



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 990

Date Filmed 6/17/83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Documents and/or sections of
reports dealing with conciliation

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input checked="" type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed Maybeth Tarant
Date 5/25/83

B 3 0 4 0 4 0 0 3 7 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-Elect Zamparelli)

MUR 990

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 21, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 990:

1. Authorize the General Counsel to file a civil suit for relief in the United States District Court.
2. Send the letter attached to the General Counsel's September 26, 1980 report.

Attest:

10/22/80

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

33040400399



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

September 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terry Philip Segal
Silverman & Kudisch
100 State Street
Boston, MA 02109

Re: MUR 990
Tsongas for Senate Committee

Dear Mr. Segal:

On September 18, 1980, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f). Accordingly, the file has been closed in this matter with respect to the Tsongas for Senate Committee. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

83040100400

83040400401

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*Terry Philip Segal
 100 State Street
 Boston, MA 02109*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *255916* |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Martin J. Norton

4. DATE OF DELIVERY
1/24/80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMASTER'S OFFICE
 BOSTON
 SET
 1980

CLERK'S INITIALS

MUR 990 TARRANT



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terry Philip Segal
Silverman & Kudisch
100 State Street
Boston, MA 02109

Re: MUR 990
Tsongas for Senate Committee

Dear Mr. Segal:

On , 1980, the Commission accepted the conciliation agreement signed by your client and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f). Accordingly, the file has been closed in this matter with respect to the Tsongas for Senate Committee. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

830404004002

MT
9/19/90

RECEIVED
90968

80 AUG 14 P 1: 07

300* 2324

30 AUG 14 P 3: 30

RECEIVED
GENERAL COUNCIL

BEFORE THE FEDERAL ELECTION COMMISSION
MAY 2, 1980

In the Matter of)
) MUR 990
Tsongas for Senate Committee)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that the Tsongas for Senate Committee ("Respondent") violated 2 U.S.C. § 441a(f) by accepting a \$5,000 contribution from the Committee to Re-Elect John Zamparelli;

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, pursuant to 2 U.S.C. § 431(n) (presently 2 U.S.C. § 431(5)), was the principal campaign committee for candidate Paul Tsongas for the 1978 campaign for the U.S. Senate.

3304040040

2. That, as such, it was subject to the contribution limitation of 2 U.S.C. § 441a(a)(1)(A) which prohibits any person from making a contribution in excess of \$1,000 per election and also prohibits the acceptance of any excess contributions.

3. Respondent accepted a \$5,000 contribution from the Committee to Re-Elect John Zamparelli on September 14, 1978.

WHEREFORE, Respondent agrees:

V. Respondent violated 2 U.S.C. § 441a(f) by accepting a \$5,000 contribution from the Committee to Re-Elect John Zamparelli.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Five Hundred Dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(6)(B).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

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


83040400404

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. It is mutually agreed that respondent shall comply with the requirement contained in Paragraph VI within thirty (30) days from the date this agreement becomes effective.

33040400405

18 Sept 1980
Date



Charles N. Steele
General Counsel
Federal Election Commission

8-11-80
Date



Tsongas for Senate Committee

BY: Patricia G. Benseitler

ITS: Treasurer

3 3 0

TSONGAS FOR SENATE COMMITTEE
P.O. BOX 2
ANDOVER, MA 01810

909702

119

8-8 1980

53-113
113

PAY TO THE
ORDER OF

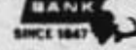
Treasurer of United States

\$500.00

Five hundred & 00/100

DOLLARS

Bay State National



MEMO

⑆01⑆30⑆138⑆ ⑆0⑆02 708 5⑆

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 990
Tsongas for Senate Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 18, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 990:

1. Accept the conciliation agreement as attached to the General Counsel's September 15, 1980 memorandum.
2. CLOSE THE FILE with respect to the Tsongas for Senate Committee.
3. Approve and send the letter as attached to the above-named memorandum.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

ATTEST:

9/18/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 9-15-80, 3:29
Circulated on 48 hour vote basis: 9-16-80, 11:00

33040400407

September 15, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

8304040040E



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RECEIVED
OFFICE OF THE
SECRETARY

80 SEP 15 P 3: 29

September 15, 1980

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel *[Signature]*
SUBJECT: MUR 990 - Conciliation Agreement

Attached is a conciliation agreement which has been signed by the treasurer of the Tsongas for Senate Committee.

The Office of General Counsel recommends the acceptance of this agreement and the closing of the file with respect to the Tsongas for Senate Committee. It is further recommended that the Commission approve the sending of the attached letter.

Attachments

1. Conciliation Agreement
2. Copy of check
3. Proposed letter

83040400409



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John F. Zamparelli, Esq.
100 George P. Hassett Drive
Medford, Massachusetts 02155

Re: MUR 990

Dear Mr. Zamparelli:

I am writing in response to your letters of July 22 and 24, 1980, concerning MUR 990.

As Dr. Frank Belinowiz, the Treasurer of the Committee to Re-elect Zamparelli, was informed by my letter dated May 23, 1980, the Federal Election Commission has found probable cause to believe the Committee violated § 441a(a)(1)(A) when it made a \$5,000 contribution to the Tsongas for Senate Committee.

The representations of facts made in your letters of July 22 and 24 would have been more appropriately made prior to the Commission's finding of probable cause. In our opinion, these representations do not significantly change the facts available to the Commission when it made its finding. Contrary to your statement that respondents were not given sufficient time to respond to the allegations of violations, nearly two months lapsed between Dr. Belinowiz's receipt of the General Counsel's written probable cause recommendation and supporting brief on March 24, 1980, and the Commission's finding on May 20, 1980. The Commission did not receive any reply from Dr. Belinowiz or any other representative of the committee during this time which substantially exceeded the 15 days required by statute. 2 U.S.C. § 437g(a)(3).

83040400410

Letter to: John F. Zamparelli
Page 2

If you have any questions in regard to this letter,
please contact Marybeth Tarrant at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8 3 0 4 0 4 0 0 4 1 1

1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery & (CONSULT POSTMASTER FOR FEES)		2. ARTICLE ADDRESSED TO: John Zamparelli 100 Irving St. #100 Melrose MA 02155	
3. ARTICLE DESCRIPTION	REGISTERED NO.	CERTIFIED NO.	INSURED NO.
		945799	
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>M. Steele</i>			
DATE OF DELIVERY			
5. ADDRESS (Complete only if registered)			
6. UNABLE TO DELIVER BECAUSE			
7. SENDER'S INITIALS			

Postmark: 086A ST 017

Tenant #102478

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BCC#2095 909049

LAW OFFICES OF
JOHN F. ZAMPARELLI
100 GEORGE F. HABBETT DRIVE
MEDFORD, MASSACHUSETTS 02155

TELEPHONE 388-9400
AREA CODE 617

JOHN F. ZAMPARELLI
DAVID BERMAN
ANDREW J. ZAMPARELLI
JOHN T. FOYNES
HENRY B. McCONVILLE
PAUL F. MALLOY
DENNIS E. McMAHON
JOSEPH A. SARNO
RONALD J. HELD

July 24, 1980

30 JUL 29 11:52

RECORDED
GE...

Charles N. Steele, Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 990

Dear Mr. Steele:

In further support of my statements both in my letter of July 22, 1980 and in your previous letter of inquiry to me dated November 16, 1979 that contributions had been made to other candidates, I enclose copies of checks manifesting contributions to Congressmen and Senators from the Commonwealth of Massachusetts as well as outside the confines.

Incidentally, when the question was ultimately posed relative to contributions, at no time did anyone restrict his inquiry to the year 1978.

Very truly yours,


JOHN F. ZAMPARELLI

JFZ/emh

Enclosures

330404041

No. 202
53-682/112

January 8, 1978

PAY One hundred \$ 100.00
THOMAS COMMITTEE ~~XX~~

CANDIDATE ACCOUNT

TO THE ORDER OF _____

COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

ADDRESS _____

CITY, STATE _____

DEPOSITORS TRUST CO., MEDFORD, MA.

Francis J. Belinsky
AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆

⑆0000010000⑆

No. 185
53-682/113

October 11, 1977

PAY One hundred \$ 100.00
RE-ELECT CONGRESSMAN JOE MOAKLEY COMMITTEE ~~XX~~

CANDIDATE ACCOUNT

TO THE ORDER OF _____

COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

ADDRESS _____

CITY, STATE _____

DEPOSITORS TRUST CO., MEDFORD, MA.

Francis J. Belinsky
AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆

⑆0000010000⑆

No. 186
53-682/113

October 11, 1977

PAY One hundred \$ 100.00
MARKEY FOR CONGRESS COMMITTEE ~~XX~~

CANDIDATE ACCOUNT

TO THE ORDER OF _____

COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

ADDRESS _____


CITY, STATE _____

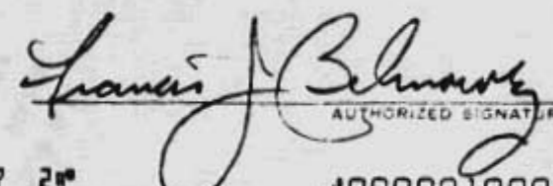
DEPOSITORS TRUST CO., MEDFORD, MA.

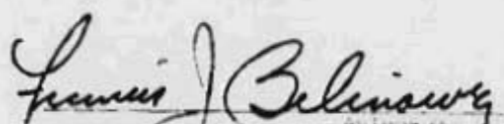
Francis J. Belinsky
AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆

⑆0000010000⑆

GENERAL EXPENDITURES <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <small>Check one.</small> <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Radio-TV <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Advertising <input type="checkbox"/> 22 Newspaper Advertising <input type="checkbox"/> 23 Signage <input type="checkbox"/> 24 Other	No. 139 83-882/113 March 16, 1977
PAY <u>One hundred</u> \$ <u>100.00</u> <u>Michael J. Early Associates</u>			CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
ADDRESS _____ CITY-STATE _____ DEPOSITORS TRUST COMPANY, Medford, Mass.			AUTHORIZED SIGNATURE 
@0113 06821 45 047 2#			0000010000

GENERAL EXPENDITURES <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <small>Check one.</small> <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Radio-TV <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Advertising <input type="checkbox"/> 22 Newspaper Advertising <input type="checkbox"/> 23 Signage <input type="checkbox"/> 24 Other	No. 132 83-882/113 February 7, 1977
PAY <u>One hundred and no/100</u> \$ <u>100.00</u> <u>TSONGAS COMMITTEE</u>			CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
ADDRESS _____ CITY-STATE _____ DEPOSITORS TRUST COMPANY, Medford, Mass.			AUTHORIZED SIGNATURE 
@0113 06821 45 047 2#			0000010000

GENERAL EXPENDITURES <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <small>Check one. If more than one, indicate specific purpose on line provided.</small> <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Salary <input type="checkbox"/> Office Expense <input type="checkbox"/> Printing <input type="checkbox"/> Travel <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <small>Check one.</small> <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Radio-TV <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Advertising <input type="checkbox"/> 22 Newspaper Advertising <input type="checkbox"/> 23 Signage <input type="checkbox"/> 24 Other	No. 104 83-882/113 Nov. 18, 1976
PAY <u>Forty</u> \$ <u>40.00</u> <u>Joe Croken Testimonial Committee</u> <u>55 N. Milton Street</u> <u>Malden Mass 02148</u>			CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
ADDRESS _____ CITY-STATE _____ DEPOSITORS TRUST COMPANY, Medford, Mass.			AUTHORIZED SIGNATURE 
@02277			0000010000

Specific Purpose: Fund-raising activity Other

Specific Purpose: Fund-raising activity Other

Specific Purpose: Fund-raising activity Other

No. 97

89-882/118

Nov. 1, 1976

PAY One hundred \$ 100.00

TO THE ORDER OF Committee To Re-Elect James P. O'Neill Jr CANDIDATE ACCOUNT

53 South Place COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

Cambridge

DEPOSITORS TRUST COMPANY, Medford, Mass.

Francis J. Belinowsky AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆ ⑆00000⑆0000⑆

GENERAL EXPENDITURES: Travel Telephone Postage Printing Other

EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY: Fund-raising Other

CAMPAIGN MEDIA EXPENSES: Newspaper Radio Television Other

No. 85

89-882/118

OCTOBER 16, 1976

PAY One hundred \$ 100.00

TO THE ORDER OF CITIZENS FOR RODINO CANDIDATE ACCOUNT

COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

DEPOSITORS TRUST COMPANY, Medford, Mass.

Francis J. Belinowsky AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆ ⑆00000⑆0000⑆

GENERAL EXPENDITURES: Travel Telephone Postage Printing Other

EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY: Fund-raising Other

CAMPAIGN MEDIA EXPENSES: Newspaper Radio Television Other

No. 45

89-882/118

OCTOBER 5, 1976

PAY ONE Hundred \$ 100.00

TO THE ORDER OF Committee To Re-Elect Edward M. Kennedy 1976 CANDIDATE ACCOUNT

760 Commonwealth St-401 COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI

Boston, Mass 02116

DEPOSITORS TRUST COMPANY, Medford, Mass.

Francis J. Belinowsky AUTHORIZED SIGNATURE

⑆0113⑆0682⑆⑆45 047 2⑆ ⑆00000⑆0000⑆

GENERAL EXPENDITURES <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Public Access <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Mail Advertising <input type="checkbox"/> 22 Signage Advertising <input type="checkbox"/> 23 Other Advertising <input type="checkbox"/> 24 Other	No. 48 83-682/113 OCTOBER 5, 1976 \$100.00 CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
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Purpose: _____ Specific Purpose: _____
 ADDRESS: _____
 CITY-STATE: _____
 DEPOSITORS TRUST COMPANY, Medford, Mass. AUTHORIZED SIGNATURE: _____
 ⑆0113⑆0682⑆⑆45 047 2⑆

GENERAL EXPENDITURES <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Public Access <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Mail Advertising <input type="checkbox"/> 22 Signage Advertising <input type="checkbox"/> 23 Other Advertising <input type="checkbox"/> 24 Other	No. 38 83-682/113 Sept. 17, 1976 \$100.00 CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
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PAY TO THE ORDER OF: **One hundred**
Committee to Elect John Joseph Markley
 149 Dorchester St.
 ADDRESS: **SO. BOSTON, MASS 02127**
 CITY-STATE: _____
 DEPOSITORS TRUST COMPANY, Medford, Mass. AUTHORIZED SIGNATURE: *Francis J. Belusio*
 ⑆0113⑆0682⑆⑆45 047 2⑆ ⑆00000⑆0000⑆

GENERAL EXPENDITURES <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	EXPENDITURES IN CONNECTION WITH FUND-RAISING ACTIVITY <input type="checkbox"/> Post <input type="checkbox"/> Telephone <input type="checkbox"/> Travel <input type="checkbox"/> Printing <input type="checkbox"/> Stationery <input type="checkbox"/> Office Supplies <input type="checkbox"/> Reproduction <input type="checkbox"/> Entertainment <input type="checkbox"/> Other	CAMPAIGN MEDIA EXPENSES <input type="checkbox"/> 17 Radio <input type="checkbox"/> 18 Television <input type="checkbox"/> 19 Public Access <input type="checkbox"/> 20 Newspaper Advertising <input type="checkbox"/> 21 Direct Mail Advertising <input type="checkbox"/> 22 Signage Advertising <input type="checkbox"/> 23 Other Advertising <input type="checkbox"/> 24 Other	No. 28 83-682/113 September 1, 1976 \$100.00 CANDIDATE ACCOUNT COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI
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PAY TO THE ORDER OF: **One hundred**
Committee to Re-Elect Michael J. Harrington
 PO Box 3031
 ADDRESS: **Salem, Massachusetts 01970**
 CITY-STATE: _____
 DEPOSITORS TRUST COMPANY, Medford, Mass. AUTHORIZED SIGNATURE: *Francis J. Belusio*

99
JOHN F. ZAMPARELLI
4 DOANE ROAD
MEDFORD, MASS. 02155

5205

PAY TO THE
ORDER OF

Dukakis Committee

PROCESSED
Malden Trust Co

Sept 11 1978
53-160
113 4

\$ 200.00

Two hundred and no/100

DOLLARS



FOR Contribution received by report

OCT 11 1978
53-160
113 4

John F. Zamparelli

⑆0113⑆0160⑆

14 7607 6⑆

⑈0000020000⑈

JOHN F. ZAMPARELLI
4 DOANE ROAD
MEDFORD, MASS. 02155

5180

PAY TO THE
ORDER OF

Committee to Elect P.J. McDonough

August 13 1978
53-160
113 4

\$ 100.00

One hundred and no/100

DOLLARS



FOR 1978 Campaign

John F. Zamparelli

⑆0113⑆0160⑆

14 7607 6⑆

⑈0000010000⑈

0
0
4
0
4
0
3
8

ENDORSEMENT THIS CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

*Birthday and Dinner
Contribute 2/4/78*

JOHN F. ZAMPARELLI
BETTY D. ZAMPARELLI

No. 4977

4 DOANE ROAD, MEDFORD, MASS. 02155

February 14, 1978

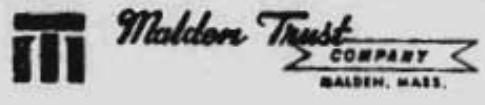
53-160/113

PAY TO THE ORDER OF

T. Sanyas Committee

\$152.00

One hundred fifty and 00/100 DOLLARS



Betty D. Zamparelli

⑆0113⑉0160⑆ 14⑉7607⑉6⑆

ENDORSEMENT THIS CHECK IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

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1

JOHN F. ZAMPARELLI
BETTY D. ZAMPARELLI

No. 4462

4 DOANE ROAD, MEDFORD, MASS. 02155

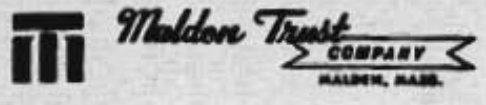
Oct. 20 1976

53-160
113

PAY TO THE ORDER OF

HARRINGTON for Congress \$100.00

One hundred and 00/100 DOLLARS



John F. Zamparelli

⑆0113⑉0160⑆ 14⑉7607⑉6⑆

⑆0000010000⑆

BY ENDORSEMENT THIS CHECK IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

JOHN F. ZAMPARELLI
BETTY D. ZAMPARELLI
4 DOANE ROAD, MEDFORD, MASS. 02155

No. 4409

PAY TO THE ORDER OF

Warrington

One hundred

PROCESSED
53-160
SEP 2 1976
MADE IN MASS. 1943
19 76 53-160 113
Warrington \$100.00
100 DOLLARS
Betty D. Zamparelli



Malden Trust
COMPANY
MALDEN, MASS.

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BY ENDORSEMENT THIS CHECK IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

JOHN F. ZAMPARELLI
BETTY D. ZAMPARELLI
4 DOANE ROAD, MEDFORD, MASS. 02155

No. 4205

PAY TO THE ORDER OF

Tsongas Committee

One hundred and no/100

Feb 14 1976 53-160 113
\$100.00
DOLLARS
John F. Zamparelli



Malden Trust
COMPANY
MALDEN, MASS.

⑆0113⑆0160⑆ ⑆47607⑆6⑆ ⑆0000010000⑆

33040400415

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

3969

53-128
113

Shawmut
County Bank, N.A.
Cambridge, Massachusetts 02142

PAY TO THE ORDER OF

DOLLARS \$50.00

00113001260 0048 240 40

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

3102

53-128
113

Feb 9 1977

PAY TO THE ORDER OF

Fifty and no/100

DOLLARS \$50.00

TREASURY COMMITTEE

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Shawmut
County Bank, N.A.
Cambridge, Massachusetts

00113001260 0048 240 40

John F. Zamparelli

0000005000

33040400420

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

2398

53-128
113

MAY 19 1976

PAY TO THE ORDER OF

One hundred and no/100

DOLLARS \$100.00

Bert FAULKNER

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

Shawmut
County Bank, N.A.
Cambridge, Massachusetts

00113001260 0048 240 40

John F. Zamparelli

00000010000

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

1258

Feb. 12 1975 53-126
113

PAY TO THE ORDER OF

One hundred and 00/100

DOLLARS \$100⁰⁰

TSONGAS COMMITTEE

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



⑆0113⑆0126⑆ ⑆048 240 4⑆

John F. Zamparelli
⑆0000010000⑆

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

2113

Jan. 14 1976 53-126
113

PAY TO THE ORDER OF

One hundred and 00/100

DOLLARS \$100⁰⁰

Edward Kennedy
Reception

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



⑆0113⑆0126⑆ ⑆048 240 4⑆

John F. Zamparelli
⑆0000010000⑆

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

1719

Sept. 13 1975 53-126
113

PAY TO THE ORDER OF

Two hundred ten and 00/100

DOLLARS \$210⁰⁰

REUSS-TSONGAS RECEPTION

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



⑆0113⑆0126⑆ ⑆048 240 4⑆

John F. Zamparelli
⑆0000021000⑆

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JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

1573

July 11 1975 53-126
113

PAY TO THE ORDER OF Two hundred and no/100

DOLLARS \$ 200.00

Committee to Re-Elect
Senator Edward M. Kennedy

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



⑆0113⑆0126⑆ ⑈048 240 4⑈

John F. Zamparelli
⑈0000020000⑈

JOHN F. ZAMPARELLI
ATTORNEY AT LAW
100 GEORGE P. HASSETT DRIVE
MEDFORD, MASSACHUSETTS 02155

916

Oct 14 1974 53-126
113

PAY TO THE ORDER OF One hundred and no/100

DOLLARS \$ 100.00

Committee to Elect
Joseph EARLY

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



⑆0113⑆0126⑆ ⑈048 240 4⑈

John F. Zamparelli
⑈0000010000⑈

33040400422

183040400423

LAW OFFICES OF
JOHN F. ZANFARELLI

100 GEORGE F. HENRY DRIVE
MEDFORD, MASSACHUSETTS 02155

ZANFARELLI
100
BUILDING



Charles N. Steele, Acting General Counsel
Federal Election Commission
Washington, D.C. 20463





JOHN F. ZAMPARELLI
REGISTER OF DEEDS

RECEIVED

Registry of Deeds
County of Middlesex
Southern District
Cambridge, Massachusetts 02141
494-4510

07-0000
JUL 25 PM 12 33
(47) #
0065

July 22, 1980

JUL 25 PM 11:44

Charles N. Steele, Acting General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 990

Dear Mr. Steele:

Although all communications relative to an alleged violation - 2 U.S.C. §441a (a) (1) (A), a provision of the Federal Election Campaign Act of 1971, as amended - have been addressed to the Committee to Re-elect John F. Zamparelli and its Treasurer, Dr. Frank J. Belinowiz, I consider the responsibility belongs to John F. Zamparelli, Paul E. Tsongas, and Nicholas Rizzo.

Guilt, if such there be, belongs to one person, Mr. Nicholas Rizzo.

This is my opinion with knowledge of those facts as presented to me.

Nevertheless, the course of computerized justice that has been meted out by the Federal Election Commission in this instance is both disappointing as well as surprising to me. How there can be any conclusions of facts on any kind of violation without testimony under oath by the accuser facing the accused, is reprehensible to any student of Constitutional Law. This is especially so when the Agency involved consists of people who know "the great game of politics" better than any of us who serve under the Federal, State, County of local level. At no period during trial by mail was sufficient time given to anyone accused to respond.

Enough rhetoric - now for the facts. My statements will be repeated under oath and are given to you under the penalties of perjury. Simply stated, Nicholas Rizzo called in panic, requesting a \$5000.00 contribution. I replied: I was not certain that \$5000.00 remained in the treasury; I indicated that, if there were, I would approve it provided it violated no law of Massachusetts or of the United States; I said I would check the State legality; Nicholas Rizzo said he would check the Federal legality. The Treasurer of my political committee informed us that there were sufficient funds to make the \$5000.00 contribution. The Secretary of State stated that there was no violation of State law but that he would make no comment on the legality of the Federal Law. Nicholas Rizzo got back to me by telephone and said: He checked with Washington and was guaranteed there was no Federal violation; he stated he would send someone to pick up the \$5000.00 contribution; the \$5000.00 contribution was delivered; at no time were there any questions about contributions to other candidates; at no time was there any inquiry of whether our Political Committee was registered; and at no time then was there any inquiry as to contributions to five (5) other National candidates.

