



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4011

DATE FILMED 10-15-71 CAMERA NO. 2

CAMERAMAN JMH

94043590454

OFFICE OF GENERAL COUNSEL
JUL 18 1 18 PM '94
P.O. Box 603
Spring Hill, TN 37174
July 15, 1994

Federal Election Commission
Office of General Counsel
999 E Street NW
Washington, D.C. 20463

MUR 4011

Dear Commission:

Please file and consider this as a formal notice of complaint under 11 C.F.R. 114.2 on Candidate Charles Salvaggio for United States Congress in the August 4th Republican Primary in Tennessee.

Mr. Salvaggio, accompanied by his wife and a campaign aide, attended a volunteer recruitment effort for his campaign on or about March 5th, 1994 at approximately 10:00 a.m. which was held at Columbia Area Mental Health Center, Inc., CAMHC. It is my understanding that CAMHC is a non-profit corporation receiving federal funds for mental health counseling. Mr. Danny King, a CAMHC employee or agent, arranged the campaign event. Mr. King also serves as Maury County Republican Party Chairman.

There were several volunteers present at this meeting. Attached are photographs which were made which fairly and accurately depict Mr. Salvaggio, his wife and aide entering the building, and their campaign vehicle along with Mr. King's vehicle in front of the CAMHC office.

At a regular meeting of the County Party, when it was announced Mr. Salvaggio was coming to Columbia and would be using these offices, I asked Mr. King what he was being charged. Mr. King said there would be no charge.

After a thorough review of Mr. Salvaggio's campaign filings with the Commission, I found no reference to a contribution or disbursement concerning the use of this corporate facility. Therefore, I ask you to investigate this activity since it may involve a deliberate failure to comply with Federal Election Commission regulations.

I also request a thorough review of Mr. Salvaggio's files for possible other questionable activities.

94043590455

page 2

If you have questions or need additional information, please contact me at (615) 381-8459.

Sincerely,

Patrick Keith Hales
Patrick Keith Hales

AFFADAVIT

County of Maury
State of Tennessee

Comes now Patrick Keith Hales who, first duly sworn, swears or affirms that the information contained in this document is true to the best of his knowledge, information and belief.

