



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TUB # 1100

Date Filmed 4/22/81 Camera No. --- 2

Cameraman BPC

FEDERAL ELECTION COMMISSION

Materials in connection
with Connelley removed
pursuant to 2750 & 437g (c)(4)(B)

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 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 checked="" type="checkbox"/> (5) Internal Documents | |

Signed _____

date _____

Augusta M. Little
3/23/87

Call - per 1100

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.....
- RESPECTED DELIVERY.
Show to whom, date, and address of delivery. \$_____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESS TO:
*Viggo
1150 Cl Ave
Ward DC 20836*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>999514</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Paul J. Tenney

4. DATE OF DELIVERY

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

FORM 381 (Rev. 5-57)

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1975-500-489



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser
Peabody, Rivlin, Lambert & Meyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of October 29, 1980, in which you requested the Commission to dismiss the above-captioned matter.

Under the circumstances, the Commission determined on March 17, 1981, to take no further action against the Courter Committee. Accordingly, the Commission has closed its file in this matter.

The file in this matter will be made public within thirty days after the Commission takes final action with respect to all respondents. 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.

Should you have any questions, please contact Suzanne Callahan at 523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Steele".

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser
Peabody, Rivlin, Lambert & Meyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

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Under the circumstances, the Commission determined on March , 1981, to take no further action against the Courter Committee. Accordingly, the Commission has closed its file in this matter.

The file in this matter will be made public within thirty days after the Commission takes final action with respect to all respondents. 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.

Should you have any questions, please contact Suzanne Callahan at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

smc
3/20

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1100
Courter for Congress Committee)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 17, 1981, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1100:

1. Take no further action against the Courter for Congress Committee.
2. Approve and send the letter attached to the General Counsel's March 6, 1981 report.
3. CLOSE THE FILE.

Commissioners Aikens, McGarry, Thomson, and Tiernan voted affirmatively for the decision; Commissioners Harris and Reiche dissented.

Attest:

3/20/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 27, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth
Sterns, Herbert & Weinroth
186 West State Street
Post Office Box 1298
Trenton, New Jersey 08607

Re: MUR 1100

Dear Mr. Weinroth:

On February 25, 1981, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file, as it pertains to your client, has been closed in this matter, and it will become a part of the public record within thirty days after the entire file is closed. 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

CALLAHAN 1100

PS Form 3811, Jan. 1979
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:
 Weirup & P
 186 W St. St.
 Weston NJ 08607

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	56867	

 (Always obtain signature of addressee or agent)

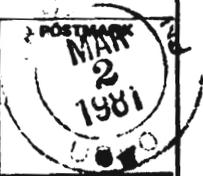
I have received the article described above.
 SIGNATURE Addressee Authorized agent

4. *M. Santoro*
 DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____

CLERK'S INITIALS _____



2 1 1 0 0 1 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth
Sterns, Herbert & Weinroth
186 West State Street
Post Office Box 1298
Trenton, New Jersey 08607

Re: MUR 1100

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

Sincerely,

Charles N. Steele
General Counsel

*Done
2/26/81*

Enclosure:

Conciliation Agreement

911911

BOOK # 377 3

✓

BEFORE THE FEDERAL ELECTION COMMISSION

JAN 21 11:22

In the Matter of)
) MUR 1100
 New Jersey GOP Congressional)
 Victory Fund)

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 New Jersey GOP Congressional Victory Fund ("Respondent") violated 2 U.S.C. § 441a.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g 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 registered with the Commission as a political committee on March 5, 1979.
 - 2. On November 3, 1978, Respondent loaned the Courter for Congress Committee \$3,000.

21700011173

JAN 21 12:28

GENERAL INVESTIGATIVE DIVISION

3. A loan is a contribution to the extent the loan remains outstanding pursuant to the definition of a contribution set forth in 2 U.S.C. § 431(e).

4. At the time the loan was made, Respondent was limited to making contributions of \$1,000 pursuant to 2 U.S.C. § 441a(a)(1)(A).

WHEREFORE, Respondent agrees:

V. Respondent's loan of \$3,000 on November 3, 1978, to the Courter for Congress Committee constitutes a violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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.

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.

27 February 1981
Date



Charles N. Steele
General Counsel
Federal Election Commission

JAN 16 1981
Date



New Jersey GOP Congressional
Victory Fund
By its Counsel

BY: _____

ITS: _____

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1100
New Jersey GOP Congressional)
Victory Fund)

CERTIFICATION

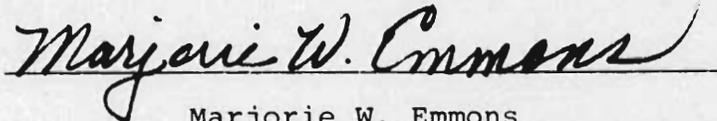
I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 25, 1981, the Commission accepted by a vote of 4-0 the conciliation agreement, as submitted with the General Counsel's February 20, 1981 memorandum, which has been signed by Richard K. Weinroth, counsel for the New Jersey GOP Congressional Victory Fund.

Commissioners McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

2/25/81

Date



Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 2-20-81, 3:08
Circulated on 48 hour vote basis: 2-23-81, 11:00

February 20, 1981

MEMORANDMM TO: Marjorie M. Emmons

FROM: Elissa T. Garr

F

SUBJECT: MUR 1100

Please have the attached Memo distributedtothe
Commission on a 48 hourrtally basis. Thank you.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

81 FEB 20 P 3: 08

February 20, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 1100 Conciliation Agreement

Attached is a conciliation agreement which has been signed by Richard K. Weinroth, counsel for the New Jersey GOP Congressional Victory Fund. The attached agreement includes all the provisions which the Commission determined should be included, and a check for the civil penalty imposed by the Commission has been received.

The Office of General Counsel recommends the acceptance of this agreement.

Attachments:

Conciliation Agreement
Photocopy of civil penalty check
Notification letter
(6 total pages)

BEFORE THE FEDERAL ELECTION COMMISSION

600#379
21 JAN 21 11:22

In the Matter of)
)
New Jersey GOP Congressional) MUR 1100
Victory Fund)

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 New Jersey GOP Congressional Victory Fund ("Respondent") violated 2 U.S.C. § 441a.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g 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 registered with the Commission as a political committee on March 5, 1979.
 - 2. On November 3, 1978, Respondent loaned the Courter for Congress Committee \$3,000.

21 JAN 21 12:25

RECEIVED
FEB 1 1980

3. A loan is a contribution to the extent the loan remains outstanding pursuant to the definition of a contribution set forth in 2 U.S.C. § 431(e).

4. At the time the loan was made, Respondent was limited to making contributions of \$1,000 pursuant to 2 U.S.C. § 441a(a)(1)(A).

WHEREFORE, Respondent agrees:

V. Respondent's loan of \$3,000 on November 3, 1978, to the Courter for Congress Committee constitutes a violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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.



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

JAN 16, 1981
Date

Charles N. Steele
General Counsel
Federal Election Commission



New Jersey GOP Congressional
Victory Fund
By its Counsel

BY: _____

ITS: _____



912037

Callahan

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P. O. BOX 1298

TRENTON, NEW JERSEY 08607

(609) 392-2100

Callahan

10 NASSAU STREET
PRINCETON, N. J. 08540
(609) 924-2108

SUITE 600
1150 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036
(202) 296-3432

JOEL H. STERNS
RICHARD K. WEINROTH
MICHAEL J. HERBERT
FRANK J. PETRINO
WILLIAM J. BIGHAM
W. S. GERALD SKEY
JOHN H. DUMONT
JOHN M. DONNELLY
ANN MARIE VAURIO
MARK D. SCHORR
SIMON KIMMELMAN
R. KEVIN MCGRORY
NIELSEN V. LEWIS

February 17, 1981

OF COUNSEL
RICHARD J. HUGHES

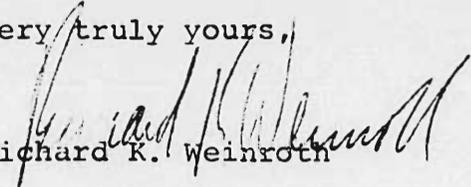
Ms. Suzanne Callahan
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1100

Dear Ms. Callahan:

Pursuant to our discussion, enclosed please find a check drawn on the Republican Party of New Jersey made payable to the Treasurer of the United States in the amount of \$250.00.

Very truly yours,


Richard K. Weinroth

RKW/cm

enclosure

cc: H. David Earling

FEB 19 1981 11:32 AM

RECEIVED
GENERAL COUNSEL

4

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U.S. GOVERNMENT PRINTING OFFICE
1975 O 500 000

413 MAY 1975
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BUREAU OF LAND MANAGEMENT
Washington, D.C. 20250

Department of the Interior
Bureau of Land Management
Washington, D.C. 20250

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth
Sterns, Herbert & Weinroth
186 West State Street
Post Office Box 1298
Trenton, New Jersey 08607

Re: MUR 1100

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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

A large, handwritten signature in black ink is located in the bottom right corner of the page.

BEFORE THE FEDERAL ELECTION COMMISSION
August 8, 1980

In the Matter of)
)
New Jersey GOP Congressional) MUR 1100
Victory Fund)
Courter for Congress Committee)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978 in violation of the limitations set forth in § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

The GOP Committee did not respond to the reason to believe notification. On March 19, 1980, the GOP Committee was sent the General Counsel's Brief recommending that the Commission find probable cause to believe the GOP Committee violated § 441a; a responsive brief was filed on March 26, 1980.

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter of February 28, 1980 to David Norcross, the Republican State Chairman of New Jersey refunding \$2,000, the excessive portion of the loan. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making this amount a direct contribution to the Courter Committee.

The General Counsel's brief recommending probable cause to believe the Courter Committee violated § 441a(f) was mailed on May 12, 1980. Robert Visser, counsel for the respondent, submitted a letter requesting conciliation prior to a finding of probable cause to believe on June 13, 1980. However, after reviewing the facts of this matter and after a conciliation meeting with OGC staff on June 20th, counsel chose to file a responsive brief which he did on July 29, 1980.

II. LEGAL ANALYSIS

(See OGC Briefs of March 19, 1980 and May 12, 1980)

The GOP Committee filed a responsive brief on March 26, 1980, stating that at the time the \$3,000 contribution was made, the GOP Committee considered itself a subordinate committee of the N.J. Republican State Committee entitled to make a \$5,000 contribution to the Courter Committee and that the contribution was a § 441a(d) expenditure.

A review of Commission records and B Index indicates that the N.J. Republican State Committee is not currently registered with the Commission nor was it registered at the time the GOP Committee made the excessive contribution to the Courter Committee; therefore, absent affiliation with a duly registered committee, the requirements set forth in § 441a for multicandidate status had not been met at the time the excessive contribution was made.

Additionally, the contribution at issue cannot be considered a § 441a(d) expenditure since the GOP Committee loaned the funds directly to the candidate rather than making expenditures on behalf of the candidate.

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.7(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a(a)(1)(A) at the time the loan was made.

The Courter Committee, through counsel, filed its responsive brief on July 29, 1980. Its counsel maintains that the Courter Committee accepted the \$3,000 loan from the GOP Committee after 1) being advised by a responsible official of the State and GOP Committee and, thus, believing that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee which itself was a qualified multicandidate party committee; 2) being advised and, thus, believing that the GOP Committee could make a loan, transfer and/or contribution to it of up to \$5,000 and 3) being advised and, thus, believing that the GOP Committee had been properly registered as a qualified multicandidate political committee with the Commission. Counsel recites that the Courter Committee, within one week after being advised that there was a question about the \$3,000 loan returned a check for \$2,000 to the GOP Committee.

Counsel maintains that the Commission's assertion as set forth in the General Counsel's brief, that it is the recipient committee's responsibility to verify the multicandidate status of donors prior to the acceptance of contributions exceeding \$1,000 "... [has] no basis in law, fact or precedent ... regarding the actions, responsibilities and duties of the Courter Committee." Counsel further contends that the statutory language and case law regarding 2 U.S.C. § 441a(f) requires that a recipient must knowingly accept

an excessive contribution and, in this case, the Courter Committee did not possess the "requisite knowledge or scienter to have violated the Act. Nor did the Courter Committee have any legal obligation or responsibility to investigate the status of the donor committee." While it is clear that the "knowingly" requirement does not make ignorance of the law a defense, it requires that the Commission prove at least constructive knowledge of the facts that made the contribution excessive. Here, the only facts that were needed to show that the \$5,000 multicandidate limit was inapplicable to the GOP Committee's contribution was 1) that the GOP Committee was not registered, and 2) the State Committee (which could be considered as an affiliate of the GOP Committee) was not registered. These facts could readily have been ascertained from public records available at the Commission and the Courter Committee had at least constructive knowledge of these negative facts.

The Courter Committee contends that the Commission cannot impose liability on the theory of constructive knowledge without a prescribed rule in accordance with the Administrative Procedure's Act. We respectfully disagree. The Commission has the responsibility of construing the provisions of the FECA in the course of a compliance proceeding. It has properly acted in imposing liability in the present case because there is a sufficient statutory basis for concluding that if a respondent has knowledge of the fact that he has accepted a contribution, he has knowingly accepted it pursuant to 2 U.S.C. § 441a(f).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Find probable cause to believe that the NJ GOP Congressional Victory Fund has violated 2 U.S.C. § 441a.
2. Find probable cause to believe that the Courter for Congress Committee has violated 2 U.S.C. § 441a(f).
3. Approve the attached conciliation agreement for the NJ GOP Congressional Victory Fund.
4. Approve the attached conciliation agreement for the Courter for Congress Committee.
5. Send attached notification letters.

14 August 1980
Date



Charles N. Steele
General Counsel

Attachments

1. Proposed Conciliation Agreements (2)
2. Letters to Respondents (2)
3. Briefs of OGC (2)
4. Briefs of Respondents (2)

BEFORE THE FEDERAL ELECTION COMMISSION
 March 31, 1980

In the Matter of)	
)	MUR 1100
New Jersey GOP Congressional)	
Victory Fund)	
Courter for Congress Committee)	

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan to David Norcross, the Republican State Chairman of New Jersey. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

II. Legal Analysis

As set forth in 2 U.S.C. §441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. §441a (a)(1)(A) at the time the loan was made.