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Charles N. Steele
Acting General Counsel

July 22, 1980

After the Primary Election of Mr. Tsongas as the Democratic National nominee for United States Senator, while I was walking out of the Governor's office, a Boston Globe correspondent asked me questions relative to whether my Committee was registered and whether contributions had been made to multi-candidates. I did not know what he was talking about. I did indicate that the Committee had contributed to other candidates and that we were registered in the State of Massachusetts. After that, questions were propounded for the first time by Mr. Rizzo and other members of the Tsongas Committee as to whether we had contributed to other candidates for National office. I responded that it was my opinion that we had given to other candidates on other occasions.

The condition precedent to the donation was explicitly stated and Mr. Rizzo guaranteed the legality. Therefore I accept no responsibility nor should any other officer of the Zamparelli Committee be found responsible. Is not the Candidate and the Tsongas Committee the proper party to advise as to the legality of contributions by those who are solicited?

The statement in the General Counsel's Brief that Mr. Rizzo had been "guided by Mr. Zamparelli's statement that his Committee had contributed to over five federal candidates" is a bold-faced lie.

This question should be placed before the appropriate parties, under oath. I am willing to submit to a polygraph test as to any statement which I make in this communication.

Your conclusion that it is apparent that I was not in a position to assume that a contribution was legal is in error. I was informed by the appropriate agency in the Commonwealth of Massachusetts that the contribution was legal by our law. We were created by Massachusetts statute and not Federal law. On the other hand, Mr. Rizzo, as Chairman of the Tsongas Finance Committee and quoting to me the Federal Election Commission in Washington, should have been in the position to inform correctly anyone from whom he solicited a contribution.

Need and greed are no substitute for accuracy and truth.

Further comment is required in connection with the statement and assumptions of Patricia G. Bensetler in her response to you dated November 19, 1979. She was the full-time, paid employee of the Tsongas Committee and she should have known what was a legal or illegal contribution and she should have reacted accordingly. Her reference to me of my involvement in the Campaign made me "aware of the need and my ability to contribute" to the Committee was a deliberate lie.

My function in the Tsongas campaign was to serve as Toastmaster and Master of Ceremony at over a dozen functions in all parts of the Commonwealth of Massachusetts; attend fund raisers; run one fund raiser at my home; and attend Finance Committee meetings when invited. The best example of my position in the campaign is expressed by the candidate himself by the enclosed copy of his letter

33040400425



Charles N. Steele
Acting General Counsel

- 3 -

July 22, 1980

to me at the height of the campaign. Miss Patricia G. Bensetler assumes wrongly again when she states that the contribution was made directly to the Main Campaign Headquarters in Boston. This is not true. Her assumption that my Committee was a multi-candidate Committee was wrong again. Further, she had no right to assume that the Committee was registered with the Federal Election Commission. She states no grounds on which she could base any of her assumptions. She never contacted me then nor now! She is misinformed again when she said only \$4000.00 should be returned because of the allowance of \$1000.00. I had already given the maximum. Her reference to my knowledge of campaign finances once again is improper. No member of the Finance Committee received verbal or written information except to announce a forthcoming fund raising event.

I agree with her conclusion in the last paragraph of page 2 relative to diligent notice on the part of the F. E. C. Neither I nor my Committee were informed at the beginning relative to the serious nature of these proceedings. The contribution was made in good faith September 14, 1978. First notice of violation was given to the Tsongas Committee January 5, 1979. The \$5000.00 was returned to the Committee January 19, 1979. The vote of violation was given to the Tsongas Committee January 20, 1979. Then, six months later, June 24, 1979, notice of violation of the Zamparelli Committee was voted based upon the WORD of Rizzo, not under oath. All of this action based upon the generosity of a fellow democrat to a candidate who sensed victory.

I quote and repeat the last paragraph of the first communication from Dr. Frank J. Belinowiz dated July 11, 1979:

"If the contribution constituted a violation of 2 U.S.C. § 441a (1) (1) (A), I suggest the facts show no intent to avoid or violate any law and that an attempt to cure the oversight was timely made. I respectfully request that no action be taken".

Sincerely yours,



John F. Zamparelli

JFZ:ys
Enclosure

33040400426



HOUSE OF REPRESENTATIVES
WASHINGTON, D. C. 20515

PAUL E. TSONGAS
5TH DISTRICT
MASSACHUSETTS

RECEIVED

80 JUL 25 PM 12 33

Q09260

June 29, 1978


Mr. John Zamparelli
4 Doane Road
Medford, MA

Dear John,

You were absolutely terrific last night. I cannot describe in this note my gratitude. Your continued support and friendship are among my most cherished and valuable gains from my public career.

I am hesitant to run any affair without you at my side.

With warmest personal regards,


Paul Tsongas

PET:d

33040400427

83040400428

*Registry of Deeds
County of Middlesex
Cambridge, Massachusetts 02141*

JUL 25 PM 12:38

RECEIVED



Charles N. Steele, Acting General Counsel
Federal Election Commission
Washington, D. C. 20463



RETURN RECEIPT REQUESTED

RECEIVED

ACC# 1659

'80 JUN 16 AM 9:09

SILVERMAN & KUDISCH
COUNSELLORS AT LAW

WILLIAM M. SILVERMAN
CLARENCE P. KUDISCH (1896-1968)
SUMNER DARMAN
PETER L. ZIMMERMAN
LAWRENCE L. BLACKER
NORMAN A. ERLICH
JAMES P. MITCHELL

100 STATE STREET
BOSTON, MASSACHUSETTS 02109
(617) 523-1711

OF COUNSEL
TERRY PHILIP SEGAL

June 12, 1980

Marybeth Tarrant, Esquire
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: In the Matter of Tsongas for Senate
Committee, MUR 990

Dear Ms. Tarrant:

Enclosed please find the appropriate authorization for me to represent
the Tsongas for Senate Committee in the above matter.

Shortly, I will be submitting a response to the proposed conciliation
agreement.

Sincerely,

Terry Philip Segal
Terry Philip Segal

TPS:ld
Enc.

008424

830404004120

PATRICIA G. BENSETLER, CONSULTANT
MAIN STREET
BOLTON, MASSACHUSETTS 01740

6-5-80

To Whom it may concern -

Atty. Segal has my authorization
to negotiate for the Tsongas for
Senate Committee in the matter
of MUR 990 -

Pat Benetler

33040400430

THE TSONGAS COMMITTEE
P.O. Box 2, Andover, Massachusetts 01810

June 4, 1980

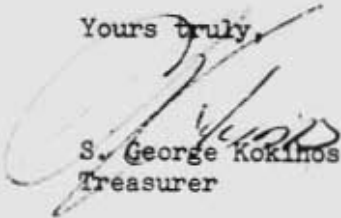
Federal Election Commission
1325 K Street NW
Washington, D.C. 20563

Dear Sirs:

This letter is to authorize Attorney Terry Segal to represent this committee before you in the matter regarding a \$5000 contribution in the 1978 election.

If any additional information is needed, please contact me.

Yours truly,


S. George Kokinos
Treasurer

SGK:as

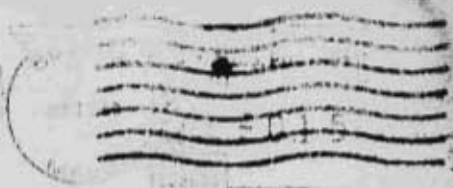
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SILVERMAN & KUDISCH

100 STATE STREET

BOSTON, MASS. 02109

8304040043



Marybeth Tarrant, Esquire
Assistant General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Tsongas for Senate Committee)
Committee to Re-Elect Zamparelli)

MJR 990

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on May 20, 1980, do hereby certify that the Commission took the following actions in MJR 990:

1. Failed on a vote of 2-4 to find no probable cause to believe a violation had occurred in this matter and close the file.

Commissioners Harris and McGarry voted affirmatively for this action; Commissioners Aikens, Friedersdorf, Reiche, and Tiernan dissented.

2. Passed on a vote of 4-2 a motion to:

- a) Find probable cause to believe that the Tsongas for Senate Committee violated 2 U.S.C. §441a(f).
b) Find probable cause to believe that the Committee to Re-Elect John Zamparelli violated 2 U.S.C. §441a(a)(1)(A).
c) Approve the conciliation agreements and letters attached to the General Counsel's May 1, 1980 report.

Commissioners Aikens, Friedersdorf, Reiche, and Tiernan voted affirmatively for these actions; Commissioners Harris and McGarry dissented.

Attest:

5/22/80

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

83040400430

BEFORE THE FEDERAL ELECTION COMMISSION
May 1, 1980

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect)
Zamparelli)

GENERAL COUNSEL'S REPORT

I. Background

8 3 0 4 0 4 0 4 3 4
This matter concerns a \$5,000 contribution from the Committee to Re-Elect Zamparelli (the Zamparelli Committee), an unregistered committee, to the Tsongas for Senate Committee (the Tsongas Committee). The matter was referred to the Commission's Office of General Counsel from the Reports Analysis Division. On March 19, 1980, letters and briefs were sent to both respondents informing them of the General Counsel's intent to recommend that the Commission find probable cause to believe that both committees violated 2 U.S.C. § 441a.

On March 28, 1980, Mrs. Patricia Bentsetler, former treasurer of the Tsongas Committee, telephoned this office and explained that the facts set out in our brief appear to be true and that there was nothing else she could add. A letter to this effect was received from Mrs. Bentsetler on April 11, 1980. There has been no response from the Zamparelli Committee.

II. Legal Analysis

The Federal Election Campaign Act of 1971, as amended, prohibits any person from making a contribution in excess of \$1,000 per election to any federal candidate or his authorized committee. 2 U.S.C. § 441a(a)(1)(A). The knowing acceptance of any contribution in excess of this limit is also prohibited. 2 U.S.C. § 441a(f).

In this matter both committees were operating under the mistaken assumption that the Zamparelli Committee was a multicandidate committee. Both committees failed to make sufficient efforts to verify the Zamparelli Committee's status. (See attached General Counsel's Briefs)

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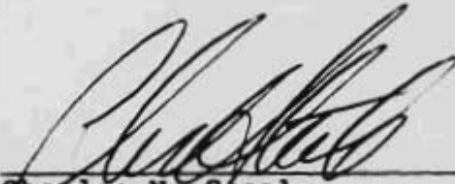
Since Congress has established a public record system which allows easy verification of the status of committees, recipients of contributions must be responsible for the accepting of prohibited contributions when that record is not checked.

IV. Recommendation

1. Find probable cause to believe that the Tsongas for Senate Committee violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that the Committee to Re-Elect John Zamparelli violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the attached conciliation agreements and letters.

15 May 1980

 Date



 Charles N. Steele
 General Counsel

Attachments

1. Proposed Conciliation Agreements
2. Proposed letters
3. OGC Briefs
4. Letter from Mrs. Bensetler

33040400436

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect)
Zamparelli)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

8 3 0 4 0 4 0 0 4 3 7
This matter concerns a \$5,000 contribution from the Committee to Re-Elect Zamparelli (the Zamparelli Committee), an unregistered committee, to the Tsongas for Senate Committee (the Tsongas Committee). The matter was referred to the Commission's Office of General Counsel from the Reports Analysis Division. On November 8, 1979, the Commission approved the sending of additional letters, with questions, to Mrs. Patricia Bensetler, treasurer of the Tsongas Committee, and to Mr. John Zamparelli.

On November 26, 1979, Mrs. Bensetler responded by stating it was Nick Rizzo, the principal fundraiser, who had direct contact with Mr. Zamparelli regarding the \$5,000 contribution (See Attachment 1). It was also her assumption that it was Mr. Rizzo who had advised Mr. Zamparelli regarding the legality of the contribution. Mrs. Bensetler claimed that until notification was received from the Commission to the contrary, she had assumed the Zamparelli Committee was a registered political committee and that had she been notified promptly by the Commission,

the contribution would have been refunded immediately. Because she felt Mr. Rizzo was in a better position to answer some of the questions, she forwarded those questions to him.

In his response, Mr. Rizzo stated that prior to his solicitation of a \$5,000 contribution from Mr. Zamparelli, he had checked with Robert Bauer, General Counsel to the Democratic Senatorial Campaign Committee (See Attachment 2). He was advised by Mr. Bauer that, if the Zamparelli Committee was a multicandidate committee which had supported five federal candidates, a \$5,000 contribution "might be OK." According to Mr. Rizzo, this information was then passed on to Mr. Zamparelli who stated that his committee had contributed to five federal candidates. 1/

Mr. Zamparelli's response also indicated that it was Mr. Rizzo who solicited the contribution (See Attachment 3). In addition, Mr. Zamparelli stated that Mr. Rizzo told him the contribution would be legal because he had already checked it out with some people in Washington. Mr. Zamparelli stated that he then contacted the office of the Massachusetts' Secretary of State and was told that the contribution was not illegal under state law, but that no opinion could be given as to federal law.

1/ Attached to Mr. Zamparelli's response were copies of his Committee's 1977 and 1978 state reports. Neither these reports nor a review of reports filed with the Commission indicates the Zamparelli Committee supported five federal candidates.

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The Zamparelli Committee then made the contribution on September 15, 1978.

A surface violation letter was sent to the Tsongas Committee by the Reports Analysis Division on January 5, 1979. On January 19, 1979, the \$5,000 was refunded to the Zamparelli Committee. On June 20, 1979, the Commission found reason to believe that the Tsongas violated 2 U.S.C. §441a.

II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, prohibits any person from making a contribution in excess of \$1,000 per election to any federal candidate or his authorized committee. Pursuant to 2 U.S.C. §431(11), formerly 2 U.S.C. §431(h), the term "person" includes a committee. Pursuant to 2 U.S.C. §441a(a)(2)(A), a multicandidate committee has a \$5,000 contribution limitation. "Multicandidate committee" as defined in 2 U.S.C. §441a(a)(4) means a political committee which has been registered with the Commission for a period of not less than 6 months, has received contributions from more than 50 persons, and has made contributions to 5 or more candidates for Federal office.

The Zamparelli Committee did not qualify as a multicandidate committee and was not registered as such with the Commission. As it was not a multicandidate committee, it was subject to the \$1,000 limitation of 2 U.S.C. §441a(a)(1)(A).

In his response, Mr. Zamparelli claims to have relied solely on Mr. Rizzo's advice concerning the legality of the contribution (See Attachment 3). Mr. Rizzo in turn claims to

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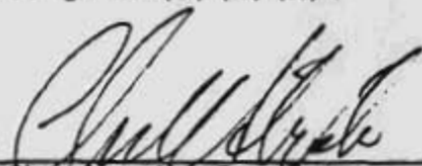
have been guided by Mr. Zamparelli's statement that his committee had contributed to over five federal candidates, and thus, (according to Mr. Rizzo's sources) appeared to qualify as a multicandidate committee (See Attachment 2).

It is thus apparent neither Mr. Rizzo nor Mr. Zamparelli were in a position to assure the other that a contribution would be legal. In any event, a committee must be responsible for knowing whether or not it has qualified as a multicandidate committee and cannot rely on the recipient of a contribution for that knowledge. Therefore, the Office of General Counsel recommends the Commission find probable cause to believe that the Zamparelli Committee violated 2 U.S.C. §441a(a)(1)(A) and proceed to conciliation.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Committee to Re-Elect John Zamparelli violated 2 U.S.C. §441a(a)(1)(A).

17 March 1980
Date



Charles N. Steele
General Counsel

ATTACHMENTS (See Attachments for Tsongas Brief)

- 1. Response from Mrs. Bensetler
- 2. Response from Mr. Rizzo
- 3. Response from Mr. Zamparelli

33040400416

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect)
Zamparelli)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

330404041
This matter concerns a \$5,000 contribution from the Committee to Re-Elect Zamparelli (the Zamparelli Committee), an unregistered committee, to the Tsongas for Senate Committee (the Tsongas Committee). The matter was referred to the Commission's Office of General Counsel from the Reports Analysis Division. On November 8, 1979, the Commission approved the sending of additional letters, with questions, to Mrs. Patricia Bensetler, treasurer of the Tsongas Committee, and to Mr. John Zamparelli.

On November 26, 1979, Mrs. Bensetler responded by stating it was Nick Rizzo, the principal fundraiser, who had direct contact with Mr. Zamparelli regarding the \$5,000 contribution (See Attachment 1). It was also her assumption that it was Mr. Rizzo who had advised Mr. Zamparelli regarding the legality of the contribution. Mrs. Bensetler claimed that until notification was received from the Commission to the contrary, she had assumed the Zamparelli Committee was a registered political committee and that had she been notified promptly by the Commission, the contribution would have been refunded immediately. Because she felt Mr. Rizzo was in a better position to answer some of the questions, she forwarded those questions to him.

In his response, Mr. Rizzo stated that prior to his solicitation of a \$5,000 contribution from Mr. Zamparelli, he had checked with Robert Bauer, General Counsel to the Democratic Senatorial Campaign Committee (See Attachment 2). He was advised by Mr. Bauer that, if the Zamparelli Committee was a multicandidate committee which had supported five federal candidates, a \$5,000 contribution "might be OK." According to Mr. Rizzo, this information was then passed on to Mr. Zamparelli who stated that his committee had contributed to five federal candidates. 1/

Mr. Zamparelli's response also indicated that it was Mr. Rizzo who solicited the contribution (See Attachment 3). In addition, Mr. Zamparelli stated that Mr. Rizzo told him the contribution would be legal because he had already checked it out with some people in Washington. Mr. Zamparelli stated that he then contacted the office of the Massachusetts' Secretary of State and was told that the contribution was not illegal under state law, but that no opinion could be given as to federal law. The Zamparelli Committee then made the contribution on September 15, 1978.

A surface violation letter was sent to the Zamparelli Committee by the Reports Analysis Division on January 5, 1979 regarding the contribution. On January 19, 1979, the \$5,000 was refunded to the Zamparelli Committee. On June 20, 1979, the Commission found reason to believe that the Zamparelli Committee violated 2 U.S.C. §441a.

1/ Attached to Mr. Zamparelli's response were copies of his committee's 1977 and 1978 state reports. Neither these reports nor a review of reports filed with the Commission indicates the Zamparelli Committee supported five federal candidates.

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II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, prohibits any person from making a contribution in excess of \$1,000 per election to any federal candidate or his authorized committee. 2 U.S.C. §441a(a)(1)(A). The knowing acceptance of any contribution in excess of this limit is also prohibited. 2 U.S.C. §441a(f).

The Zamparelli Committee was subject to the \$1,000 limitation of section 441a(a)(1)(A) since it was not a qualified multicandidate committee. Pursuant to section 441a(a)(2)(A), a multicandidate committee has a \$5,000 contribution limitation. "Multicandidate committee" as defined in section 441a(a)(4) means a political committee which has been registered with the Commission for a period of not less than 6 months, has received contributions from more than 50 persons, and has made contributions to 5 or more candidates for federal office. The Zamparelli Committee did not meet this definition.

The Tsongas Committee violated 2 U.S.C. §441a(f) by knowingly accepting a contribution in excess of the \$1,000 limit. Although it appears Mr. Rizzo asked Mr. Zamparelli how many federal candidates the Zamparelli Committee had contributed to previously, no attempt was apparently made by the Tsongas Committee to determine if the Zamparelli Committee was registered with the Commission and otherwise qualified as a multicandidate committee. In addition to making contributions to at least five federal candidates, multicandidate committees must have been registered for at least 6 months and have received donations from more than 50 contributors. Since Mr. Zamparelli indicated he was uncertain his committee

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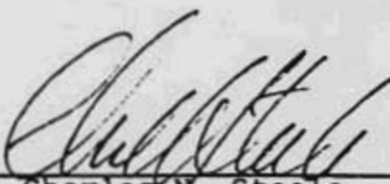
qualified as a multicandidate committee when he talked with Mr. Rizzo, the Tsongas Committee could not rely upon his representations. The Tsongas Committee had reason to doubt that the Zamparelli Committee was a multicandidate committee and failed to make sufficient efforts to verify its status. Therefore, the Office of General Counsel recommends the Commission find probable cause to believe that the Tsongas Committee violated 2 U.S.C. §441a(f) and proceed to conciliation.

III. RECOMMENDATION

Find probable cause to believe that the Tsongas for Senate Committee violated 2 U.S.C. §441a(f).

3 5 0 4 0 4 0 0 4 1 4

17 March 1980
Date



Charles N. Steele
General Counsel

ATTACHMENTS

1. Response from Mrs. Bensetler
2. Response from Mr. Rizzo
3. Response from Mr. Zamparelli

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RECEIVED

MAR 990

PATRICIA G. BENSETLER, CONSULTANT
MAIN STREET
BOLTON, MASSACHUSETTS 01740

'80 APR 11 PM 12:23

Testimony

Attachment 4

Federal Election Commission
1325 K Street NW
Washington, D.C.

Dear Sir/Madam;

The facts as you have reported in your brief are accurate to the best of my knowledge. I did not have first hand knowledge of the events of the soliciation but your facts seem to be supported by the evidence presented by Mr. Rizzo and Mr. Zamparielli.

If you have any additional requests for information please feel free to contact me.

Sincerely,

Pat Bensetler

Patricia G. Bensetler

REC'D
GENERAL COUNSEL
APR 11 1980 3:17

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10/2

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MAR 990

PATRICIA G. BENSETLER, CONSULTANT
MAIN STREET
BOLTON, MASSACHUSETTS 01740

'80 APR 11 PM 12:20

Federal Election Commission
1325 K Street NW
Washington, D.C.

Dear Sir/Madam;

The facts as you have reported in your brief are accurate to the best of my knowledge. I did not have first hand knowledge of the events of the soliciation but your facts seem to be supported by the evidence presented by Mr. Rizzo and Mr. Zamparielli.

If you have any additional requests for information please feel free to contact me.

Sincerely,

Pat Bensetler

Patricia G. Bensetler

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL
APR 11 1980 3:17

3040400447



WE'RE COUNTING
YOUR VOTE
CENSUS '80

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Attn: Mary Beth Tarrant

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80 APR 11 PM 12:28



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Mrs. Bensetler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 20, 1979, found reason to believe that your committee may have violated 2 U.S.C. §441a(f), a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

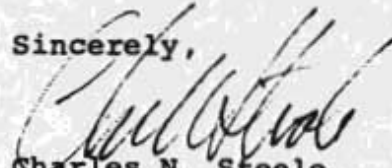
A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

83040400418

Page Two
Patricia G. Bensetler

Should you have any questions, please contact Marybeth
Tarrant at (202) 523-4175.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

8 3 0 4 0 4 0 0 4 1 9



Patricia G. Bensetler
Marybeth Tarrant
202-523-4175

ATLANTA GA
MAY 1981

912/4175

Patricia G. Bensetler, Treas.

8 3 0 4 0 4 0 0 4 3 0

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
 Show to whom and date delivered.....
 Show to whom, date and address of delivery.....
 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.....
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 John F. Zamparelli
 100 George P. Hassett Drive
 Medford, Mass. 02155

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 947398 |
 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
John F. Zamparelli

4. DATE OF DELIVERY | POSTMARK
 12-1-50 |

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE. | CLERK'S INITIALS

Form 3811, Rev. 1-59
RETURN RECEIPT, REGISTERED, CERTIFIED AND INSURED MAIL

940 Zamparelli

☆GPO : 1975-285-040



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank J. Belinowiz, Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hassett Drive
Medford, MA 02155

Re: MUR 990

Dear Mr. Belinowiz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 20, 1979, found reason to believe your committee may have violated 2 U.S.C. §441a(a) (1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this

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Page Two
Frank J. Belinowiz

matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Marybeth Tarrant at (202) 523-4175.