This 15th day of July, 1994

Patrick Keith Hales
Patrick Keith Hales

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS 15th DAY OF JULY, 1994

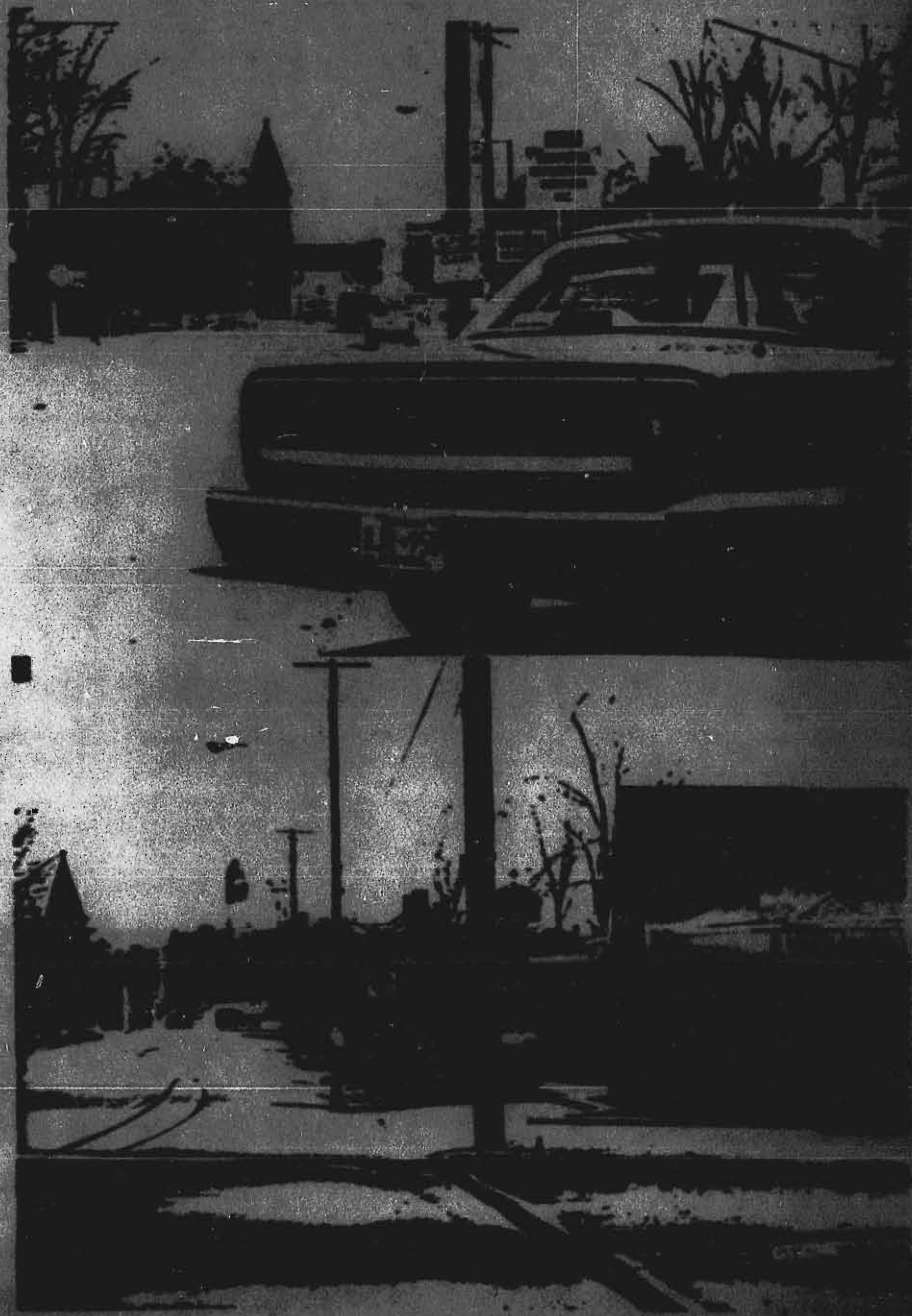
COMMISSION EXPIRES Oct 16, 1994

Connie L. Lewis
NOTARY PUBLIC



94043590456

94043590457





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 22, 1994

Patrick Keith Hales
P.O. Box 603
Spring Hill, TN 37174

RE: MUR 4011

Dear Mr. Hales:

This letter acknowledges receipt on July 18, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4011. 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

94043590458



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JULY 22, 1994

Danny R. King, Registered Agent
Columbia Area Mental Health, Inc.
321 West 7th Street
Columbia, TN 38402-1197

RE: MUR 4011

Dear Mr. King:

The Federal Election Commission received a complaint which indicates that Columbia Area Mental Health, Inc. 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 4011. 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 Columbia Area Mental Health, Inc. 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.

94043590459

Danny R. King, Registered Agent
Columbia Area Mental Health, 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

94043590460



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

JULY 22, 1994

Mike Edwards, Treasurer
Charles Salvaggio for Congress Exploratory Committee
P.O. Box 381003
Germantown, TN 38183

RE: MUR 4011

Dear Mr. Edwards:

The Federal Election Commission received a complaint which indicates that Charles Salvaggio for Congress Exploratory Committee ("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 4011. 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.

94043590461

Mike Edwards, Treasurer
Charles Salvaggio for Congress Exploratory Committee
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

94043590462



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JULY 22, 1994

Charles Salvaggio
c/o Charles Salvaggio for Congress Exploratory Committee
P.O. Box 381003
Germantown, TN 38183

RE: MUR 4011

Dear Mr. Salvaggio:

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 4011. 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.