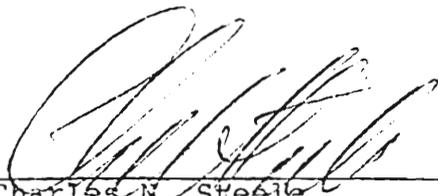
It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee's status under §441a.

Therefore, the Courter for Congress Committee violated 2 U.S.C. §441a at the time it accepted the subject loan even though it refunded the excessive portion as soon as it discovered the GOP Committee was not a multicandidate committee.

III. General Counsel's Recommendation

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

12 May 1980
Date


Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION
March 10, 1980

In the Matter of)
) MUR 1100
New Jersey GOP Congressional)
Victory Fund)
Courter for Congress Committee)

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan, to David Norcross, the Republican State Chairman of New Jersey. (Attachment I). The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

II. Legal Analysis

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000, per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

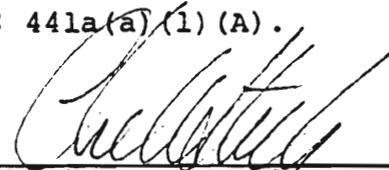
Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a (a)(1)(A) at the time the loan was made.

The GOP Committee did not provide additional information in response to the Commission's reason to believe notification. Therefore, absent evidence which refutes the Commission's earlier determination, the Office of General Counsel recommends the Commission find probable cause to believe the GOP Committee has violated 2 U.S.C. § 441a(a)(1)(A).

III. General Counsel's Recommendation

Find probable cause to believe the New Jersey GOP Congressional Victory Fund has violated 2 U.S.C. § 441a(a)(1)(A).

17 March 1980
Date



Charles N. Steele
General Counsel

RICHARD K. WEINROTH
MICHAEL J. HERBERT
FRANK J. PETRINO
WILLIAM J. BIGHAM
W. S. GERALD SKEY
JOHN H. DUMONT
JOHN M. DONNELLY
ANN MARIE VAURIO
MARK D. SCHORR
SIMON KIMMELMAN
R. KEVIN McGRORY

OF COUNSEL
RICHARD J. HUGHES

TRENTON, NEW JERSEY 08607

800 392-2100

(800) 924-2108

SUITE 600
1150 SEVENTEENTH STREET N.W.
WASHINGTON, D.C. 20036
(202) 296 3432

March 26, 1980

ATTACHMENT 4 (17 pgs)

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

Re: MUR 1100

Dear Ms. Callahan:

As counsel to the New Jersey Republican State Committee, I have been asked to review your correspondence and brief of March 19, 1980 relative to the New Jersey GOP Congressional Victory Fund ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"). At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman

10 MAR 31 12:52

RECEIVED
GENERAL COUNSEL

007217

ATTACHMENT

None

INSTRUCTIONS INITIATED BY RAD:

Ms. Suzanne Callahan

-2-

March 26, 1980

Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979.

Should there be a finding that a technical violation of 2 U.S.C. Article a (a) (1) be found to have occurred, it is respectfully submitted that said violation was inadvertent and that with the return of the aforementioned \$2,000.00 has been made moot. I will await your response with respect to this matter.

Very truly yours,



Richard K. Weinroth

RKW/cc

Enclosure

cc: Honorable James Courter
Mr. David Norcross
Mr. David Earling

RETURN RECEIPT REQUESTED

Callahan

LAW OFFICES

2047 409293

ABODY, RIVLIN, LAMBERT & MILLERS

RECEIVED

WASHINGTON, D. C. 20036

ENDICOTT PEABODY
LEWIS A. RIVLIN
JEREMIAH O. LAMBERT
TEOSON J. MEYERS
CHARLES T. GUNCAN
JORGE L. CORDOVA, JR.
DAVID J. TAYLOR
MICHAEL W. FABER
TIMOTHY J. WATERS
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CHARLES R. WORK
JOHN A. HODGES
ROBERT H. MORSE
ROBERT A. WARREN
ROBERT N. JENSEN
COLLISTER JOHNSON, JR.
JOHN LOCKIE
ROBERT P. VISSER

TWELFTH FLOOR
CONNECTICUT BUILDING
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000
CABLE ADDRESS "EXCELSIOR"
TELEX 887413

NATHALIE P. GILFOYLE
LAWRENCE WHITE
SANDRA M. KAYDEN
JEANNE A. CARPENTER
JOHN MARK JANSEN
SUSAN M. LISS
NANCY MARIE STILES
MICHAEL W. SEASLEY
ROBERT J. MILLER
GLENN R. REICHARDT
JOEL S. WINNIK
WILLIAM O. COSTON
RALPH A. SIMMONS
JEFFREY N. MARTIN
ROBERT A. HAZEL

OF COUNSEL
TIMOTHY L. HARKER

July 28, 1980

WRITER'S DIRECT DIAL NUMBER
(202) 457-1019

BY HAND DELIVERY

Ms. Marjorie W. Emmons
Secretary
Federal Election Commission
1325 K Street NW
Washington DC 20463

Re: MUR-1100

Dear Ms. Emmons,

This brief is being submitted on behalf of the Courter for Congress Committee ("Courter Committee") in response to the brief of the General Counsel of the Federal Election Commission ("Commission"), dated May 12, 1980, recommending that the Commission find probable cause to believe that the Courter Committee violated Section 441a(f), Title 2, United States Code, with regard to the above-referenced Matter Under Review.

I. SUMMARY OF FACTS

A thorough review of the chronological and factual background is essential to a complete understanding and analysis of this matter. In fact, the following review of the facts and circumstances of this case mandate that the General Counsel's recommendation be rejected as without any foundation in law or fact and that this proceeding be dismissed in its entirety forthwith.

On November 3, 1978, the Courter Committee received a three thousand Dollar (\$3,000) loan from the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee"). At the time of the loan, the Courter Committee was advised by a responsible official of the State and GOP Committees and believed that

Ms. Marjorie W. Emmons
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Page Two

the GOP Committee was a subordinate committee of the New Jersey Republican State Committee ("State Committee") which was a qualified multicandidate party committee. At the time the Courter Committee was similarly advised and believed that the GOP Committee could make a loan, transfer and/or contribution to it of up to five thousand Dollars (\$5,000). Moreover, the Courter Committee was also advised and believed that the GOP Committee had been properly registered as a qualified multicandidate political committee with the Commission.

On February 21, 1979, the GOP Committee was apparently contacted by the Reports and Analysis Division of the Commission and advised that the Commission believed that the GOP Committee's three thousand Dollar (\$3,000) loan "may" violate 2 U.S.C. §441a(a)(1)(A). Mr. Walter Peters, then Executive Director of the State Committee, immediately advised the Courter Committee of the Commission's allegations and again advised the Courter Committee at that time that (a) the State Committee believed that it had acted properly, (b) the GOP Committee was a properly organized and qualified subordinate committee of the State Committee, and (c) that it would defend its actions before the Commission.

Within one week, on February 28, 1979, Congressman Courter wrote a letter to David Norcross, Chairman of the State Committee, noting that there "seems to be some question concerning the loan that the [GOP Committee] made to my campaign" and returned a check from the Courter Committee in the amount of two thousand Dollars (\$2,000) to the GOP Committee.

On February 22, 1980, over fifteen (15) months after the initial loan transaction, the Commission notified the Courter Committee for the first time of its "Reason to Believe Finding" that the Courter Committee's acceptance of the loan "appears" to violate 2 U.S.C. §441(a)(f). It should be noted that this notification was sent by the Commission fully one year after it had initiated compliance proceedings against the GOP Committee.

Again, within one week of the Commission's notification, on February 29, 1980, Congressman Courter personally wrote to Commissioner Tiernan reviewing the facts of the loan and stating that the Courter Committee did not "knowingly" accept this contribution in violation of the law. The Congressman stated that, in fact, the Committee assumed that "the [GOP Committee] was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to five thousand Dollars (\$5,000) per candidate in the general election of 1978". Apparently assuming that the Commission must have

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some basis for its allegation, he continued that, as this "[o]bviously was not the case", his Committee would not have accepted any such loan if it had known that the GOP Committee was not properly registered with the Federal Election Commission.

In fact, the facts establish that Congressman Courter and his campaign committee had done more than just "assume" such proper qualification and registration of the GOP Committee. As set forth above, the Courter Committee received the affirmative representation of an appropriate officer of the State Committee that this loan was appropriate and had been "approved by the [Commission].

Moreover, it is my understanding that the "GOP Committee" has denied the Commission's allegations that said committee did not attain multicandidate committee status pursuant to §441a(a)(4) during the time it was registered. To the contrary, as late as March 26, 1980, counsel for the GOP Committee defended that Committee's actions and stated that the GOP Committee had properly registered with the Commission and, moreover, that the GOP Committee was a subordinate committee of the State Committee and entitled to make a loan of up to five thousand Dollars (\$5,000) at that time.

In particular, on March 26, 1980, Richard K. Weinroth, as Counsel to the State Committee, responded to the March 19, 1980, Brief of the Commission with regard to the GOP Committee and the Courter Committee. Mr. Weinroth stated that:

At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979. (Emphasis supplied.)

On May 12, 1980, despite the clear and convincing evidence that the Courter Committee had acted properly and acted upon the representations and advice of the State and GOP Committees, the Commission advised Ray Mark, Treasurer of the Courter Committee, that "after considering all of 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 violation had occurred." Enclosed with that letter was a copy of the General Counsel's Brief, dated May 12, 1980, which summarized certain of the facts regarding this matter and concluded that:

(a) the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status and was therefore limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000; and,

(b) [i]t is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of the contributions exceeding \$1,000," and, accordingly, "the Courter Committee should have contacted the FEC to ascertain the GOP's Committee status under §441(a).

Simply stated, there is absolutely no basis in law, fact or precedent to support this incredulous conclusion regarding the actions, responsibilities and duties of the Courter Committee. It is clear from reading the statutory language and the applicable case law regarding the "knowingly accept" provision, that the Committee did not possess the requisite knowledge

or scienter to have violated the Act. Nor did the Courter Committee have any legal obligation or responsibility to investigate the status of the donor committee.

In addition, the imposition of a new rule of strict liability by the Commission regarding such "constructive knowledge" or duties of investigation, without the necessary steps contained within the Commission's own enabling statute concerning the promulgation of rules, goes beyond the scope of its authority. Such action also violates applicable provisions of the Administrative Procedure Act regarding rulemaking procedures, as well as fundamental constitutional guarantees of due process of law.

The Courter Committee has demonstrated complete good faith in this matter. In the face of the unconscionable delay on the part of the Commission in this proceeding and the fact that the issue is moot, this matter should be dismissed at once. Any other result would work grave injustice and constitute unconstitutional behavior by the Commission.

II. ARGUMENT

A. The Courter Committee Did Not Knowingly Accept Any Contribution In Violation of the Act.

Section 441(a)(f) of the Federal Election Campaign Act of 1971, as amended, 1/ provides:

No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section. (Emphasis supplied.)

The very plain and unambiguous language of this Act reflects Congress's concern with the requirement of knowledge as a key and fundamental element in any violation thereof. Clearly

1/ 2 U.S.C. §441a(f).

the legislative intent was to limit liability to those individuals or groups that accept monies with the full knowledge and understanding that they are in violation of the provisions of the Act. This is not only the common meaning interpretation of the Act's statutory language, it is also the only reasonable interpretation which furthers the legitimate legislative and public interests of the Act.

This interpretation is further supported by the legislative history of the Act. The qualification of knowing acceptance did not appear in the original Senate bill, but was added by amendment on the Senate floor. 2/ This demonstrates the importance attached to the knowledge requirement and is further supported by colloquy during the Senate floor debates. Senator Scott expressed concern about the possibility of criminal penalties without the requirement of knowledge in stating:

So, Mr. President, you can go to jail without meaning to do so, or you can go to jail without violating the law, or you can go to jail because somebody takes part of your contribution and applies it in a way you did not know about or did not intend. 3/ (Emphasis supplied.)

Senators Prouty, Griffin, Baker, Cook and Stevens expressed similar concerns:

In view of this we would urge the Committee on Rules and Administration to carefully examine such provisions so as to insure that contributors are clearly on notice concerning the law. This is essential in order to avoid placing individuals in jeopardy or inadvertently in violation of the law without this knowledge. 4/ (Emphasis supplied.)

2/ See, S.Rep. No. 96, 92d Cong., 1st Sess. (1971); and Amendment introduced by Mr. Mathias on August 4, 1971, 117 Cong. Rec. 29296 (1971).

3/ 117 Cong. Rec. 29296 (1971).

4/ S.Rep. No. 96, 92d Cong., 1st Sess. (1971) at 88.

The applicable case law confirms and amplifies this interpretation. In In Re Federal Election Campaign Act Litigation, 474 F.Supp. 1044 (D.D.C. 1979) the D.C. District Court spoke to the issue of knowing acceptance. The complaint was brought by a citizen alleging violations by numerous candidates of Section 441(a)(f) of the Act. In dismissing the complaint, the court held that it failed to allege all of the elements necessary to constitute a violation. It found that "as part of this violation, the candidates must have been aware of the illegal nature of the contributions." 5/ The court went on to note:

[The Plaintiff] has not stated that any of the candidates or their committees knowingly accepted donations from separate political action committees which were subject to the same control. Moreover, he has not presented the slightest evidence that the accused parties possessed knowledge of the illicit control. His silence on this critical point is, by itself, sufficient reason not to investigate the allegation. 6/ (Emphasis supplied.)

The language demonstrates that the court interpreted "knowing acceptance" to mean that the candidate must not only know of the acceptance of the monies, but also of its illegal nature. Only this complete knowledge can qualify as a knowing acceptance.

Moreover, in a recent decision by the District of Columbia Court of Appeals in AFL-CIO v. Federal Election Commission 7/, decided April 1, 1980, the Court held that (a) there must be found that there was "clear and convincing" evidence that a violation of the Act was "knowing and willful" as well as (b) a finding that the respondent's belief in the legitimacy of its actions were "unreasonable", in order for a civil penalty to be imposed under the Act. In that case, the court also concluded that the actions of respondent were properly characterized as the "correction of a mistake" and did not constitute knowing and willful violations of the Act.