Sincerely;

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

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ADDRESSEE'S NAME AND ADDRESS FRANK J. BELINOWIZ, TREAS. 100 GEORGE R. HASSARD DRIVE WALTON, MA 02155	CERTIFIED NO. 949017	INSURED NO.
I have examined the article described above: <input type="checkbox"/> Address <input type="checkbox"/> Authorized agent		
ARTICLE DESCRIPTION		
POSTAGE AND FEES (Check one) <input type="checkbox"/> REGISTERED MAIL WITH RETURN RECEIPT GUARANTEED DELIVERY <input type="checkbox"/> REGISTERED MAIL WITH RETURN RECEIPT GUARANTEED DELIVERY (POSTNET)		
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U.S. MAIL
MAR 1981
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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO : THE COMMISSION
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: March 20, 1980
SUBJECT: MUR 990

The attached documents are circulated for your information.

8304040043

ATTACHMENTS:
1) Memo; 2) Brief; 3) Letter

March 19, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 990

Please have the attached Memo and Briefs distributed to the Commission on an informational basis. Thank you.

8304040045



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED P 5: 03

March 19, 1980

MEMORANDUM TO: The Commission
FROM: Charles N. Steele *CS*
General Counsel
SUBJECT: MUR 990

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on March 19, 1980. Following receipt of the Respondents' replies to the notice, this office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

33040400452

BEFORE THE FEDERAL ELECTION COMMISSION
February 27, 1980

In the Matter of)	
)	
Tsongas for Senate Committee)	MUR 990
Committee to Re-Elect)	
Zamparelli)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter concerns a \$5,000 contribution from the Committee to Re-Elect Zamparelli (the Zamparelli Committee), an unregistered committee, to the Tsongas for Senate Committee (the Tsongas Committee). The matter was referred to the Commission's Office of General Counsel from the Reports Analysis Division. On November 8, 1979, the Commission approved the sending of additional letters, with questions, to Mrs. Patricia Benseitler, treasurer of the Tsongas Committee, and to Mr. John Zamparelli.

On November 26, 1979, Mrs. Benseitler responded by stating it was Nick Rizzo, the principal fundraiser, who had direct contact with Mr. Zamparelli regarding the \$5,000 contribution (See Attachment 1). It was also her assumption that it was Mr. Rizzo who had advised Mr. Zamparelli regarding the legality of the contribution. Mrs. Benseitler claimed that until notification was received from the Commission to the contrary, she had assumed the Zamparelli Committee was a registered political committee and that had she been notified promptly by the Commission,

83040-100456

the contribution would have been refunded immediately. Because she felt Mr. Rizzo was in a better position to answer some of the questions, she forwarded those questions to him.

In his response, Mr. Rizzo stated that prior to his solicitation of a \$5,000 contribution from Mr. Zamparelli, he had checked with Robert Bauer, General Counsel to the Democratic Senatorial Campaign Committee (See Attachment 2). He was advised by Mr. Bauer that, if the Zamparelli Committee was a multicandidate committee which had supported five federal candidates, a \$5,000 contribution "might be OK." According to Mr. Rizzo, this information was then passed on to Mr. Zamparelli who stated that his committee had contributed to five federal candidates. 1/

Mr. Zamparelli's response also indicated that it was Mr. Rizzo who solicited the contribution (See Attachment 3). In addition, Mr. Zamparelli stated that Mr. Rizzo told him the contribution would be legal because he had already checked it out with some people in Washington. Mr. Zamparelli stated that he then contacted the office of the Massachusetts' Secretary of State and was told that the contribution was not illegal under state law, but that no opinion could be given as to federal law.

1/ Attached to Mr. Zamparelli's response were copies of his Committee's 1977 and 1978 state reports. Neither these reports nor a review of reports filed with the Commission indicates the Zamparelli Committee supported five federal candidates.

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The Zamparelli Committee then made the contribution on September 15, 1978.

A surface violation letter was sent to the Tsongas Committee by the Reports Analysis Division on January 5, 1979. On January 19, 1979, the \$5,000 was refunded to the Zamparelli Committee. On June 20, 1979, the Commission found reason to believe that the Tsongas violated 2 U.S.C. §441a.

II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, prohibits any person from making a contribution in excess of \$1,000 per election to any federal candidate or his authorized committee. Pursuant to 2 U.S.C. §431(1), formerly 2 U.S.C. §431(h), the term "person" includes a committee. Pursuant to 2 U.S.C. §441a(a)(2)(A), a multicandidate committee has a \$5,000 contribution limitation. "Multicandidate committee" as defined in 2 U.S.C. §441a(a)(4) means a political committee which has been registered with the Commission for a period of not less than 6 months, has received contributions from more than 50 persons, and has made contributions to 5 or more candidates for Federal office.

The Zamparelli Committee did not qualify as a multicandidate committee and was not registered as such with the Commission. As it was not a multicandidate committee, it was subject to the \$1,000 limitation of 2 U.S.C. §441a(a)(1)(A).

In his response, Mr. Zamparelli claims to have relied solely on Mr. Rizzo's advice concerning the legality of the contribution (See Attachment 3). Mr. Rizzo in turn claims to

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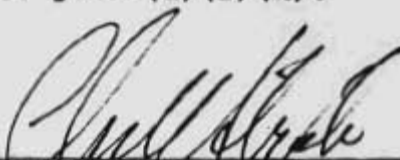
have been guided by Mr. Zamparelli's statement that his committee had contributed to over five federal candidates, and thus, (according to Mr. Rizzo's sources) appeared to qualify as a multicandidate committee (See Attachment 2).

It is thus apparent neither Mr. Rizzo nor Mr. Zamparelli were in a position to assure the other that a contribution would be legal. In any event, a committee must be responsible for knowing whether or not it has qualified as a multicandidate committee and cannot rely on the recipient of a contribution for that knowledge. Therefore, the Office of General Counsel recommends the Commission find probable cause to believe that the Zamparelli Committee violated 2 U.S.C. §441a(a)(1)(A) and proceed to conciliation.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Committee to Re-Elect John Zamparelli violated 2 U.S.C. §441a(a)(1)(A).

17 March 1980
Date



Charles N. Steele
General Counsel

ATTACHMENTS (See Attachments for Tsongas Brief)

1. Response from Mrs. Bensetler
2. Response from Mr. Rizzo
3. Response from Mr. Zamparelli

33040400455

BEFORE THE FEDERAL ELECTION COMMISSION
February 28, 1980

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect)
Zamparelli)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

33040400450
This matter concerns a \$5,000 contribution from the Committee to Re-Elect Zamparelli (the Zamparelli Committee), an unregistered committee, to the Tsongas for Senate Committee (the Tsongas Committee). The matter was referred to the Commission's Office of General Counsel from the Reports Analysis Division. On November 8, 1979, the Commission approved the sending of additional letters, with questions, to Mrs. Patricia Bensetler, treasurer of the Tsongas Committee, and to Mr. John Zamparelli.

On November 26, 1979, Mrs. Bensetler responded by stating it was Nick Rizzo, the principal fundraiser, who had direct contact with Mr. Zamparelli regarding the \$5,000 contribution (See Attachment 1). It was also her assumption that it was Mr. Rizzo who had advised Mr. Zamparelli regarding the legality of the contribution. Mrs. Bensetler claimed that until notification was received from the Commission to the contrary, she had assumed the Zamparelli Committee was a registered political committee and that had she been notified promptly by the Commission, the contribution would have been refunded immediately. Because she felt Mr. Rizzo was in a better position to answer some of the questions, she forwarded those questions to him.

In his response, Mr. Rizzo stated that prior to his solicitation of a \$5,000 contribution from Mr. Zamparelli, he had checked with Robert Bauer, General Counsel to the Democratic Senatorial Campaign Committee (See Attachment 2). He was advised by Mr. Bauer that, if the Zamparelli Committee was a multicandidate committee which had supported five federal candidates, a \$5,000 contribution "might be OK." According to Mr. Rizzo, this information was then passed on to Mr. Zamparelli who stated that his committee had contributed to five federal candidates. 1/

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Mr. Zamparelli's response also indicated that it was Mr. Rizzo who solicited the contribution (See Attachment 3). In addition, Mr. Zamparelli stated that Mr. Rizzo told him the contribution would be legal because he had already checked it out with some people in Washington. Mr. Zamparelli stated that he then contacted the office of the Massachusetts' Secretary of State and was told that the contribution was not illegal under state law, but that no opinion could be given as to federal law. The Zamparelli Committee then made the contribution on September 15, 1978.

A surface violation letter was sent to the Zamparelli Committee by the Reports Analysis Division on January 5, 1979 regarding the contribution. On January 19, 1979, the \$5,000 was refunded to the Zamparelli Committee. On June 20, 1979, the Commission found reason to believe that the Zamparelli Committee violated 2 U.S.C. §441a.

1/ Attached to Mr. Zamparelli's response were copies of his committee's 1977 and 1978 state reports. Neither these reports nor a review of reports filed with the Commission indicates the Zamparelli Committee supported five federal candidates.

II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, prohibits any person from making a contribution in excess of \$1,000 per election to any federal candidate or his authorized committee. 2 U.S.C. §441a(a)(1)(A). The knowing acceptance of any contribution in excess of this limit is also prohibited. 2 U.S.C. §441a(f).

The Zamparelli Committee was subject to the \$1,000 limitation of section 441a(a)(1)(A) since it was not a qualified multicandidate committee. Pursuant to section 441a(a)(2)(A), a multicandidate committee has a \$5,000 contribution limitation. "Multicandidate committee" as defined in section 441a(a)(4) means a political committee which has been registered with the Commission for a period of not less than 6 months, has received contributions from more than 50 persons, and has made contributions to 5 or more candidates for federal office. The Zamparelli Committee did not meet this definition.

The Tsongas Committee violated 2 U.S.C. §441a(f) by knowingly accepting a contribution in excess of the \$1,000 limit. Although it appears Mr. Rizzo asked Mr. Zamparelli how many federal candidates the Zamparelli Committee had contributed to previously, no attempt was apparently made by the Tsongas Committee to determine if the Zamparelli Committee was registered with the Commission and otherwise qualified as a multicandidate committee. In addition to making contributions to at least five federal candidates, multicandidate committees must have been registered for at least 6 months and have received donations from more than 50 contributors. Since Mr. Zamparelli indicated he was uncertain his committee


33040400452

qualified as a multicandidate committee when he talked with Mr. Rizzo, the Tsongas Committee could not rely upon his representations. The Tsongas Committee had reason to doubt that the Zamparelli Committee was a multicandidate committee and failed to make sufficient efforts to verify its status. Therefore, the Office of General Counsel recommends the Commission find probable cause to believe that the Tsongas Committee violated 2 U.S.C. §441a(f) and proceed to conciliation.

III. RECOMMENDATION

Find probable cause to believe that the Tsongas for Senate Committee violated 2 U.S.C. §441a(f).

17 March 1980
Date



Charles M. Steele
General Counsel

ATTACHMENTS

1. Response from Mrs. Bensetler
2. Response from Mr. Rizzo
3. Response from Mr. Zamparelli

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Attachment 2
RECEIVED
FEDERAL ELECTION
COMMISSION

Hand Delivered

November 19, 1979
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Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

HAND DELIVERED

Dear Sir/Madam;

This letter is in response to your letter of November 16, 1979 requesting additional information concerning the contribution from Mr. Zamparielli in September 1978.

I would like to state at the onset that the answers I will be giving to your questions are based solely on information that I have of the events of last September. I have forwarded some of the questions for additional comment to Mr. Nick Rizzo. I have enclosed a copy of the letter that I sent to him today.

I was not directly involved in fund raising. Mr. Rizzo was the principal fund raiser. He was the one that had direct contact with Mr. Zamparielli and in the best position to answer the technical questions concerning the actual date of the solicitation as well as the circumstances surrounding the contribution. I will answer all the other questions to the best of my ability and if you need additional information please feel free to contact me.

1. Yes, to my knowledge the Committee to Elect John Zamparielli was solicited in regard to the contribution to the Tsongas for Senate Committee. I am certain that Mr. Zamparielli was very aware of the financial status of the committee just before the election. He was a member of the Finance Committee and as a member of the committee was aware of the campaign finances. Often this sort of contribution may not be directly solicited but certainly, by the nature of his involvement with the campaign he was aware of our need and his ability to contribute to the committee.

Mr. Zamparielli and Mr. Nick Rizzo were the persons involved in the solicitation of the contribution. Mr. Zamparielli delivered the contribution to the best of my knowledge - directly to the main campaign headquarters in Boston. The contribution was received by the Campaign Manager Dennis Kanin.

I assume that Mr. Rizzo informed Mr. Zamparielli concerning the nature of the legality of the contribution. Mr. Rizzo informed me that he had checked with the counsel of the House and Senate Counsel and that that individual had checked with the FEC that the contribution was legal. I assume that this conversation with the FEC was prompted by the desire of Mr. Zamparielli to contribute to the committee and the information was passed on to him.

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I contacted the FEC concerning the legality of the contribution. After the pre-primary reports of the committee were made public, we were informed that the FEC had been contacted by a reporter from the Boston media. He had been told that the contribution was illegal. I called and, in the evening, spoke to the FEC Press representative. He told me that he did not have the Zamparielli committee registered but that that was not enough to indicate that there were problems with the contribution. I assumed that we were discussing the committee as a multi-candidate committee and not as a simple candidate committee. My understanding was that the issue was whether the Zamparielli committee was a legal Multi-candidate committee. I assumed that he had registered with the FEC as a committee.

Later, the next day I believe, I contacted Bill Coppell and asked him about the contribution. Apparently he had been informed that there was some question concerning the contribution but told me that I should wait until contacted by the FEC before I returned the contribution. All this time I never at any time understood that the Zamparielli Committee was not registered with the FEC even as a candidate committee. Additionally, I was told in December, when I was informed that the contribution was to be returned, that we need only return the \$4,000. because the \$1,000 would have been a legal contribution. This information was transmitted to me by telephone in a conversation with the FEC.

You final question in section 1 I believe I have answered above. Mr Zamparielli was a member of the Finance Committee and was aware of the nature of the campaign finances. I have just checked our original committee filing to note whether Mr. Zamparielli was a member of the committee. He apparently was not at the point of the registration but had been previously, and I assume that there was a clerical error in not including his name as a member of the Finance Committee.

2. I think that I have answered this question above. I knew that the Zamparielli committee had given to the Tsongas Committee before, I knew that he had given to other candidates and their committees and I had no reason to believe that he was not a multi-candidate committee.


I might make an additional statement. I frankly feel that the problems that have arisen concerning the Zamparielli contribution would have been avoided, at least on the part of the Tsongas for Senate Committee concerning the activities that I was directly involved in, if the FEC had acted immediately and informed us that the contribution was illegal. We would have returned the contribution immediately. We had no desire to take such an obviously illegal contribution if we had been informed at any point that the contribution should have been returned. I feel that our contact with the FEC was one that could be characterized on the Commission's part as an issue of no grave concern. If I had been told the actual circumstances, from the Commission's perspective I would have immediately returned the contribution and had sought to straighten out the matter on the Committee's end.

3-

As I stated in my letter previously, we have, through the years, made all possible attempts to reflect the guidelines of the FEC in both the spirit and the letter of the Act. We certainly would not have taken knowi such an illegal contribution and would have acted sooner if the FEC had informed us concerning the nature of the contribution.

Please feel free to contact me for additional information.

Sincerely,


Patricia G. Bensetler

MUR 990

9024071345

November 19, 1979

Nick Rizzo
Box 513
Andover, Massachusetts

Dear Nick;

The FEC has requested additional information concerning the Samparielli contribution. There are some questions I cannot answer and they have requested that I send the questions to you.

The questions are;

1. The data of the solicitation of the contribution.
2. The circumstances of the solicitation- did he contact you or did you contact him?
3. Did you inform Mr. Samparielli that the contribution was legal? Please describe here the details of your conversation with the House and Senate Counsel regarding the nature of the contribution. The FEC needs to know the circumstances of your conversations, the contact that their counsel had with the FEC and any other particulars. Did John ask you to call them?, did you do so on your own initiative, et

I will be answering all the questions put to me by the FEC to the best of my ability. They will need your information before they can make an informed judgement as to this matter.

If you have any questions please feel free to contact me. They will need a response from you in five days.

Sincerely,

Pat Bensetler

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Handwritten notes:
Pat Bensetler
11/20/79

NICHOLAS A. RIZZO JR.
30 HEMLOCK ROAD
ANDOVER, MASS. 01810

RECEIVED
ELECTION
COMMISSION

'79 DEC 11 PM 12:03

23 November 79

Attachment 2

11858
MUR 990
AH

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
19 DEC 11 2:31 43

Ms. Patricia Bensetler
P O Box 58
Main Street
Bolton, MA 01740

Dear Patricia:

In reply to your letter of November 19th.

1. I am confused over your question "the data of the solicitation of the contribution." What data are you referring to?
2. I contacted John. I knew he had a political committee that had contributed to us in the past. I knew that committees were eligible to contribute 5,000.00 per primary and 5,000.00 for the general. I requested a 5,000.00 contribution from John's committee. He informed me he had that amount (barely) in the committee account.
3. Before soliciting the contribution I telephoned Bill Wester at the Senate Campaign Committee who, in turn, gave me the telephone of Robert Bauer, Counsel to the committee. I spoke with Bob Bauer. I informed him of the solicitation. He asked if we had accepted contributions from this particular committee in the past. My reply was positive. He (Bauer) asked if the committee was a "multi-candidate committee", explaining that it must have contributed to at least five federal candidates. I inquired of John Zamparelli and he told me his committee had contributed to Paul's congressional campaigns, Mike Harrington's, Joe Moakley's, Tip O'Neill's, and was sure that there were at least five. He also told me he had never had any problem with these contributions. (I later discovered all the above were contributions of 100.00). On the basis of this information, Bob Bauer agreed that accepting this committee contribution of 5,000.00 "might be OK". I telephoned John with the results of my conversations. In the interim John informed me he had personally telephoned the Election Finance Division of the Massachusetts Secretary of State and had determined that the contribution could be made.

The above represent the facts as I can recall.

If anymore information is requested. Please call or write.

Sincerely,

Nicholas A. Rizzo Jr.
NICHOLAS A. RIZZO, JR.

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QUESTIONS

19 DEC 4 P 11:59

RECEIVED
GENERAL COUNSEL

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

i) Please provide the names of the individuals involved (for both committees) regarding this solicitation.

Nicholas A. Rizzo, Jr. and John F. Zamparelli

ii) What was the date of the solicitation?

So far as I can recall, the same date that was on the check. My memory is that it was the Friday before the Tuesday Primary date. Everything occurred in one day.

iii) Describe the circumstances surrounding this solicitation.

See attached explanation.

iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?

Yes

v) Did any member of your committee contact the Commission regarding the legality of the contribution?

No

2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

Material will be furnished and mailed under separate cover. You do not allow sufficient time for me to comply with your requests and information. I do the best I can under the circumstances. I run the Registry of Deeds in the largest county and the largest district with the largest volume of business in the State of Massachusetts. I also am allowed to practice law. I usually leave these matters to my political committee. As I said, I am pleased to cooperate, but please allow more than five days for reasonable compliance.

83040400455

3. Please provide copies of any letters or memos you may have in connection with the above questions.

See answer to 1.iii).

83040100470

ATTACHMENT

1. iii) Describe the circumstances surrounding this solicitation.

Nick Rizzo telephoned me and requested a \$5,000.00 contribution from the Committee to Re-elect John F. Zamparelli. I responded that I did not know whether there was \$5,000.00 in the account. I told him I would check with the Treasurer. I asked him if this were legal because I thought \$1,000.00 was the maximum. He replied that he checked with Washington and that it was legal. I said that if it was legal with the Commonwealth of Massachusetts and we had it then he could have it for the election of Paul Tsongas. I telephoned the office of the Secretary of State and was informed that such a contribution was not illegal from the State viewpoint. I was also told that no opinion was being given on the Federal level. I relayed that information to Rizzo; stressing the fact that I had no knowledge of the Federal legality and that I was relying on the Tsongas Committee. He replied that it was legal. My committee agreed to make the contribution. The check was then given to the Tsongas Committee. My memory is that all of this happened in one day.

33040400471



JOHN F. ZAMPARELLI
REGISTER OF DEEDS

RECEIVED
Registry of Deeds
County of Middlesex
Southern District
Cambridge, Massachusetts 02141

200-1
11830

December 5, 1979

Federal Election Commission
Washington
D. C. 20463

005265

Attention: Charles N. Steele, Acting General Counsel

Gentlemen: Re: MUR 990

In accordance with your request I had submitted my response to your questions referred to in your letter dated November 16, 1979. In compliance with my reply to question two (2), please find, enclosed herewith, the following copies:

- Committee To Re-elect John F. Zamparelli, check for \$5000.00
- Letter from Tsongas For U. S. Senate Committee, National Finance Chairman, Kenneth M. Curtis
- Letter from candidate, Paul Tsongas
- Note from Nick Rizzo
- Letter with check for \$5000.00 from Tsongas for Senate Committee
- Committee's state reports for 1977 and 1978

I am pleased to cooperate.

Please notify me if there is anything further that I may do.

Very truly yours,

John F. Zamparelli
John F. Zamparelli
Register of Deeds

JFZ:ys
Encls. 8

CC: Ms. Mary Beth Tarrant

33040400472

79 DEC 7 P 1:14

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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<p>GENERAL EXPENSES</p> <p>Check one or more boxes which apply to the purpose of this account:</p> <p><input type="checkbox"/> General Expenses</p> <p><input type="checkbox"/> Campaign Media Expenses</p>	<p>EXPENDITURES IN CONNECTION WITH POLITICAL ACTIVITY</p> <p>Check one or more boxes which apply to the purpose of this account:</p> <p><input type="checkbox"/> Political Party</p> <p><input type="checkbox"/> Political Campaign</p> <p><input type="checkbox"/> Political Organization</p> <p><input type="checkbox"/> Political Cause</p> <p><input type="checkbox"/> Political Issue</p> <p><input type="checkbox"/> Political Candidate</p>	<p>CAMPAIGN MEDIA EXPENSES</p> <p>Check one or more boxes which apply to the purpose of this account:</p> <p><input type="checkbox"/> Radio</p> <p><input type="checkbox"/> Television</p> <p><input type="checkbox"/> Newspaper</p> <p><input type="checkbox"/> Magazine</p> <p><input type="checkbox"/> Direct Mail</p> <p><input type="checkbox"/> Public Affairs</p>	<p>NO. 249</p> <p>53-007/113</p>
<p>Specific Purpose: <u>Five Thousand</u></p> <p><u>September 15, 1978</u></p> <p><u>TRONCAS FOR SENATE COMMITTEE</u></p> <p><u>CANDIDATE ACCOUNT</u></p> <p>PAY <u>\$ 5000.00</u></p> <p>TO THE ORDER OF _____</p> <p>ADDRESS: _____</p> <p>CITY/STATE: _____</p> <p>DEPOSITORS TRUST CO., MEDFORD, MA.</p> <p>COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI</p> <p><i>John F. Zamparelli</i> AUTHORISED SIGNATURE</p> <p>⑆0⑆⑆3⑆⑆0682⑆⑆450⑆72⑆</p>			

Paul Tsongas U.S. Senate

Finance Committee
Suite 300, 11 Lawrence Street
Lawrence, Massachusetts 01840
Phone (617) 682-2793

September 25, 1978

Honorable John F. Zamparelli
Four Doane Road
Medford, Massachusetts 02155

Dear John:

WE HAVE WON!

Paul is now the nominee for the Democratic party for the United States Senate in Massachusetts. I am sure you join with all of us in this joyous moment.

Now the work begins towards final victory on November 7th. You have played an indispensable part in our primary campaign. Your contribution has made it all happen.

"We now start from scratch". Our election requirement is \$500,000. It will not be easy, but then again, it was not easy for the primary. May I respectfully solicit a contribution from you towards the November victory?

Enclosed you will please find a self-addressed envelope for your convenience.

Again, I join with Paul in expressing to you our deepest gratitude for your help.

