



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3889

DATE FILMED 12/15/91 CAMERA NO. 2

CAMERAMAN MMR

14043600733

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

RECEIVED  
FEDERAL ELECTION COMMISSION  
94 JAN 21 PM 4:31

**CENTER FOR RESPONSIVE POLITICS**

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

v.

Complainant,

James Bronce Henderson

Respondent,

**COMPLAINT**

MUR 3889

**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 James Bronce Henderson 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 James Bronce Henderson made contributions attributed to the 1992 calendar year in the amount of \$34,500. These contributions exceeded by \$9,500 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

The undersigned complainant, on behalf of the Center for Responsive Politics, swears that the statements in this Complaint are based on the sources indicated, and as such, are true and correct to the best of her information and belief.

District of Columbia )  
 ) ss

*Regina Sarda*  
Notary Public

**Phyllis Landsau**  
**Notary Public District of Columbia**  
**My Commission Expires May 14, 1998**

**HENDERSON, JAMES BRONCE**  
Contributions Attributed to 1992

Exhibit 1

**Summary of FEC Data**

<b>Recipient</b>	<b>Amount</b>	<b>Date</b>	<b>FEC Microfilm Location</b>
Bush, George	\$1,000	12/12/91	92FEC/731/0490
Carl, Douglas	\$1,000	02/25/92	92HSE/449/0584
Dingell, John D	\$1,000	11/21/91	92HSE/437/4907
National Republican Senatorial Cmte	\$5,500	01/28/92	92SEN/006/2233
Republican National Cmte	\$15,000	01/28/92	92FEC/740/0137
Republican National Cmte	\$10,000	10/22/92	92FEC/807/2590
Republican National Cmte	\$1,000	09/22/92	92FEC/792/3911

**Total Contributions Attributed to 1992: \$34,500**

**James Henderson**  
**Exhibit 2**

4043600738



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 poli-  
tical committee to solicit contributions from such committee.

PERIOD COVERING PERIOD FROM 7/ 1/91 THRU 12/31/91 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALCULATED YR-TO-DATE
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MR. JAMES W. HENDERSON			\$7737.00
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20101 HOOVER  
DETROIT, MI 48205

10/16/91	\$7500.00
10/16/91	\$227.00
10/16/91	\$142.00

CHAIRMAN OF THE BOARD

RAY C. HENDERSON			\$215.00
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15068 LASC DRIVE  
SLOUGHHOUSE, CA 95691

7/22/91	\$35.00
10/ 1/91	\$35.00

8  
INFORMATION REQUESTED

MR. NORMA HENDERSON			\$105.00
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62023 SUN HUNT CIRCLE  
SHUATHEE, CA 92252

7/17/91	\$15.00
7/22/91	\$5.00
8/30/91	\$20.00
9/10/91	\$20.00
9/26/91	\$5.00
10/ 7/91	\$10.00
10/ 9/91	\$15.00
10/17/91	\$10.00
11/10/91	\$10.00
12/16/91	\$15.00

HOUSEWIFE

MR. PAUL A. HENDERSON			\$215.00
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176 E. ROOSEVILLE ROAD  
LANCASTER, CA 97601

7/ 3/91	\$25.00
8/ 5/91	\$25.00
9/10/91	\$10.00
10/15/91	\$10.00
11/12/91	\$10.00
12/10/91	\$10.00

RETIRED

MR. JAMES W. HENDERSON			\$250.00
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20101 HOOVER  
DETROIT, MI 48205

9/16/91	\$150.00
12/ 4/91	\$100.00

HOUSEWIFE

MR. JAMES W. HENDERSON			\$240.00
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20101 HOOVER  
DETROIT, MI 48205