5/ 474 F.Supp. 1044, 1047, n. 3.

6/ 474 F.Supp. 1044, 1947.

7/ 48 U.S. Law Week 2684 (4/22/80).

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Page Eight

Similarly, in the instant case, the clear and convincing evidence is that the Courter Committee not only did not know that the Commission belatedly believed that the GOP Committee was not a qualified multicandidate committee, but that it believed and relied upon the affirmative representations from both the State and GOP Committees that they were so qualified. In fact, it has not yet been established that they were not so qualified and counsel for the State and GOP Committees currently maintain that they were and are so qualified.

Second, it is perfectly clear that the Courter Committee relied and acted upon such representations and belief in a reasonable manner. When a qualified representative of a State party committee advises a candidate that it, along with its properly qualified subordinate committee, can make a contribution of the nature and amount which the GOP Committee did make, it is unreasonable to ask or require a candidate committee to launch an investigation into the accuracy of such representations.

Finally, the Courter Committee has acted in total good faith by both returning the alleged excessive contribution as soon as it was advised there may be a question as to the status of the donor committee and by openly and candidly responding to the belated Commission inquiry. Such activity reflects the Courter Committee's intention to correct any mistake that may inadvertently have been made by the State and GOP Committees. No mistake of any kind, inadvertent or otherwise, has been made by the Courter Committee requiring any corrective action on its part.

Clearly the Courter Committee did not violate this section of the Act. Not only was the Committee of the reasonable belief that the contributing organization was authorized to loan \$3,000, but it was further assured of this fact by the Executive Director of the State Committee. Since the Courter Committee's actions are not proscribed by the Act, this action must be dismissed.

B. The Commission's Actions Are Arbitrary,
Capricious, and Have No Foundation in
Either Law or Fact.

1. The Commission's Imposition of a
Standard of Strict Liability is
Without Precedent or Basis in Law.

A review of the formal determinations of the Commission in this proceeding are quite startling.

In the Notification of Reason to Believe Findings, dated February 5, 1980, the Commission noted that the "Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee." Without setting forth any factual basis for its bald conclusion, the Commission concluded that it "appears" the GOP Committee's \$3,000 loan "may" violate the Act and "the Courter Committee's acceptance of the loan appears to violate" the Act. (Emphasis supplied.) Three months later, the Brief of the General Counsel recommending a finding of probable cause to believe that the Courter Committee violated the Act, for the first time, sets forth the unsubstantiated and unsustainable basis on which the Commission is attempting to prosecute this matter.

After asserting, again without any factual basis or substantiation whatsoever, that the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, the Commission concludes that the Courter Committee violated 2 U.S.C. §441(a) at the time it accepted the subject loan even though it refunded the excessive portion as soon as it was advised the GOP may not be a multicandidate committee. The rickety bridge on which the Commission seeks to support its conclusion is set forth in the last page of the Brief of the General Counsel wherein it sets forth the following original doctrine of strict liability:

It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee status under §441(a).

Ms. Marjorie W. Emmons
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This simple statement is startling to anyone who has practiced before the Commission and to any attorney or other person familiar with the Act as it has evolved since 1971. There is no provision in the Act, no regulation and simply no precedent before any court of law or before the Commission itself, wherein such a doctrine of strict liability on the part of any candidate or candidate committee has ever before been publicly espoused, promulgated, or adopted. The Commission apparently is attempting through administrative compliance procedures to create a doctrine of "constructive knowledge" resulting in strict liability for any candidate who does not fully investigate the source of a contribution to determine whether or not it is being made in violation of the Act or regulations promulgated thereunder. There is simply no such law, requirement or obligation on the part of any candidate or candidate committee extant in the law today.

Such a proposition flies in the face of the Act itself which requires a knowing acceptance of such an illegal contribution. Such a proposition flies in the face of the Administrative Procedure Act and the Commission's rulemaking requirements. Such a proposition flies in the face of the United States Constitution in that it seeks to impose civil and criminal penalties and to deprive a candidate and/or his committee of valuable rights and property without due process of law. Such a proposition, as a practical matter, is unenforceable, untenable, and preposterous on its face and, in all probability, would certainly not be accepted by the United States Congress if proposed in the requisite and appropriate procedure. Such a proposition does fundamental violence to the good will and voluntary compliance necessary by those subject to the Act in order to make the Act work effectively within today's political process.

As an attorney who has practiced before the Commission for a number of years, I know of no proposal, requirement, or rule of law that would suggest that candidates and their committees must be advised to make absolutely certain that donors are properly qualified to give contributions in the amount and nature that are sought to be made. That is not to say, arguendo, that if facts are brought to the attention of a candidate or his committee which would lead a reasonable person to believe that such a contribution may be illegal or in violation of the Act, either intentionally or inadvertently, one may not have some responsibility to make an appropriate inquiry under all of the facts and circumstances. Such a case may occur if a candidate were to receive a contribution written on a corporate account

Ms. Marjorie W. Emmons
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Page Eleven

without any indication as to whether or not it was actually the personal and individual contribution of a corporate executive or the contribution of a corporate political action committee as opposed to an inadvertent illegal corporate contribution from an incorporated entity unfamiliar with the Act. Under such circumstances, it may be appropriate for the candidate committee to make a reasonable inquiry in order to resolve the question prior to its acceptance. The Commission has set forth certain guidelines as to the acceptance of such corporate contributions and the manner in which they should be handled until the matter is clarified.

Contrast that situation, however, with the matter at hand. In the instant case, if the Courter Committee had asked whether or not the GOP Committee was a properly qualified multi-candidate committee or subordinate committee of a properly qualified state committee, it would have then, as now, received an affirmative response. In fact, these representations were affirmatively made by the State and GOP Committees' Executive Director and it was perfectly reasonable for the Courter Committee to rely upon such official statements. Moreover, counsel for the State and GOP Committees currently maintains that said committees were properly qualified and capable of making such a contribution. There was no inquiry of the State and GOP Committees at the time which could have been made that would have enabled the Courter Committee to learn of the Commission's position with regard to the qualification of said committee. It is true that the Courter Committee could have made an inquiry of the Commission, but there is no requirement that it do so, nor would it appear even remotely reasonable that it should unilaterally have taken such action under the facts and circumstances of this case.

2. The Arbitrary Imposition of a New Rule or Obligation is Beyond the Scope of the Commission's Authority.

The Courter Committee expressly did not "knowingly accept" any illegal contribution or act in violation of the Act. To interpret its activity in any other way, the Commission would have to impose a new duty upon candidates to affirmatively investigate all potential contributors regardless of the circumstances. This obligation is cited in the General Counsel's Brief without any supporting authority. Not only is this duty not contained within the Act, as noted above, but its imposition is, in effect, the promulgation of a new and unprecedented rule. It is beyond the scope of the Commission's authority to arbitrarily enact new

rules or regulations without following the explicit procedures mandated by its own enabling statute.

Section 438(d)(1) of the Act provides:

Before prescribing any rule, regulation, or form under this section or any other provision of this Act, the Commission shall transmit a statement with respect to such rule, regulation, or form to the Senate and the House of Representatives, in accordance with this subsection. Such statement shall set forth the proposed rule, regulation, or form, and shall contain a detailed explanation and justification of it. 8/

This provision evidences the Legislature's intent to maintain a firm hand on the powers of the Commission and to review its proposed regulations carefully. To disregard these parameters would be to usurp powers that the Legislature has appropriately reserved for itself. Such an ultra vires act would be unconstitutional.

The procedures required in rulemaking are laid out for agencies generally in Section 553 of the Administrative Procedure Act which provides:

General notice of proposed rule making shall be published in the Federal Register, unless persons subject thereto are named and either personally served or otherwise have actual notice thereof in accordance with law. The notice shall include:

- (1) a statement of the time, place and nature of public rulemaking proceedings;
- (2) reference to the legal authority under which the rule is proposed; and
- (3) either the terms or substance of the proposed rule or a description of the subjects and issues involved. 9/ (Emphasis supplied.)

8/ 2 U.S.C. §438(d)(1).

9/ 5 U.S.C. §553(b).

The law is clear that the Commission may not promulgate new rules without complying with explicit procedures provided for in its own statute and in the Administrative Procedure Act. The justifications for these procedures are to prevent the agencies from working injustice against those who would be without "actual notice" of its rules and regulations. To operate outside of these legislatively established bounds is an unconstitutional encroachment upon the sphere legitimately reserved for the Legislature.

C. The Federal Election Commission
Has Effected an Unconscionable
Period of Delay.

The loan in issue was received by the Courter Committee on November 3, 1979. The Committee was first advised of the alleged violation on February 21 of that year. Within one week the excess monies were promptly returned by the Courter Committee to the GOP Committee. The Commission did not formally begin compliance proceedings until fifteen months after the loan transaction occurred and fully one year after it had initiated compliance proceedings against the GOP Committee. No justification or explanation has been offered by the Commission in regard to this unreasonable and unconscionable delay.

Moreover, the Courter Committee has demonstrated complete good faith by its actions in this matter. Within one week of notice of the possible improper nature of the contribution, that money was returned. The intent of possible violators is important, and the Courter Committee certainly demonstrated every intention of following, and did follow, both the letter and spirit of the law.10/

10/ The D.C. Court recently discussed a related state of mind issue in Common Cause v. National Archives and Records Services, (April 30, 1980). D.C. Civil Action No. 77-0297; Slip Opinion No. 79-1637. In a matter dealing with the reporting provisions of the F.E.C.A., the court states on page 10, note 11: "The penalties prescribed by law do vary with the state of mind of the recipient." In addition, the Court of Appeals in Pennsylvania in United States v. Hankin, reversed a conviction for violation of the Act stating, the Act "is to be liberally interpreted in favor of the accused." 607 F.2d 611, 615 (3rd Cir. 1979).

III. CONCLUSION

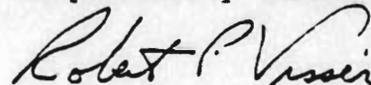
This Matter Under Review must be dismissed. There has been no violation of any provision of the Act by the Courter Committee and certainly no "knowing violation" of any provision of the Act or regulations promulgated thereunder. The Courter Committee acted in good faith in accepting the loan and, furthermore, acted upon the explicit representation of an appropriate official of the State and GOP Committees that it could make such a loan. Any other interpretation of this provision of the Act would amount to the promulgation of a new rule by the Commission and cannot be effected without compliance with express statutory procedures and with the Administrative Procedure Act.

In particular, the shocking proposal by the Commission in this case of requiring imposition of a new rule of strict liability on the part of a candidate's committee regarding their "constructive knowledge" or duties of investigation, is without any basis in law or precedent. Such action on the part of the Commission would constitute arbitrary and capricious action beyond the scope of its authority. In addition, such action would violate fundamental constitutional guarantees of due process of law.

Contrasted with the prompt response of the Courter Committee, the actions of the Commission in seeking to institute compliance proceedings a full year after the facts of this incident were known to the Commission, and fully a year after it had already initiated compliance proceedings against the State and GOP Committees, is unconscionable. To balance the equities in this case requires that the recommendation of the General Counsel be totally rejected and that this Matter Under Review be dismissed at once. To do otherwise would be to work a grave injustice and constitute arbitrary, capricious and unconstitutional action by the Commission.

Finally, in considering the importance of voluntary compliance under the Act and the importance of the public interests to be served in instituting compliance actions, there are clearly no legitimate goals nor public interests to be served by continuing this investigation against the Courter Committee. Accordingly, this proceeding should be dismissed at once by the Commission.

Respectfully submitted,



Robert P. Visser

Ms. Marjorie W. Emmons
July 28, 1980
Page Fifteen

cc: By Hand Delivery
Charles N. Steele, Esq.
Thomas J. Whitehead, Esq.
Suzanne Callahan, Esq.

cc: Hon. James A. Courter
Mr. Ray Mark



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: AUGUST 5, 1980
SUBJECT: MUR 1100 - Interim Investigative Report #1
dated 8-1-80; Signed 8-4-80; Received
in OCS 8-4-80, 11:52

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, August 4, 1980.

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

August 4, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1100

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION
August 1, 1980

In the Matter of)
)
) MUR 1100
New Jersey GOP Congressional)
Victory Fund)
Courter for Congress Committee)

Interim Investigative Report #1

The General Counsel's Brief recommending probable cause to believe that the Courter for Congress Committee violated 2 U.S.C. §441a(f) was mailed to the respondent on May 12, 1980.

Robert Visser, counsel for the respondent, submitted a letter requesting conciliation prior to a finding of probable cause to believe on June 13, 1980. However, after reviewing the facts of this matter and meeting with OGC staff on June 20th, counsel decided to file a responsive brief; he did so on July 29, 1980.

The Office of General Counsel is currently preparing a final General Counsel's Report in connection with this matter. We expect to forward our report to the Commission within ten days.

Date: 4 August 1980



Charles N. Steele..
General Counsel

80 AUG 4

52

LAW OFFICES
PEABODY, RIVLIN, LAMBERT & MEYERS

WASHINGTON, D. C. 20036

TWELFTH FLOOR
CONNECTICUT BUILDING
1150 CONNECTICUT AVENUE, N. W.

TELEPHONE (202) 457-1000
CABLE ADDRESS "EXCELSIOR"
TELEX 897413

June 13, 1980

ENDICOTT PEABODY
LEWIS A. RIVLIN
JEREMIAH D. LAMBERT
TEDSON J. MEYERS
CHARLES T. DUNCAN
JORGE L. CORDOVA, JR.
DAVID J. TAYLOR
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ROBERT A. WARDEN
ROBERT N. JENSEN
COLLISTER JOHNSON, JR.
JOHN LOCKIE
ROBERT P. VISSER

RECEIVED
JUN 16 1980
NATHALIE P. GILFOYLE
LAWRENCE WHITE
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WILLIAM D. COSTON
RALPH A. SIMMONS
JEFFREY N. MARTIN
ROBERT A. HAZEL
OF COUNSEL
TIMOTHY L. HARKER

WRITER'S DIRECT DIAL NUMBER

(202) 457-1019

BY HAND DELIVERY

Ms. Suzanne Callahan
Federal Election Commission
1325 K Street NW
Washington DC 20463

Dear Ms. Callahan,

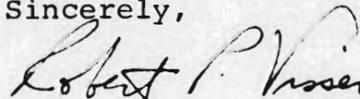
Re: MUR 1100

Reference is made to Mr. Steele's letter dated June 6, 1980, extending the time of the Courter for Congress Committee until today in which to file a responsive brief in connection with the above-referenced matter.