Very truly yours,



Kenneth M. Curtis
NATIONAL FINANCE CHAIRMAN
TSONGAS FOR U.S. SENATE COMMITTEE

smm
Enclosure

3304040047

Paul Tsongas
80 Mansur Street
Lowell, Massachusetts 01852

October 5, 1978

Committee to Re-Elect John Zamparelli
100 George P. Hassett Dr.
Medford, MA

Dear Friends,

Because of your generous contribution and support--I am the Democratic Nominee for the United States Senate! I want to express my appreciation for your much-needed assistance.

Now, during the next few weeks before the general election, our campaign efforts must be accelerated and we must begin organizing to maintain the momentum we gained through our victory. It is only with the support of people like yourself that we were able to present my record and views to the voters of Massachusetts. You helped to make this victory possible, and I know through our combined efforts we will be successful on November 7.

Thank you again for your contribution. I hope I will merit your continued commitment and confidence in my candidacy for the United States Senate.

Sincerely,


Paul Tsongas

3304040047

1/24

John:

You know how
much your help meant
to me during the campaign.
I will always be indebted
to you, as will Paul.

Regards,

Nick

83040400476

TSONGAS FOR SENATE COMMITTEE

Main Street - Box 58
Bolton, Massachusetts 01740

Patricia Bensetler,
Treasurer

Committee to Re-Elect John Zamparelli
100 George P. Hassett Dr
Medford, Massachusetts
02154

Dear Mr. Zamparelli;

Enclosed please find a check for \$5000.00 .

If you have any further questions please feel free to contact
me.

Sincerely,



Patricia G. Bensetler
Treasurer
Tsongas for Senate Committee

33040400471

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<p>GENERAL PARTICIPATES IN THE CAMPAIGN</p> <p>Specific Purpose</p>	<p>EXEMPTIBLE BY CONTRIBUTION IN THE CAMPAIGN</p> <p>Specific Purpose</p>	<p>CAMPAIGN MEDIA EXPENSES</p>
<p>No. 2047</p> <p>1-19 33-091/1879</p>		
<p>PAY <u>First National</u> \$ <u>5000</u></p>		
<p>TO THE ORDER OF <u>Committee to Re-Elect John Foye, III, CAMPAIGN ACCOUNT</u></p> <p>TSONGAS FOR SENATE COMMITTEE</p> <p>ADDRESS _____</p> <p>CITY, STATE _____</p> <p>FIRST BANK & TRUST CO., CHELMSFORD, MASS.</p> <p><i>Patricia Buxton</i> AUTHORIZED SIGNATURE</p>		

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DEPOSITORY

The Commonwealth of Massachusetts

OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

GENERAL REPORT OF FUND-RAISING RECEIPTS, EXPENDITURES, DISBURSEMENTS AND LIABILITIES

14979
 Initial Report (short one)
 10th day of January
 Dissolution

To be filed with the Director of Campaign and Political Finance
8 Beacon Street, Boston, Mass. 02108

Madford January 10, 1979
(City or Town) (Date)

I certify that the following is a true statement of all the fund-raising receipts, expenditures, disbursements and liabilities of
COMMITTEE TO RE-ELECT JOHN P. ZAMPARELLI
(Full name of Candidate or Committee)

for nomination to the election of _____
(Office and District)
and of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chap. 53, Section 18, as amended, covering the period indicated below during the election year 1978

Be sure to sign your name and address on last page of this return.

NOTE: A RETURN MUST BE MADE WHETHER OR NOT MONEY OR ITS EQUIVALENT WAS RECEIVED OR DISBURSED, AND WHETHER OR NOT THE CANDIDATE IS NOMINATED OR ELECTED.

RECEIPTS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED <small>Alphabetical Listing Mandatory</small>	RESIDENTIAL ADDRESS	AMOUNT
	NONE		NONE

8304040048

LIABILITIES

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
SUB-TOTAL GENERAL LIABILITIES THIS REPORT				None
TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING				None
TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT				None

"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION OF CONTRIBUTION	VALUE RECEIVED
				None
			GENERAL	FUND RAISING
TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE			None	None
TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00			None	None
TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD			None	None

Indicate Activity of Contributions as:
G = General
FR = Fund Raising

SIGNATURE *[Signature]* (Signed under the Penalty of Perjury)
Candidate or Treasurer
33 *[Address]*
(House no., street number, City or Town) - 0169

3304010010

EXPENDITURES OR DISBURSEMENTS OF \$25.00 OR MORE

DATE PAID	TO WHOM PAID Alphabetical Listing Mandatory	ADDRESS	PURPOSE	AMOUNT	
1/2/78	Michael J. Early Associates	24 Inman Street, Lowell	Donation	100 00	
1/2/78	Tsongas Committee		Donation	100 00	
1/13/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	19 97	
1/18/78	Tynan Testimonial	37 Slocum Street Jamaica Plain	Donation	50 00	
2/14/78	John L. Danahy Testimonial	Cambridge	Donation	100 00	
2/14/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	18 64	
2/21/78	Michael P. Skerry Testimonial	Malden	Donation	100 00	
3/1/78	Malden Trust	Malden	Donation	25 00	
3/2/78	Mass. Democratic State Committee	Park Plaza, Boston	Donation	100 00	
3/9/78	Toll House Restaurant	Whitman	Political Committee Mtg.	37 80	
3/13/78	Mass. Legislative Association	Dedham	Life Membership	10 00	
3/13/78	Comm. to Elect Sen. Dalabone	Rox 1261, Dedham	Donation	100 00	
3/14/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38 01	
3/20/78	Friends of Nick Ruggione		Donation	45 00	
4/4/78	Dinner Committee for S. Pastor Ralph	Somerville	Donation	100 00	
4/5/78	Friends of Sen. Joseph Dally	Lowell	Donation	100 00	
4/7/78	Comm. To Re-elect a Sen. House of Rep.	Boston	Donation	100 00	
4/7/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	38 64	
4/10/78	Chet Atkins Committee	P.O. Box 540, Concord	Donation	25 00	
4/10/78	St. Williams Band	Dorchester	Donation	25 00	
4/10/78	BC Law School Alumni Association	Chestnut Hill	Donation	175 00	
4/11/78	Comm. To Re-elect Sen. F.V. McCann	Cambridge	Donation	25 00	
5/3/78	Comm. to Re-elect Michael J. Lombardi	Ellery Street, Cambridge	Donation	100 00	
5/3/78	Comm. To Re-elect Rep. Michael Flaherty	Boston	Donation	100 00	
5/5/78	George Keverian Re-Election Comm.	Everett	Donation	100 00	
5/6/78	Comm. To Re-elect St. Auditor Sucko	Boston	Donation	50 00	
5/9/78	Tom O'Neill, III Committee	Cambridge	Donation	100 00	
5/26/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	39 69	
5/12/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	42 00	
6/28/78	Harbor View Hotel	Edgartown	Registers Convention	336 30	
5/29/78	Registers of Deeds Association	Cambridge	Dues	25 00	
5/29/78	Registers of Deeds Association	Cambridge	Donation	100 00	
7/19/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38 64	
7/25/78	Comm. of Mass. Sec. of State	Boston		25 00	
7/25/78	Comm. of Mass. Sec. of State	Boston		25 00	
8/25/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38 22	
				GENERAL	FUND RAISING
TOTAL EXPENDITURES & DISBURSEMENTS \$25.00 OR MORE				7814 91	NONE
TOTAL EXPENDITURES & DISBURSEMENTS UNDER \$25.00				30 00	
TOTAL ALL EXPEND. & DISBURSE. FOR THE PERIOD				7844 91	

See Activity Expenditures on General

3304010049

83040403407

LIABILITIES

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
	NONE			NONE

SUB-TOTAL GENERAL LIABILITIES THIS REPORT	NONE
TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING	NONE
TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT	NONE

"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION of CONTRIBUTION	VALUE RECEIVED
	NONE			NONE

	GENERAL	FUND RAISING
TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE	NONE	NONE
TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00	NONE	NONE
TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD	NONE	NONE

State Agency
Contributions as:
G - General
R - Fund Raising

SIGNATURE *151*
1-7 Dina's Room
 (Signed under the Penalty of Perjury)
 Candidate

Attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Mrs. Bensetler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 20, 1979, found reason to believe that your committee may have violated 2 U.S.C. §441a(f), a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

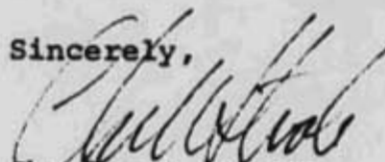
A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

B 3 0 4 0 4 0 0 4 0 3 8

Page Two
Patricia G. Bensetler

Should you have any questions, please contact Marybeth
Tarrant at (202) 523-4175.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

33040100439



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank J. Belinowiz, Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hassett Drive
Medford, MA 02155

Re: MUR 990

Dear Mr. Belinowiz:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 20, 1979, found reason to believe your committee may have violated 2 U.S.C. §441a(a) (1) (A), a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this

33040400496

Page Two
Frank J. Belinowiz

matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Marybeth Tarrant at (202) 523-4175.

Sincerely;


Charles N. Steele
General Counsel

Enclosure
Brief

83040400491



GENERAL FUND-RAISING RECEIPTS, EXPENDITURES, DISBURSEMENTS AND LIABILITIES

79 DEC 7 AM 11:51

To be filed with the Director of Campaign and Political Finance
8 Beacon Street, Boston, Mass. 02108

Medford
(City or Town)

January 3, 1978
Date

I certify that the following is a true statement of all the fund-raising receipts, expenditures, disbursements and liabilities of **Committee to Re-elect John F. Zamparelli** general
(Full name of Candidate or Committee)
for nomination to the **Register of Deeds, Middlesex County Southern District** election
(Office and District)
and of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chap. 55, Section 15, as amended, covering the period indicated below during the year **1977**

Be sure to sign your name and address on last page of this return.

NOTE: A RETURN MUST BE MADE WHETHER OR NOT MONEY OR ITS EQUIVALENT WAS RECEIVED OR DISBURSED, AND WHETHER OR NOT THE CANDIDATE IS NOMINATED OR ELECTED.

RECEIPTS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED Alphabetical Listing Mandatory	RESIDENTIAL ADDRESS	AMOUNT
1/1/77 to 12/31/77	Depositors Trust Company	Interest payments	557 48

SUB-TOTAL RECEIPTS OF \$25.00 OR MORE

CARRY FORWARD TO NEXT PAGE

Indicate Activity of Receipts as:
G - General
FR - Fund Raising

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT

SUB-TOTAL GENERAL LIABILITIES THIS REPORT	None
TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING	None
TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT	None

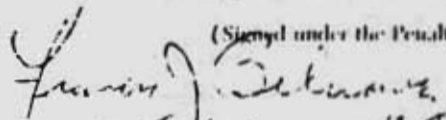
"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION OF CONTRIBUTION	VALUE RECEIVED
				None

TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00 TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD	GENERAL	None	FUND RAISING	None
	GENERAL	None	FUND RAISING	None
	GENERAL	None	FUND RAISING	None

Indicate Activity of Contributions as:
 G - General
 FR - Fund Raising

(Signed under the Penalties of Perjury)

SIGNATURE 

33 (Wedgefield New Winchester, Va.
 (Residence, street number, City or Town)

Candidate or Treasurer
- 2/19/6

EXPENDITURES OR DISBURSEMENTS OF \$25.00 OR MORE

DATE PAID	TO WHOM PAID Alphabetical Listing Mandatory	ADDRESS	PURPOSE	AMOUNT	
1/2/78	Michael J. Early Associates	24 Inman Street, Lowell	Donation	100	00
1/2/78	Tsongas Committee		Donation	100	00
1/13/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	39	97
1/18/78	Tynan Testimonial	37 Slocum Street Jamaica Plain	Donation	50	00
2/14/78	John L. Danehy Testimonial	Cambridge	Donation	100	00
2/14/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	38	64
2/21/78	Michael P. Skerry Testimonial	Malden	Donation	100	00
3/1/78	Malden Trust	Malden	Donation	25	00
3/2/78	Mass. Democratic State Committee	Park Plaza, Boston	Donation	100	00
3/9/78	Toll House Restaurant	Whitman	Political Committee Mt.	37	80
3/13/78	Mass. Legislative Association	Dedham	Life Membership	30	00
3/13/78	Comm. to Elect Wm. Dalahunt	Box 1261, Dedham	Donation	100	00
3/14/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	01
3/20/78	Friends of Nick Ruggione		Donation	45	00
4/4/78	Dinner Committee for S. Lester Ralph	Somerville	Donation	100	00
4/5/78	Friends of Sen. B. Joseph Tully	Lowell	Donation	100	00
4/7/78	Comm. To Re-elect a Dem. House of Rep.	Boston	Donation	100	00
4/7/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	38	64
4/10/78	Chet Atkins Committee	P.O. Box 540, Concord	Donation	25	00
4/10/78	St. Williams Band	Dorchester	Donation	25	00
4/10/78	BC Law School Alumni Association	Chestnut Hill	Donation	175	00
4/11/78	Comm. To Re-elect Sen. F. McCann	Cambridge	Donation	25	00
5/3/78	Comm. to Re-elect Michael J. Lombardi	Ellery Street, Cambridge	Donation	100	00
5/3/78	Comm. To Re-elect Rep. Michael Flaheerty	Boston	Donation	100	00
5/6/78	George Keverian Re-Election Comm.	Sverett	Donation	100	00
5/6/78	Comm. To Re-elect St. Auditor Buczko	Boston	Donation	50	00
5/9/78	Tom O'Neill, III Committee	Cambridge	Donation	100	00
5/26/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	39	69
6/12/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	42	00
6/28/78	Harbor View Hotel	Edgartown	Registers Convention	336	30
6/29/78	Registers of Deeds Association	Cambridge	Dues	25	00
6/29/78	Registers of Deeds Association	Cambridge	Donation	100	00
7/19/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	64
7/25/78	Comm. of Mass. Sec. of State	Boston		25	00
7/25/78	Comm. of Mass. Sec. of State	Boston		25	00
8/25/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	22

TOTAL EXPENDITURES & DISBURSEMENTS \$25.00 OR MORE
TOTAL EXPENDITURES & DISBURSEMENTS UNDER \$25.00
TOTAL ALL EXPEND. & DISBURSE. FOR THE PERIOD

GENERAL		FUND RAISING	
7814	91	NONE	
30	00		
7844	91		

date Activity
 expenditures as:
 * General

LIABILITIES

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
	NONE			NONE

SUB-TOTAL GENERAL LIABILITIES THIS REPORT	NONE
TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING	NONE
TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT	NONE

"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION of CONTRIBUTION	VALUE RECEIVED
	NONE			NONE

TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE	GENERAL		FUND RAISING	
	NONE		NONE	
	NONE		NONE	
TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00	NONE		NONE	
TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD	NONE		NONE	

indicate Activity
 Contributions as:
 - General
 R - Fund Raising

(Signed under the Penalties of Perjury)

SIGNATURE

1/5/
 Candidate
SFL
4 DUANE ROAD
 (Residence, Street number, City, & Town)

NICHOLAS A. RIZZO JR.
30 HEMLOCK ROAD
ANDOVER, MASS. 01810

RECEIVED
FEDERAL ELECTION
COMMISSION

11858

'79 DEC 11 PM 12:03

MUR 990

23 November 79

19 DEC 11 2:43
GENERAL COUNSEL

Ms. Patricia Bensetler
P O Box 58
Main Street
Bolton, MA 01740

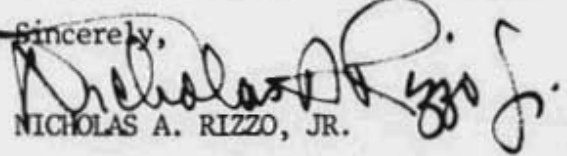
Dear Patricia:

In reply to your letter of November 19th.

1. I am confused over your question "the data of the solicitation of the contribution." What data are you referring to?
2. I contacted John. I knew he had a political committee that had contributed to us in the past. I knew that committees were eligible to contribute 5,000.00 per primary and 5,000.00 for the general. I requested a 5,000.00 contribution from John's committee. He informed me he had that amount (barely) in the committee account.
3. Before soliciting the contribution I telephoned Bill Wester at the Senate Campaign Committee who, in turn, gave me the telephone of Robert Bauer, Counsel to the committee. I spoke with Bob Bauer. I informed him of the solicitation. He asked if we had accepted contributions from this particular committee in the past. My reply was positive. He (Bauer) asked if the committee was a "multi-candidate committee", explaining that it must have contributed to at least five federal candidates. I inquired of John Zamparelli and he told me his committee had contributed to Paul's congressional campaigns, Mike Harrington's, Joe Moakley's, Tip O'Neill's, and was sure that there were at least five. He also told me he had never had any problem with these contributions. (I later discovered all the above were contributions of 100.00). On the basis of this information, Bob Bauer agreed that accepting this committee contribution of 5,000.00 "might be OK". I telephoned John with the results of my conversations. In the interim John informed me he had personally telephoned the Election Finance Division of the Massachusetts Secretary of State and had determined that the contribution could be made.

The above represent the facts as I can recall.

If anymore information is requested. Please call or write.

Sincerely,

NICHOLAS A. RIZZO, JR.

83040400501

3040400902



114001067000
20463

CERTIFIED
P07 NOV 20 10 10 1993
MAIL

RETURN RECEIPT
REQUESTED



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *y*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: DECEMBER 6, 1979
SUBJECT: MUR 990 - Interim Investigative Report
dated 11-30-79; Signed 12-4-79;
Received in OCS 12-5-79, 7:52

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 11:00, December 5, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

83040100500

December 4, 1979

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please have the attached Interim Invest Report on
MUR 990 distributed to the Commission.

Thank you.

8304040050.

BEFORE THE FEDERAL ELECTION COMMISSION
November 30, 1979

In the Matter of)
)
Tsongas for Senate Committee)
Committee to Re-Elect Zamparelli)

7907099 A7:52

INTERIM INVESTIGATIVE REPORT


On November 16, 1979, letters with questions that were previously approved by the Commission, were sent out to both respondents.

On November 26, 1979, this office received a response from Pat Bensetler, treasurer of the Tsongas Committee. Those questions which Mrs. Bensetler could not answer were forwarded to another campaign worker, Nick Rizzo, with instructions to respond within five days to the Commission.

Upon receipt of Mr. Rizzo's and the Zamparelli Committee's responses, or in the absence of replies within ten days, a full report will be made to the Commission.

8304010050

4 December 1979
Date


Charles W. Steele
Acting General Counsel



JOHN F. ZAMPARELLI
REGISTER OF DEEDS

RECEIVED
Registry of Deeds
County of Middlesex
Southern District
Cambridge, Massachusetts 02141

874-0000

4024
11830

December 5, 1979

Federal Election Commission
Washington
D. C. 20463

005265

Attention: Charles N. Steele, Acting General Counsel

Gentlemen: Re: MUR 990

In accordance with your request I had submitted my response to your questions referred to in your letter dated November 16, 1979. In compliance with my reply to question two (2), please find, enclosed herewith, the following copies:

- Committee To Re-elect John F. Zamparelli, check for \$5000.00
- Letter from Tsongas For U. S. Senate Committee, National Finance Chairman, Kenneth M. Curtis
- Letter from candidate, Paul Tsongas
- Note from Nick Rizzo
- Letter with check for \$5000.00 from Tsongas for Senate Committee
- Committee's state reports for 1977 and 1978

I am pleased to cooperate.

Please notify me if there is anything further that I may do.

Very truly yours,

John F. Zamparelli
John F. Zamparelli
Register of Deeds

JFZ:ys
Encls. 8

CC: Ms. Mary Beth Tarrant

33040100506

19 DEC 7 11:14

GENERAL
OFFICE
RECEIVED

DEPOSITORY

The Commonwealth of Massachusetts

Initial Report (check one)
1st day of January
Nomination



OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

GENERAL FUND-RAISING REPORT OF RECEIPTS, EXPENDITURES, DISBURSEMENTS AND LIABILITIES

79 DEC 7 AM 11:51

To be filed with the Director of Campaign and Political Finance
8 Beacon Street, Boston, Mass. 02108

Medford (City or Town)

January 5, 1978

I certify that the following is a true statement of all the fund-raising receipts, expenditures, disbursements and liabilities of Committee to Re-elect John F. Zamparelli
(Full name of Candidate or Committee)
for nomination to the Register of Deeds, Middlesex County Southern District
election (Office and District)
and of every officer and other person acting under authority or in behalf of said Committee or Candidate in accordance with the requirements of General Laws, Chap. 55, Section 15, as amended, covering the period indicated below during the year 1977

Be sure to sign your name and address on last page of this return.

NOTE: A RETURN MUST BE MADE WHETHER OR NOT MONEY OR ITS EQUIVALENT WAS RECEIVED OR DISBURSED, AND WHETHER OR NOT THE CANDIDATE IS NOMINATED OR ELECTED.

RECEIPTS OF \$25.00 OR MORE

Table with 4 columns: DATE RECEIVED, FROM WHOM RECEIVED (Alphabetical Listing Mandatory), RESIDENTIAL ADDRESS, and AMOUNT. Includes one entry for Depositors Trust Company interest payments totaling 557.48.