7/16/91	\$40.00
8/16/91	\$25.00

INFORMATION REQUESTED

4043600739

## SCHEDULE A

## ITEMIZED RECEIPTS

Line No. 11a

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 OF COMMITTEE: JOHN D. DRIGELL FOR CONGRESS COMMITTEE

NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Forstner, Glen W 871 Ridgeland Bloomfield Hills MI 48304	Ross Roy Group OCCUPATION Chairman CEO	21 Nov 91	\$500.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$500.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Gale, Thomas C 4899 Cedarhill Drive Rochester MI 48306	Chrysler Corporation OCCUPATION Vice President	21 Nov 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Groves, Lino J 4567 Chateau Court Troy MI 48068	Chrysler Corporation OCCUPATION Vice President	21 Nov 91	\$500.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$500.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Manderson, James B 20101 Hurver Detroit MI 48205	Detroit Center Tool, Inc OCCUPATION Chairman	21 Nov 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Maricca, Lido A 30 Sennet Oaks Drive Bloomfield Hills MI 48304	Chrysler Corporation OCCUPATION Chairman of the Board	21 Nov 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Johnson, Glen R 5583 Northumberland Street Pittsburgh PA 15217	Mutual Trust Fund Federated Securities Corp OCCUPATION President	21 Nov 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Kessel, Mark 950 Park Avenue, Apt #10A New York NY 10028	Sherman & Sterling OCCUPATION Partner	3 Dec 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Lawrence, O'Donnell, Marcus & Co 51 Broadway New York NY 10006	Partnership OCCUPATION	24 Dec 91	\$500.00
NO PARTNER'S ALLOCABLE CONTRIBUTION EXCEEDED \$200			
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$500.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Levitt, Arthur Jr 375 Park Avenue New York NY 10152	Levitt Made Co OCCUPATION Chairman	3 Dec 91	\$1,000.00
CONTRIBUTION FOR 92 General	YEAR TO DATE TOTAL		\$2,000.00
NAME & ADDRESS	EMPLOYER	DATE	AMOUNT
Lindler, Arthur C 556 Oak Street Birmingham MI 48009 3838	Chrysler Corporation OCCUPATION Vice President	21 Nov 91	\$1,000.00
CONTRIBUTION FOR 92 Primary	YEAR TO DATE TOTAL		\$1,000.00

4043600740



**SCHEDULE A**

**FINANCED RECEIPTS**

Supplemental schedule to the campaign finance report  
to be filed with the report of the  
Candidate's Financial Report

**Page 1 of 1**  
**Form 100-100**

(Any information required from each Employer and Employer 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

**CARL RICE CANDIDATE COMMITTEE**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
<b>DANIEL M. LYNCH</b> 200 PIMMILLER AVE. #10 2000 DETROIT, MI 48203	<b>MS-304 LYNCH</b>  <b>INVESTMENT BANKER</b> Aggregate Year-to-Date > \$ 100.00	<b>2/1/72</b>	<b>100.00</b>
<b>THOMAS S. HOGG</b> 1084 PONTIAC AVE. DETROIT, MI 48207	<b>THOMAS S. HOGG</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/1/72</b>	<b>100.00</b>
<b>JOHN GORDON</b> 1736 E. 14TH STREET FLINT, MI 48903	<b>JOHN GORDON</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/1/72</b>	<b>100.00</b>
<b>CHUCK GORDON</b> 1736 E. 14TH ST FLINT, MI 48903	<b>CHUCK GORDON</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/1/72</b>	<b>100.00</b>
<b>JOHN GORDON</b> 3716 PONTIAC AVE. FLINT, MI 48903	<b>JOHN GORDON</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/1/72</b>	<b>100.00</b>
<b>ALBERT J. HOGG</b> 800 N. GORDON RD FLINT, MI 48907	<b>ALBERT J. HOGG</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/2/72</b>	<b>500.00</b>
<b>THOMAS S. HOGG</b> 2701 HOGG RD DETROIT, MI 48205	<b>THOMAS S. HOGG</b>  <b>AGGREGATE YEAR-TO-DATE &gt; \$ 100.00</b>	<b>2/25/72</b>	<b>100.00</b>
<b>TOTAL of Receipts This Page (optional)</b>			<b>5,400.00</b>
<b>TOTAL This Period (fill in the number only)</b>			

404360074

# NATIONAL REPUBLICAN

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 1/ 1/92 THRU 1/31/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALNDAR YR-TO-DATE
MRS. DONALD HEDBERG P. O. BOX 1422 JANESVILLE, WI 53547	1/28/92	\$1000.00	\$1000.00
INFORMATION REQUESTED			
MRS. ALICE R. HEIN 200 WALNUT MONTGOMERYVILLE, PA 17754	1/22/92	\$220.00	\$220.00
HOUSEWIFE	1/28/92	\$120.00	\$120.00
MR. EDGAR F. MEISER, JR. 261 BLUFFS EDGE DRIVE LAKE FOREST, IL 60045	1/22/92	\$500.00	\$500.00
INVESTMENTS			
MR. JAMES BRONCE HENDERSON 20101 NOOVER DETROIT, MI 48205	1/28/92	\$500.00	\$500.00
CHAIRMAN OF THE BOARD			
MR. F. GUY HENLEY, JR 1903 RENA LANE MILTON, GA 30720	1/15/92	\$300.00	\$300.00
RETIRED			
MISS GERTRUDE HENNING 303 PASO MADERA APT. C GREEN VALLEY, AZ 85614-2534	1/ 2/92	\$225.00	\$225.00
RETIRED	1/13/92	\$95.00	
	1/14/92	\$25.00	
	1/16/92	\$35.00	
	1/21/92	\$35.00	
	1/28/92	\$35.00	
MRS. ARTHUR L. HERBERGER 300 HOT SPRINGS ROAD #35 MONTECITO, CA 93108-2031	1/21/92	\$500.00	\$500.00
INFORMATION REQUESTED			

