee") and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043594723

MUR 3872
BRUCE C. GOTTWALD

The Center for Responsive Politics filed a complaint alleging that Bruce Gottwald exceeded his 1992 \$25,000 annual contribution limit by \$7,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$32,000. The contributions identified in the complaint raised the issue of whether some of the recipient committees, the Butler for Congress Committee and the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

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This matter involves less significant issues relative to other matters pending before the Commission and the respondents took remedial action.

4043594724



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

NOV 21 1994

Robert Carlson, Treasurer
Butler for Congress
3329 Grass Hill Terrace
Falls Church, VA 22044

RE: MUR 3872

Dear Mr. Carlson:

On February 15, 1994, the Federal Election Commission notified Butler for Congress ("Committee") and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

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NUR 3872

BRUCE C. GOTTWALD

The Center for Responsive Politics filed a complaint alleging that Bruce Gottwald exceeded his 1992 \$25,000 annual contribution limit by \$7,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$32,000. The contributions identified in the complaint raised the issue of whether some of the recipient committees, the Butler for Congress Committee and the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

Mr. Gottwald responds that the \$1,000 contribution made to George Allen was for a 1991 Special Election and therefore not attributable to 1992. He states that the \$5,000 contribution made to the Republican Party of Virginia was mistakenly deposited in its federal account and that the Committee corrected its error by transferring the \$5,000 into its non-federal account. According to Mr. Gottwald, the \$4,000 contribution made to the Butler for Congress Committee was written on the Gottwald's joint account and should have been allocated equally between him and his wife, instead of being attributed solely to him. Mr. Gottwald states that these actions brings his 1992 contributions to \$24,500.

The Butler for Congress Committee responds that its software failed to print the titles of contributors and therefore, it incorrectly reported contributions from the Gottwalds as being solely from Mr. Gottwald. The Committee states further that it did not receive excessive contributions from Mr. Gottwald and that it amended its reports to reflect the correct information. In response to the complaint, the Bush-Quayle '92 Primary Committee states that Mr. Gottwald and his son, Bruce Gottwald, Jr., each contributed \$1,000 to the Committee.

This matter involves less significant issues relative to other matters pending before the Commission and the respondents took remedial action.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3872

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