Indicate Activity of Receipts as:
G - General
FR - Fund Raising

SUB-TOTAL RECEIPTS OF \$25.00 OR MORE

CARRY FORWARD TO NEXT PAGE

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT

SUB-TOTAL GENERAL LIABILITIES THIS REPORT	None
TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING	None
TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT	None

"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION OF CONTRIBUTION	VALUE RECEIVED
				None

TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE	GENERAL	FUND RAISING
	None	None
	None	None
TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00	None	None
TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD	None	None

Indicate Activity of Contributions as:
 G - General
 FR - Fund Raising

SIGNATURE (Signed under the Penalties of Perjury)

Candidate or Treasurer

33 (Hedgecroft New Brunswick Ave)
(Residence, street number, City or Town)

2019

RECEIPTS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED Alphabetical Listing Mandatory	RESIDENTIAL ADDRESS	AMOUNT	
	NONE		NONE	

Indicate Activity of Receipts as:
G - General
R - Fund Raising

TOTAL RECEIPTS OF \$25.00 OR MORE
TOTAL RECEIPTS UNDER \$25.00
TOTAL ALL RECEIPTS FOR THE PERIOD

GENERAL		FUND RAISING	
NONE		NONE	
NONE		NONE	
NONE		NONE	

EXPENDITURES OR DISBURSEMENTS OF \$25.00 OR MORE

DATE PAID	TO WHOM PAID Alphabetical Listing Mandatory	ADDRESS	PURPOSE	AMOUNT	
1/2/78	Michael J. Early Associates	24 Inman Street, Lowell	Donation	100	00
1/2/78	Tsongas Committee		Donation	100	00
1/13/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	39	97
1/18/78	Tynan Testimonial	37 Slocum Street Jamaica Plain	Donation	50	00
2/14/78	John L. Danehy Testimonial	Cambridge	Donation	100	00
2/14/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	38	64
2/21/78	Michael F. Skerry Testimonial	Malden	Donation	100	00
3/1/78	Malden Trust	Malden	Donation	25	00
3/2/78	Mass. Democratic State Committee	Park Plaza, Boston	Donation	100	00
3/9/78	Toll House Restaurant	Whitman	Political Committee Mtg.	37	80
3/13/78	Mass. Legislative Association	Dedham	Life Membership	30	00
3/13/78	Comm. to Elect Wm. Delahunt	Box 1261, Dedham	Donation	100	00
3/14/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	01
3/20/78	Friends of Nick Ruggione		Donation	45	00
4/4/78	Dinner Committee for S. Lester Ralph	Somerville	Donation	100	00
4/5/78	Friends of Sen. B. Joseph Tully	Lowell	Donation	100	00
4/7/78	Comm. To Re-elect a Dem. House of Rep.	Boston	Donation	100	00
4/7/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	38	64
4/10/78	Chet Atkins Committee	P.O. Box 540, Concord	Donation	25	00
4/10/78	St. Williams Band	Dorchester	Donation	25	00
4/10/78	BC Law School Alumni Association	Chestnut Hill	Donation	175	00
4/11/78	Comm. To Re-elect Sen. F.X. McCann	Cambridge	Donation	25	00
5/3/78	Comm. to Re-elect Michael J. Lombardi	Ellery Street, Cambridge	Donation	100	00
5/3/78	Comm. To Re-elect Rep. Michael Flaherty	Boston	Donation	100	00
5/6/78	George Keverian Re-Election Comm.	Everett	Donation	100	00
5/6/78	Comm. To Re-elect St. Auditor Buczko	Boston	Donation	50	00
5/9/78	Tom O'Neill, III Committee	Cambridge	Donation	100	00
5/26/78	N.E. Newsclip Agency	5 Auburn Street Framingham	News Service	39	69
6/12/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	42	00
6/28/78	Harbor View Hotel	Edgartown	Registers Convention	336	30
5/29/78	Registers of Deeds Association	Cambridge	Dues	25	00
5/29/78	Registers of Deeds Association	Cambridge	Donation	100	00
7/19/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	64
7/25/78	Comm. of Mass. Sec. of State	Boston		25	00
7/25/78	Comm. of Mass. Sec. of State	Boston		25	00
8/25/78	N.E. Newsclip Agency	5 Auburn Street, Framingham	News Service	38	22

TOTAL EXPENDITURES & DISBURSEMENTS \$25.00 OR MORE

TOTAL EXPENDITURES & DISBURSEMENTS UNDER \$25.00

TOTAL ALL EXPEND. & DISBURSE. FOR THE PERIOD

GENERAL		FUND RAISING	
7814	91	NONE	
30	00		
7844	91		

LIABILITIES

DATE INCURRED	TO WHOM DUE	ADDRESS	PURPOSE	AMOUNT
	NONE			NONE

SUB-TOTAL GENERAL LIABILITIES THIS REPORT NONE

TOTAL GENERAL LIABILITIES PREVIOUSLY REPORTED AND STILL OUTSTANDING NONE

TOTAL OUTSTANDING GENERAL LIABILITIES AS OF THIS REPORT NONE

"IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE

DATE RECEIVED	FROM WHOM RECEIVED	RESIDENTIAL ADDRESS	DESCRIPTION of CONTRIBUTION	VALUE RECEIVED
	NONE			NONE

TOTAL "IN KIND" CONTRIBUTIONS OF \$25.00 OR MORE TOTAL "IN KIND" CONTRIBUTIONS OF UNDER \$25.00 TOTAL ALL "IN KIND" CONTRIBUTIONS FOR THE PERIOD	GENERAL	FUND RAISING
	NONE	NONE
	NONE	NONE

Indicate Activity
Contributions as:
— General
R -- Fund Raising

SIGNATURE

JFL
4-DORIS ROSS

(Signed under the Penalties of Perjury)

Candidate

(Residence, home number, City, State)

83040400516

GENERAL EXPENDITURES Check one. If more than one, check all that apply. No. <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3	EXPENDITURE IN CONNECTION WITH POLITICAL ACTIVITY Check one. No. <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6	CAMPAIGN MEDIA EXPENSES Check one. 17 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 21 <input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 25 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28	No. 249 53-007/113
Specific Purpose		Specific Purpose	
<p>PAY <u>Five Thousand</u> \$ <u>5000.⁰⁰ XX</u></p> <p>TO THE ORDER OF <u>TRAGAS FOR SENATE COMMITTEE</u></p> <p>ADDRESS _____</p> <p>CITY/STATE _____</p> <p>DEPOSITORS TRUST CO., MEDFORD, MA.</p>		<p>September 15, 1978</p> <p>CANDIDATE ACCOUNT</p> <p>COMMITTEE TO RE-ELECT JOHN F. ZAMPARELLI</p> <p><i>Louis J. Belmoro</i> AUTHORIZED SIGNATURE</p>	
⑆0113⑆0682⑆45 047 2⑆			

2

Paul Tsongas U.S. Senate

Finance Committee
Suite 300, 11 Lawrence Street
Lawrence, Massachusetts 01840
Phone (617) 682-2793

September 25, 1978

Honorable John F. Zamparelli
Four Doane Road
Medford, Massachusetts 02155

Dear John:

WE HAVE WON!

Paul is now the nominee for the Democratic party for the United States Senate in Massachusetts. I am sure you join with all of us in this joyous moment.

Now the work begins towards final victory on November 7th. You have played an indispensable part in our primary campaign. Your contribution has made it all happen.

"We now start from scratch". Our election requirement is \$500,000. It will not be easy, but then again, it was not easy for the primary. May I respectfully solicit a contribution from you towards the November victory?

Enclosed you will please find a self-addressed envelope for your convenience.

Again, I join with Paul in expressing to you our deepest gratitude for your help.

Very truly yours,

Ken Curtis

Kenneth M. Curtis
NATIONAL FINANCE CHAIRMAN
TSONGAS FOR U.S. SENATE COMMITTEE

SMN
Enclosure

83040100517

Paul Tsongas
80 Mansour Street
Lowell, Massachusetts 01852

October 5, 1978

Committee to Re-Elect John Zamparelli
100 George P. Hassett Dr.
Medford, MA

Dear Friends,

Because of your generous contribution and support--I am the Democratic Nominee for the United States Senate! I want to express my appreciation for your much-needed assistance.

Now, during the next few weeks before the general election, our campaign efforts must be accelerated and we must begin organizing to maintain the momentum we gained through our victory. It is only with the support of people like yourself that we were able to present my record and views to the voters of Massachusetts. You helped to make this victory possible, and I know through our combined efforts we will be successful on November 7.

Thank you again for your contribution. I hope I will merit your continued commitment and confidence in my candidacy for the United States Senate.

Sincerely,


Paul Tsongas

8 3 0 4 0 1 0 0 5 1 8

1/24

John:

You know how
much your help meant
to me during the campaign.
I will always be indebted
to you, as will Paul.

Regards,

Nick

83040400519

TSONGAS FOR SENATE COMMITTEE

Main Street - Box 58
Bolton, Massachusetts 01740

Patricia Bensetler,
Treasurer

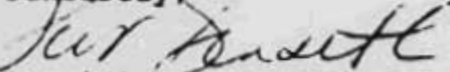
Committee to Re-Elect John Zamparelli
100 George P. Hassett Dr
Medford, Massachusetts
02154

Dear Mr. Zamparelli;

Enclosed please find a check for \$5000.00 .

If you have any further questions please feel free to contact
me.

Sincerely,



Patricia G. Bensetler
Treasurer
Tsongas for Senate Committee

330404005

8 3 0 4 0 4 0 0 5 2 1

<p>GENERAL INITIATIVES</p> <p><input type="checkbox"/> ... <input type="checkbox"/> ... <input type="checkbox"/> ...</p> <p>Specific Purpose</p>	<p>EXPENDITURES IN CONNECTION WITH FUND RAISING ACTIVITY</p> <p><input type="checkbox"/> ... <input type="checkbox"/> ... <input type="checkbox"/> ...</p> <p>Specific Purpose</p>	<p>CAMPAIGN MEDIA EXPENSES</p> <p><input type="checkbox"/> ... <input type="checkbox"/> ... <input type="checkbox"/> ...</p>	<p>No. 2047</p>
<p>PAY <u>Five thousand</u> \$ <u>5000</u></p>			<p>1-19 83-001/1879</p>
<p>TO THE ORDER OF <u>Committee to Re-elect John Zampicelli</u></p> <p>ADDRESS _____</p> <p>CITY, STATE _____</p>			<p>CAMPAIGN ACCOUNT</p> <p>TSONGAS FOR SENATE COMMITTEE</p>
<p>FIRST BANK & TRUST CO., CHELMSFORD, MASS.</p>			<p><i>Patricia Bassett</i></p> <p>AUTHORIZED SIGNATURE</p>
<p>⑆011306913⑆</p>			<p>⑆37⑈854⑈2⑆</p>

8304040012

*Registry of Deeds
County of Middlesex
Cambridge, Massachusetts 02141*



Federal Election Commission
Washington
D. C. 20463

Attention: Charles N. Steele,
Acting General Counsel



JOHN F. ZAMPARELLI
REGISTER OF DEEDS

REC'D
REGISTRY OF DEEDS
COUNTY OF MIDDLESEX
SOUTHERN DISTRICT
Cambridge, DEC 7 11:50
92141

GC#
11 226

December 5, 1979

Federal Election Commission
Washington
D. C. 20463

905276

Attention: Charles N. Steele, Acting General Counsel

Gentlemen: Re: MUR 990

In accordance with your request I had submitted my response to your questions referred to in your letter dated November 16, 1979. In compliance with my reply to question two (2), please find, enclosed herewith, the following copies:

- Committee To Re-elect John F. Zamparelli, check for \$5000.00
- Letter from Tsongas For U. S. Senate Committee, National Finance Chairman, Kenneth M. Curtis
- Letter from candidate, Paul Tsongas
- Note from Nick Rizzo
- Letter with check for \$5000.00 from Tsongas for Senate Committee
- Committee's state reports for 1977 and 1978

I am pleased to cooperate.

Please notify me if there is anything further that I may do.

Very truly yours,

John F. Zamparelli
John F. Zamparelli
Register of Deeds

JFZ:ys
Encls. 8

✓ CC: Ms. Mary Beth Tarrant

8304010052

DEC 7 11:50

GENERAL
REGISTRY OF DEEDS

8 3 4 0 4 0 5 2 4

*Registry of Deeds
County of Middlesex
Cambridge, Massachusetts 02141*

Ms. Mary Beth Tarrant

Federal Election Commission

Washington

D. C. 20463



UNITED STATES

QUESTIONS

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

i) Please provide the names of the individuals involved (for both committees) regarding this solicitation.

Nicholas A. Rizzo, Jr. and John F. Zamparelli

ii) What was the date of the solicitation?
So far as I can recall, the same date that was on the check. My memory is that it was the Friday before the Tuesday Primary date. Everything occurred in one day.

iii) Describe the circumstances surrounding this solicitation.
See attached explanation.

iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?
Yes

v) Did any member of your committee contact the Commission regarding the legality of the contribution?
No

2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

Material will be furnished and mailed under separate cover. You do not allow sufficient time for me to comply with your requests and information. I do the best I can under the circumstances. I run the Registry of Deeds in the largest county and the largest district with the largest volume of business in the State of Massachusetts. I also am allowed to practice law. I usually leave these matters to my political committee. As I said, I am pleased to cooperate, but please allow more than five days for reasonable compliance.

3304040053

19 DEC 4 11 50

RECORDED
GENERAL COUNSEL

3. Please provide copies of any letters or memos you may have in connection with the above questions.

See answer to 1.iii).

83040400526

ATTACHMENT

1. iii) Describe the circumstances surrounding this solicitation.

Nick Rizzo telephoned me and requested a \$5,000.00 contribution from the Committee to Re-elect John F. Zamparelli. I responded that I did not know whether there was \$5,000.00 in the account. I told him I would check with the Treasurer. I asked him if this were legal because I thought \$1,000.00 was the maximum. He replied that he checked with Washington and that it was legal. I said that if it was legal with the Commonwealth of Massachusetts and we had it then he could have it for the election of Paul Tsongas. I telephoned the office of the Secretary of State and was informed that such a contribution was not illegal from the State viewpoint. I was also told that no opinion was being given on the Federal level. I relayed that information to Rizzo, stressing the fact that I had no knowledge of the Federal legality and that I was relying on the Tsongas Committee. He replied that it was legal. My committee agreed to make the contribution. The check was then given to the Tsongas Committee. My memory is that all of this happened in one day.

8304040057

83040400128

LAW OFFICES OF

JOHN F. ZAMPARELLI

100 GEORGE R. HASSETT DRIVE

MEDFORD, MASSACHUSETTS 02155



Federal Election Commission
Washington, D.C. 20463

Att: Charles N. Steele, Esquire



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 16, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by your letter of July 9, 1979.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant at (202) 523-4175.

Sincerely,

33040400519

25 FEB 20 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery & CONSULT POSTMASTER FOR FEES

2. ARTICLE DESCRIPTION:
 REGISTERED NO. 45301 | CERTIFIED NO. | INSURED NO.
 ARTICLE ADDRESSED TO:
 Patricia G. Bensetler, Treas.
 Main Street, Box 58
 Bolton, MA 01740

3. I have requested the article described above:
 Addressed Authorized agent
 SIGNATURE: [Handwritten Signature]
 DATE RECEIVED: 11/16/79
 5. ADDRESS: Complete (date requested)
 6. UNABLE TO DELIVER BECAUSE:
 CLERK'S MARK: [Handwritten Mark]
 POSTMARK: [Circular Postmark]

Tarrant MUR. 990

1977-0-248-505

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

11/16/79

Mr. John Zamparelli
Registry of Deeds
County of Middlesex
Cambridge, MA 02141

Re: MUR 990

Dear Mr. Zamparelli:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by the letter of July 11, 1979 from Mr. Frank J. Belinowiz.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant, at (202) 523-4175.

Sincerely,

W

William C. Oldaker
General Counsel

Enclosure
Questions

33040100530

AMT
11/16/79

QUESTIONS

1. To your knowledge, was the Committee to Elect John Zamparelli solicited on behalf of the Tsongas for Senate Committee for a \$5,000.00 contribution?

If so,

- i) Provide the names of those persons involved (from both committees) regarding the solicitation.

- ii) What was the date of the solicitation?

- iii) Describe the circumstances surrounding the solicitation.

- iv) State whether the Zamparelli Committee at the time of the solicitation was informed by a representative of the Tsongas Committee that a \$5,000.00 contribution would be legal.

- v) Did anyone from your committee ever contact the Commission regarding the legality of such a contribution?

If not,

- i) Please explain how your committee came to receive such a contribution.

2. In your response of July 9, 1979, you state there was some confusion regarding the Zamparelli Committee's registration date and its status as a multicandidate committee. As the Zamparelli Committee has never registered with the Commission, please explain these statements.

3. Please provide copies of any letters or memos you may have in connection with the above questions.

83040400531



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 16, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Zamparelli
Registry of Deeds
County of Middlesex
Cambridge, MA 02141

Re: MUR 990

Dear Mr. Zamparelli:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by the letter of July 11, 1979 from Mr. Frank J. Belinowiz.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant, at (202) 523-4175.

Sincerely,

Charles N. Steele
Acting General Counsel

Enclosure
Questions

33040400532

8 3 0 4 0 4 0 0 5 3 3

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered \$
 Show to whom, date, and address of delivery \$
 RESTRICTED DELIVERY
 Show to whom and date delivered \$
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery: \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 John Zamparelli
 Registry of Deeds
 County of Middlesex
 Cambridge, MA 02141

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	963302	

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: 179 NOV 21 POSTMARK

5. ADDRESS: (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO 1977-0-249-568

Tarrant MUR 490

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ralph Griffith, Treasurer
National Republican Governors
Campaign Committee
310 First Street, S.E.
Washington, D.C. 20003

11/16/79

Re: MUR 1067

Dear Mr. Griffith:

This is in regard to the Commission's previous finding of reason to believe that your committee may have violated 2 U.S.C. §433 and §434 of the Federal Election Campaign Act of 1971, as amended ("the Act"). After considering the information you provided and letters from both the Oregon Republican Party and the Nevada Republican Central Committee, the Commission determined, on November 1979, that there was no reasonable cause to believe that your committee violated the Act. Accordingly the Commission has closed its file on this matter.

Should you have any questions, please contact Marybeth Tarrant, the staff member now assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
Acting General Counsel

3304040053

MT
11/15/79

QUESTIONS

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

- i) Please provide the names of the individuals involved (for both committees) regarding this solicitation.
- ii) What was the date of the solicitation?
- iii) Describe the circumstances surrounding this solicitation.
- iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?
- v) Did any member of your committee contact the Commission regarding the legality of the contribution?

2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

83040400533

3. Please provide copies of any letters or memos you may have in connection with the above questions.

83040400536

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect Zamparelli)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 8, 1979, the Commission approved by a vote of 4-0 the letters with questions attached to the Acting General Counsel's Memorandum dated November 5, 1979 relating to the above-captioned matter.

Voting for this determination were Commissioners Aikens, Harris, McGarry, and Reiche.

Attest:

11/8/79
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

83040400537



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: NOVEMBER 8, 1979
SUBJECT: MUR 990 - COMMENTS REGARDING MUR 990

Attached is a copy of Commissioner Reiche's
vote sheet with comments regarding the questions attached
to the Memorandum dated 11-5-79.

63040400538

ATTACHMENT:
Copy of Vote Sheet

48 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

79 NOV 6

Date and Time Transmitted: 11-6-79, 11:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, NOVEMBER 8, 1979 -
11:00

MUR No. 990 - Memorandum from OGC dated 11-5-79 with Letters
and questions

- I approve the recommendation
- I object to the recommendation

COMMENTS: But please note my comments.

Date: 11/6/79 Signature: Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

33040400533



QUESTIONS

1. To your knowledge, was the Committee to Elect John Zamparelli solicited on behalf of the Tsongas for Senate Committee for a \$5,000.00 contribution?

If so,

- i) Provide the names of those persons involved (from *confusing-* both committees) regarding the solicitation.

Don't we really want to know who solicited whom?

- ii) What was the date of the solicitation?

- iii) Describe the circumstances surrounding the solicitation.

- iv) State whether the Zamparelli Committee at the time of the solicitation was informed by a representative of the Tsongas Committee that a \$5,000.00 contribution would be legal.

- v) Did anyone from your committee ever contact the Commission regarding the legality of such a contribution?

Yes If so, give details.

- i) Please explain how your committee came to receive such a contribution.

2. In your response of July 9, 1979, you state there was some confusion regarding the Zamparelli Committee's registration date and its status as a multicandidate committee. As the Zamparelli Committee has never registered with the Commission, please explain these statements.

3. Please provide copies of any letters or memos you may have in connection with the above questions.

33040400510

QUESTIONS

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

- i) Please provide the names of the individuals involved (for both committees) regarding this solicitation. *same comment*
- ii) What was the date of the solicitation?
- iii) Describe the circumstances surrounding this solicitation.
- iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?
- v) Did any member of your committee contact the Commission regarding the legality of the contribution?

If so, give details.

2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

33040400541

November 5, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please have the attached Memo distributed to the Commission
on a 48 hour tally basis.

Thank you.

33040400541



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

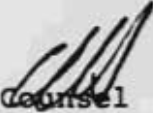
79 NOV 5 P 1: 45

November 5, 1979

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker
General Counsel

BY: Charles N. Steele 
Associate General Counsel

SUBJECT: Letters in connection with MUR 990

Attached for Commission approval are two letters to be sent to the respondents in MUR 990. Due to conflicting information contained in their replies to our first letter, this office feels more information is needed from the committees involved before a recommendation can be made.

Recommendation

Approve the attached letters with questions.

Attachments

Proposed letters

33040400513



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by your letter of July 9, 1979.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

10464051

QUESTIONS

1. To your knowledge, was the Committee to Elect John Zamparelli solicited on behalf of the Tsongas for Senate Committee for a \$5,000.00 contribution?

If so,

- i) Provide the names of those persons involved (from both committees) regarding the solicitation.
- ii) What was the date of the solicitation?
- iii) Describe the circumstances surrounding the solicitation.
- iv) State whether the Zamparelli Committee at the time of the solicitation was informed by a representative of the Tsongas Committee that a \$5,000.00 contribution would be legal.
- v) Did anyone from your committee ever contact the Commission regarding the legality of such a contribution?

If not,

- i) Please explain how your committee came to receive such a contribution.
2. In your response of July 9, 1979, you state there was some confusion regarding the Zamparelli Committee's registration date and its status as a multicandidate committee. As the Zamparelli Committee has never registered with the Commission, please explain these statements.
3. Please provide copies of any letters or memos you may have in connection with the above questions.

33040400545



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Zamparelli
Registry of Deeds
County of Middlesex
Cambridge, MA 02141

Re: MUR 990

Dear Mr. Zamparelli:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by the letter of July 11, 1979 from Mr. Frank J. Belinowiz.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

0146400516

QUESTIONS

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

- i) Please provide the names of the individuals involved (for both committees) regarding this solicitation.
- ii) What was the date of the solicitation?
- iii) Describe the circumstances surrounding this solicitation.
- iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?
- v) Did any member of your committee contact the Commission regarding the legality of the contribution?

2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

83040400547

3. Please provide copies of any letters or memos you may have in connection with the above questions.

33040400548



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 22, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove *QC*
SUBJECT: MUR 990

19 OCT 22 P 3: 42

Please withdraw from 48 hour circulation the Memo to the Commission on MUR 990. A new report will be circulated as soon as possible.

Thank you.

33040400519

October 18, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 990

Please have the attached Memo to the Commission on MUR 990 distributed to the Commission on a 48 hour tally basis.

Thank you.

63040400550



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

RECEIVED
OCT 18 1979
AIO: 43

October 18, 1979

MEMORANDUM

TO: The Commission
FROM: William C. Oldaker *WCO*
SUBJECT: Letters in connection with MUR 990

Attached for Commission approval are two letters to be sent to the respondents in MUR 990. Due to conflicting information contained in their replies to our first letter, this office feels more information is needed from the committees involved before a recommendation can be made.

Recommendation

Approve the attached letters with questions.

Attachments

Proposed letters

83940-100551



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Zamparelli
Registry of Deeds
County of Middlesex
Cambridge, MA 02141

Re: MUR 990

Dear Mr. Zamparelli:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by the letter of July 11, 1979 from Mr. Frank J. Belinowiz.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

QUESTIONS

1. In his letter of July 11, 1979, Mr. Frank Belinowiz stated that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00 from your committee.

If so,

- i) Please provide the names of the individuals involved (for both committees) regarding this solicitation.
- ii) What was the date of the solicitation?
- iii) Describe the circumstances surrounding this solicitation.
- iv) Was your committee informed at this time by the Tsongas Committee that such a contribution would be legal?
- v) Did any member of your committee contact the Commission regarding the legality of the contribution?

If not,

- i) How did your committee come to make such a contribution?
2. Both you and the Tsongas Committee have stated that your committee has given to many federal candidates, yet reports filed with the Commission do not reflect this fact. How do you explain this? In this regard, please furnish us with copies of your committee's state reports for 1977 and 1978.

3. Did you ever give any information to the Tsongas Committee which may have led them to believe your committee was registered with the Commission?

If not,

33040400533

i) Do you know who might have?

If not,

i) Please state why you think the Tsongas Committee was under such an impression.

4. Please provide copies of any letters or memos you may have in connection with the above questions.

33040400554



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

In furtherance of its investigation into the above referenced matter, the Commission requests that you provide certain information in addition to that provided by your letter of July 9, 1979.

Please submit your response to the enclosed questions within five days of your receipt of this letter, as well as any factual or legal material which you deem relevant to the Commission's investigation of this matter.

If you have any questions, please contact Marybeth Tarrant at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Questions

QUESTIONS

1. To your knowledge, was the Committee to Elect John Zamparelli solicited on behalf of the Tsongas for Senate Committee for a \$5,000.00 contribution?

If so,

i) Provide the names of those persons involved (from both committees) regarding the solicitation.

ii) What was the date of the solicitation?

iii) Describe the circumstances surrounding the solicitation.

iv) State whether the Zamparelli Committee at the time of the solicitation was informed by a representative of the Tsongas Committee that a \$5,000.00 contribution would be legal.

v) Did anyone from your committee ever contact the Commission regarding the legality of such a contribution?

If not,

i) Please explain how your committee came to receive such a contribution.

2. In your response of July 9, 1979, you state there was some confusion regarding the Zamparelli Committee's registration date and its status as a multicandidate committee. As the Zamparelli Committee has never registered with the Commission, please explain these statements.

3. Please provide copies of any letters or memos you may have in connection with the above questions.

33040400556



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: OCTOBER 16, 1979
SUBJECT: MUR 990 - Interim Investigative Report
dated 10-3-79; Signed 10-15-79;
Received in OCS 10-15-79, 12:19

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, October 15, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

83040100557

October 15, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

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Please have the attached Interim Invest Report on
MUR 990 distributed to the Commission.

Thank you.