4043600742

# NATIONAL COMMITTEE

ITINERIZED REPORT COVERING PERIOD FROM 9/01/92 THRU 9/30/92 OVER \$200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD	TO DATE
Mr. James Henderson 1111 12th St Washington DC 20002	INFORMATION REQUESTED 09/30/92	09/30/92	\$250.00	\$250.00
Mr. James Henderson 1111 12th St Washington DC 20002	HOUSEWIFE	09/28/92	\$300.00	\$300.00
Mr. Harriett M. Henderson 1111 12th St Washington DC 20002	Retired	09/18/92	\$250.00	\$250.00
Mr. J. L. Henderson 1111 12th St Washington DC 20002	Retired	09/25/92	\$55.00	\$222.00
Mr. James Bruce Henderson 2001 Hoover Street Detroit MI 48205	INFORMATION REQUESTED 09/22/92	09/22/92	\$1,000.00	\$1,000.00
Mrs. Marie M. Henderson 257 Newberry St. N.W. Aiken SC 29801	Retired	09/10/92 09/28/92	\$150.00 \$150.00	\$625.00
Mr. Theodore Henderson Apartment 1-2 3663 Greenbelt Road Greenbelt MD 20770	Counseling Psychologist P. G. Co. Board of Education	09/03/92	\$60.00	\$540.00
Mr. Elaine E. Hendrickson 2615 La Cuesta San Jose Hills CA 92653	INFORMATION REQUESTED 09/28/92	09/28/92	\$1,000.00	\$1,000.00
Mr. Henderson 1111 12th St Washington DC 20002	INFORMATION REQUESTED 09/28/92	09/28/92	\$100.00	\$225.00
Mr. Henderson 1111 12th St Washington DC 20002	INFORMATION REQUESTED 09/28/92	09/28/92	\$75.00	\$225.00

4043600743

# SCHEDULE A-P

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

## ITEMIZED RECEIPTS

Use separate  
schedules for  
each category  
of the detailed  
summary page

PAGE	OF (total pages)
679	1290
LINE NUMBER	
12a	

NAME OF COMMITTEE (in Full)			
DEMOCRATIC '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		DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
NAME ADDRESS CITY STATE ZIP CODE Marinis, Mr. Thomas P. Jr. 923 Briar Ridge 1001 Law St. Houston, TX 77002	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	11/06/91 \$1,000.00
NAME ADDRESS CITY STATE ZIP CODE George, Mr. David A. 502 Center Island Rd. Center Island, NY 11771	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	12/11/91 \$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Marshall, Mr. Harold D. 300 E. Carpenter Fwy. Ste. 1800 Irving, TX 75062	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	12/12/91 \$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Prechter, Mr. Heinz C. 14013 Parke Lane Grosseille, WI 48138	NAME OF EMPLOYER American Sun Roof Corp. OCCUPATION CEO AGGREGATE YEAR TO DATE \$1,000.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/12/91 \$750.00
NAME ADDRESS CITY STATE ZIP CODE Giss, Mr. Vernon J. 33 Pinhurst Circle Little Rock, AR 72212	NAME OF EMPLOYER Stephens, Inc. OCCUPATION Director AGGREGATE YEAR TO DATE \$250.00	RECEIPT FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	12/12/91 \$250.00
NAME ADDRESS CITY STATE ZIP CODE Henderson, Mr. James B. 20101 Hoover Detroit, MI 48205	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	12/12/91 \$1,000.00
NAME ADDRESS CITY STATE ZIP CODE D. Peltz, Mr. Charlie 1000 S. Oakridge Ln. Ft. Worth, TX 76103	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	11/01/91 \$1,000.00
NAME ADDRESS CITY STATE ZIP CODE HARTMAN, Mr. HARRY N. 4000 RIVERSIDE AVE HOUSTON, TX 77057	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	11/01/91 \$1,000.00

GROSS TOTAL OF RECEIPTS IN PERIOD \$7,000.00

TOTAL FOR PERIOD (last page of this summary)