94043590463

Charles Salvaggio
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

94043590464

COLUMBIA AREA MENTAL HEALTH CENTER
321 WEST 7TH ST
COLUMBIA TENNESSEE 38401

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

JUL 1 9 20 AM '94

JULY 21, 1994

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

Re: MUR 4011

Dear Ms. Taksar,

The meeting you refer to in your complaint was in fact held on Saturday March 5th. Mr. Salvaggio, his wife, and a campaign aide was present along with myself and three other people from Maury County. Mr. Salvaggio was introduced to these individuals and approximately an hour was spent by Mr. Salvaggio in explaining who he was and his political position on various issues. There was no solicitation for funds but he did encourage those present to help in his campaign efforts. Mr. Hales also attended this meeting although arriving late.

The Columbia Area Mental Health Center is closed for business on Saturdays therefore the building was not being used for Center purposes. I am in fact an employee of the Center and Chairman of the Maury County Republican Party. My duties as Party Chair are conducted after hours and on my personal time.

Mr. Hales attended a Party meeting also held at this same facility and again after hours. During that meeting the visit by Mr. Salvaggio was announced. Mr. Hale during that same meeting addressed those in attendance and described his campaign in much the same manner as Mr. Salvaggio did on March the 5th. He was not charged for the facility at that time just as Mr. Salvaggio was not charged for the facility on the 5th of March. Mr. Hale ask regarding the availability of the facility at that time and was informed by myself that we did not charge for its use and in fact had encouraged its use by groups in the community.

It certainly was not my intent to involve the Columbia Area Mental Health Center in this matter since the activities in question were all conducted after normal operating hours. The Center in no way officially supports the candidacy of anyone seeking public office. No signs for any candidate are allowed on the property. The corporation does not make political contributions of any type.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 1 10 32 AM '94

The facility in question is owned by Health Facilities, Inc. and leased by Columbia Area Mental Health Center.

If we have unknowingly violated the law, we will certainly change our policies on the use of our facilities immediately.

Sincerely,



Danny King
Business Manager

94043590466

Michael A. Edwards
President

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

AUG 29 9 00 AM '94



FIRST
TENNESSEE
BANK

First Tennessee Bank National Association
7640 Poplar Avenue
Germantown, TN 38138
(901) 753-3057
Cable FIRBANK

August 23, 1994

Federal Election Commission
Office of the General Counsel
999 East Street N.W.
Washington, DC 20463

Dear Commission Members:

Re: MUR 4011

Please let this letter serve as a response to the complaint filed by Pat Hale by letter dated July 15, 1994, against the Charles Salvaggio for Congress Committee and Mike Edwards, its treasurer. Please consider this letter as a response on behalf of both respondents.

On or about Saturday, March 5, 1994, Charles Salvaggio did have a meeting in Columbia, Tennessee. The meeting lasted less than one hour and was attended by just seven people including Charles Salvaggio, his wife, and campaign manager. The meeting was held in the board room of the Maury County Mental Health Center.

This meeting room, the campaign manager was told, is available to various civic, community and political events at no charge. This facility is of the type covered in the commission's regulation 11 CFR 1412 (b). The committee did not believe this occurrence constituted a reportable event because of the above referenced regulation and the demeanous nature of the event itself.

This complaint was filed on the eve of the election by a primary opponent. In fact, Mr. Hales appeared on a cable channel to publicize the filing of the complaint. For the foregoing reasons, we ask the commission to dismiss this complaint.

Please contact me if you have any further questions.

Sincerely,

Mike Edwards

Mike Edwards

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 29 10 37 AM '94

94043590467

AFFADAVIT

STATE OF TENNESSEE
COUNTY OF SHELBY

COMES NOW MIKE EDWARDS WHO, FIRST DULY SWORN, SWEARS OR AFFIRMS
THAT THE INFORMATION CONTAINED IN THIS DOCUMENT IS TRUE TO THE BEST
OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

THIS 23 DAY OF August, 1994

Mike Edwards
MIKE EDWARDS

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS 24th DAY OF August, 1994.