RECEIVED
OFFICE OF THE
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
October 3, 1979

906119 P12: 19

In the Matter of)	
)	
Tsongas for Senate Committee)	MUR 990
Committee to Re-Elect John)	
Zamparelli)	

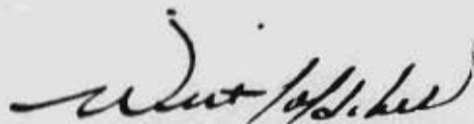
INTERIM INVESTIGATIVE REPORT

83040400559

Due to conflicting information given by the respondents in their written replies, letters with questions will be sent to each committee. These letters will be circulated for approval shortly.

Pending replies from the respondents, a full report will be made to the Commission.

10/15/79
Date



William C. Oldaker
General Counsel

September 26, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please withdraw from 48 hour circulation the General Counsel's Report on MUR 990. A revised report will be circulated as soon as possible.

Thankyou.

83040400560



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MUR*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: SEPTEMBER 26, 1979
SUBJECT: MUR 990 - General Counsel's Report dated 9-17-79;
Signed 9-21-79; Received in OCS 9-21-79,
4:13
OBJECTION

The above-named document was circulated on a 48 hour
vote basis at 11:00, September 24, 1979.

Commissioner McGarry submitted an objection at 11:40,
September 26, 1979, requesting MUR 990 be placed on the
Executive Session Agenda for discussion.

33040100551

September 21, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please have the attached General Counsel's Report on
MUR 990 distributed to the Commission on a 48 hour tally
basis.

Thank you.

83040100562

BEFORE THE FEDERAL ELECTION COMMISSION
September 17, 1979

RECEIVED
FEDERAL ELECTION COMMISSION
COMMUNICATIONS SECTION

79 SEP 21 P 4: 13

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect John)
Zamparelli)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 20, 1979, the Commission found reason to believe that both the Tsongas for Senate Committee (the Tsongas Committee) and the Committee to Re-Elect John Zamparelli (the Zamparelli Committee) violated 2 U.S.C. §441a. Letters went out to both committees on June 25, 1979.

II. EVIDENCE

On July 16, 1979, this office received a letter from Frank J. Belinowiz, treasurer of the Zamparelli Committee. Mr. Belinowiz stated that his committee was solicited by the Chairman of the Tsongas Committee for a \$5,000 contribution. He said that the Zamparelli Committee was informed at the time that such a contribution would be legal as the matter had already been discussed with the Federal Election Commission.^{1/} Therefore, upon receiving clearance regarding state election laws, the \$5,000 contribution was made.

A response from Pat Benseitler, treasurer of the Tsongas Committee, indicates that her committee was under the impression

^{1/} No particular staff member of the FEC was mentioned.

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the Zamparelli Committee was a registered multi-candidate committee (specific mention is even made to the question of whether or not the Zamparelli Committee was considered registered as of the certified mailing date of their registration forms.) Mrs. Bentsetler further stated that the Zamparelli Committee had given to many other federal candidates in the past.

On August 30, 1979, a staff member of this office placed a phone call to Mr. Zamparelli concerning the Tsongas Committee's reply. Mr. Zamparelli confirmed the fact that both he and his committee have contributed to many federal candidates, however, his committee has never registered with the Commission. He said his committee was organized for a state election but has excess funds.^{2/}

III. ANALYSIS

Section 441a(a)(1)(A) of the Act prohibits contributions in excess of \$1,000 and section 441a(f) prohibits the acceptance of such contributions. Section 441a(a)(2) sets a limit of \$5,000 on contributions by multi-candidate political committees and §441a(a)(4) defines "multi-candidate political committee." The Zamparelli Committee does not meet this definition because it was not registered with the Commission. Therefore, the Zamparelli Committee was subject to the §441a(a)(1)(A) limitation of \$1,000 and its contribution to the Tsongas Committee was in violation of this section.

^{2/} A review of the G index does not indicate activity in excess of \$1,000 per year by the Zamparelli Committee; however, forms and information have been sent to Mr. Zamparelli so that he might determine if his committee is subject to the requirements of 2 U.S.C. §433 and §434.


3304040055

Although the Tsongas Committee was under the impression the Zamparelli Committee was a multi-candidate committee and thus, wrongly advised the Zamparelli Committee regarding their contribution of \$5,000, these factors do not operate to erase the respondents' liability under the Act. Therefore, the Office of General Counsel recommends the Commission find reasonable cause to believe both Committees violated 2 U.S.C. §441a.

IV. RECOMMENDATION

1. Find reasonable cause to believe that the Tsongas Committee violated 2 U.S.C. §441a(f) and initiate conciliation.
2. Find reasonable cause to believe the Zamparelli Committee violated 2 U.S.C. §441a(a)(1)(A) and initiate conciliation.
3. Approve the attached conciliation agreements.
4. Send the attached letters.

21 Sept 1979
Date


William E. Deaker
General Counsel

ATTACHMENTS

1. Response from Zamparelli Committee
2. Response from Tsongas Committee
3. Proposed Conciliation Agreements
4. Proposed letters

6304040055

Tsongas

Attachment 1

200+
10573

FRANK J. BELINOWITZ, REC'D
238 HIGH STREET FEDERAL ELECTION
MEDFORD, MASSACHUSETTS 02155
396-5480

JUL 16 1979 PM 2:27

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

903115

Re: MUR 990

Attention: William C. Oldaker, Esquire

Dear Mr. Oldaker:

In response to your letter of June 25, 1979, the allegation that the Committee to Re-Elect John Zamparelli made a contribution of \$5,000.00 to the Tsongas for Senate Committee and that the contribution was subsequently refunded is correct.

The factual background of the above transactions is that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00. He advised the Committee to Re-Elect John Zamparelli that it was legal and that he had checked the matter with the Federal Election Commission. A member of the Zamparelli Committee spoke with the Secretary of State's Office in Massachusetts and received clearance relative to the State Election Laws. The contribution was then made. At some future time, as a

79 JUL 16 P 4:00

RECEIVED
GENERAL INVESTIGATION
DIVISION

3 0 4 0 4 0 0 5 6 6

FRANK J. BELINOWIZ, D.M.D.
238 HIGH STREET
MEDFORD, MASSACHUSETTS 02155
396-5450

Page 2.
July 11, 1979
William C. Oldaker, Esquire

result of an opinion from your Commission, the contribution was returned to the Committee to Re-Elect John Zamparelli. No further reference has been made until receipt of the letter dated June 25, 1979 addressed to the Treasurer.

If the contribution constituted a violation of 2 U.S.C. Section 441A(a)(1)(A), I suggest the facts show no intent to avoid or violate any law and that an attempt to cure the oversight was timely made. I respectfully request that no action be taken.

Respectfully submitted,

Frank J. Belinowiz
Frank J. Belinowiz

FJB/jlf

33040400537

Tarrant

ECC* 10593

TSONGAS FOR SENATE COMMITTEE

Main Street - Box 58
Bolton, Massachusetts 01740
FEDERAL ELECTION COMMISSION

Patricia Bensettler,
Treasurer

'79 JUL 17 PM 1:14

Attachment 2

July 9, 1979

903133

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Dear Sir/Madam;

This letter is in reference to your request for information concerning MUR 990.

I received a check, in the amount of \$5,000 from the Committee to Elect John Zamparielli . The check as delivered to the Tsongas Committee just prior to the September primary.

I asked our campaign manager, Dennis Kanin, whether the contribution was legitimate and he indicated that it was. I did not have any particular reason to question the contribution from the Zamparielli Committee. Mr Zamparielli had contributed to the Tsongas Committee often over the years. He had always been a generous contributor and he was well known as a Massachusetts political contributor. The Tsongas Committee was by no means the only committee to receive contributions from that committee.

A period of time later I became aware that there had been some question as to the correctness of the contribution. I understood that after the primary, certain reporters from Boston had contacted the Federal Election Commission Director of Communications about this particular contribution. I called the press person and was told that the issue was not clear. I was told that there was some concern that the Zamparielli Committee was not registered as a multi-candidate committee.

At this point I checked with Mr. Nicholas Rizzo, the principal committee fund raiser, who is a close friend of Mr. Zamparielli. He told me that the issue was over the question as to whether the waiting period, after registration , for a committee to become a multi-candidate committee had passed prior to the contribution. He stated that the Zamparielli Committee was a multi-candidate committee if the mailing date of the registration forms was considered as the begining of the waiting period. He had discussed the matter with Bob Bower ,Chief Counsel for the Joint House and Senate Council.



Mr. Bower had given an opinion that the committee should be considered as having registered the day that the forms were mailed to the FEC if the forms had been certified.

At this point I again checked with the FEC and was informed that the Commission was looking into the matter and would contact the Tsongas Committee if the check was to be returned. As you are aware, a letter from the FEC was sent to the Tsongas Committee in December requesting that the contribution be returned. The Tsongas Committee returned the contribution in full .

If you have any additional questions please feel free to contact me. I have outlined the events surrounding the receipt of the contribution under question to the best of my ability and state that the information I have supplied is accurate . I certainly do not contest that the contribution was given or received. I do believe that the Tsongas Committee acted , at all times, as we have from the begining of the Congressional Committee, with the intent to support the letter and the spirit of the law.

Sincerely,

Pat Bensetler

Patricia G. Bensetler
Treasurer
Tsongas For Senate Committee

33040100559

BEFORE THE FEDERAL ELECTION COMMISSION
September 17, 1979

In the Matter of)
) MUR 990
Tsongas for Senate Committee)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after reasonable cause to believe having been found that Tsongas for Senate Committee ("Respondent") violated 2 U.S.C. §441a(f) by accepting a \$5,000 contribution from the Committee to Re-Elect John Zamparelli.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a) (5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

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

III. Respondent enters voluntarily into this Agreement with the Commission.

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

1. Respondent, pursuant to 2 U.S.C. §431(n), was the principal campaign committee for candidate Paul Tsongas for the 1978 campaign for the U.S. Senate.

2. That, as such, it was subject to the contribution limitations of 2 U.S.C. §441a which prohibits any person

33040100579

from making a contribution in excess of \$1,000 per election and also prohibits the acceptance of any excess contributions.

3. Respondent accepted a \$5,000 contribution from the Committee to Re-Elect John Zamparelli on September 14, 1978.

WHEREFORE, Respondent agrees:

V. Respondent violated 2 U.S.C. §441a(f) by accepting a \$5,000 contribution from the Committee to Re-Elect John Zamparelli.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(6)(B).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431, et seq.

GENERAL CONDITIONS

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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

33040400571

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Tsongas for Senate Committee
BY: Patricia G. Bensetler
ITS: Treasurer

33040400572

BEFORE THE FEDERAL ELECTION COMMISSION
September 17, 1979

In the Matter of)
)
Committee to Re-Elect) MUR 990
John Zamparelli)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after reasonable cause to believe having been found that the Committee to Re-Elect John Zamparelli ("Respondent") violated 2 U.S.C. §441a(a)(1)(A) by contributing \$5,000 to the Tsongas for Senate Committee.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

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

III. Respondent enters voluntarily into this Agreement with the Commission.

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

1. Respondent, was an unregistered political committee and that as such, was subject to a contribution limitation of \$1,000 per election, pursuant to 2 U.S.C. §441a(a)(1)(A).

33040400573

2. Respondent, on September 14, 1978, contributed \$5,000 to the Tsongas for Senate Committee, the principal campaign committee for U.S. Senate candidate, Paul Tsongas.

WHEREFORE, Respondent agrees:

V. Respondent violated 2 U.S.C. §441a(a)(1)(A) by contributing \$5,000 to the Tsongas for Senate Committee.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(6)(B).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431, et seq.

GENERAL CONDITIONS

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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

3304040057

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Committee to Re-Elect John
Zamparelli

BY: Frank J. Belinowiz

ITS: Treasurer

33040400575

Attachment 4



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main Street, Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

On September , 1979, the Commission determined there was reasonable cause to believe that your committee committed a violation of 2 U.S.C. §441a(f) of the Federal Election Campaign Act of 1971, as amended, in connection with your acceptance of a \$5,000 contribution from the Committee to Elect John Zamparelli.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the penalty payable to the U.S. Treasurer.

- 2 -

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Frank J. Belinowiz, Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hasset Drive
Medford, MA 02155

Re: MUR 990

Dear Mr. Belinowiz:

On September , 1979, the Commission determined there was reasonable cause to believe that your committee committed a violation of 2 U.S.C. §441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, in connection with a \$5,000 contribution to the Tsongas for Senate Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Conciliation Agreement

040057



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MJE by jc*

DATE: AUGUST 13, 1979

SUBJECT: MUR 990 - Interim Investigative Report
dated 8-8-79; Signed by GC 8-9-79;
Received in OCS 8-10-79, 11:36

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 2:00, August 10, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

33940400530

August 10, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 990

Please have the attached Interim Investigative Report on MUR 990 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

33040100501

TSONGAS FOR SENATE COMMITTEE

Main Street - Box 58
Bolton, Massachusetts 02740

RECEIVED
FEDERAL ELECTION
COMMISSION

CCC*
10593

Patricia Bensetter,
Treasurer

'79 JUL 17 PM 1:14

July 9, 1979

903133

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Dear Sir/Madam;

This letter is in reference to your request for information concerning MUR 990.

I received a check, in the amount of \$5,000 from the Committee to Elect John Zamparielli. The check was delivered to the Tsongas Committee just prior to the September primary.

I asked our campaign manager, Dennis Kanin, whether the contribution was legitimate and he indicated that it was. I did not have any particular reason to question the contribution from the Zamparielli Committee. Mr Zamparielli had contributed to the Tsongas Committee often over the years. He had always been a generous contributor and he was well known as a Massachusetts political contributor. The Tsongas Committee was by no means the only committee to receive contributions from that committee.

A period of time later I became aware that there had been some question as to the correctness of the contribution. I understood that after the primary, certain reporters from Boston had contacted the Federal Election Commission Director of Communications about this particular contribution. I called the press person and was told that the issue was not clear. I was told that there was some concern that the Zamparielli Committee was not registered as a multi-candidate committee.

At this point I checked with Mr. Nicholas Rizzo, the principal committee fund raiser, who is a close friend of Mr. Zamparielli. He told me that the issue was over the question as to whether the waiting period, after registration, for a committee to become a multi-candidate committee had passed prior to the contribution. He stated that the Zamparielli Committee was a multi-candidate committee if the mailing date of the registration forms was considered as the beginning of the waiting period. He had discussed the matter with Bob Bower, Chief Counsel for the Joint House and Senate Council.

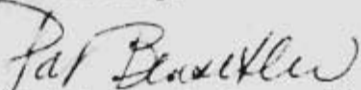


Mr. Bower had given an opinion that the committee should be considered as having registered the day that the forms were mailed to the FEC if the forms had been certified.

At this point I again checked with the FEC and was informed that the Commission was looking into the matter and would contact the Tsongas Committee if the check was to be returned. As you are aware, a letter from the FEC was sent to the Tsongas Committee in December requesting that the contribution be returned. The Tsongas Committee returned the contribution in full .

If you have any additional questions please feel free to contact me. I have outlined the events surrounding the receipt of the contribution under question to the best of my ability and state that the information I have supplied is accurate . I certainly do not contest that the contribution was given or received. I do believe that the Tsongas Committee acted , at all times, as we have from the begining of the Congressional Committee, with the intent to support the letter and the spirit of the law.

Sincerely,



Patricia G. Bensetler
Treasurer
Tsongas For Senate Committee

8304010053

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

BEFORE THE FEDERAL ELECTION COMMISSION

August 8, 1979 79 AUG 10 AM: 36

In the Matter of)	
)	
Tsongas for Senate Committee)	MUR 990
Committee to Elect John)	
Zamparelli)	

INTERIM INVESTIGATIVE REPORT

On June 20, 1979, the Commission found reason to believe that both the Tsongas for Senate Committee and the Committee to Re-Elect John Zamparelli violated 2 U.S.C. § 441a. This office has since received responses from both committees. However, due to some conflicting information given by the Tsongas Committee, further inquiry must be made of the Zamparelli Committee.

Upon a response from the Zamarelli Committee, a full report and recommendation will be made to the Commission.

8304040053

8/9/79
Date

William C. Oldaker
General Counsel

8304040058

TSONGAS FOR SENATE COMMITTEE

Main Street — Box 58
Boston, Mass. 01740

BOSTON, MA
JUL 12
1 PM
1979
021

BOSTON, MA
JUL 12
1979
021

Federal Election Commission
1325 K Street NW
Washington, D.C.

JUL 17 PM 1:14
1979

CERTIFIED MAIL
RECEIVED
FEDERAL ELECTION COMMISSION
JUL 17 1979
07 01979

RETURN RECEIPT
REQUESTED



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: JULY 17, 1979
SUBJECT: MUR 990 - Interim Investigative Report
dated 7-12-79. Signed by GC 7-13-79;
Received in OCS 7-13-79, 3:36

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 11:00, July 16, 1979.

There were no objections to the Interim Investigative
Report at the time of the deadline.

8304010053

July 13, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 990

Please have the attached Interim Invest Report
on MUR 990 distributed to the Commission.

Thank you.

83040100537

RECEIVED
CLERK OF THE
COMMUNICATIONS SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
July 12, 1979

79 JUL 13 P 3: 36

In the Matter of)
)
Tsongas for Senate Committee) MUR 990
Committee to Re-Elect John)
Zamparelli)

INTERIM INVESTIGATIVE REPORT

On June 20, 1979, the Commission found reason to believe that both the Tsongas for Senate Committee and the Committee to Re-Elect John Zamparelli violated 2 U.S.C. §441a. Letters went out to both respondents on June 25, 1979.

Both committees have responded by telephone and we expect written responses shortly. Upon receipt of their responses, a full report and recommendation will be made to the Commission.

7/13/79
Date

William C. Oldaker
William C. Oldaker
General Counsel

83040400538E

8 3 0 4 0 4 0 0 5 8 9

SECRET 10 3

FRANK J. BELINOWITZ
238 HIGH STREET
MEDFORD, MASSACHUSETTS
966-5480
REC'D FEDERAL ELECTION COMMISSION

JUL 16 1979 2:27

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

903115

Re: MUR 990

Attention: William C. Oldaker, Esquire

Dear Mr. Oldaker:

In response to your letter of June 25, 1979, the allegation that the Committee to Re-Elect John Zamparelli made a contribution of \$5,000.00 to the Tsongas for Senate Committee and that the contribution was subsequently refunded is correct.

The factual background of the above transactions is that the Chairman of the Tsongas Finance Committee requested a contribution of \$5,000.00. He advised the Committee to Re-Elect John Zamparelli that it was legal and that he had checked the matter with the Federal Election Commission. A member of the Zamparelli Committee spoke with the Secretary of State's Office in Massachusetts and received clearance relative to the State Election Laws. The contribution was then made. At some future time, as a

JUL 16 4:00

RECEIVED
GENERAL INVESTIGATIVE
DIVISION

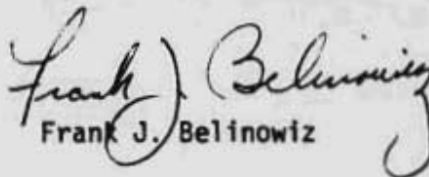
FRANK J. BELINOWIZ, D.M.D.
238 HIGH STREET
MEDFORD, MASSACHUSETTS 02155
396-5480

Page 2.
July 11, 1979
William C. Oldaker, Esquire

result of an opinion from your Commission, the contribution was returned to the Committee to Re-Elect John Zamparelli. No further reference has been made until receipt of the letter dated June 25, 1979 addressed to the Treasurer.

If the contribution constituted a violation of 2 U.S.C. Section 441A(a)(1)(A), I suggest the facts show no intent to avoid or violate any law and that an attempt to cure the oversight was timely made. I respectfully request that no action be taken.

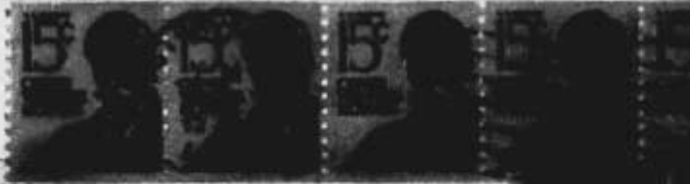
Respectfully submitted,


Frank J. Belinowiz

FJB/jlf

33040400570

GERALD J. BELINOWIZ, D. M. D.
236 HIGH STREET
LANSFORD, MASSACHUSETTS 02158



CERTIFIED

No. 288303

MAIL

Federal Election Commission

1325 K Street, N.W.

Washington, D. C. 20463

Return Receipt Requested

RECEIVED
FEDERAL ELECTION
COMMISSION
Att: **WALTER C. Oldaker, Esquire**

TSONGAS FOR SENATE COMMITTEE

Main Street - Box 58
Bolton, Massachusetts 01740

RECEIVED
FEDERAL ELECTION
COMMISSION

Patricia Bensetler,
Treasurer

000
10496

79 JUL 6 PM 12:44

July 2, 1979

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

902964

Dear Sir/Madam;

This letter is in response to your letter concerning MUR 990.

I respectfully request that you give this committee an extension on the 10 day deadline for reply to your letter. This request comes at the same time as the Quarterly Federal Report and the July 4th holiday.

I will respond to your request for information in a timely manner and will seek no unreasonable delays.

Thank you for your cooperation in this matter.

Sincerely,

Patricia G Bensetler
Treasurer
Tsongas for Senate Committee

33040100570

19 JUL 6 2:13

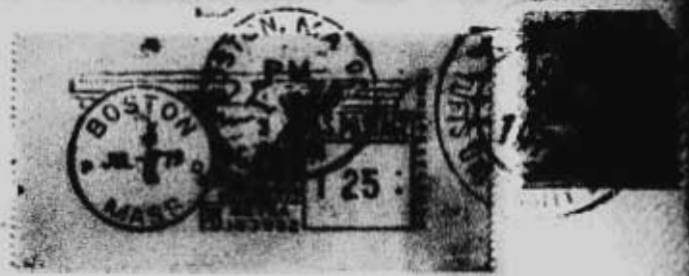
RECEIVED
FEDERAL ELECTION
COMMISSION



83040400593

TSONGAS FOR SENATE COMMITTEE

Main Street — Box 88
Bolton, Mass. 01740



Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

bh 21
Attn: ~~Msgr~~ Tarrant
10/11/74

REC'D
FEDERAL EL
COMMISS

**RETURN RECEIPT
REQUESTED**

**CERTIFIED
No. 228933
MAIL**



JOHN F. ZAMPARELLI
REGISTER OF DEEDS

Surant 660 10487
Registry of Deeds
County of Middlesex
Cambridge, Massachusetts 02141
RECEIVED
FEDERAL ELECTION
COMMISSION

78 JUL 5 AM 11:56

June 30, 1979

Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Attn: William C. Odaker, Esquire

902964

Re: MUR 990

Dear Mr. Odaker:

Your letter directed to the Treasurer of the Committee to Re-Elect John Zamparelli has been brought to my attention. I was unable to reach the Treasurer, Dr. Francis Belinowiz, or the Chairman, Andrew J. Zamparelli.

I am leaving for a vacation planned in advance of receipt of your communication and shall return July 10, 1979. I respectfully request an extension of an additional ten days to allow the Treasurer to respond.

Rest assured of my cooperation.

Very truly yours,

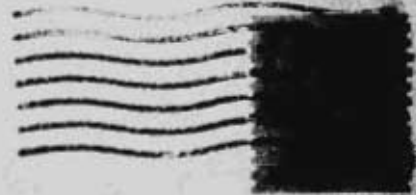
John F. Zamparelli
JOHN F. ZAMPARELLI

JFZ:grb

3304010059

83040400295

Registry of Deeds
County of Middlesex
Cambridge, Massachusetts 02141



Federal Election Commission

1325 K Street, N.W.

Washington, D. C. 20463

Attn: William C. Odaker, Esquire

79 JUL 5 AM 11:56

RECEIVED
FEDERAL ELECTION
COMMISSION



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 25, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hassett Drive
Medford, MA

Re: MUR 990

Dear Treasurer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Committee to Re-Elect John Zamparelli, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you made a contribution of \$5,000 to the Tsongas for Senate Committee, in violation of 2 U.S.C. §441a(a)(1)(A). While we note the contribution was refunded, the Act was violated when the contribution was made.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.