Receipts must be accompanied by Designation Request

4043600744

# REPUBLICAN NATIONAL COMMITTEE

PAGE 36

THIRTEEN MONTH REPORT COVERING PERIOD FROM 1/01/92 THRU 1/31/92 OVER \$900.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD 12-31-92	12-31-91
Mrs. Peggy B. Haywood 65 Glendale Avenue SE Concord NC 28025	Retired	01/13/92	\$250.00	\$250.00
Mr. & Mrs. Donald Halberg P. O. Box 1368 Janesville WI 53547	C. E. O. & Treasurer Lab Safety Supply Company	01/29/92	\$2,000.00	\$2,000.00
Mr. Harold W. Hall 5523 1st Street NW Washington DC 20011	Computer Systems Analyst Internal Revenue Service	01/08/92	\$500.00	\$500.00
Mrs. Clara E. Heise 144 Beachmont Dorchester MA 01924	Homemaker	01/15/92	\$15,000.00	\$15,000.00
Mr. Edgar F. Heiser Jr. 251 Bluffs Edge Drive Lake Forest IL 60045	Investments Self-employed	01/17/92	\$300.00	\$300.00
Mrs. Laurel Reed Humes 74 Riverview Road Hobe Sound FL 33455	None	01/07/92	\$250.00	\$250.00
Mrs. Jane E. Henderson Box 11 Sandy Ridge Road Stockton NJ 08559	Farmer Self-employed	01/06/92	\$500.00	\$500.00
Mr. James Bruce Henderson 1760 Meron Ridge Drive Blomfield Hills MI 48302	Chairman of the Board Detroit Center Tool Company	01/28/92	\$15,000.00	\$15,000.00
Ms. Tiffany Hendry Kipany Productions 134 East 38th Street New York NY 10016	Video Producer Kipany Productions	01/30/92	\$5,000.00	\$5,000.00
Dr. Paul Henrys 1100 NW 11th Street Miami FL 33136	Physician Self-employed	01/22/92	\$225.00	\$225.00

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# H

REPUBLICAN NATIONAL COMMITTEE

PAGE 670

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

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD	YR-TO-DATE
Mr. James A. Henderson 6185 Orudorff Hill Rd. Russellville KY 42276	Retired	11/17/92	\$100.00	\$600.00
Mr. James Bruce Henderson 20401 Hoover Street Detroit MI 48205	Chairman & C. E. O. Detroit Center Tool, Inc.	10/22/92	\$10,000.00	\$11,000.00
Mrs. Joann Henderson 1760 Heron Ridge Drive Bloomfield Hills MI 48302	Housewife	10/22/92	\$5,000.00	\$5,000.00
Mrs. Marie H. Henderson 257 Strawberry St. S.W. Albion SC 29801	Retired	10/23/92 10/23/92	\$100.00 \$100.00	\$975.00
Mr. R. C. Henderson 178 Pine-Tree Sandusky MI 49871	INFORMATION REQUESTED 11/02/92	10/27/92 11/02/92	\$80.00 \$80.00	\$265.00
Mr. Richard Henderson Box 747 Hilo HI 96721	President The Realty Investment Co.	10/23/92	\$1,000.00	\$1,000.00
Mrs. Sandra C. Henderson 17 Hillary Court La Plata MD 20646	INFORMATION REQUESTED 10/29/92	10/21/92 10/29/92	\$60.00 \$29.00	\$345.00
Mr. Theodore Henderson Apartment T-2 8683 Greenbelt Road Greenbelt MD 20770	Counseling Psychologist P. G. Co. Board of Education	11/03/92 11/04/92	\$140.00 \$120.00	\$900.00
Mr. Carl Hendrick 1110 Bryant Street Fairmont WV 26554	Retired	10/20/92 10/30/92	\$25.00 \$24.00	\$262.00
Dr. Grady Hendrix 1435 Duneloft Villa Johns Island SC 29455	Physician Medical Univ. of S.C.	10/21/92	\$200.00	\$400.00

14043600746





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

January 28, 1994

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

RE: MUR 3889

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 James Bronce Henderson. The respondent 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 3889. 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, Attorney*

Mary L. Taksar, Attorney  
Central Enforcement Docket

Enclosure  
Procedures

4043600747



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

January 28, 1994

James Bronce Henderson  
20101 Hoover Street  
Detroit, MI 48205

RE: MUR 3889

Dear Mr. Henderson:

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 3889. 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.

4043600748

James Bronce Henderson  
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

4043600749



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20540

FEB 15 1994

William J. McManus, Treasurer  
Republican National Committee - RNC  
310 First Street, SE  
Washington, DC 20003

RE: MUR 3889

Dear Mr. McManus:

The Federal Election Commission received a complaint which indicates that the Republican National Committee - RNC ("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 3889. 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.

4043600750

William J. McManus, Treasurer  
Republican National Committee - RNC  
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

4043600751



LAW OFFICES  
STONE, BIBER & O'TOOLE, P.C.

CONTINENTAL PLAZA BUILDING  
2701 TROY CENTER DRIVE, SUITE 400  
TROY, MICHIGAN 48064

TELEPHONE (313) 362-2030  
TELECOPIER (313) 362-5567

DAVID C. STONE  
MICHAEL J. BIBER  
ROGER J. O'TOOLE  
GORDON A. BECKER  
SARA E. ALLEN  
JOHN R. FOWLER, JR.  
JOHN D. TOMLINSON

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FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

10 14 11:01 AM '94  
COUNSEL  
FRANK J. ALLEN, P.C.  
RAYMOND L. FEUL  
ANDREA M. DEFRAIN  
YOUNG HAMOOD, P.C.  
RODGER D. YOUNG  
JAMAL JOHN HAMOOD  
WRITER'S DIRECT DIAL

February 8, 1994

Personal and Confidential

Federal Election Commission  
Washington, D.C. 20463

Attention: Mary L. Taksar, Esq.  
Ms. Joan McEnery

Re: MUR 3889

Dear Ms. Taksar and McEnery:

James B. Henderson of Detroit, Michigan has requested that we contact you regarding the above captioned matter.