MY COMMISSION EXPIRES JAN. 14, 1998

MY COMMISSION EXPIRES _____

Doris Stone
NOTARY PUBLIC



94043590468

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 22 9 43 AM '94

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

I. INTRODUCTION

This report is the first Enforcement Priority System Monthly Report.¹ The purpose of this August 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

By closing such cases the Commission is

1. Prior to this report, Enforcement Priority System reports were done on a quarterly basis. However, on July 19, 1994, the Commission decided to change the reporting frequency from quarterly to monthly. Because this Office needed sufficient time to implement the change in reporting frequency, the August Monthly Report includes cases for July and August. In the future, the Monthly Report will reflect one month's activity.

Additionally, this Office previously indicated to the Commission that at the end of each quarter, we will provide a statistical recap for the activity that occurred during the quarter. Sometime in early October, this Office will provide a report for third quarter activity.

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able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.² 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 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral or sua sponte submission.

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 5 cases that

do not

2. These matters are: MUR 3963; MUR 3981; MUR 3982; MUR 3983; MUR 3989; MUR 3992; MUR 3993; MUR 3994; MUR 4006; MUR 4011; MUR 4015; MUR 4017; MUR 4020; MUR 4021; and PM 300.

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warrant further investment of significant Commission resources.³ Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. However, for the externally-generated matters, the complaint and response(s) are attached to the report and for internally-generated matters, the referral is attached. See Attachments 17-21.

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3. These matters are: MUR 3784; MUR 3788; RAD 93L-52, RAD 93NF-23, and PH 287.

IV. RECOMMENDATIONS

A. Decline to open a MUR, close the file, and approve the appropriate letter in the following matters:

- 1) RAD 93L-52
- 2) RAD 93NF-23
- 4) PM 287
- 5) PM 300

B. Take no action, close the file, and approve the appropriate letter in the following matters:

- 1) MUR 3784
- 2) MUR 3788
- 3) MUR 3963
- 4) MUR 3981
- 5) MUR 3982
- 6) MUR 3983
- 7) MUR 3989
- 8) MUR 3992
- 9) MUR 3993
- 10) MUR 3994
- 11) MUR 4006
- 12) MUR 4011
- 13) MUR 4015
- 14) MUR 4017
- 15) MUR 4020
- 16) MUR 4021

Date

9-21-94

Lawrence M. Noble
Lawrence M. Noble
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Enforcement Priority

)
)
)

Agenda Document
#X94-94

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 27, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

A. Decline to open a MUR, close the file, and approve the appropriate letter in the following matters:

- 1) RAD 93L-52;
- 2) RAD 93NF-23;
- 3) PH 287;
- 4) PH 300.

B. Take no action, close the file, and approve the appropriate letter in the following matters:

- 1) MUR 3784;
- 2) MUR 3788;
- 3) MUR 3963;
- 4) MUR 3981;
- 5) MUR 3982;
- 6) MUR 3983;
- 7) MUR 3989;

(continued)

94043590473

Federal Election Commission
Certification: Enforcement Priority
September 27, 1994

Page 2

- 8) MUR 3992;
- 9) MUR 3993;
- 10) MUR 3994;
- 11) MUR 4006;
- 12) MUR 4011;
- 13) MUR 4015;
- 14) MUR 4017;
- 15) MUR 4020;
- 16) MUR 4021.

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

Attest:

9-29-94
Date

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

94043590474



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Patrick Keith Hales
P.O. Box 603
Spring Hill, TN 37174

RE: MUR 4011

Dear Mr. Hales:

On July 18, 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 Charles Salvaggio for Congress Exploratory Committee and Mike Edwards, as treasurer, Charles Salvaggio and Columbia Area Mental Health, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter. 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
Central Enforcement Docket

Attachment
Narrative

SEP 27 1994

Date the Commission voted to close the file: _____

94043590475

HUR 4011
CHARLES SALVAGGIO FOR CONGRESS
EXPLORATORY COMMITTEE

The complainant, Patrick Keith Hales, alleges that the use of the Columbia Area Mental Health Center, Inc. (CAMHC) facilities by the Charles Salvaggio for Congress Exploratory Committee ("Committee") constituted a prohibited in-kind corporate contribution. The complainant states that the Committee has failed to report either an in-kind contribution from the corporation or a disbursement for the cost of renting the facility in its disclosure reports.