This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

183040100507

SEND TO: Add your address in the "RETURN TO" space on the back.

1. The following service is requested (check one):

- Show to whom and date delivered \$
- Show to whom, date, and address of delivery \$
- RESTRICTED DELIVERY
Show to whom and date delivered \$
- RESTRICTED DELIVERY
Show to whom, date, and address of delivery. \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Treasury
100 George A. Hassett Dr.
Acushnet, MA

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

H. B. O'Leary

4. DATE OF DELIVERY
6-29-77

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS _____

POSTAL SERVICE
POST OFFICE
ACUSHNET, MA 01917

MUE-990 Threat PSG: 1877-0-249-585

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hasset Drive
Medford, MA

Re: MUR 990

Dear Treasurer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Committee to Re-Elect John Zamparelli, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you made a contribution of \$5,000 to the Tsongas for Senate Committee, in violation of 2 U.S.C. §441a(a)(1)(A). While we note the contribution was refunded, the Act was violated when the contribution was made.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.

3304040057
js 6/22/79

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

83040100599



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 25, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main St., Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your Committee, the Tsongas for Senate Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you accepted a \$5,000 contribution from The Committee to Re-Elect John Zamparelli, in violation of 2 U.S.C. § 441a. While we note the contribution has been returned, the Act was violated when you accepted the contribution.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

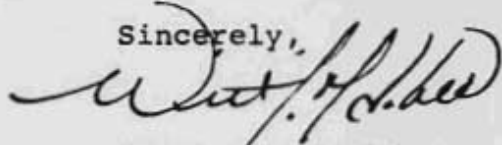
If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

83040100600

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

0400601

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main St., Box 58
Boston, MA 01740

Re: MUR 990*

Dear Ms. Bensetler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your Committee, the Tsongas for Senate Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you accepted a \$5,000 contribution from The Committee to Re-Elect John Zamparelli, in violation of 2 U.S.C. § 441a. While we note the contribution has been returned, the Act was violated when you accepted the contribution.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

33040100602
JH 6/22/74

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

83040400503



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 25, 1979

Senator Paul E. Tsongas
United States Senate
437 Russell Senate Office
Building
Washington, D.C.

Re: MUR 990

Dear Senator Tsongas:

This is to advise you that on June 20, 1979, the Federal Election Commission found reason to believe that your committee, the Tsongas for Senate Committee may have violated 2 U.S.C. §441a by accepting an excessive contribution of \$5,000 from the Committee to Re-Elect John Zamparelli. This section of the Federal Election Campaign Act of 1971, as amended, precludes the acceptance of contributions over \$1,000 from such a committee.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee, we believe that you, as the candidate, should be made aware of this development.

Under 2 U.S.C. §437g(a)(3)(B), this matter will remain confidential unless the Tsongas for Senate Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.

Sincerely,

William C. Oldaker
General Counsel



Tarrant **MUR 990**

PS Form 3811, Apr 1977

1 SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered \$
 Show to whom, date, and address of delivery \$
 RESTRICTED DELIVERY
Show to whom and date delivered \$
 RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Senator Paul E. Tsongas
U.S. Senate
937 Russell Senate Office Bldg.
Wash., D.C.

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. **D. Kearney**
 DATE OF DELIVERY POSTMARK

5. ADDRESS: Complete only if requested

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO: 1977-0-249-596

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3811, Apr 1977

1 SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
 Show to whom and date delivered \$
 Show to whom, date, and address of delivery \$
 RESTRICTED DELIVERY
Show to whom and date delivered \$
 RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Patricia G. Bensetter, Treas.
Main St. 160758
Boston, MA 01740

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. **Patricia Bensetter**
 DATE OF DELIVERY POSTMARK

5. ADDRESS: Complete only if requested

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

MUR-990 **Tarrant** ☆GPO 1977-0-249-596

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Senator Paul E. Tsongas
United States Senate
437 Russell Senate Office
Building
Washington, D.C.

Re: MUR 990

Dear Senator Tsongas:

This is to advise you that on June , 1979, the Federal Election Commission found reason to believe that your committee, the Tsongas for Senate Committee may have violated 2 U.S.C. §441a by accepting an excessive contribution of \$5,000 from the Committee to Re-Elect John Zamparelli. This section of the Federal Election Campaign Act of 1971, as amended, precludes the acceptance of contributions over \$1,000 from such a committee.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee, we believe that you, as the candidate, should be made aware of this development.

Under 2 U.S.C. §437g(a)(3)(B), this matter will remain confidential unless the Tsongas for Senate Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.

Sincerely,

William C. Oldaker
General Counsel

8304049060

ls
4/22

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 990
Tsongas for Senate Committee)
Committee to Re-Elect John Zamparelli)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 20, 1979, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated June 18, 1979, regarding the above-captioned matter:

1. Find reason to believe that both the Tsongas for Senate Committee and the Committee to Re-Elect John Zamparelli violated 2 U.S.C. §441a.
2. Approve the letters attached to the above-named report.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Thomson, and Tiernan.

Attest:

6/21/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 6-18-79, 12:49
Circulated on 48 hour vote basis: 6-18-79, 4:00

83040400607

June 18, 1979

MEMORANDUM TO: Marge Emmons
FROM: Jane Colgrove
SUBJECT: MUR 990

Please have the attached First General Council's
Report on MUR 990 distributed to the Commission on a
48 hour tally basis.

Thank you.

83040400608

FEDERAL ELECTION COMMISSION
RECEIVED
OFFICE OF THE
FIRST GENERAL COUNSEL (S) REPORT SECRETARY

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUN 18 1979

79 JUN 18 12 29 PM '79
STAFF MEMBER(S) Tarrant

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENT'S NAME: Tsongas for Senate Committee, Bolton, MA
Committee to Re-Elect John Zamparelli, Medford, MA
RELEVANT STATUTE: 2 U.S.C. §441a

INTERNAL REPORTS CHECKED: Public Records
FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On June 5, 1979, the Tsongas for Senate Committee (the Tsongas Committee) was referred to the Office of General Counsel by the Reports Analysis Division (RAD) for receipt of an excessive contribution, in violation of 2 U.S.C. § 441a.

EVIDENCE

On their October 10, 1978 Quarterly Report, the Tsongas Committee disclosed a \$5,000 contribution from the Committee to Re-Elect John Zamparelli (the Zamparelli Committee), an unregistered committee. A surface violation letter was sent to both committees by RAD on January 5, 1979. The treasurer of the Tsongas Committee, Patricia Bensetler, phoned RAD on January 19, 1979, and was advised by RAD to return the money. A few days later, the Commission received written notice the contribution would be returned. This response was considered inadequate, however, because it did not specifically state the money had been returned. RAD informed Ms. Bensetler of the problem by telephone on March 29, 1979. In response, a copy of the check for \$5,000 made out to the Zamparelli Committee, which was dated January 19, 1979, was sent to the Commission. This refund was also disclosed on the Tsongas Committee's April 10, 1979 Report.

8304040060

Although the Zamparelli Committee did not respond to the surface violation letter regarding their status as a political committee, nothing further was sent to the committee because the contribution had been returned.

ANALYSIS

Here the excessive contribution was clearly made and accepted in violation of 2 U.S.C. § 441a. Therefore, the Office of General Counsel recommends a finding of reason to believe that both committees violated the Act.

RECOMMENDATIONS:

1. Find reason to believe that both the Tsongas for Senate Committee and the Committee to Re-Elect John Zamparelli violated 2 U.S.C. § 441a.
2. Approve the attached letters.

Attachments

1. Referral from RAD
2. Proposed letters

33040100610

MUR 990

REPORTS ANALYSIS REFERRAL SHEET

DATE 6-5-79

ANALYST William Coppel

TO: OGC

TEAM CHIEF Suzanne Wilson

THROUGH: STAFF DIRECTOR *AP:*

COMPLIANCE REVIEW *C. Bowen*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *WJH*

Attachment 1

CANDIDATE/COMMITTEE: Tsongas for Senate Committee

TREASURER: Patricia G. Bensetler

ADDRESS: Main St., Box 58
Bolton, MA 01740

AFFILIATE(S): N/A

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Receipt of an excessive contribution.	441a(a)(1)(A)	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:
Normal review - 10/27/78
(October 10 Report) ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM May 17, 1978 TO October 30, 1978

TOTAL RECEIPTS \$ 407478.12 TOTAL EXPENDITURES \$ 398595.42

CASH ON HAND \$ 8882.70 DEBTS \$ 45889.88

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
Surface Violation notice sent - 1/5/79 3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon dated - 1/19/79 4
Telecon dated - 3/29/79 6

REASON(S) FOR REFERRAL: ATTACHMENT
Response received 1/25/79 - inadequate 5
Response received 3/31/79 - adequate 7
Violation meets Commission threshold for review by the General Counsel.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
N/A

OTHER RELEVANT INFORMATION:
The April 10 Report for the committee discloses the return of this contribution. 8

Notice sent to contributing committee 1/5/79. No response, however no further action taken because of contribution refund. 9

STATE

COMMITTEE	DOCUMENT	REVENUES		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ISONDAS FOR SENATE COMMITTEE								
1978	STATEMENT OF ORGANIZATION					25MAY78		ID# C00090149
	REQUEST FOR ADDITIONAL INFORMATION					6 JUN78	6	78SEN/006/0637
	STATEMENT OF ORGANIZATION - GOVERNMENT					10 JUN78	3	78FEC/075/5103
	48 HOUR CONTRIBUTION NOTICE					15SEP78	4	78SEN/006/3446
	REQUEST FOR ADDITIONAL INFORMATION TO F.L.S.C.					22SEP78	2	78SEN/012/0465
	48 HOUR CONTRIBUTION NOTICE					30OCT78	2	78SEN/012/0667
	48 HOUR CONTRIBUTION NOTICE					6NOV78	2	78SEN/016/4347
	1 DAY PRE-PRIMARY	189,934		218,540		1 JUL78 - 4SEP78	390	78SEN/011/3974
	1 DAY PRE-PRIMARY - AMENDMENT	195,609		218,540		1 JUL78 - 4SEP78	7	78SEN/012/0537
	1 DAY PRE-PRIMARY - AMENDMENT					1 JUL78 - 4SEP78	2	78SEN/012/0311
	REQUEST FOR ADDITIONAL INFORMATION					1 JUL78 - 4SEP78	4	78FEC/088/4000
	REQUEST FOR ADDITIONAL INFORMATION					1 JUL78 - 4SEP78	2	79FEC/118/1740
	30 DAY POST-PRIMARY		35,080		38,321	1OCT78 - 10OCT78	42	78SEN/015/0990
	JULY TO QUARTERLY	112,509		58,396		17MAY78 - 30 JUN78	148	78SEN/007/7834
	JULY TO QUARTERLY - AMENDMENT					17MAY78 - 30 JUN78	3	78SEN/010/0961
	REQUEST FOR ADDITIONAL INFORMATION					17MAY78 - 30 JUN78	3	78FEC/068/3997
	REQUEST FOR ADDITIONAL INFORMATION					30 JUN78	1	79FEC/116/4925
	JULY TO QUARTERLY - AMENDMENT					17MAY78 - 30 JUN78	3	79SEN/001/0007
	JULY TO QUARTERLY - AMENDMENT					17MAY78 - 30 JUN78	10	79SEN/001/1881
	OCTOBER TO QUARTERLY		99,259		121,658	5SEP78 - 30SEP78	209	78SEN/013/2520
	OCTOBER TO QUARTERLY - AMENDMENT					5SEP78 - 30SEP78	5	78SEN/015/1039
	REQUEST FOR ADDITIONAL INFORMATION					30SEP78	3	79FEC/116/3577
	OCTOBER TO QUARTERLY - AMENDMENT					8SEP78 - 30SEP78	3	79SLH/001/2284
	OCTOBER TO QUARTERLY - AMENDMENT					5SEP78 - 30SEP78	9	79SEN/002/0271
	10 DAY PRE-GENERAL		102,528		101,492	10OCT78 - 23OCT78	133	78SEN/016/0486
	30 DAY POST-GENERAL		202,319		198,873	24OCT78 - 23NOV78	503	78SEN/018/1261
	YEAR END REPORT		27,109		31,103	24NOV78 - 31DEC78	43	79SEN/001/2948
1979	APRIL 10 QUARTERLY		95,906		95,476	1JAN79 - 31MAR79	95	79SEN/003/1582
	TOTAL	308,218	558,201	276,936	586,923		1639	TOTAL PAGES

EXIT

SCHEDULE A

107

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

Transfer
Monies For Senate Committee
 (Full Name of Candidate or Committee)

Part No. _____
 (Use for itemizing Part 1, 2, 3, 4, or 5)

edger Entry
 -14-78

SEE REVERSE SIDE FOR INSTRUCTIONS
 (Use separate page (A) for each numbered Part)

OCTOBER 10 REPORT

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (if self-employed, also check here)	Amount of Receipt This Period	
			This period	Aggregate Year-to-Date
03-682	Committee to Re-Elect John Zamparelli 100 George P Hassett Dr Medford, Mass <i>1200</i> <input type="checkbox"/>		\$ 5,000.00	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	
		<input type="checkbox"/>	\$	

833040100610

5,000.00
TOTAL THIS PERIOD
 (Last page of this Part only)



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

January 5, 1979

Ms. Patricia G. Bensetler, Treasurer
Tsongsas For Senate Committee
Main Street Box 58
Bolton, Massachusetts 01740

Dear Ms. Bensetler:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

770-1123

330400061

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Bill Coppe! (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4172.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

830406100615

(

MEMORANDUM: FOR FILES

ANALYST: COPPEL

RE: TELECON

FROM: Patricia G. Bensetler, Treasurer

DATE: 1/19/79

NAME OF COMMITTEE: Tsongas for Senate Committee/MA

Ms. Bensetler called in response to the surface violation notice the committee received for the receipt of an excessive contribution from an unregistered committee. The Q3 report of the Tsongas Committee indicates that the Committee to Re-Elect John Zampareilli transferred \$5000 to the Tsongas Committee. I advised Ms. Bensetler to return the money based on the fact that the Act does not allow unregistered committees to contribute in excess of \$1000 to any federal campaign. I further advised her that the committee should return the entire amount since she would not be able to determine how many other federal campaigns the Zampareilli committee has contributed to.

Bensetler said that she understood and would respond to it as soon as she looked into the matter.

33040400616

TSONGAS FOR SENATE COMMITTEE

Main Office - Box 58
Bolton, Massachusetts 01740
1979 JAN 20 PM 11:03

Patricia Bensetler,
Treasurer

HA. DELIVERED
1979 JAN 20 PM 1:10
January 19, 1979

33040

Federal Election Commission
1325 K Street N.W.
Washington, D.C.
20463

Dear Sir/Madam:

This letter is to acknowledge the receipt of your letter dated January 5, 1979.

The committee will be returning the contribution from the Committee to Re-Elect John Zamparielli, 100 George P. Hassott Dr., Medford, Massachusetts.

Thank you for your assistance in this matter.

Sincerely,

Patricia G. Bensetler
Patricia G. Bensetler
Treasurer
Tsongas for Senate Committee

3304010057

R 52517

MEMORANDUM: FOR FILES

ANALYST: COPPEL

RE: TELECON

FROM: Patricia Bensetler, Treasurer

DATE: 3/29/79

NAME OF COMMITTEE: Tsongas for Senate Committee/MA

I called Ms. Bensetler with regards to the response we received concerning the excessive contribution from the Zamparielli Committee. I advised her that the response was not adequate, since the letter indicated that she "will be returning the contribution", making it appear that she had not done so. I also asked her to forward that cancelled check to verify the transaction. She agreed to provide the information so as to achieve compliance.

33040400618

Main Street - Box 58
Boston, Massachusetts 0174
SECRETARY OF THE SENATE

RECEIVED
FEDERAL ELECTION
COMMISSION Patricia Bensetler,
Treasurer

1979 APR -6 AM 11:56

'79 APR .4 1:14

HAND DELIVERED

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Dear Bill,

Enclosed please find a copy of our check to John Zamparelli for \$5,000. I have also enclosed a copy of the report from the First Bank and Trust showing that the check was processed by our bank.

If you have any further questions please contact me.

You should note that the date of the payment of the check is January 19, 1979. Our report of this expenditure will appear on the first quarterly report.

Sincerley,

Patricia G. Bensetler
Treasurer
Tsongas For Senate Committee

3 370940021000362771

K S2587 MA DEM C1052



The Commonwealth of Massachusetts

OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

REPORT OF CAMPAIGN CONTRIBUTIONS AND EXPENDITURES

RECEIVED.
SECRETARY OF THE SENATE
519 APR -6 AM 11:56
HAND DELIVERED

From February 1 19 79 Through February 28 19 79

Name of Candidate or Committee: Tsongas for Senate Committee

Office Sought: Senate

Campaign Account with: First Bank & Trust Company, Chelmsford, Mass. 01824

Beginning Balance for Period, Campaign Account \$16,691.52

7090200266772

Add: Contributions \$25.00 and over as follows:
(See attached Schedules)

General Contributions for reporting period \$41,950.00

Fund Raising Contributions for reporting period None

TOTAL: Contributions \$25.00 and over for reporting period \$41,950.00

Add: Contributions under \$25.00 as follows:
(See attached Schedules)

General Contributions for reporting period None

Fund Raising Contributions for reporting period

TOTAL: Contributions under \$25.00 for reporting period None

Total Contributions for reporting period \$41,950.00

Total Contributions plus Beginning Balance \$58,641.52

Deduct: Checks Paid and Other Charges as follows:
(See attached Schedules)

General Expenditures for reporting period \$53,109.11

Fund-Raising Expenditures for reporting period

Campaign Media Expenditures for reporting period

TOTAL: Checks Paid and Other Charges for reporting period \$53,109.11

Ending balance for reporting period \$5,532.41

I, Timothy W. McLean of the above-named Bank do hereby declare that the information contained herein is true and correct to the best of my knowledge and belief.

OFFICE USE ONLY
Filed By
Pre Audit
2nd Audit
Recommendation

Signature of Timothy W. McLean
(Signature of Cashier or Treasurer)

Purpose of Expenditures	Date Check Paid	Payee (Alphabetical Listing Mandatory)	Address	Amount	
	1-19-74	Zampacetti, Committee to elect Sabo		5000	00

7094021000263715

Expenditure Page Total 5000 00

GENERAL AND MEDIA EXPENDITURES

If none apply, indicate specific purpose in column provided.

- 1. Food
- 2. Transportation
- 3. Salary
- 4. Beverages
- 5. Donation
- 6. Photography
- 7. Rental
- 8. Flowers
- 17. Postage
- 18. Television Time
- 19. Radio Time
- 20. Newspaper Advertising
- 21. Billboard Advertising
- 22. Magazine Advertising
- 23. Telephone
- 24. Telegraph
- 25. Opinion Polling
- 26. Printing
- 27. Computer Use
- 28. Advertising Agency
- 29. Public Relations

INSTRUCTIONS TO BANK

- 1. Color-coded forms have been provided for semi-monthly bank reporting as follows:
 - (a) GENERAL and MEDIA — Contribution and Expenditures (CPF-BS Yellow)
 - (b) FUND-RAISING — Contributions and Expenditures (CPF-B9 Pink)
 - (c) SUMMARY SHEETS — To be completed and signed by bank (CPF-B7 White)
- 2. A code legend is provided on the expenditure side of each color-coded reporting schedule. Proper transfer of code numbers or specific purpose should be CAREFULLY made from legend on check to expenditure side of reporting schedule with corresponding legend.
- 3. This form is to be prepared by candidate or committee treasurer in triplicate on the front side only, one copy to be validated and returned to treasurer or candidate, 2nd copy for your records, original to be filed with this office.

11 0 3 2 6

Check one of the following boxes:

- General Expenditures
- Party Expenditures
- Political Expenditures
- Other Expenditures

EXPENDITURES IN CONNECTION WITH FUND RAISING ACTIVITY

- All other work
- Direct mail
- Telephone
- Other
- Other
- Other
- Other

CAMPAIGN MEDIA EXPENSES

- Broadcast Advertising
- Direct Mail
- Other
- Other
- Other
- Other
- Other

No. 2047

1-19 53-69111379

PAY Fred Howard

Committee to Re-Elect John Edwards

CAMPAIGN ACCOUNT

TO THE ORDER OF

ADDRESS

CITY, STATE

FIRST BANK & TRUST CO., CHELMSFORD, MASS.

6

8 7 1 3

TSONGAS FOR SENATE COMMITTEE

Patricia B. Buxton
AUTHORIZED SIGNATURE

⑆011306913⑆

⑆370854⑆ 2⑆

⑆0000500000

213
"The undersigned affirms under the penalties of perjury that he is the named payee of this check, or an authorized officer thereof, that he or it performed the services or delivered the goods indicated hereon, that the payment is for the sole purpose of paying for such goods or services and that no person other than the named payee has any interest, direct or indirect, in this payment."

For Deposit only to
The acc't # 450472 E.G.

PAY

TO THE ORDER OF

8-1-79

682

8-1-79

PAY ANY BANK
BY DEPOSIT

1-1

0 0 0

FEE

1879

1-1

PAY ANY BANK
BY DEPOSIT
THE BOSTON
618-00015

FD-3
 Election Commission
 1975, 1976
 A.C.C. 10443

EXPENDITURES
 Reporting Transfers Out, Contributions in Kind,
 Loans, Loan Repayments and Refunds Made
 Supporting Lines 22a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page _____ of _____ for
 Line Number _____

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee as Full
 Name For Senate Committee

APRIL 10

Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John Travel 28 Dover, Mass	Travel	1-22	240.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3-12	117.00 ✓
Nichlesinger Summer Street Dokline, Mass	Party Charges	1-8	329.08 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Windsor 119 Acut, Mass	Food	1-29	110.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Ed Woods	Consulting-1978	1-25	500.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1-31	500.00
Committee to Re-Elect John Doane Road Bedford, Mass	Contribution Return	1-19	5000.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Lorah Karol 1 Bay State Road Dorchester, Mass 02769	Phone Bill	1-29	100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Dou Barlow	Consulting	1-31	600.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Llivan Brothers 5 Bridge Street Lowell, Mass	Printing	3-12	393.23
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

SUBTOTAL of expenditures this reporting period

\$



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

January 5, 1979

Committee to Re-Elect John Zamparelli
100 George P. Hassett Dr.
Medford, MA

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Tsongas for Senate Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

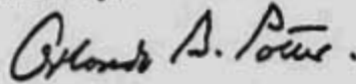
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

6739924011006427

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Bill Coppel, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,



Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

07 03 07 4. 0; 1. 0. 0; 6. 31 51



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Committee to Re-Elect John Zamparelli
100 George P. Hassett Drive
Medford, MA

Re: MUR 990

Dear Treasurer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Committee to Re-Elect John Zamparelli, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you made a contribution of \$5,000 to the Tsongas for Senate Committee, in violation of 2 U.S.C. §441a(a)(1)(A). While we note the contribution was refunded, the Act was violated when the contribution was made.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.



This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

813040100626



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia G. Bensetler, Treasurer
Tsongas for Senate Committee
Main St., Box 58
Bolton, MA 01740

Re: MUR 990

Dear Ms. Bensetler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your Committee, the Tsongas for Senate Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you accepted a \$5,000 contribution from The Committee to Re-Elect John Zamparelli, in violation of 2 U.S.C. § 441a. While we note the contribution has been returned, the Act was violated when you accepted the contribution.

We have numbered this matter MUR 990.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

040400650



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Senator Paul E. Tsongas
United States Senate
437 Russell Senate Office
Building
Washington, D.C.

Re: MUR 990

Dear Senator Tsongas:

This is to advise you that on June , 1979, the Federal Election Commission found reason to believe that your committee, the Tsongas for Senate Committee may have violated 2 U.S.C. §441a by accepting an excessive contribution of \$5,000 from the Committee to Re-Elect John Zamparelli. This section of the Federal Election Campaign Act of 1971, as amended, precludes the acceptance of contributions over \$1,000 from such a committee.