As we understand it, a Complaint has been filed against Mr. Henderson by the Center for Responsive Politics, alleging that Mr. Henderson exceeded his contribution limits in 1992.

This matter was previously brought to our attention. At that time, Mr. Henderson directed us to begin an investigation of the matter. As a result, we have contacted the Recipients of Mr. Henderson's contributions and have requested their advice regarding whether a violation occurred and the corrective action that should take place. While we have not received a definitive answer from those Recipients, they have refunded sufficient funds to bring our clients contributions within the appropriate guidelines (see attached letter dated November 1, 1993, from the Republican National Committee).

As of this date, we have not been able to determine whether the contributions were made jointly or as an individual.

We would appreciate it if you could contact us at your earliest convenience to arrange for a time and place to meet, review the facts and to reconcile the matter.

In advance, we would appreciate receiving from you any Guidelines that you may have in determining whether a violation has occurred, the procedures for conciliation and how best we can obtain the necessary information from the Recipients.

94 FEB 14 PM 3:40

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FEDERAL ELECTION COMMISSION

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STONE, BIBER & O'TOOLE, P.C.

Mary L. Taksar, Esq.  
Ms. Joan McEnery  
Page Two  
February 8, 1994

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FEDERAL ELECTION COMMISSION  
94 FEB 14 PM 3:46

Thank you in advance for your cooperation.

Yours sincerely,



Roger J. O'Toole



Michael J. Biber

MJB:dph  
cc: Mr. Bronce Henderson

Certified Mail  
Return Receipt Requested

4043600753

REPUBLICAN NATIONAL FINANCE COMMITTEE

310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 (202) 693-8730 FAX: (202) 693-8894

November 1, 1993

94 FEB 14 PM 3:47

RECEIVED  
MISSION

Mr. James Bruce Henderson  
20101 Hoover  
Detroit, Michigan 48205

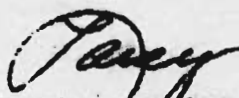
Dear Jim:

At your request, you have recently received a refund check for your 1992 federal contribution to the Republican National Committee in the amount of \$9,750.

As you know, you can replace this check in the same amount to the Republican National State Elections Committee (RNSEC), a non-federal account.

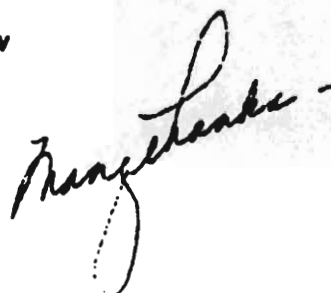
I hope you will give top priority to this request. Please feel free to call me if you have any questions concerning this.

Sincerely,



Nancy Bradford Thawley  
Director, Republican Eagles

NBT:amw



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RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

FEB 16 11 06 AM '94

Bronce Henderson  
20101 Hoover  
Detroit, MI 48205  
(313) 372-6043

February 8, 1994

VIA CERTIFIED AND REGULAR MAIL

Federal Election Commission  
Washington, D.C. 20463

ATTN: Mary L. Taksar, Esq.  
Ms. Joan McEnery

Re: MUR 3889

Dear Ms. Taksar and McEnery:

In response to your letter of January 28, 1994 regarding the above captioned matter, I am informing you that I intend to be represented by counsel in this matter. My counsel are Roger J. O'Toole and Michael J. Biber. Attached is the Statement of Designation of Counsel you have requested.

In addition, it is my intention to keep this investigation confidential and I appreciate your efforts in that regard.

I want you to understand that I do not believe, at this time, that I am in violation of the Act.

If a violation did occur, I was not aware and it may have been based upon my incomplete designation of the donor of the contributions.

I believe, however, that the principles of the Act are important. It is my intention, therefore, and I have so instructed my counsel, to do everything necessary to cooperate with the Commission and to reconcile any dispute that may exist in a manner that supports the intentions of the Act.

By copy of this letter, I have requested that my counsel contact you and to undertake whatever steps are necessary to resolve this matter.

Very Truly Yours,



Bronce Henderson

cc: Roger O'Toole, Esq.  
Michael J. Biber, Esq.

94 FEB 16 PM 2:24

RECEIVED  
FEDERAL ELECTION COMMISSION

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**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 3889

NAME OF COUNSEL: ROGER O'TOOLE OR MICHAEL J. BIBER

ADDRESS: 2701 TROY CENTER DR. SUITE 400

TROY, MI 48084

TELEPHONE: ( 810 ) 362-2030

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.