In response to the complaint, Danny King, Business Manager of CAMFC and Chairman of the Maurey County Republican Party, states that the meeting in question occurred after business hours on Saturday, March 5, 1994, and was attended by Mr. King, Mr. Salvaggio and his wife, a campaign aide, and four other individuals from Maurey County. Mr. King indicates that at the meeting, Mr. Salvaggio discussed his candidacy but that there was no solicitation of funds involved. Mr. King states that CAMFC makes its facilities available to community groups at no charge after business hours, CAMFC does not support candidates, and no signs for candidates are allowed on the property. According to Mr. King, the CAMFC facilities had been made available to Mr. Hales, another candidate, for a similar meeting on an earlier date and Mr. Hales was not charged for his use of the facilities.

In response to the complaint, the Salvaggio Committee states that the use of CAMFC facility appeared permissible under Commission regulations which allow a corporation, which customarily makes its meeting rooms available to civic and community groups, to make its facilities available to political committees and therefore, the Committee did not believe that it was an event that needed to be reported. The Committee states that the meeting, which lasted one hour, was attended by seven people.

This matter involves a limited amount of money, appears to have had minimal impact on the process, and involves less significant issues relative to the other issues pending before the Commission.

94043590476



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Danny R. King, Registered Agent
Columbia Area Mental Health, Inc.
321 West 7th Street
Columbia, TN 38402-1197

RE: MUR 4011

Dear Mr. King:

On July 22, 1994, the Federal Election Commission notified you 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 Columbia Area Mental Health, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file:

SEP 27 1994

94043590477

**HUR 4011
CHARLES SALVAGGIO FOR CONGRESS
EXPLORATORY COMMITTEE**

The complainant, Patrick Keith Hales, alleges that the use of the Columbia Area Mental Health Center, Inc. (CAMHC) facilities by the Charles Salvaggio for Congress Exploratory Committee ("Committee") constituted a prohibited in-kind corporate contribution. The complainant states that the Committee has failed to report either an in-kind contribution from the corporation or a disbursement for the cost of renting the facility in its disclosure reports.

In response to the complaint, Danny King, Business Manager of CAMFC and Chairman of the Maurey County Republican Party, states that the meeting in question occurred after business hours on Saturday, March 5, 1994, and was attended by Mr. King, Mr. Salvaggio and his wife, a campaign aide, and four other individuals from Maurey County. Mr. King indicates that at the meeting, Mr. Salvaggio discussed his candidacy but that there was no solicitation of funds involved. Mr. King states that CAMFC makes its facilities available to community groups at no charge after business hours, CAMFC does not support candidates, and no signs for candidates are allowed on the property. According to Mr. King, the CAMFC facilities had been made available to Mr. Hales, another candidate, for a similar meeting on an earlier date and Mr. Hales was not charged for his use of the facilities.

In response to the complaint, the Salvaggio Committee states that the use of CAMFC facility appeared permissible under Commission regulations which allow a corporation, which customarily makes its meeting rooms available to civic and community groups, to make its facilities available to political committees and therefore, the Committee did not believe that it was an event that needed to be reported. The Committee states that the meeting, which lasted one hour, was attended by seven people.

This matter involves a limited amount of money, appears to have had minimal impact on the process, and involves less significant issues relative to the other issues pending before the Commission.