While the Committee Treasurer is responsible for the acceptance of contributions made to a Federal committee, we believe that you, as the candidate, should be made aware of this development.

Under 2 U.S.C. §437g(a)(3)(B), this matter will remain confidential unless the Tsongas for Senate Committee notifies the Commission in writing that it wishes the investigation to be made public.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202-523-4175.

Sincerely,

William C. Oldaker
General Counsel



REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE November 30, 1979

ANALYST Susan Kaltenbaugh SK

TO: OGC

TEAM CHIEF Peter Kell, Jr. PKJ

ATTENTION:

THROUGH: STAFF DIRECTOR ALH/ABP

COMPLIANCE REVIEW Carroll Bowen CB/PB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

MUR No. 990

DATE OF ORIGINAL REFERRAL 6/27/79

**PURPOSE: Information

83040100632

The attached was received by the Reports Analysis Division on 11/26/79. It is being removed from the Senate index. In addition, efforts are being made to have the document removed from the microfilm and to recover the original from the Secretary of the Senate.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

RECEIVED
FEDERAL ELECTION
COMMISSION

NOV 21 1979

November 19, 1979

'79 NOV 26 PM 1:38

HAND DELIVERED

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Dear Sir/Madam;

This letter is in response to your letter of November 16, 1979 requesting additional information concerning the contribution from Mr. Zamparielli in September 1978.

I would like to state at the onset that the answers I will be giving to your questions are based solely on information that I have of the events of last September. I have forwarded some of the questions for additional comment to Mr. Nick Rizzo. I have enclosed a copy of the letter that I sent to him today.

I was not directly involved in fund raising. Mr. Rizzo was the principal fund raiser. He was the one that had direct contact with Mr. Zamparielli and in the best position to answer the technical questions concerning the actual date of the solicitation as well as the circumstances surrounding the contribution. I will answer all the other questions to the best of my ability and if you need additional information please feel free to contact me.

1. Yes, to my knowledge the Committee to Elect John Zamparielli was solicited in regard to the contribution to the Tsongas for Senate Committee. I am certain that Mr. Zamparielli was very aware of the financial status of the committee just before the election. He was a member of the Finance Committee and as a member of the committee was aware of the campaign finances. Often this sort of contribution may not be directly solicited but certainly, by the nature of his involvement with the campaign he was aware of our need and his ability to contribute to the committee.

Mr. Zamparielli and Mr. Nick Rizzo were the persons involved in the solicitation of the contribution. Mr. Zamparielli delivered the contribution to the best of my knowledge - directly to the main campaign headquarters in Boston. The contribution was received by the Campaign Manager Dennis Kanin.

I assume that Mr. Rizzo informed Mr. Zamparielli concerning the nature of the legality of the contribution. Mr. Rizzo informed me that he had checked with the counsel of the House and Senate Counsel and that that individual had checked with the FEC that the contribution was legal. I assume that this conversation with the FEC was prompted by the desire of Mr. Zamparielli to contribute to the committee and the information was passed on to him.

3739042001007016343

HAND DELIVERED

S2587 / MA DEM C 1052

I contacted the FEC concerning the legality of the contribution. After the pre-primary reports of the committee were made public, we were informed that the FEC had been contacted by a reporter from the Boston media. He had been told that the contribution was illegal. I called and , in the evening, spoke to the FEC Press representative. He told me that he did not have the Zamparielli committee registered but that that was not enough to indicate that there were problems with the contribution. I assumed that we were discussing the committee as a multi-candidate committee and not as a simple candidate committee. My understanding was that the issue was whether the Zamparielli committee was a legal Multi-candidate committee . I assumed that he had registered with the FEC as a committee.

Later , the next day I believe, I contacted Bill Coppel and asked him about the contribution. Apparently he had been informed that there was some question concerning the contribution but told me that I should wait until contacted by the FEC before I returned the contribution. All this time I never at any time understood that the Zamparielli Committee was not registered with the FEC even as a candidate committee. Additionally, I was told in December , when I was informed that the contribution was to be returned , that we need only return the \$4,000. because the \$1,000 would have been a legal contribution. This information was transmitted to me by telephone in a conversation with the FEC.

You final question in section 1 I believe I have answered above. Mr Zamparielli was a member of the Finance Committee and was aware of the nature of the campaign finances. I have just checked our original committee filing to note whether Mr. Zamparielli was a member of the committee. He apparently was not at the point of the registration but had been previously, and I assume that there was a clerical error in not including his name as a member of the Finance Committee.

2. I think that I have answered this question above. I knew that the Zamparielli committee had given to the Tsongas Committee before, I knew that he had given to other candidates and their committees and I had no reason to believe that he was not a multi-candidate committee.

I might make an additional statement. I frankly feel that the problems that have arisen concerning the Zamparielli contribution would have been avoided, at least on the part of the Tsongas for Senate Committee concerning the activities that I was directly involved in, if the FEC had acted immediately and informed us that the contribution was illegal. We would have returned the contribution immediately. We had no desire to take such an obviously illegal contribution if we had been informed at any point that the contribution should have been returned. I feel that our contact with the FEC was one that could be characterized on the Commission's part as an issue of no grave concern . If I had been told the actual circumstances, from the Commission's perspective I would have immediately returned the contribution and had sought to straighten out the matter on the Committee's end.

3,904,000,706,344

3-

As I stated in my letter previously, we have, through the years, made all possible attempts to reflect the guidelines of the FEC in both the spirit and the letter of the Act. We certainly would not have taken knowingly such an illegal contribution and would have acted sooner if the FEC had informed us concerning the nature of the contribution.

Please feel free to contact me for additional information.

Sincerely,


Patricia G. Bensetler

839042010701345

MUR 990

November 19, 1979

Nick Rizzo
Box 513
Andover, Massachusetts

Dear Nick;

The FEC has requested additional information concerning the Zamparielli contribution. There are some questions I cannot answer and they have requested that I send the questions to you.

The questions are;

1. The data of the solicitation of the contribution.
2. The circumstances of the solicitation- did he contact you or did you contact him?
3. Did you inform Mr. Zamparielli that the contribution was legal? Please describe here the details of your conversation with the House and Senate Counsel regarding the nature of the contribution. The FEC needs to know the circumstances of you conversations, the contact that their counsel had with the FEC and any other particulars. Did John ask you to call them?, did you do so on your own initiative, etc?

I will be answering all the questions put to me by the FEC to the best of my ability. They will need your information before they can make an informed judgement as to this matter.

If you have any questions please feel free to contact me. They will need a response from you in five days.

Sincerely,

Pat Bensetler

73900201007016346

Handwritten notes:
Pat Bensetler
11-22-79

TSONGAS FOR SENATE COMMITTEE

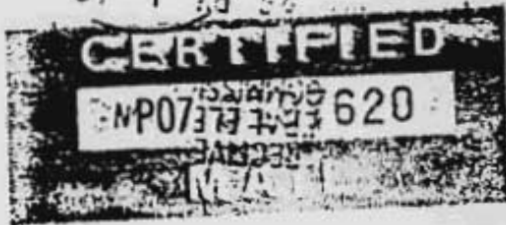
Main Street — Box 58
Bolton, Mass. 01740



RETURN RECEIPT
REQUESTED

89 1 14 92

*Federal Election Commission
1325 K Street NW
Washington DC
20463*



7
2
9
9
2
4
0
7
3
4
7



J. ...
SECRETARY

United States Senate

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20510

NOTICE

THE POSTMARK ON THE PRECEDING ENVELOPE IS 11-21-79

REGISTERED _____ CERTIFIED

33820 070848

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 6-5-79

ANALYST William Coppel

TO: OGC

TEAM CHIEF Suzanne Wilson

THROUGH: STAFF DIRECTOR AP:

COMPLIANCE REVIEW C. Bowen

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS WJH

CANDIDATE/COMMITTEE: Tsongas for Senate Committee

TREASURER: Patricia G. Benseitler

ADDRESS: Main St., Box 58
Bolton, MA 01740

AFFILIATE(S): N/A

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Receipt of an excessive contribution.	441a(a)(1)(A)	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

Normal review - 10/27/78
(October 10 Report) ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM May 17, 1978 TO October 30, 1978

TOTAL RECEIPTS \$ 407478.12 TOTAL EXPENDITURES \$ 398595.42

CASH ON HAND \$ 8882.70 DEBTS \$ 45889.88

HISTORY:

RESULTS OF REVIEW:	ATTACHMENT
Surface Violation notice sent - 1/5/79	3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

Telecon dated - 1/19/79	4
Telecon dated - 3/29/79	6

REASON(S) FOR REFERRAL: ATTACHMENT

Response received 1/25/79 - inadequate	5
Response received 3/31/79 - adequate	7
Violation meets Commission threshold for review by the General Counsel.	

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

N/A

OTHER RELEVANT INFORMATION:

The April 10 Report for the committee discloses the return of this contribution. 8

Notice sent to contributing committee 1/5/79. No response, however no further action taken because of contribution refund. 9

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)
 83040400640
 SENATE

DATE 16MAY79
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
TSONGAS FOR SENATE COMMITTEE								
1978	STATEMENT OF ORGANIZATION					25MAY78	6	78SEN/006/0637
	REQUEST FOR ADDITIONAL INFORMATION					5JUN78	3	78FEC/075/5104
	STATEMENT OF ORGANIZATION - AMENDMENT					10JUN78	4	78SEN/006/3466
	48 HOUR CONTRIBUTION NOTICE					15SEP78	2	78SEN/012/0465
	MISCELLANEOUS TRANSACTION TO F.E.C.					22SEP78	2	78SEN/012/0667
	48 HOUR CONTRIBUTION NOTICE					30OCT78	2	78SEN/016/4347
	48 HOUR CONTRIBUTION NOTICE					6NOV78	2	78SEN/017/0802
	10 DAY PRE-PRIMARY	189,934		218,540		1JUL78 - 4SEP78	390	78SEN/011/3974
	10 DAY FIVE-PRIMARY - AMENDMENT	195,609		218,540		1JUL78 - 4SEP78	7	78SEN/012/0537
	10 DAY PRE-PRIMARY - AMENDMENT					1JUL78 - 4SEP78	2	78SEN/012/0311
	REQUEST FOR ADDITIONAL INFORMATION					1JUL78 - 4SEP78	4	78FEC/088/4000
	REQUEST FOR ADDITIONAL INFO 2ND					1JUL78 - 4SEP78	2	79FEC/118/1740
	30 DAY POST-PRIMARY		35,080		38,321	1OCT78 - 1OCT78	42	78SEN/015/0997
	JULY 10 QUARTERLY	112,609		58,396		17MAY78 - 30JUN78	148	78SEN/007/2834
	JULY 10 QUARTERLY - AMENDMENT					17MAY78 - 30JUN78	3	78SEN/010/0961
	REQUEST FOR ADDITIONAL INFORMATION					17MAY78 - 30JUN78	3	78FEC/068/3997
	REQUEST FOR ADDITIONAL INFORMATION					30JUN78	1	79FEC/116/4925
	JULY 10 QUARTERLY - AMENDMENT					17MAY78 - 30JUN78	3	79SEN/001/0007
	JULY 10 QUARTERLY - AMENDMENT					17MAY78 - 30JUN78	10	79SEN/001/1881
	OCTOBER 10 QUARTERLY		99,259		121,658	5SEP78 - 30SEP78	209	78SEN/013/2625
	OCTOBER 10 QUARTERLY - AMENDMENT					5SEP78 - 30SEP78	5	78SEN/015/1039
	REQUEST FOR ADDITIONAL INFORMATION					30SEP78	3	79FEC/116/3577
	OCTOBER 10 QUARTERLY - AMENDMENT					8SEP78 - 30SEP78	3	79SEN/001/2284
	OCTOBER 10 QUARTERLY - AMENDMENT					5SEP78 - 30SEP78	9	79SEN/002/2771
	10 DAY PRE-GENERAL		102,528		101,492	10OCT78 - 23OCT78	133	78SEN/016/0886
	30 DAY POST-GENERAL		202,319		198,873	24OCT78 - 23NOV78	503	78SEN/018/1261
	YEAR END REPORT		27,109		31,103	24NOV78 - 31DEC78	43	79SEN/001/2948
1979	APRIL 10 QUARTERLY		93,906		95,476	1JAN79 - 31MAR79	95	79SEN/003/1582
	TOTAL	308,218	558,201	276,936	586,923		1639	TOTAL PAGES

EXIT

SCHEDULE A

107

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

transfer
donations for Senate Committee
 (Full Name of Candidate or Committee)

Part No. _____
 (Use for itemizing Part 1, 2, 3, 4, or 5)

ledger Entry
 -16-78

SEE REVERSE SIDE FOR INSTRUCTIONS
 (Use separate page(s) for each numbered Part)

OCTOBER 10 2007

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (If self-employed, also check box) <input type="checkbox"/>	Amount of Receipt This Period
		Aggregate Year-to-Date \$	
3-682	Committee to Re-Elect John Zamparelli 100 George P Hasset Dr Medford, Mass	<input type="checkbox"/>	This period \$ 5,000.00
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$
		<input type="checkbox"/>	This period \$

83040400641

TOTAL THIS PERIOD 5,000.00
 (Last page of this Part only)



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

January 5, 1979

Ms. Patricia G. Bensetler, Treasurer
Tsongas For Senate Committee
Main Street Box 58
Bolton, Massachusetts 01740

Dear Ms. Bensetler:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10 Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

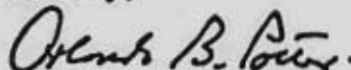
The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Handwritten signature

3304000642

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Bill Coppel (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4172.

Sincerely,



Orlando B. Potter
Staff Director

3 3 0 4 0 4 0 0 6 1 3

MEMORANDUM: FOR FILES

ANALYST: COPPEL

RE: TELECON

FROM: Patricia G. Bensetler, Treasurer

DATE: 1/19/79

NAME OF COMMITTEE: Tsongas for Senate Committee/MA

Ms. Bensetler called in response to the surface violation notice the committee received for the receipt of an excessive contribution from an unregistered committee. The Q3 report of the Tsongas Committee indicates that the Committee to Re-Elect John Zampareilli transferred \$5000 to the Tsongas Committee. I advised Ms. Bensetler to return the money based on the fact that the Act does not allow unregistered committees to contribute in excess of \$1000 to any federal campaign. I further advised her that the committee should return the entire amount since she would not be able to determine how many other federal campaigns the Zampareilli committee has contributed to.

Bensetler said that she understood and would respond to it as soon as she looked into the matter.

83040-100614

TSONGAS FOR SENATE COMMITTEE

Main Office - Box 58
Bolton, Massachusetts 01740
1979 JAN 20 PM 11:03

Patricia Bensetler,
Treasurer

HAND DELIVERED
79 JAN 20 PM 1:19

January 19, 1979

Federal Election Commission
1325 K Street N.W.
Washington, D.C.
20463

00012

Dear Sir/Madam;

This letter is to acknowledge the receipt of your letter dated January 5, 1979.

The committee will be returning the contribution from the Committee to Re-Elect John Zamparielli, 100 George P. Hassett Dr., Medford, Massachusetts.

Thank you for your assistance in this matter.

Sincerely,

Patricia G. Bensetler
Patricia G. Bensetler

Treasurer
Tsongas for Senate Committee

33040

52587

MEMORANDUM: FOR FILES

ANALYST: COPPEL

RE: TELECON

FROM: Patricia Bensetler, Treasurer

DATE: 3/29/79

NAME OF COMMITTEE: Tsongas for Senate Committee/MA

I called Ms. Bensetler with regards to the response we received concerning the excessive contribution from the Zamparielli Committee. I advised her that the response was not adequate, since the letter indicated that she "will be returning the contribution", making it appear that she had not done so. I also asked her to forward that cancelled check to verify the transaction. She agreed to provide the information so as to achieve compliance.

33040400646

Main Street - Box 58
Boston, Massachusetts 0174
SECRETARY OF THE SENATE

RECEIVED
FEDERAL ELECTION
COMMISSION Patricia Bensetler,
Treasurer

1979 APR -6 AM 11:56

'79 APR 4 11:14

HAND DELIVERED

Federal Election Commission
1325 K Street NW
Washington, D.C.
20463

Dear Bill,

Enclosed please find a copy of our check to John Zamparelli for \$5,000. I have also enclosed a copy of the report from the First Bank and Trust showing that the check was processed by our bank.

If you have any further questions please contact me.

You should note that the date of the payment of the check is January 19, 1979. Our report of this expenditure will appear on the first quarterly report.

Sincerley,

Patricia G. Bensetler
Treasurer
Tsongas For Senate Committee

3304020032771

K S2587 MA DEM C1052



The Commonwealth of Massachusetts

OFFICE OF DIRECTOR OF CAMPAIGN AND POLITICAL FINANCE

REPORT OF CAMPAIGN CONTRIBUTIONS AND EXPENDITURES

RECEIVED. SECRETARY OF THE SENATE 5:19 APR -6 AM 11:56 HAND DELIVERED

From February 1 19 79 Through February 28 10 79

Name of Candidate or Committee: Tsongas for Senate Committee

Office Sought: Senate

Campaign Account with: First Bank & Trust Company, Chelmsford, Mass. 01824

Beginning Balance for Period, Campaign Account \$16,691.52

772 Add: Contributions \$25.00 and over as follows: (See attached Schedules) General Contributions for reporting period \$41,950.00 Fund Raising Contributions for reporting period None TOTAL: Contributions \$25.00 and over for reporting period \$41,950.00

300 Add: Contributions under \$25.00 as follows: (See attached Schedules) General Contributions for reporting period None Fund Raising Contributions for reporting period None TOTAL: Contributions under \$25.00 for reporting period None

304 Total Contributions for reporting period \$41,950.00 Total Contributions plus Beginning Balance \$58,641.52

Deduct: Checks Paid and Other Charges as follows: (See attached Schedules) General Expenditures for reporting period \$53,109.11 Fund-Raising Expenditures for reporting period Campaign Media Expenditures for reporting period

TOTAL: Checks Paid and Other Charges for reporting period \$53,109.11

Ending balance for reporting period \$5,532.41

I, Timothy W. McLean of the above-named Bank do hereby declare that the information contained herein is true and correct to the best of my knowledge and belief.

OFFICE USE ONLY Filed By Pre Audit 2nd Audit Recommendation

Timothy W. McLean (Signature of Cashier or Treasurer)

(FOR BANK USE ONLY)

Purpose of Expenditures	Date Check Paid	Payee (Alphabetical Listing Mandatory)	Amount	
	1-19-74	Zampacetti, Committee to Elect John	5	00 00

7 3 3
9 0 4 0 2 0 0 2 6 1 7 5
7 7 5

Expenditure Page Total 5000 00


GENERAL AND MEDIA EXPENDITURES

If none apply, indicate specific purpose in space provided.

- 1. Food
- 2. Transportation
- 3. Salary
- 4. Beverages
- 5. Donation
- 6. Photography
- 7. Rental
- 8. Flowers
- 17. Postage
- 18. Television Time
- 19. Radio Time
- 20. Newspaper Advertising
- 21. Billboard Advertising
- 22. Magazine Advertising
- 23. Television
- 24. Telephone
- 25. Copying
- 26. Printing
- 27. Computer Use
- 28. Advertising Agency
- 29. Public Relations

INSTRUCTIONS TO BANK

- Color-coded forms have been provided for semi-monthly bank reports as follows:
 - (a) GENERAL and MEDIA — Contribution and Expenditures (Yellow)
 - (b) FUND-RAISING — Contributions and Expenditures (CFF — White)
 - (c) SUMMARY SHEETS — To be completed and signed by candidate or treasurer (White)
- A code legend is provided on the expenditure side of each color-coded schedule. Proper transfer of code numbers or specific purpose should be CAREFULLY made from legend to expenditure side of reporting schedule with corresponding legend.
- This form is to be prepared by candidate or committee treasurer in duplicate on the front side only, one copy to be validated and returned to treasurer or candidate, 2nd copy for your records and one to be filed with this office.

GENERAL EXPENDITURES <small>Check one. If more than one, indicate specific purpose on the front.</small>	EXPENDITURES IN CONNECTION WITH FUND RAISING ACTIVITY <small>Check one. If more than one, indicate specific purpose on the front.</small>	CAMPAIGN MEDIA EXPENSES <small>Check one.</small>
<input type="checkbox"/> 1 Fund <input type="checkbox"/> 2 Salary <input type="checkbox"/> 3 Office Expenses <input type="checkbox"/> 4 Telephone <input type="checkbox"/> 5 Printing <input type="checkbox"/> 6 Postage <input type="checkbox"/> 7 Travel <input type="checkbox"/> 8 Automobile <input type="checkbox"/> 9 Entertainment <input type="checkbox"/> 10 Food <input type="checkbox"/> 11 Rental <input type="checkbox"/> 12 Printing <input type="checkbox"/> 13 Telephone <input type="checkbox"/> 14 Postage <input type="checkbox"/> 15 Automobile <input type="checkbox"/> 16 Entertainment <input type="checkbox"/> 17 Food <input type="checkbox"/> 18 Rental <input type="checkbox"/> 19 Printing <input type="checkbox"/> 20 Telephone <input type="checkbox"/> 21 Postage <input type="checkbox"/> 22 Automobile <input type="checkbox"/> 23 Entertainment <input type="checkbox"/> 24 Food <input type="checkbox"/> 25 Rental <input type="checkbox"/> 26 Printing <input type="checkbox"/> 27 Telephone <input 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96 Printing <input type="checkbox"/> 97 Telephone <input type="checkbox"/> 98 Postage <input type="checkbox"/> 99 Automobile <input type="checkbox"/> 100 Entertainment
RETURN of Contribution		
No. 2047		
PAY <u>Five thousand</u> \$ <u>5000</u>		
TO THE ORDER OF <input checked="" type="checkbox"/> <u>Committee to Re-elect John Lampicelli</u> CAMPAIGN ACCOUNT		
ADDRESS _____		
CITY-STATE _____		
FIRST BANK & TRUST CO., CHELMSFORD, MASS.		
TSONGAS FOR SENATE COMMITTEE  AUTHORIZED SIGNATURE		
@0113069131 @ 37 854 28 @000050000C		

1-19 53-691/1137

"The undersigned affirms under the penalty of perjury that he is the named payee of this check, or an authorized officer thereof, that he or it performed the services or delivered the goods indicated herein, that the payment is for the sole purpose of paying for such goods or services and that no person other than the named payee has any interest, direct or indirect, in this payment."

For Deposit only to
The acc't # 450472 E.G.

PAY
SS.
-682

682

PAY ANY BANK
1111
1111111111

1111

0000

FEE

1829

1111

PAY ANY BANK
THE POSITION
1111111111

178
 State Commission
 Oct. 19 80
 A.C.C. 20463

EXPENSES
 (Cash, Transfers Out, Contributions in Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page _____ of _____ for
 Line Number _____

(Use Separate Schedules for
 each numbered line)

of Candidate or Committee in Full
 Name For Senate Committee

APRIL 10

Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Boston Travel 28 Dover, Mass	Travel	1-22	240.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	3-12	117.00 ✓
Schlesinger Summer Street Dorchester, Mass	Party Charges	1-8	329.08 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Windsor 119 Dorchester, Mass	Food	1-29	110.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Ed Woods	Consulting-1978	1-25	500.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	1-31	500.00
Committee to Re-Elect John Doane Road Dorchester, Mass	Zamparelli Contribution Return	1-19	5000.00 ✓
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
borah Karol 1 Bay State Road Dorchester, Mass 02769	Phone Bill	1-29	100.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Dou Barlow	Consulting	1-31	600.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
ullivan Brothers 5 Bridge Street Dorchester, Mass	Printing	3-12	393.23
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

SUBTOTAL of expenditures for this period

\$

\$



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

January 5, 1979

Committee to Re-Elect John Zamparelli
100 George P. Hasset Dr.
Medford, MA

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Tsongsas for Senate Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

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Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Bill Coppel, in our Reports Analysis Division at (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Certified Mail
Return Receipts Requested

Enclosures

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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 990

Date Filmed 6/17/83 Camera No. --- 2

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