2-8-94  
Date

  
Signature

RESPONDENT'S NAME: BRONCE HENDERSON (AKA JAMES B. HENDERSON III)

ADDRESS: 20101 HOOVER

DETROIT, MI 48205

TELEPHONE: HOME(        )                     

BUSINESS( 313 ) 372-6043

94 FEB 16 PM 2:24

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

4043600756



**Republican  
National  
Committee**

**Michael A. Hess**  
Chief Counsel

March 2, 1994

**Ms. Joan McEnerny  
Office Of The General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463**

**RE: MUR 3889  
Republican National Committee,  
Respondent**

**Dear Ms. McEnerny:**

**This is in response to the complaint filed by the Citizens For Responsive Politics referred to in the above captioned matter. It appears from the public record that the Republican National Committee may have accepted excessive contributions from Mr. James Bronce Henderson for calendar year 1992.**

**On January 28, 1992 the RNC received a contribution from Mr. Henderson, 1760 Heron Ridge Drive, Bloomfield Hills, Michigan. The RNC received another contribution on October 22, 1992 from Mr. Henderson, 20101 Hoover, Detroit, Michigan. Although these donations were made by the same individual, the RNC data base recorded these contributions as received from two different individuals because of the different addresses.**

**As a result the RNC inadvertently accepted \$9,750 over its annual limit from Mr. Henderson. The RNC has procedures in place to circumvent this problem but for some unexplained reason those procedures failed in this particular case. Also, because one contribution was received in January and the other in October, the monthly review of FEC Reports did not highlight the discrepancy.**

**The RNC was made aware of this problem by Mr. Henderson, the contributor, on October 13, 1993 and refunded the excess that same day (see Exhibit 1). This refund was disclosed by the RNC on its October 1993 Monthly Report (see Exhibit 2). The RNC has also made the appropriate modifications to its data base to insure that all of Mr. Henderson's contributions will be properly aggregated in the future, irrespective of the address used.**

Although the contribution which caused Mr. Henderson to exceed his contribution limits was received in October 1992 and not refunded until October 1993, the RNC respectfully submits that no action should be taken against the Committee. Commission regulations at 11 C.F.R. § 103.3 require refunds of illegal contributions within thirty days of discovering the illegality, the RNC refunded the excess the same day. This transaction was one of thousands and although regrettable, inadvertent errors are bound to occur even though the RNC has procedures in place that would normally prevent this problem. The problem was corrected immediately upon discovery. There were more than sufficient funds in the RNC's federal account to cover all of its federal expenditures, excluding this excessive contribution.

Based upon all of these facts and circumstances, the RNC respectfully submits that no further action should be taken against respondents in this matter.

Sincerely,

  
Michael A. Hess

4443600758



2745

## REPUBLICAN NATIONAL FINANCE COMMITTEE

310 FIRST STREET, SE.  
WASHINGTON, D.C. 20003

OCTOBER 13 19 93

1475

BY  
THE  
ORDER OF MR. JAMES BRONCE HENDERSON

\$ 9,750.00\*\*\*

\*\*\*NINE THOUSAND SEVEN HUNDRED FIFTY AND 00/100\*\*\*

DOLLARS

**SIGNET BANK**

Arlington, VA

Virginia

OR REFUND 1992

⑈00002745⑈ ⑆056004089⑆ 651-7220643⑈

4043600759


**EXHIBIT 2**  
**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For Other Than An Authorized Committee  
(Summary Page)

<b>1. NAME OF COMMITTEE (in full)</b> <b>REPUBLICAN NATIONAL COMMITTEE</b> <b>ADDRESS (number and street)</b> <b>310 FIRST STREET SE</b> <b>CITY, STATE and ZIP CODE</b> <b>WASHINGTON, DC 20003</b>	<b>2. FEC IDENTIFICATION NUMBER</b> <b>C00003418</b> <b>3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date).</b>
---	---

**4. TYPE OF REPORT**

- (a) ☐ April 15 Quarterly Report  
☐ July 15 Quarterly Report  
☐ October 15 Quarterly Report  
☐ January 31 Year end Report  
☐ July 31 Mid Year Report (Non-election Year Only)  
☐ Termination Report
- Monthly Report Due On:  
☐ February 20    ☐ June 20    ☐ October 20  
☐ March 20    ☐ July 20    ☒ November 20  
☐ April 20    ☐ August 20    ☐ December 20  
☐ May 20    ☐ September 20    ☐ January 31
- ☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<b>5. Covering Period</b> 10-01-93 through 10-31-93		
<b>6. (a) Cash on Hand January 1, 1993.....</b>		<b>\$2,256,421.73</b>
<b>(b) Cash on Hand at Beginning of Reporting Period.....</b>	<b>\$4,980,715.14</b>	
<b>(c) Total Receipts (from line 19).....</b>	<b>2,500,812.22</b>	<b>31,306,725.19</b>
<b>(d) Subtotal (add Lines 6(b) and 6(c) for column A and Lines 6(a) and 6(c) for Column B).....</b>	<b>7,481,527.36</b>	<b>33,565,146.92</b>
<b>7. Total Disbursements (from Line 30).....</b>	<b>2,764,483.78</b>	<b>28,848,103.34</b>
<b>8. Cash on Hand at Close of Reporting Period.....</b>	<b>\$4,717,043.58</b>	<b>\$4,717,043.58</b>
<b>9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....</b>	<b>\$173,822.11</b>	<b>For further information contact:</b> <b>Federal Election Commission</b> <b>999 E street, NW</b> <b>Washington, DC 20463</b> <b>Toll Free 800-424-9530</b> <b>Local 202-219-3420</b>
<b>10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....</b>	<b>NONE</b>	
<b>I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.</b>		
<b>Type or Print Name of Treasurer</b>	<b>Jay C. Banning</b>	<b>Assistant Treasurer</b>
<b>Signature of Treasurer</b> 		<b>Date</b> <b>11/15/93</b>