As we discussed, following a review of the factual background of this matter, I have requested a meeting with you and Mr. Whitehead for the purposes of informal conciliation of this matter. That meeting has been set for 11 o'clock on next Friday, June 20th, at your office. In view of the approved request, I respectfully reserve my right to file any such responsive brief dependent upon the outcome of such informal conciliation.

I thank you for your consideration in this matter and look forward to seeing you next week.

Sincerely,



Robert P. Visser

cc: Hon. James A. Courter



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser
Peabody, Rinlin, Lambert & Meyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June 5, 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

● 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). <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 <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom, date, and address of delivery. \$ _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESS TO: Robert P. Visser Peabody, Rinlin, Lambert & Meyers 1150 Conn. Ave., N.W. Wash. D.C. 20036	3. ARTICLE DESCRIPTION: REGISTERED NO. 945081 CERTIFIED NO. _____ INSURED \$ _____
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent J. Cohen	
4. DATE OF DELIVERY	INITIALS JUN 10 1980
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	

MUR-1100 Callahan



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser
Peabody, Rinlin, Lambert & Méyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June , 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

CS
Sincerely,

CS
Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1100
Courter for Congress Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 5, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1100:

1. Approve counsel's request for an extension of time in which to file a responsive brief until June 13, 1980.
2. Send the notification letter, as attached to the Memorandum to the Commission dated June 4, 1980.

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

Attest:

6/5/80

Date

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

Received in Office of the Commission Secretary: 6-4-80, 11:04
Circulated on 48 hour vote basis: 6-4-80, 4:00

June 4, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1100

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 JUN 4 11:04

June 4, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: Extension request - MUR 1100

On May 30, 1980, the Office of General Counsel received a request from Robert Visser, counsel to the Courter for Congress Committee, for an extension of time in which to file a responsive brief in connection with MUR 1100.

Mr. Visser's letter indicates that he has just been retained by the Courter Committee and would like an opportunity to respond to our brief; Visser has requested an extension until June 13, 1980.

Under the circumstances, the Office of General Counsel recommends that Mr. Visser be granted an extension until June 13th.

Recommendation

1. Approve counsel's request for an extension of time in which to file a responsive brief until June 13, 1980.
2. Send attached notification letter.

Attachments

1. Counsel's letter of May 28, 1980
2. Proposed Notification Letter

Callahan

LAW OFFICES

PEABODY, RIVLIN, LAMBERT & MEYERS

WASHINGTON, D. C. 20036

ENDICOTT PEABODY
LEWIS A. RIVLIN
JEREMIAH D. LAMBERT
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ROBERT N. JENSEN
COLLISTER JOHNSON, JR.
JOHN LOCKIE
ROBERT P. VISSER

MAY 30 P 1: 15 TWELFTH FLOOR
CONNECTICUT BUILDING
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000
CABLE ADDRESS "EXCELSIOR"
TELEX 897413

May 28, 1980

NATHALIE P. GILFOYLE
LAWRENCE WHITE
SANDA M. KAYDEN
JEANNE A. CARPENTER
JOHN MARK JANSEN
SUSAN M. LISS
NANCY MARIE STILES
MICHAEL W. BEASLEY
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JOEL S. WINNIK
WILLIAM D. COSTON
RALPH A. SIMMONS
JEFFREY N. MARTIN
ROBERT A. HAZEL
OF COUNSEL
TIMOTHY L. HARKER

WRITERS DIRECT DIAL NUMBER

By Hand Delivery

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1100

Dear Mr. Steele:

Pursuant to my telephone conversation today with Mr. Whitehead of your office, this is to confirm that I have this date been retained as Counsel to the Courter for Congress Committee in connection with the above-referenced Matter Under Review.

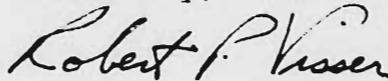
By letter, dated May 12, 1980 from you to Ray Mark, Treasurer for the Courter for Congress Committee, you stated that the Federal Election Committee, on February 20, 1980, has found reason to believe that the Courter for Congress Committee has violated Section 441(a) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. In accordance with FEC regulations, the Committee was accorded fifteen days in which to submit a reply brief stating its position on the issues and replying to the brief of the General Counsel. In view of the fact that I have just been retained as counsel in connection with this matter, and in order to fully familiarize myself with the facts and circumstances regarding this situation, I hereby respectfully request that the Committee be granted a two week extension through Friday, June 13 during which it may formally respond to your notice. Following such factual review, I would also appreciate the opportunity to meet with Ms. Callahan to discuss this matter preparatory to requesting informal conciliation.

PEABODY, RIVLIN, LAMBERT & MEYERS

Charles N. Steele, Esq.
May 28, 1980
Page Two

Thank you for your consideration of this matter. In view of the brief time available in which to respond, I would appreciate it if you would please notify me of such extension by telephone.

Sincerely,



Robert P. Visser

RPV/dbk

cc: Mr. Ray Mark

cc: By Hand Delivery

Marjorie W. Emmons
Thomas J. Whitehead, Esq.
Suzanne Callahan, Esq.
Roger A. Bodman



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Visser
Peabody, Rinlin, Lambert & Méyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June , 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer
Courter for Congress Committee
121 Shelly Drive, Suite 2B
Hackettstown, NJ 07840

Re: MUR 1100

Dear Mr. Mark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the Courter for Congress Committee violated section 441a 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.

Ray Mark, Treasurer
Page 2

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.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

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
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2. ARTICLE ADDRESSED TO:
Ray Mark, Treasurer
121 Shelly Drive, Suite 2B
Hackettstown, NJ 07840

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
| 944767 |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
5-15-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK: HACKETTSTOWN NJ 07840 MAY 15 1980

☆ U.S. POSTAL SERVICE ☆ PO: 878-278-388

mur-1100 Callahan-

May 12, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1100

Please have the attached Memo and brief distributed to the Commission for their information. Thank you.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 12, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1100

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 12, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

BEFORE THE FEDERAL ELECTION COMMISSION
March 31, 1980

In the Matter of)
) MUR 1100
New Jersey GOP Congressional)
Victory Fund)
Courter for Congress Committee)

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan to David Norcross, the Republican State Chairman of New Jersey. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

II. Legal Analysis

As set forth in 2 U.S.C. §441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. §441a (a)(1)(A) at the time the loan was made.

It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee's status under §441a.

Therefore, the Courter for Congress Committee violated 2 U.S.C. §441a at the time it accepted the subject loan even though it refunded the excessive portion as soon as it discovered the GOP Committee was not a multicandidate committee.

III. General Counsel's Recommendation

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

12 May 1980
Date



Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer
Courter for Congress Committee
121 Shelly Drive, Suite 2B
Hackettstown, NJ 07840

Re: MUR 1100

Dear Mr. Mark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the Courter for Congress Committee violated section 441a 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.

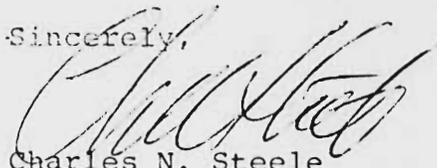
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the 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.

Ray Mark, Treasurer
Page 2

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.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer
New Jersey GOP Congressional
Victory Fund
28 West State Street, Suite 612
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the New Jersey GOP Congressional Victory Fund violated section 441a 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.

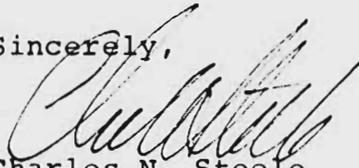
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the 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.

Walter T. Peters
Page 2

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.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

● 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). <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 <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery. (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Walter T. Peters, Jr.,	
3. ARTICLE DESCRIPTION: REGISTERED NO. 944209	INSURED NO.
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent E. Martin	
4. DATE OF DELIVERY MAR 24 1980	
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★ 890: 1978-472-202

MUR 1100 (Callahan)

RECEIVED
GCC# 1506
MAY 29 PM 1:05

LAW OFFICES
PEABODY, RIVLIN, LAMBERT & MEYERS

WASHINGTON, D.C. 20036

TWELFTH FLOOR
CONNECTICUT BUILDING
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000
CABLE ADDRESS "EXCELSIOR"
TELEX 897413

May 28, 1980

08228

ENDICOTT PEABODY
LEWIS A. RIVLIN
JEREMIAH D. LAMBERT
TEDSON J. MEYERS
CHARLES T. DUNCAN
JORGE L. CORDOVA, JR.
DAVID J. TAYLOR
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ROBERT P. VISSER

NATHALIE P. GILFOYLE
LAWRENCE WHITE
SANDA M. KAYDEN
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JOEL S. WINNIK
WILLIAM D. COSTON
RALPH A. SIMMONS
JEFFREY N. MARTIN
ROBERT A. HAZEL
OF COUNSEL
TIMOTHY L. HARKER

WRITERS DIRECT DIAL NUMBER

By Hand Delivery

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1100

Dear Mr. Steele:

Pursuant to my telephone conversation today with Mr. Whitehead of your office, this is to confirm that I have this date been retained as Counsel to the Courter for Congress Committee in connection with the above-referenced Matter Under Review.

By letter, dated May 12, 1980 from you to Ray Mark, Treasurer for the Courter for Congress Committee, you stated that the Federal Election Committee, on February 20, 1980, has found reason to believe that the Courter for Congress Committee has violated Section 441(a) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. In accordance with FEC regulations, the Committee was accorded fifteen days in which to submit a reply brief stating its position on the issues and replying to the brief of the General Counsel. In view of the fact that I have just been retained as counsel in connection with this matter, and in order to fully familiarize myself with the facts and circumstances regarding this situation, I hereby respectfully request that the Committee be granted a two week extension through Friday, June 13 during which it may formally respond to your notice. Following such factual review, I would also appreciate the opportunity to meet with Ms. Callahan to discuss this matter preparatory to requesting informal conciliation.

PEABODY, RIVLIN, LAMBERT & MEYERS

Charles N. Steele, Esq.
May 28, 1980
Page Two

Thank you for your consideration of this matter. In view of the brief time available in which to respond, I would appreciate it if you would please notify me of such extension by telephone.

Sincerely,



Robert P. Visser

RPV/dbk

cc: Mr. Ray Mark

cc: By Hand Delivery

Marjorie W. Emmons
Thomas J. Whitehead, Esq.
Suzanne Callahan, Esq.
Roger A. Bodman

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

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00 MAY 29 PM 1:0

By Hand Delivery

Charles N. Steele, Esq.

General Counsel

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P O. BOX 1298

TRENTON, NEW JERSEY 08607

609 392-2100

RECEIVED

007888

80 MAR 31 P 1: 27

10 NASSAU STREET
PRINCETON, N J 08540
(609) 924 2108

SUITE 600
1150 SEVENTEENTH STREET, N W
WASHINGTON, D C 20036
(202) 296 3432

JOEL H STERNS
RICHARD K WEINROTH
MICHAEL J. HERBERT
FRANK J PETRINO
WILLIAM J BIGHAM
W S GERALD SKEY
JOHN H DUMONT
JOHN M DONNELLY
ANN MARIE VAURIO
MARK D. SCHORR
SIMON KIMMELMAN
R. KEVIN McGRORY

OF COUNSEL
RICHARD J. HUGHES

March 26, 1980

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

007217

80 MAR 31 P 2: 52

Re: MUR 1100

Dear Ms. Callahan:

As counsel to the New Jersey Republican State Committee, I have been asked to review your correspondence and brief of March 19, 1980 relative to the New Jersey GOP Congressional Victory Fund ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"). At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman

STERNS, HERBERT & WEINROTH

Ms. Suzanne Callahan

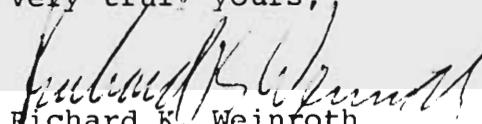
-2-

March 26, 1980

Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979.

Should there be a finding that a technical violation of 2 U.S.C. Article a (a) (1) be found to have occurred, it is respectfully submitted that said violation was inadvertent and that with the return of the aforementioned \$2,000.00 has been made moot. I will await your response with respect to this matter.

Very truly yours,


Richard K. Weinroth

RKW/cc

Enclosure

cc: Honorable James Courter
Mr. David Norcross
Mr. David Earling

RETURN RECEIPT REQUESTED

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20036

93 MAY 29 AM 1 04

By Hand Delivery

Marjorie W. Emmons

Secretary

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

RECEIVED
MAY 29 PM 1

By Hand Delivery

Thomas J. Whitehead, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D C 20036

RECEIVED

30 MAY 29 PM 1 7

By Hand Delivery

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

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW

196 WEST STATE STREET

P. O. BOX 1298

TRENTON, NEW JERSEY 08607

CERTIFIED

No. 662447

MAIL

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

RETURN RECEIPT REQUESTED

10 MAR 31 P 1:27

RL ED



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO : THE COMMISSION
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: March 19, 1980
SUBJECT: MUR 1100

The attached documents are circulated for your information.

ATTACHMENTS:

1) Memo; 2) Brief; 3) Letter

March 19, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1100

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CNS*
General Counsel

SUBJECT: MUR 1100

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on March 19, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

BEFORE THE FEDERAL ELECTION COMMISSION
March 10, 1980

In the Matter of)
) MUR 1100
New Jersey GOP Congressional)
Victory Fund)
Courter for Congress Committee)

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan, to David Norcross, the Republican State Chairman of New Jersey. (Attachment I). The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

II. Legal Analysis

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000, per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

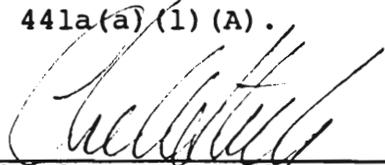
Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a (a)(1)(A) at the time the loan was made.

The GOP Committee did not provide additional information in response to the Commission's reason to believe notification. Therefore, absent evidence which refutes the Commission's earlier determination, the Office of General Counsel recommends the Commission find probable cause to believe the GOP Committee has violated 2 U.S.C. § 441a(a)(1)(A).