94043590478



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Charles Salvaggio
9444 Dogwood Road
Germantown, TN 38138

RE: MUR 4011

Dear Mr. Salvaggio:

On July 22, 1994, the Federal Election Commission notified you 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 you. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file: _____

94043590479

**HUR 4011
CHARLES SALVAGGIO FOR CONGRESS
EXPLORATORY COMMITTEE**

The complainant, Patrick Keith Hales, alleges that the use of the Columbia Area Mental Health Center, Inc. (CAMHC) facilities by the Charles Salvaggio for Congress Exploratory Committee ("Committee") constituted a prohibited in-kind corporate contribution. The complainant states that the Committee has failed to report either an in-kind contribution from the corporation or a disbursement for the cost of renting the facility in its disclosure reports.

In response to the complaint, Danny King, Business Manager of CAMFC and Chairman of the Maurey County Republican Party, states that the meeting in question occurred after business hours on Saturday, March 5, 1994, and was attended by Mr. King, Mr. Salvaggio and his wife, a campaign aide, and four other individuals from Maurey County. Mr. King indicates that at the meeting, Mr. Salvaggio discussed his candidacy but that there was no solicitation of funds involved. Mr. King states that CAMFC makes its facilities available to community groups at no charge after business hours, CAMFC does not support candidates, and no signs for candidates are allowed on the property. According to Mr. King, the CAMFC facilities had been made available to Mr. Hales, another candidate, for a similar meeting on an earlier date and Mr. Hales was not charged for his use of the facilities.

In response to the complaint, the Salvaggio Committee states that the use of CAMFC facility appeared permissible under Commission regulations which allow a corporation, which customarily makes its meeting rooms available to civic and community groups, to make its facilities available to political committees and therefore, the Committee did not believe that it was an event that needed to be reported. The Committee states that the meeting, which lasted one hour, was attended by seven people.

This matter involves a limited amount of money, appears to have had minimal impact on the process, and involves less significant issues relative to the other issues pending before the Commission.

94043590480



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEP 29 1994

Mike Edwards, Treasurer
Charles Salvaggio for Congress
Exploratory Committee
P.O. Box 381003
Germantown, TN 38183

RE: MUR 4011

Dear Mr. Edwards:

On July 22, 1994, the Federal Election Commission notified you 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 Charles Salvaggio for Congress Exploratory Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Attachment
Narrative

Date the Commission voted to close the file:

SEP 27 1994

**HUR 4011
CHARLES SALVAGGIO FOR CONGRESS
EXPLORATORY COMMITTEE**

The complainant, Patrick Keith Hales, alleges that the use of the Columbia Area Mental Health Center, Inc. (CAMHC) facilities by the Charles Salvaggio for Congress Exploratory Committee ("Committee") constituted a prohibited in-kind corporate contribution. The complainant states that the Committee has failed to report either an in-kind contribution from the corporation or a disbursement for the cost of renting the facility in its disclosure reports.

In response to the complaint, Danny King, Business Manager of CAMFC and Chairman of the Maurey County Republican Party, states that the meeting in question occurred after business hours on Saturday, March 5, 1994, and was attended by Mr. King, Mr. Salvaggio and his wife, a campaign aide, and four other individuals from Maurey County. Mr. King indicates that at the meeting, Mr. Salvaggio discussed his candidacy but that there was no solicitation of funds involved. Mr. King states that CAMFC makes its facilities available to community groups at no charge after business hours, CAMFC does not support candidates, and no signs for candidates are allowed on the property. According to Mr. King, the CAMFC facilities had been made available to Mr. Hales, another candidate, for a similar meeting on an earlier date and Mr. Hales was not charged for his use of the facilities.

In response to the complaint, the Salvaggio Committee states that the use of CAMFC facility appeared permissible under Commission regulations which allow a corporation, which customarily makes its meeting rooms available to civic and community groups, to make its facilities available to political committees and therefore, the Committee did not believe that it was an event that needed to be reported. The Committee states that the meeting, which lasted one hour, was attended by seven people.

This matter involves a limited amount of money, appears to have had minimal impact on the process, and involves less significant issues relative to the other issues pending before the Commission.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 7011

DATE FILMED 11-13-94 CAMERA NO. 2

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