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

**FEC FORM 3X**  
(REVISED 1/1/91)

**DETAILED SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENT  
PAGE 2, FEC FORM 3X**

NAME OF COMMITTEE <b>REPUBLICAN NATIONAL COMMITTEE</b>		REPORT COVERING PERIOD FROM 10-01-93 TO: 10-31-93	
		COLUMN A Total This Period	COLUMN B Calendar Year
<b>I. Receipts</b>			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committee			
i. Itemized (use Schedule A).....		\$834,342.11	\$7,180,373.47
ii. Unitemized.....		1,160,052.42	18,612,350.26
iii. Total..... (add i and ii) >		1,994,394.53	25,792,723.73
b. Political Party Committees.....		0.00	0.00
c. Other Political Committees (such as PACs).....		11,130.00	138,680.00
d. Total Contributions..... (add a iii, b and c) >		2,005,524.53	25,931,403.73
12. Transfers From Affiliated/Other Party Committees.....		0.00	6,101.65
13. All Loans Received.....		0.00	0.00
14. Loan Repayments Received.....		0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.).....		19,766.31	649,341.06
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....		0.00	90,155.56
17. Other Federal Receipts (Dividends, Interest, etc.).....		0.00	0.00
18. Transfers from Nonfederal Account for Joint Activity.....		475,521.38	4,631,723.19
19. Total Receipts..... (add 11d, 12, 13, 14, 15, 16, 17, and 18) >		2,500,812.22	31,308,725.19
20. Total Federal Receipts..... (subtract line 18 from line 19) >		\$2,025,290.84	\$26,677,002.00
<b>II. Disbursements</b>			
21. Operating Expenditures:			
a. Shared Federal/Non Federal Activity (from Schedule H4)			
i. Federal share.....		\$910,321.68	\$8,676,746.07
ii. Non-Federal Share.....		626,834.29	5,811,863.97
b. Other Federal Operating Expenditures.....		984,703.57	11,804,198.75
c. Total Operating Expenditures..... (add a i, a ii, and b) >		2,521,859.54	26,292,808.79
22. Transfers to Affiliated/Other Party Committees.....		72,884.24	2,190,534.24
23. Contributions to Federal Candidates/Committees and Other Political Committees.....		0.00	20,000.00
24. Independent Expenditures (use Schedule E).....		0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2U.S.C. 441a(d))(use Schedule F).....		0.00	119,810.97
26. Loan Repayments Made.....		0.00	0.00
27. Loans Made.....		0.00	0.00
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees.....		164,740.00	219,449.34
b. Political Party Committees.....		0.00	0.00
c. Other Political Committees (such as PACs).....		0.00	0.00
d. Total Contribution Refunds..... (add a, b and c) >		164,740.00	219,449.34
29. Other Disbursements.....		5,000.00	5,500.00
30. Total Disbursements..... (add 21c, 22, 23, 24, 25, 26, 27, 28d and 29) >		2,764,483.78	28,848,103.34
31. Total Federal Disbursements..... (subtract line 21 a ii from line 30) >		\$2,137,649.49	\$23,036,239.37
<b>III. Net Contributions/Operating Expenditures</b>			
32. Total Contributions (other than loans) (from line 11d).....		\$2,005,524.53	\$25,931,403.73
33. Total contribution Refunds (from line 28d).....		164,740.00	219,449.34
34. Net Contributions (other than loans) (subtract line 33 from 32).....		1,840,784.53	25,711,954.39
35. Total Federal Operating Expenditures..... (add 21 a i and 21 b) >		1,895,025.25	20,480,944.82
36. Offsets to Operating Expenditures (from line 15).....		19,766.31	649,341.06
37. Net Operating Expenditures..... (subtract line 36 from 35) >		\$1,875,258.94	\$19,831,603.76

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REPUBLICAN NATIONAL COMMITTEE

ITEMIZED DISBURSEMENTS

PAGE 2 OF 3  
LINE #28(a)