III. General Counsel's Recommendation

Find probable cause to believe the New Jersey GOP Congressional Victory Fund has violated 2 U.S.C. § 441a(a)(1)(A).

17 March 1980
Date



Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer
New Jersey GOP Congressional
Victory Fund
28 West State Street, Suite 612
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the New Jersey GOP Congressional Victory Fund violated section 441a 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.

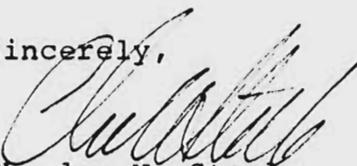
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the 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.

Walter T. Peters
Page 2

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.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer
New Jersey GOP Congressional
Victory Fund
28 West State Street, Suite 612
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on February 20, 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.
Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-5071.

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosures

Notification of reason to believe finding
Procedures

PS Form 3811, Aug. 1978

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

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. <input type="checkbox"/> 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: Walter T. Peters, Jr. Treasurer N.J. GOP Cong. Victory Fund	3. ARTICLE DESCRIPTION: REGISTERED NO. _____ CERTIFIED NO. 994018 INSURED NO. _____	4. I have received the article described above. SIGNATURE <input type="checkbox"/> Address <input type="checkbox"/> Authorized agent <i>Callahan</i>	5. ADDRESS (Complete only if requested) MUR 1100 Callahan TRENTON, NJ 08646 DATE OF DELIVERY FEB 26 1980 OFFICIAL USE ONLY TRENTON, NJ DOWNTOWN STA FEB 28 1980 USPO	6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS _____
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★ GPO: 1980-222-282

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE February 5, 1980

MUR NO. 1100

RESPONDENT New Jersey GOP Congressional
Victory Fund

STAFF MEMBER(S) & TEL. NO.
Donaldson (202) 523-4057

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees. 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. The GOP Committee's \$3,000 loan to the Courter Committee, which remained outstanding for three months, appears to violate 2 U.S.C. § 441a(a)(1)(A).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the GOP Committee violated 2 U.S.C. § 441a(a)(1)(A) in connection with an excessive loan to the Courter Committee.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer
Courter for Congress Committee
121 Shelly Drive, Suite 2B
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer
Page 2

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

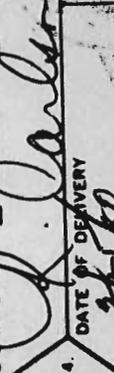


ROBERT O. TIERNAN
Chairman

Enclosures

1. Summary of reason to believe finding
2. Procedures

PS Form 3811, Aug. 1978

● 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): <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 <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery. \$ _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Ray Mark Treasurer Courter for Congress Committee	
3. ARTICLE DESCRIPTION: REGISTERED NO. 944041	INSURED NO.
I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent 	
4. DATE OF DELIVERY 2/5/80	
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS	

MUR 1100 *Callahan*

☆ (950) 1100-5740

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE February 5, 1980

MUR NO. 1100
STAFF MEMBER(S) & TEL. NO.
Donaldson (202) 523-4057

RESPONDENT Courter for Congress Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C. § 441a (a)(1)(A). 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. Therefore, it appears that the GOP Committee's \$3,000 loan, made in November 1978, may violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. § 441a(f).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
New Jersey GOP Congressional) MUR 1100
Victory Fund)
Courter for Congress)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 20, 1980, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1100:

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. §441a and send the letter attached to the General Counsel's first report in this matter.
2. Find reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. §441a(f) and send the letter attached to the General Counsel's first report in this matter.

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

Attest:

2/21/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: FEBRUARY 19, 1980
SUBJECT: OBJECTION - MUR 1100, First General Counsel's
Report dated 2-13-80; Received in OCS
2-13-80, 1:28

The above-named document was circulated on a 48 hour
vote basis at 4:00, February 13, 1980.

Commissioner Aikens submitted an objection at
4:47, February 15, 1980, thereby placing MUR 1100 on the
Amended Agenda for February 20, 1980.

February 13, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1100

Please have the attached Memo and First GC Report distributed to the Commission on a 48 hour tally basis.

Thankyou.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 13, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 1100 - First General Counsel's Report

Attached is the First General Counsel's Report for MUR 1100 which was discussed by the Commission in Executive Session on February 5, 1980. At that meeting, the Commission postponed consideration of the recommendations pending review by the General Counsel's office of the use of the term "unqualified multicandidate committee." This office has reconsidered and redrafted the report and has substituted "political committee supporting more than one Federal candidate" in the report as well as in the Respondents' notifications.

01 FEB 1980 11:20

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL FEB 13 1980
BY OGC TO THE COMMISSION _____

MUR # 1100
STAFF MEMBER(S) _____
Donaldson _____

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.
2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL FEB 13 1980
BY OGC TO THE COMMISSION _____

MUR # 1100
STAFF MEMBER(S) _____
Donaldson _____

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.
2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Dug Greevy
TO: Office of General Counsel TEAM CHIEF Roberta Werfel
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund
TREASURER: Walter T. Peters, Jr.
ADDRESS: Suite 612 - 28 W. State Street
Trenton, New Jersey 08608
AFFILIATE(S):

ALLEGATION(S): Excessive Contribution to Candidate
CITE: 2 U.S.C. 441a
ATTACHMENT(S): 2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review. AND DATE: 2/21/79
ATTACHMENT

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

PERIOD COVERED FROM 9/15/78 TO 4/10/79
TOTAL RECEIPTS \$ 16,754 TOTAL EXPENDITURES \$ 16,704
CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
Letter received from committee indicating repayment of excessive amount of loan prior to mailing of SV notification by RAD. 5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
Telecon: Greevy with Earling, 2/21/79 3
Telecon: Greevy with Peters, 6/11/79 4

REASON(S) FOR REFERRAL: ATTACHMENT
Excessive contribution (loan) meets RAD threshold for OGC Review

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
None

OTHER RELEVANT INFORMATION:

Letter from Peters, 3/26/79 6
Partial Copy of Committee's April 10, 1979 report 7
RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 3/27/78. However, this apparently was not received by Commission. The six month requirement for qualified status would have been on 2/27/79 had that document RAD Form 1 been received. SFF REFERRAL FOR RECIPIENT COMMITTEE. COURTESY FOR CONGRESS

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11 JUN 79
 PAGE 1

COMMITTEE	DOCUMENT	REVENUES		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW JERSEY GOV LONG VICTORY FUND								ID# E00105676
1979	STATEMENT OF ORGANIZATION- AMENDMENT					5MAR79	4	79FEC/121/1841
	MISCELLANEOUS TRANSACTION TO F.E.C.					16MAR79	2	79FEC/121/5384
1978	10 DAY PRE-GENERAL		13,537	4,500		15SEP78 -28OCT78	6	78FEC/095/1440
	REQUEST FOR ADDITIONAL INFORMATION					15SEP78 -28OCT78	2	79FEC/122/0494
	10 DAY PRE-GENERAL - AMENDMENT					10OCT78 -23OCT78	1	79FEC/122/4458
	30 DAY POST-GENERAL		1,159	9,000		29OCT78 -20NOV78	8	78FEC/096/2541
	REQUEST FOR ADDITIONAL INFORMATION					29OCT78 -20NOV78	1	79FEC/122/0496
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	3	79FEC/122/3619
	YEAR END REPORT					27AUG78 -31JAN79	3	79FEC/121/1845
	TERMINATION REPORT - TERMINATED	57		1,254		21NOV78 -12DEC78	8	78FEC/116/0820
1979	APRIL 10 QUARTERLY		2,000		1,950	10APR79	6	79FEC/126/0867
	TOTAL	57	16,696	1,254	15,450		44	TOTAL PAGES

All reports reviewed

**SCHEDULE B
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, 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 1 of 1 for
Line Number 22A

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
New Jersey G.O.P. congressional Victory Fund			
Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Courter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			

Telecon:

Dug Greevy to Dave Earling
NJGOP Congressional Victory Fund
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

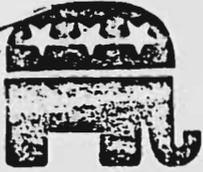
I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~it~~ had ~~not~~ been sent ~~in~~ in August, but that he would send a copy with an original signature in case it had been lost in the mail.

I stated further that the committee had loaned the Courter for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.



NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS
Chairman

ANN D. FLYNN
Vice Chairman

ROBERT D. JONES
Treasurer

KATHLEEN A. THORPE
Secretary

March 12, 1979

001328

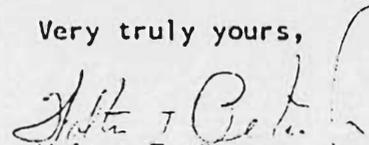
Mr. David Greevy
Federal Election Commission
1325 K Street NW
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

We wish that this notification be made a part of our official file.

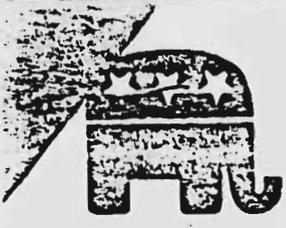
Very truly yours,


Walter T. Peters, Jr.
Executive Director

WTP:rp

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"Because We Care"



NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED
FEDERAL ELECTION
COMMISSION

DAVID F. NORCROSS
Chairman
ANN D. FLYNN
Vice Chairman
ROBERT D. JONES
Treasurer
KATHLEEN A. THORPE
Secretary

'79 MAR 28 PM 1:36

March 26, 1979

Federal Election Commission
Attn: David Greeny
1325 K. Street, N.W.
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund
#C00105676

Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
 - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
 - (a) For missing or incorrect signature, see above.
 - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been received by the Quarter Committee.

Very truly yours,

Walter T. Peters, Jr.
attachment

"Because We Care"

79031223619

RECEIVED
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
NOV 10 1979

**REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE**

RECEIVED
FEDERAL ELECTION
COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

NOV 10 1979

States: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

New Jersey GOP Congressman VICTORY FUND ... CO015476

Name of Candidate or Committee (in full)

Candidate/Committee

SUITE 612 - 28 W. STATE ST

U.S. CONGRESS

Address (number and street)

Office Sought, State/District (if applicable)

TRENTON, NEW JERSEY 08608

City, State and ZIP Code

Check if address is different than previously reported.

Year of Election 1978

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report

Tenth day report preceding _____ election
(primary, general or convention)

Termination Report

July 10 Quarterly Report

on _____ in the State of _____
(date)

Amendment for _____

October 10 Quarterly Report

Thirtieth day report following _____ election
(primary, general or convention)

(attach report)

January 31 Annual Report

Monthly Report _____

(month)

on _____ in the State of _____
(date)

This is a report for

Primary Election

General Election

Primary and General

Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

6 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through <u>APR 10, 1979</u>		
8 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1979
(Date)

WALTER T. PETEES, JR.
(Typed Name of Treasurer or Candidate)

[Signature]
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441 (see reverse side of form).

For further information, contact:

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

or call 800/424-9530

Approved by GAO
B-187620 (RUC:CP)
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

79031269067

RECEIVED
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463
APR 10 1979

**REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE**

RECEIVED
FEDERAL ELECTION
COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

170 APR 10 1979

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 New Jersey G.O.P. Congressional Victory Fund 2 I.D. No. C0015676
 Name of Candidate or Committee (in full) Candidate/Committee
SUITE 612 - 28 W. STATE ST 3 U.S. CONGRESS
 Address (number and street) Office Sought, State/District (if applicable)
TRENTON, NEW JERSEY 08608
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)
 April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for _____
 October 10 Quarterly Report (date) (which report)
 January 31 Annual Report Thirtieth day report following _____ election (primary, general or convention)
 Monthly Report _____ on _____ in the State of _____ (month) (date)
 This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through <u>APR 10, 1979</u>		
6 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C1)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C1)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.
4/10/1979 (Date) WALTER T. PETERS, JR. (Typed Name of Treasurer or Candidate) [Signature] (Signature of Treasurer or Candidate)

Notes: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form).

For further information, contact:  Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, or call 800-424-9530. Approved by GAO B-187820 (R0506) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

79031269857

**SCHEDULE A
REVISED**
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for
Line Number 17A-

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
COURTNEE FOR CONGRESS COMMITTEE HACKETTSTOWN, N.J. 07840	CONF Occupation POLITICAL COMM.	3/8/79	\$ 2,000.00
Receipt for LOAN REPAYMENT <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period

7003137851

SUBTOTAL of receipts this page (optional) \$ **2,000.00**
TOTAL this period (last page this line number only) \$ **2,000.00**

Telecon:

Greevy with Walter Peters
NJ GOP Congressional Victory Fund
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

SCHEDULE C
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

DEBTS AND OBLIGATIONS
 Supporting Line Numbers 12 and 13
 OF FORM 700

Page 1 of 1 for
 Line Number 12

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
New Jersey G.O.P. Congressional Victory Fund				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
COURTNEY FOR CONGRESS COMMITTEE 256 MAIN ST HACKETTSTOWN, N.J. 07040		\$3,000.00	\$2,000.00	\$1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
SUBTOTALS (the period this page (optional).....		\$	\$	\$
TOTAL (the period (last page the line number only).....		\$ 3,000-	\$ 2,000-	\$ 1,000-

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REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/70 ANALYST Mary Jo Mesner mjm
 TO: Office of General Counsel TEAM CHIEF Suzanne Wilson su
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Carroll Bowen CB/RS
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13
 TREASURER: Ray Mark
 ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S): Accepted an excessive loan from a non-qualified committee
 CITE: 2 U.S.C. 441a
 ATTACHMENT(S): 2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review
 Special Project
 Other:
 ATTACHMENT

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

PERIOD COVERED FROM 10/24/73 TO 11/27/73
 TOTAL RECEIPTS \$ 61,553 TOTAL EXPENDITURES \$ 60,365
 CASH ON HAND \$ 3,273 DEBTS \$ 104,750 (owed by committee)

HISTORY:

RESULTS OF REVIEW: Excessive loan disclosed on 30 Day Post-General report
 Amount in excess was repaid by committee on April 10 report prior to RAD notification of surface violation.
 ATTACHMENT 2
 3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: None
 ATTACHMENT

REASON(S) FOR REFERRAL: Loan received by committee was \$2,000 in excess of limit for non-qualified committees
 ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: Surface violation notice being processed for 30 Day Post General report for two excessive in-kind contributions received from non-qualified committees. These contributions were received prior to the General Election.
 ATTACHMENT

OTHER RELEVANT INFORMATION: Committee received excessive loan on 11/5/73 - one day prior to general election. Candidate won general election with 52% of votes.
 ATTACHMENT

See companion referral of New Jersey GOP Congressional Victory Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD: None

PREVIOUS MURS: MUR 905, closed 3/6/79 (Candidate)

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) 1977-1978

DATE 29NOV79
 PAGE

DISC

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION	
		PRIMARY	GENERAL	PRIMARY	GENERAL				
COURTIER FOR CONGRESS COMMITTEE									
1978	STATEMENT OF ORGANIZATION					3JAN78	3	114 000084269	
	STATEMENT OF ORGANIZATION AMENDMENT					11JAN78	3	78HSE/127/3608	
	STATEMENT OF ORGANIZATION AMENDMENT					27JAN78	4	78HSE/129/3343	
	40 HOUR CONTRIBUTION NOTICE					6JUN78	1	78HSE/137/3622	
	40 HOUR CONTRIBUTION NOTICE					8JUN78	1	78HSE/137/4093	
	STATEMENT OF ORGANIZATION AMENDMENT					31AUG78	1	78HSE/144/0329	
	40 HOUR CONTRIBUTION NOTICE					30CT78	4	78HSE/154/4300	
	40 HOUR CONTRIBUTION NOTICE					24OCT78	1	78HSE/151/2244	
	40 HOUR CONTRIBUTION NOTICE					26OCT78	1	78HSE/151/3109	
	40 HOUR CONTRIBUTION NOTICE					127OCT78	1	78HSE/152/0081	
	40 HOUR CONTRIBUTION NOTICE					26OCT78	1	78HSE/152/0787	
	40 HOUR CONTRIBUTION NOTICE					28OCT78	1	78HSE/152/0814	
	40 HOUR CONTRIBUTION NOTICE					29OCT78	1	78HSE/152/3405	
	40 HOUR CONTRIBUTION NOTICE					30NOV78	1	78HSE/154/4246	
	40 HOUR CONTRIBUTION NOTICE					30NOV78	1	78HSE/155/0190	
	40 HOUR CONTRIBUTION NOTICE					30NOV78	1	78HSE/155/0293	
	40 HOUR CONTRIBUTION NOTICE					9NOV78	1	78HSE/155/1415	
1977	YEAR END REPORT		400			0-22DEC77	-31DEC77	2	78HSE/127/4110
	YEAR END REPORT POSTCARD							1	78HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29DEC77	-31DEC77	2	78FEC/083/5002
1978	APRIL 10 QUARTERLY	27,252		26,872		1JAN78	-31MAR78	10	78HSE/132/5123
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78	-31MAR78	2	78FEC/083/5005
	10 DAY PRE-PRIMARY	36,565		28,492		1APR78	-22MAY78	12	78HSE/136/3041
	REQUEST FOR ADDITIONAL INFORMATION					1APR78	-22MAY78	1	78FEC/083/5000
	30 DAY POST-PRIMARY	17,230		19,441		23MAY78	-26JUN78	12	78HSE/139/3772
	30 DAY POST-PRIMARY AMENDMENT					23MAY78	-26JUN78	1	78HSE/151/0187
	JULY 10 QUARTERLY			5,465		22JUN78	-30JUN78	6	78HSE/140/4471
	OCTOBER 10 QUARTERLY		130,988		110,894	1JUL78	-30SEP78	46	78HSE/148/2910
	10 DAY PRE-GENERAL		51,675		72,061	1OCT78	-23OCT78	36	78HSE/152/0105
	30 DAY POST-GENERAL		61,530		58,865	24OCT78	-27NOV78	42	78HSE/157/3813
	YEAR END REPORT		6,268		8,574	28NOV78	-31DEC78	19	78HSE/161/1994
	REQUEST FOR ADDITIONAL INFO 2ND							1	78FEC/099/2895
	TOTAL	91,148	250,887	90,274	250,414			230	TOTAL PAGES

All reports reviewed

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79
 PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURIER FOR CONGRESS COMMITTEE								124 000084265
	1979 STATEMENT OF ORGANIZATION- AMENDMENT					JUL79	1	79HSE/165/1118
	STATEMENT OF ORGANIZATION- AMENDMENT					SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					NOV79	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		7,259	JAN79 -31MAR79	19	79HSE/164/2093
	JULY 10 QUARTERLY		5,825		6,753	APR79 -30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		26,770		24,071	JUL79 -30SEP79	19	79HSE/169/1916
	TOTAL	0	39,999	0	38,083		63	TOTAL PAGES

All reports reviewed

SCHEDULE A
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Day Post - General

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 17 a

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
James A. Courter Hatchery Road Hackettstown, NJ 07840	Courter, Robert & Hare Hackettstown, NJ 07840 Occupation Attorney 178 RD 13025	11/1/78	\$5,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 70,000.00			
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	Occupation 20015676	11/6/78	\$3,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3,000.00			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional)			\$ 8,000.00
TOTAL this period (last page this line number only)			\$ 8,000.00

730115739

April 10 Quarterly

Name of Candidate or Committee in Full			
COURTIER FOR CONGRESS			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	Repayment of Loan C00105670	2/28/79	\$2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (totals).....			\$ 2,000.00
TOTAL this period (last page this line number only).....			\$ 2,000.00

GENERAL A
REVISED
January, 1978
Federal Election Commission
125 K Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1
Line Number 15 c
Use Separate Schedules for
each numbered line

78011573032

Name of Candidate or Committee in Full			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Backettstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,200.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,385.24
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$302.64
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Share of Expenses Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Politics	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	Date (month, day, year) 10/12/78	Amount of each Receipt this Period \$2.26
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Appropriate Year To Date \$		
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (all pages this line number only).....			\$ 2,965.26

FORM 328

January, 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 3

Line Number 15 c

Use Separate Schedules for
each numbered line

Name of Candidate or Committee on Full		COURTIER FOR CONGRESS <i>30 Day Post Gen. 1</i>	
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Backetstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,238.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,385.24
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$302.64
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$37.12
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Washington, DC 20013 Politics	Principal Place of Business Bernard K. Allanson - Organizing Occupation	Date (month, day, year) 10/12/78	Amount of each Receipt this Period \$2.26
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

78011573932

SCHEDULE A
DTVGTB
 January, 1970
 Federal Election Commission
 1775 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Losses, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 15a, 17a, and/or 17a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 15 c

Use Separate Schedules for
 each numbered line

Name of Candidate or Committee in Full		COURTESY FOR CONGRESS		Date (month, day, year)	Amount of each Receipt this Period
Warren County Republican Finance Campaign Committee Backettstown, NJ 07840		Share of Billboard Advertising Occupation		10-18	331.82
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)					\$ 331.82
TOTAL this period last page (this line number only)					\$ 331.82

10 Day PRG Rev



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer
Courter for Congress Committee
121 Shelly Drive, Suite 2B
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer
Page 2

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures

1. Summary of reason to believe finding
2. Procedures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer
New Jersey GOP Congressional
Victory Fund
28 West State Street, Suite 612
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on _____, 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.
Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Enclosures
Notification of reason to believe finding
Procedures



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *e*
FROM: MARJORIE W. FMMONS/MARGARET CHANEY *m*
DATE: FEBRUARY 1, 1980
SUBJECT: ADDITIONAL OBJECTION TO MUR 1100

Your office was notified at 10:45 this date that Commissioner Aikens had submitted an objection to MUR 1100.

At 2:15, February 1, 1980, Commissioner Friedersdorf submitted an objection to MUR 1100.



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE ✓
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: FEBRUARY 1, 1980
SUBJECT: OBJECTION - MUR 1100 - First General
Counsel's Report dated 1-30-80: Received
in OCS 1-30-80, 12:25

The above-named document was circulated on a 48
hour vote basis at 4:00, January 30, 1980.

Commissioner Aikens submitted an objection at close
of business, January 31, 1980, thereby placing MUR 1100
on the Executive Session Agenda for February 5, 1980.

January 30, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1100

Please have the attached First General Counsel's Report on MUR 1100 distributed to the Commission on a 48 hour tally basis.

Thank you.

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JAN 30 1980

1100
MUR #
STAN 30 MEMBER(S) 24
Donaldson

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D
RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multicandidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.

2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79

ANALYST Dug Greevy *with you guys*

TO: Office of General Counsel

TEAM CHIEF Roberta Werfel *RBW*

THROUGH: STAFF DIRECTOR *RBW*

COMPLIANCE REVIEW CB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JH*

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund

TREASURER: Walter T. Peters, Jr.

ADDRESS: Suite 612 - 28 W. State Street
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S):
Excessive Contribution
to Candidate

CITE:
2 U.S.C. 441a

ATTACHMENT(S)
2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 2/21/79

ATTACHMENT

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

PERIOD COVERED FROM 9/15/78 TO 4/10/79

TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704

CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Letter received from committee indicating repayment of excessive amount of loan prior to mailing of SV notification by RAD.

5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Earling, 2/21/79

3

Telecon: Greevy with Peters, 6/11/79

4

REASON(S) FOR REFERRAL:

ATTACHMENT

Excessive contribution (loan) meets RAD threshold for OGC Review

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

Letter from Peters, 3/26/79

Partial Copy of Committee's April 10, 1979 report

RE: Multicandidate Status of Committee--Committee sent Statement of Organization However, this apparently was not received by Commission. The six month re for qualified status would have been on 2/27/79 had that document R been received. SFF REFERRAL FOR RECIPIENT COMMITTEE. COURTER FOR C

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

02-2135

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79

ANALYST Mary Jo Mesner mjm

TO: Office of General Counsel

TEAM CHIEF Suzanne Wilson SW

THROUGH: STAFF DIRECTOR SW

COMPLIANCE REVIEW Carroll Bowen CB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13

TREASURER: Ray Mark

ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Accepted an excessive loan from
a non-qualified committee

2 U.S.C. 441a

2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

Normal Review

Other:

ATTACHMENT

Special Project:

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

PERIOD COVERED FROM 10/24/78 TO 11/27/78

TOTAL RECEIPTS \$ 61,558 TOTAL EXPENDITURES \$ 58,865

CASH ON HAND \$ 3,273 DEBTS \$ 104,760 (owed by committee)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Excessive loan disclosed on 30 Day Post-General report
Amount in excess was repaid by committee on April 10 report
prior to RAD notification of surface violation.

2
3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

Loan received by committee was \$2,000 in excess of limit
for non-qualified committees

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

Surface violation notice being processed for 30 Day Post General report
for two excessive in-kind contributions received from two
non-qualified committees. These contributions were received prior to
the General Election.

4

OTHER RELEVANT INFORMATION:

ATTACHMENT

Committee received excessive loan on 11/6/78 - one day prior to
general election. Candidate won general election with 52% of
vote.

See companion referral of New Jersey GOP Congressional
Victory Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

PREVIOUS MURS:

MUR 905, closed 3/6/79 (Candidate)

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/1/79 ANALYST Dug Greevy
TO: Office of General Counsel TEAM CHIEF Roberta Werfel
THROUGH: STAFF DIRECTOR ORP COMPLIANCE REVIEW ORP
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund
TREASURER: Walter T. Peters, Jr.
ADDRESS: Suite 612 - 28 W. State Street
Trenton, New Jersey 08608
AFFILIATE(S):

ALLEGATION(S): Excessive Contribution to Candidate
CITE: 2 U.S.C. 441a
ATTACHMENT(S): 2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review. AND DATE: 2/21/79
ATTACHMENT

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

PERIOD COVERED FROM 9/15/78 TO 4/10/79
TOTAL RECEIPTS \$ 316,754 TOTAL EXPENDITURES \$ 16,704
CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:
RESULTS OF REVIEW: ATTACHMENT

Letter received from committee indicating repayment of excessive amount of loan prior to mailing of SV notification by RAD. 5

COMMUNICATIONS WITH CANDIDATE COMMITTEE: ATTACHMENT
Telecon: Greevy with Earling, 2/21/79 3
Telecon: Greevy with Peters, 6/11/79 4

REASON(S) FOR REFERRAL: ATTACHMENT
Excessive contribution (loan) exceeds RAD threshold for 200 New Jersey

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
None

OTHER RELEVANT INFORMATION:
Letter from Peters, 5/25/79
Partial copy of Committee's April 13, 1979 report
RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 3/27/78. However, this apparently was not received by Commission. The six month requirement for qualified status would have been on 3/27/79 had that document been received. RAD Form 1
SEE ATTACHMENT FOR RECIPIENT COMMITTEE, COURTESY FOR COMMITTEE

31010111670

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11 JUN 79
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		# OF PAGES	MICROFILM LOCATION
		Primary	General	Primary	General		
NEW JERSEY VOTER CONSCIOUSNESS FUND							ID# C00100576
1979	STATEMENT OF ORGANIZATION - ADDITIONAL MISCELLANEOUS INFORMATION TO F.E.C.					58NOV79	4 79FEC/121/1841
						16NOV79	2 79FEC/121/1894
1978	10 DAY PRE-GENERAL REQUEST FOR ADDITIONAL INFORMATION	13,537		4,500		15SEP78 -20OCT78	6 78FEC/093/1440
	10 DAY PRE-GENERAL AMENDMENT					15OCT78 -20NOV78	2 79FEC/122/0494
	30 DAY POST-GENERAL REQUEST FOR ADDITIONAL INFORMATION	1,159		9,000		10OCT78 -20NOV78	1 79FEC/122/4458
	30 DAY POST-GENERAL AMENDMENT					29OCT78 -20NOV78	8 78FEC/096/2541
	YEAR END REPORT					24OCT78 -27NOV78	1 79FEC/122/0496
	TERMINATION REPORT - TERMINATED	57		1,254		27AUG78 -31JAN79	3 79FEC/122/3619
1979	APRIL 10 QUARTERLY TOTAL	57	2,000	1,254	1,950	21NOV78 -12DEC78	8 78FEC/116/0820
			16,696		1,950	10APR79	6 79FEC/126/0867
							44 TOTAL PAGES

All reports reviewed

**SCHEDULE B
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, 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 1 of 1 for
Line Number 22A

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
New Jersey G.O.P. congressional Victory Fund			
Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Full Name, Mailing Address and ZIP Code Courter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period

Teleson:

Dug Greevy to Dave Earling
NJGOP Congressional Victory Fund
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

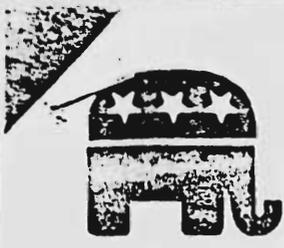
I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~it~~ had ~~not~~ been sent ~~in~~ in August, but that he would send a copy with an original signature in case it had been lost in the mail.