SCHEDULE B

NAME ADDRESS	PURPOSE OF DISBURSEMENTS	DATE	AMOUNT DISBURSED
MR. EUGENE APPLEBAUM 3331 WEST BIG BEAVER ROAD TROY MI 48007	REFUND	10/12/93	15,000.00
MR. JAMES BRONCE HENDERSON 20101 HOOVER DETROIT MI 48205	REFUND	10/13/93	9,750.00
MR. THOMAS A. KERSHAW 84 BEACON ST BOSTON MA 02108	REFUND	10/14/93	17,000.00
MR. THOMAS F. KRANZ 245 STRADA CORTA ROAD LOS ANGELES CA 90007	REFUND	10/14/93	15,000.00
MR. WILLIAM W BOESCHENSTEIN FIBERGLAS TOWER TOLEDO OH 43659	REFUND	10/14/93	250.00
MR. NORMAN V. KINSEY 401 EDWARD ST SHREVEPORT LA 71101	REFUND	10/14/93	13,750.00
MR. THOMAS L. HANSBERGER 500 EAST BROWARD BLVD FT. LAUDERDALE FL 33394	REFUND	10/14/93	16,000.00
	TOTAL		86,750.00

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OAC 575

LAW OFFICES  
STONE, BIBER & O'TOOLE, P.C.

CONTINENTAL PLAZA BUILDING  
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JOHN D. TOMLINSON

OF COUNSEL  
JEROME JAY ALLEN, P.C.  
RAYMOND L. FEUL  
ANDREA M. DEFRAIN

YOUNG HAMOOD, P.C.  
RODGER D. YOUNG  
JAMAL JOHN HAMOOD

WRITER'S DIRECT DIAL

March 15, 1994

Personal and Confidential

Ms. Joan McEnery  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 3889

Dear Ms. McEnery:

Several weeks have gone by and we have exchanged phone calls on many occasions. Consequently, I would appreciate your contacting my secretary, Debbie, to establish a time and date for a telephone conference or, conversely, if you can indicate who at your office has access to your schedule, I will attempt to do the same.

Yours sincerely,

*Roger J. O'Toole*  
Roger J. O'Toole

RJO:dph

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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

4043600764



relative to the other pending cases.<sup>1</sup> 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.<sup>2</sup> 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.

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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.

**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

4043600768

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

James Bronce Henderson. )

MUR 3889

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 3889 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

4043600769





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

NOV 21 1994

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

RE: MUR 3889

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

14043600770



4043600771  
NUR 3889

JAMES BRONCE HENDERSON

The Center for Responsive Politics filed a complaint alleging that James Bronce Henderson exceeded his 1992 \$25,000 annual limit by \$9,500 because his contributions to federal candidates and committees attributable to 1992 total \$34,500. The contributions identified in the complaint raised the issue of whether the Republican National Committee accepted contributions which exceeded the \$20,000 calendar year limit.

In response to the complaint, Mr. Henderson indicates that he does not believe that he has violated FECA and that if a violation occurred, it was due to joint contributions from him and his wife being attributed solely to him. Mr. Henderson states that prior to receiving the complaint, Mr. Henderson requested and received a \$9,750 refund from the Republican National Committee.

The Republican National Committee (RNC) responds that in January 1992, it received a contribution from a Mr. James Henderson of Bloomfield Hills, Michigan and that in October 1992, it received a contribution from a Mr. Bruce Henderson of Detroit, Michigan. The RNC indicates that although it has procedures in place to circumvent this problem, the contributions were recorded as being from separate individuals. As a result, the RNC states that it accepted \$9,750 over the \$20,000 limit from Mr. Henderson. According to the RNC, on October 13, 1993, Mr. Henderson notified the RNC of the problem and on the same date, \$9,750 was refunded to him. The RNC indicates that the refund was disclosed in its 1993 October Monthly Report. The RNC attached a copy of the refund check to its response.

This matter involves less significant issues relative to other matters pending before the Commission.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 21 1994

Roger O'Toole, Esq.  
2701 Troy Center Dr., Suite 400  
Troy, MI 48064

RE: MUR 3889  
James B. Henderson

Dear Mr. O'Toole:

On January 28, 1994, the Federal Election Commission notified your client, James B. Henderson, 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

4043600772

MUR 3889

JAMES BRONCE HENDERSON

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4043600773



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 21 1994

William J. McManus, Treasurer  
Republican National Committee - RNC  
310 First Street, S.E.  
Washington, D.C. 20003

RE: MUR 3889

Dear Mr. McManus:

On February 15, 1994, the Federal Election Commission notified the Republican National Committee - RNC ("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

cc:Michael A. Hess, Esq.

4043600774

NUR 3889  
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This matter involves less significant issues relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3889  
DATE FILMED 12/15/94 CAMERA NO. 2  
CAMERAMAN MMR

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