I stated further that the committee had loaned the Courter for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.



NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS
Chairman
ANN D. FLYNN
Vice Chairman
ROBERT D. JONES
Treasurer
KATHLEEN A. THORPE
Secretary

March 12, 1979

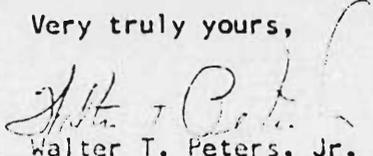
001008

Mr. David Greevy
Federal Election Commission
1325 K Street NW
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

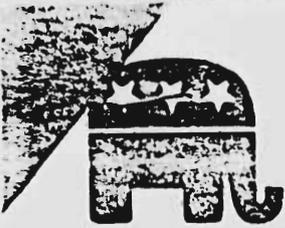
We wish that this notification be made a part of our official file.

Very truly yours,

Walter T. Peters, Jr.
Executive Director

WTP:rp

70031315384

"Because We Care"



NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED
FEDERAL ELECTION
COMMISSION

DAVID F. NORCROSS
Chairman

ANN D. FLYNN
Vice Chairman

ROBERT D. JONES
Treasurer

KATHLEEN A. THORPE
Secretary

'79 MAR 28 PM 1:36

March 26, 1979

Federal Election Commission
Attn: David Greeny
1325 K. Street, N.W.
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund
#C00105676

Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
 - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
 - (a) For missing or incorrect signature, see above.
 - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been

Very truly yours,

Walter T. Peters, Jr.
attachment

"Because We Care"

31710212031290312903129

RECEIVED
 FEDERAL ELECTION COMMISSION
 1225 K Street, N.W.
 Washington, D.C. 20463
 APR 10 1979

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

RECEIVED
 FEDERAL ELECTION
 COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

770 APR 10 1979

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

NEW JERSEY GOP CONGRESSIONAL VICTORY FUND CO015476
 Name of Candidate or Committee (in full) Candidate/Committee
SUITE 612 - 28 W. STATE ST U.S. CONGRESS
 Address (number and street) Office Sought, State/District (if applicable)
TRENTON, NEW JERSEY 08608
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election on _____ in the State of _____
 (primary, general or convention)

July 10 Quarterly Report Termination Report

October 10 Quarterly Report Amendment for _____ (attach report)

January 31 Annual Report Thirtieth day report following _____ election (primary, general or convention)

Monthly Report _____ on _____ in the State of _____ (month) (date)

This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1979		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.
4/10/1979 (Date) WALTER T. PETERS, JR. (Typed Name of Treasurer or Candidate) [Signature] (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441; (see reverse side of form).

For further information, contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 or call 800-424-9530. Approved by GAO B-18720 (R0506) Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

7003169067

RECEIVED MAIL
 FEBRUARY 10 1979

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

REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE

RECEIVED
 FEDERAL ELECTION
 COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

170 APR 16 1979

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. New Jersey G.O.P. Congressional Victory Fund 2. I.D. No. C0015676
 Name of Candidate or Committee (in full) Candidate/Committee
SUITE 612 - 28 W. STATE ST 3. U.S. CONGRESS
 Address (number and street) Office Sought, State/District (if applicable)
TRENTON, NEW JERSEY 08608
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1978

4. Type of Report (check appropriate boxes)
 April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for _____ (attach report)
 October 10 Quarterly Report Thirtieth day report following _____ election (primary, general or convention) (attach report)
 January 31 Annual Report Monthly Report _____ on _____ in the State of _____ (month) (date)
 This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through <u>APR 10, 1979</u>		
6. Cash on hand January 1, 19__		\$
7. Cash on hand at beginning of reporting period	\$ -0-	
8. Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9. Total expenditures (from line 20)	\$ 1,950.00	\$ 1,950.00
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11. Value of contributed items on hand to be inventoried (Attach itemized list)	\$ -0-	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
4/10/1979 (Date) WALTER T. PETERS, JR. (Typed Name of Treasurer or Candidate) [Signature] (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441; (see reverse side of form).

For further information, Contact:

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

or call 800/424 9530

Approved by GAO
 B-187620 (R05/06)
 Expires 3/31/81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

7903169657

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20453

ITEMIZED RECEIPTS
 (Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 17A-

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND			
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
CHIEF OF CONGRESS COMMITTEE		CAMP	
HACKETTSTOWN, N.J. 07840		Occupation	Amount of each Receipt this Period
		POLITICAL COMM.	3/8/79 \$ 2,000.00
Receipt for LOAN REPAYMENT		<input type="checkbox"/> Check if Contributor is self-employed	
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
		Occupation	Amount of each Receipt this Period
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
		Occupation	Amount of each Receipt this Period
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
		Occupation	Amount of each Receipt this Period
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
		Occupation	Amount of each Receipt this Period
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)
		Occupation	Amount of each Receipt this Period
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-To-Date \$	
SUBTOTAL of receipts this page (optional):			\$ 2,000.00
TOTAL this period (fill page the line number only):			\$ 2,000.00

7003137851

Telecon:

Greevy with Walter Peters
NJ GOP Congressional Victory Fund
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

SCHEDULE C
REVISED
 January, 1978
 Federal Election Commission
 1225 K Street, N.W.
 Washington, D.C. 20463

DEBTS AND OBLIGATIONS
 Supporting Line Numbers 12 and 13
 Schedule C

Page 1 of 1 for
 Line Number 12

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
New Jersey G.O.P. Congressional Victory Fund				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
COURTNEY FOR CONGRESS COMMITTEE 256 MAIN ST HACKETTSTOWN, N.J. 07033		\$3,000.00	\$2,000.00	\$1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only)		\$ 3,000-	\$ 2,000-	\$ 1,000-

9031159871

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Mary Jo Mesner mjm
 TO: Office of General Counsel TEAM CHIEF Suzanne Wilson su
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Carroll Bowen CB/RS
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13
 TREASURER: Ray Mark
 ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S): CITE: ATTACHMENT(S)
 Accepted an excessive loan from a non-qualified committee 2 U.S.C. 441a 2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project: ATTACHMENT

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

PERIOD COVERED FROM 10/24/78 TO 11/27/78

TOTAL RECEIPTS \$ 41,568 TOTAL EXPENDITURES \$ 40,865

CASH ON HAND \$ 3,273 DEBTS \$ 104,750 (owed by committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
 Excessive loan disclosed on 30 Day Post-General report 2
 Amount in excess was repaid by committee on April 10 report 3
 prior to RAD notification of surface violation.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 None

REASON(S) FOR REFERRAL: ATTACHMENT
 Loan repaid by committee was \$2,000 in excess of limit for non-qualified committees

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 Surface violation notice being processed for 30 Day Post-General report
 regarding contributions received from non-qualified committees.
 These contributions were received prior to the General Election.

OTHER RELEVANT INFORMATION: ATTACHMENT
 Committee repaid excessive loan on 11/5/78 - see pay prior to general election. Candidate won general election with 12% of votes.
 See report on referral of New Jersey GOP Congressional

PREVIOUS OCC/AUDIT REFERRALS FROM RAD:
 None

PREVIOUS MURS:
 MUR 305, closed 3/8/79 (Candidate)

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) 1977-1978

DATE 29NOV78
 PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EX- PRIM	EX- ORDINARY		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL		GENERAL	GENERAL			
COURTIER FOR CONGRESS COMMITTEE									154 000684269
1978	STATEMENT OF DISBURSEMENTS					30JAN78		3	78HSE/127/3608
	STATEMENT OF DISBURSEMENTS FOR AMENDMENT					11JAN78		3	78HSE/127/4500
	STATEMENT OF DISBURSEMENTS FOR AMENDMENT					22JAN78		1	78HSE/129/1343
	48 HOUR CONTRIBUTION REPORT					7JAN78		1	78HSE/137/3622
	48 HOUR CONTRIBUTION REPORT					8JAN78		1	78HSE/137/4093
	STATEMENT OF DISBURSEMENTS FOR AMENDMENT					31AUG78		1	78HSE/144/0329
	48 HOUR CONTRIBUTION REPORT					30CT78		1	78HSE/154/4300
	48 HOUR CONTRIBUTION REPORT					24NOV78		1	78HSE/151/2244
	48 HOUR CONTRIBUTION REPORT					24NOV78		1	78HSE/151/3109
	48 HOUR CONTRIBUTION REPORT					26NOV78		1	78HSE/152/0081
	48 HOUR CONTRIBUTION REPORT					26NOV78		1	78HSE/152/0787
	48 HOUR CONTRIBUTION REPORT					28NOV78		1	78HSE/152/0814
	48 HOUR CONTRIBUTION REPORT					29NOV78		1	78HSE/152/3405
	48 HOUR CONTRIBUTION REPORT					31AUG78		1	78HSE/154/4244
	48 HOUR CONTRIBUTION REPORT					31AUG78		1	78HSE/155/0190
	48 HOUR CONTRIBUTION REPORT					31AUG78		1	78HSE/155/0293
	48 HOUR CONTRIBUTION REPORT					31AUG78		1	78HSE/155/1415
1977	YEAR END REPORT		400			0129DEC77	-31DEC77	2	78HSE/127/4130
	YEAR END REPORT							1	78HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29DEC77	-31DEC77	2	78FEC/093/5002
1978	APPEAL TO QUARTERLY	27,253		26,87		1JAN78	-31MAR78	10	78HSE/132/5123
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78	-31MAR78	2	78FEC/083/5005
	10 DAY PRE-PRIMARY	36,364		28,492		1APR78	-22MAY78	17	78HSE/136/3041
	REQUEST FOR ADDITIONAL INFORMATION					1APR78	-22MAY78	1	78FEC/083/5000
	30 DAY POST-PRIMARY	17,239		19,441		23MAY78	-26JUN78	12	78HSE/139/3772
	30 DAY POST-PRIMARY AMENDMENT					23MAY78	-26JUN78	1	78HSE/151/0187
	JULY 10 QUARTERLY			5,461		27JUN78	-30JUN78	6	78HSE/140/4471
	OCTOBER 10 QUARTERLY		130,988		110,894	1JUL78	-30SEP78	46	78HSE/148/2918
	10 DAY PRE-GENERAL		51,673		72,061	1OCT78	-23OCT78	33	78HSE/152/0105
	30 DAY POST-GENERAL		21,550		50,865	24OCT78	-29NOV78	42	78HSE/157/3813
	YEAR END REPORT		6,268		8,574	28NOV78	-31DEC78	17	78HSE/161/1974
	REQUEST FOR ADDITIONAL INFORMATION 2ND							1	78FEC/099/2895
	TOTAL	91,148	250,887	80,274	250,414			230	TOTAL PAGES

All reports reviewed

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79
 PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURTIER FOR CONGRESS COMMITTEE								ID# 000084269
1979	STATEMENT OF ORGANIZATION - AMENDMENT					JUL79	1	79HSE/165/1118
	STATEMENT OF ORGANIZATION - AMENDMENT					SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					10979	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		27,259	JAN79 - 31MAR79	19	79HSE/164/2093
	JULY 10 QUARTERLY		5,025		6,753	APR79 - 30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		26,770		24,071	JUL79 - 30SEP79	19	79HSE/169/1916
	TOTAL	0	39,999	0	38,083		63	TOTAL PAGES

All reports reviewed

30 Day Post - General
 ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
James A. Courter Hatchery Road Hackettstown, NJ 07840	Courter, Robert & Hare Hackettstown, NJ 07840 Occupation: Attorney 178 RD 1302B	11/1/78	\$5,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 70,000.00			
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	APK Occupation: 200105676	11/6/78	\$3,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 3,000.00			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional)			\$ 8,000.00
TOTAL this period (last page this line number only)			\$ 8,000.00

7301157339

RECEIVED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

(Operating, Transfers Out, Contributions In-Kind,
 Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Line Number 21

(Use Separate Schedules for
 each numbered line)

April 10 Quarterly

Name of Candidate or Committee in Full			
COURTIER FOR CONGRESS			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608 <i>22</i>	Repayment of Loan <i>C00105670</i>	2/28/79	\$2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (additions).....			\$ 2,000.00
TOTAL this period (last page this line number only).....			\$ 2,000.00

**SCHEDULE A
REVISED**
January 1978
Federal Election Commission
125 K Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Line Number 15 c

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Receipt for	Principal Place of Business	Date (month, day, year)	Amount of each Receipt (the Period)
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Backettstown, NJ 07840	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$1,200.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$1,385.24
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$302.64
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Windale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation		
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Politics	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	10/12/78	\$2.26
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

79011573932

SCHEDULE A

January, 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

TRANSFER RECEIPT

(Contributions, Transfers, Contribution in-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 3
Line Number 15c

Use Separate Schedules for
each numbered line!

Name of Candidate or Committee on File		Date (month, day, year)		Amount of each Receipt this Period
COURTIER FOR CONGRESS <i>30 Day Post Gen. 1</i> Warren County Republican Campaign Finance Committee Hackettstown, NJ 07840		11/78	Share of Billboard Advertising	\$1,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	Share of Billboard Advertising	\$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	Share of Billboard Advertising	\$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation	11/78	Share of Expenses	\$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Washington, DC 20013	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	10/12/78	Bernard K. Allanson - Organizing	\$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation			
SUBTOTAL of receipts this page (attach all).....				\$ 2,965.26
TOTAL this period (last page this line number only).....				\$ 2,965.26

7811573932

SCHEDULE A
REVISED
 January, 1970
 Federal Election Commission
 1775 K Street, N.W.
 Washington, D.C. 20540

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Losses, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 15a, 17a, and/or 11a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 15 c

Use Separate Schedules for
 each numbered line!

Name of Candidate or Committee in Full		COURTIER FOR CONGRESS		<i>10 May 70 Rev (6)</i>	
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
	Warren County Republican Finance Campaign Committee Backettstown, NJ 07840	Share of Billboard Advertising		10 78	331.82
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Full Name, Mailing Address and ZIP Code	Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)					\$ 331.82
TOTAL this period (last page this line number entry)					\$ 331.82



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Walker W. Peters, Jr., Treasurer
New Jersey GOP Congressional
Victory Fund
28 West State Street, Suite 612
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on _____, 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.

Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Robert O. Tiernan
Chairman

Max L. Friedersdorf
Vice Chairman

Enclosures

Notification of reason to believe finding
Procedures

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE January 18, 1980

MUR NO. 1100
STAFF MEMBER(S) & TEL. NO.
Donaldson (202) 523-4057

RESPONDENT New Jersey GOP Congressional
Victory Fund

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multicandidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees. 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. The GOP Committee's \$3,000 loan to the Courter Committee, which remained outstanding for three months, appears to violate 2 U.S.C. § 441a(a)(1)(A).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the GOP Committee violated 2 U.S.C. § 441a(a)(1)(A) in connection with an excessive loan to the Courter Committee.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer
Courter for Congress Committee
121 Shelly Drive, Suite 2B
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer

Page 2

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Robert O. Tiernan
Chairman

Max L. Friedersdorf
Vice Chairman

Enclosures

1. Summary of reason to believe finding
2. Procedures

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE January 22, 1980

MUR NO. 1100
STAFF MEMBER(S) & TEL. NO.
Donaldson (202) 523-4057

RESPONDENT Courter for Congress Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multi-candidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C. § 441a (a) (1) (A). 11 C.F.R. § 100.4(a) (1) states that a loan is a contribution to the extent that the obligation remains outstanding. Therefore, it appears that the GOP Committee's \$3,000 loan, made in November 1978, may violate 2 U.S.C. § 441a(a) (1) (A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. § 441a(f).

FEDERAL ELECTION COMMISSION
General Counsel's Office
Enforcement Section - Routing Slip

TRACK I

MUR # 1100 Type of Report 1st GC

Staff Member(s) Assigned DONALDSON

To ___ On ___ From ___ for work by staff member.

To Ch On 1/8 From SD for typing.

To TV On 1/22 From SP for comment by team leader.

To ___ On ___ From ___ for approval by Special Asst G.C.

To ES On 1/14 From PA for reworking by author. formats on back

To ___ On ___ From ___ for typing.

To D On 1/8 From CH for approval of final by author.

To AS On 1/21 From AS for approval of final by Special Asst. G.C.

To AS On 1/14 From AS for signature by G.C.

To SC On 1/2 From EM for Commission via Docket.

To ___ On ___ From ___ for staff initial of carbon. The cont. has not raised by

To SC On 1/2 From car for signature of G.C. int. study, loan or

To ___ On ___ From ___ for mailing by Docket.

To ___ On ___ From ___ for notification of mailing.

COMMENTS (Please date and initial all comments)

Contributor has terminated + took RAD
almost a yr. to get up here. This
matter is a bit old at this point
but since Contee won we can let the
Council decide!

I think we should try

RFB + close the file (JL)

The case is over a year
old - It's been almost
a yr. since ~~RFB~~ ^{notice} was ~~found~~ ^{sent to}
~~agent~~ the contributor + they
are long gone now. The \$ was
apparently ~~not~~ by the
~~time~~ immediately upon
notification. Also, seems to
be some confusion over
whether the contributor
was multi-dilate - Also
it seems like ~~the~~ ^{the} ~~document~~ ^{document} is in deep debt -
What do you think?

RFB,

RAD has got to refer these things
sooner - they didn't even find
RFB + they had it this long.

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN:

DATE July 2, 1980

ANALYST Mary Jo Mesner

TO: Office of General Counsel
ATTENTION:

TEAM CHIEF Peter Kell *PK*

THROUGH: STAFF DIRECTOR *B.L.*

COMPLIANCE REVIEW Wade McArthur

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1100(79)

DATE OF ORIGINAL REFERRAL 12/10/79

**PURPOSE:

Results of RAD Action:

- | | | |
|---|---------|--------|
| 1. 4SV1/80-0041 for 30 Day Post-General Report (1978) | 2/13/80 | Att. 1 |
| 2. RFAI for October 10 Quarterly Report (1979) | 2/13/80 | Att. 2 |
| 3. Telecon of conversation with Ray Mark | 2/25/80 | Att. 3 |
| 4. Adequate response to 4SV1/80-0041 | 2/25/80 | Att. 4 |
| 5. Adequate response to October 10 RFAI | 2/27/80 | Att. 5 |

OUTCOME: (if applicable)

The unregistered committees will not be referred as the excessive amounts have been refunded and they do not meet the threshold for referral.

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 13, 1980

Courter for Congress
Ray Mark, Treasurer
121 Shelley Drive, Suite 2B
Hackettstown, NJ 07840

Dear Mr. Mark:

This letter is prompted by the Commission's review of your disclosure reports undertaken in the normal course of carrying out its supervisory responsibilities under the Federal Election Campaign Act (FECA). Based on the requirements of the FECA and appropriate Regulations, the review indicated possible prohibited activity, errors and/or omitted information. We have attached an itemization of the information needing clarification and/or correction.

The Federal Election Commission reviews all federal campaign disclosure documents including those filed initially with the Clerk of the House. For informational purposes only, the Office of the Clerk notifies filers of errors and omissions found in their preliminary review. However, this letter and attached documentation constitute official notification by the Commission.

Please respond within fifteen (15) days from the date of this letter to the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. If you have any questions, you may contact our Reports Analysis Division. The name and telephone number of the analyst handling this matter are located on the attached page(s).

Sincerely,

A handwritten signature in cursive script that reads "Thomas J. Haselhorst".

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

Attachment(s)

C00084269

NJ/13

Courter for Congress
Ray Mark, Treasurer
121 Shelley Drive, Suite 2B
Hackettstown, NJ 07840

Toll Free Number: (800)424-9530

Local Number: (202)523-4172

The following information is requested by our analyst, Mary Jo Mesner, for the 30 Day Post-General Report, covering October 24, 1978 through November 27, 1978.

Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multi-candidate committee, from making contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donors the amounts in excess of \$1,000. (Any refund should appear on Line 21a of Schedule B on your next report.)

If you find that the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission. Please inform the Commission of your determination in this matter by letter within fifteen (15) days from the date of this notification.

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Name of Candidate or Committee in Full

COURTNER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
Warren County Republican Campaign Finance Committee Backettstown, NJ 07840 <i>186</i>	Share of Billboard Advertising Occupation	11/78	\$4,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860 <i>186</i>	Share of Billboard Advertising Occupation	11/78	\$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960 <i>TRK</i>	Share of Billboard Advertising Occupation <i>100105114</i>	11/78	\$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Morris County Women's Club Ferndale Avenue Chatham, NJ 07928 <i>186</i>	Share of Expenses Occupation	11/78	\$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
National Chamber Alliance for Box 1725 Washington, DC 20013 Politics <i>TRK</i>	Bernard K. Allanson - Organizing Occupation <i>C58082040</i>	10/12/78	\$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional)			\$ 2,965.24
TOTAL this period (last page this line number only)			\$ 2,965

7
0
1
1
5
7
9
3
5
2

NJ/13

Courter for Congress
Ray Mark, Treasurer
121 Shelley Drive, Suite 2B
Hackettstown, NJ 07840

Toll Free Number: (800) 424-9530
Local Number: (202) 523-4172

The following information is requested by our analyst, Mary Jo Mesner for the October 10 Report, covering July 1, 1979 through September 30, 1979.

On your previous report, you disclose the following outstanding debt:

Bennett Business Equipment \$126.00

However you fail to disclose the status of this debt.

Section 104.8(a) of the Commission's Regulations requires continuous reporting of all debts until extinguished. Please submit a Schedule C, disclosing the status of these debts.

On Schedule C, your report discloses a loan(s) from James A. Courter. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loan(s) is from a bank, please provide the name and address of a lending institution and the interest rate and terms of the loan(s).

On Line 17a of the Detailed Summary Page and Line 13 of Schedule C you disclose a \$7,000 loan from the candidate. However, you have not shown this receipt on Line 17a of Schedule A. Please amend your report accordingly.

On your previous report, you disclose two debts to Creative Ink on 10/23/78 totalling \$5,278.21. The cumulative payment to date is listed as \$3,000. On this report, however, the original debt is disclosed as \$4,870.67 on 10/8/78 and the payment to date is \$799.02. Please amend your report to explain these discrepancies.

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Ray Mark, Treas.

DATE: 2/25/80

NAME OF COMMITTEE OR CANDIDATE: Courter for Congress, NJ

TELEPHONE:

Mr. Mark called to say that some amendments that he had already sent in in response to an RFAI were incorrect. In the amendments that had already been sent, he had explained that an excessive contribution from the Warren Co. committee and the Sussex Co. committee were really legal because each was intended for both the primary and general elections. Mr. Mark now told me that, upon further investigation, he had discovered that the contributions were for the general election only and that he was sending another amendment explaining this and saying that the excess amount was being refunded to each committee. He said that the next report, the Q1 would show these amounts being refunded and he apologized for the error. I thanked for calling and said that I would put a note in the committee's file.

JIM COURTER
15TH DISTRICT, NEW JERSEY

WASHINGTON OFFICE:
323 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 223-8801

COMMITTEES:
ARMED SERVICES
POST OFFICE AND CIVIL SERVICE

ATTACHMENT 4

3001#
557

DISTRICT OFFICES:
22 N. SUSSEX STREET
DOVER, NEW JERSEY 07801
(201) 366-0974
7 MAIN STREET
FLEMINGTON, NEW JERSEY 08822
(201) 788-2813
58 TRINITY STREET
NEWTON, NEW JERSEY 07860
(201) 383-8818

Congress of the United States
House of Representatives
Washington, D.C. 20515

February 25, 1980

Federal Election Commission
Washington, D.C. 20463

Att: Miss Mary Jo Mesner

Re: 4SV1/80-0041
Courter For Congress
C00084269 . NJ/13

COO084

Dear Miss Mesner:

In accordance with our follow-up conversation of today's date, I am herewith enclosing a copy of the original letter I sent to you on February 20, 1980 with respect to the answer I had originally conveyed to you in connection with the in-kind contributions for the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee. I am also enclosing a copy of Schedule A which you had originally sent to me showing that the in-kind contributions received by the Committee were in excess of the \$1,000 that is allowed per election.

In my letter of February 20, 1980 I indicated that the billboard advertising covered both the primary and general election in 1978. This was incorrect. In checking further, I found that the billboard advertising for both committees was for the general election only as originally reported and I am, therefore, on this date, refunding checks to the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee for \$238.00 and \$385.24 respectively. These refunds will be shown on our Quarterly report for the period January 1, 1980 to March 31, 1980 on Line 21 of Schedule B.

Thanking you in advance for your cooperation in this matter.

Very truly yours,


Ray Mark, CPA
Treasurer

RM/kc
Encl.

30 FEB 29 1980

RECEIVED
FEB 28 1980

WASHINGTON OFFICE:
325 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-5801

COMMITTEES:
ARMED SERVICES
POST OFFICE AND CIVIL SERVICE

Congress of the United States
House of Representatives
Washington, D.C. 20515

DISTRICT OFFICES:
22 N. SUSSEX STREET
DOVER, NEW JERSEY 07801
(201) 366-0974
7 MAIN STREET
FLEMINGTON, NEW JERSEY 08822
(201) 788-2813
88 TRINITY STREET
NEWTON, NEW JERSEY 07860
(201) 383-9818

February 20, 1980

COPY

Federal Election Commission
Washington, D.C. 20463

Att: Miss Mary Jo Mesner

Re: 4SV1/80-0041
Courter For Congress
C00084269 NJ/13

Dear Miss Mesner:

In accordance with your letter dated February 13, 1980 (copy attached) I am herewith enclosing an amended Schedule A for Line 15c which indicates that the in-kind contribution for the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee for the share of billboard advertising covers both the primary and general elections.

Very truly yours,

Ray Mark, CPA
Treasurer

RM/kc

Encl.

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules
 each numbered line)

100157932

Name of Candidate or Committee in Full COURTNER FOR CONGRESS			
Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Racketstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each this Period \$1,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each this Period \$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	Principal Place of Business Share of Billboard Advertising Occupation 100105114	Date (month, day, year) 11/78	Amount of each this Period \$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each this Period \$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1726 Washington, DC 20013	Principal Place of Business Bernard K. Allanson - Organizing Occupation 000082040	Date (month, day, year) 10/12/78	Amount of each this Period \$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date...\$	
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

JIM COURTER
1000 EASTMAN ROAD
WASHINGTON, D.C. 20014
(202) 462-2801
REGISTERED
ARMED SERVICES
POST OFFICE AND CIVIL SERVICE

CERTIFIED

FEB 20 1980

Congress of the United States
House of Representatives
Washington, D.C. 20515

U.S. GOVERNMENT PRINTING OFFICE
1979 O-284-001
WASHINGTON, D.C. 20540
U.S. GOVERNMENT PRINTING OFFICE
1979 O-284-001
WASHINGTON, D.C. 20540

072869

February 19, 1980

Federal Election Commission
Washington, D.C. 20463

Att: Miss Mary Jo Mesner

Re: 4SV1/80-0041
Courter For Congress
C00084269 NJ/13

RECEIVED
FEB 27 11 3 27

Dear Miss Mesner:

In accordance with your letter dated February 13, 1980 (copy attached) I am herewith responding to the questions you raised concerning our October 10, 1979 report for the period July 1, 1979 to September 30, 1979.

1. Bennett Business Equipment - The amount owed to Bennett Business Equipment in the amount of \$126.00 was omitted on this report because we discovered that this amount was previously paid and that this was an erroneous invoice that was listed on our FEC report Schedule C.
2. Please be advised that the total amount of loans from James A. Courter was loaned to the Committee from the candidate's personal funds. None of the amounts were borrowed from a banking institution. In addition, I am also enclosing an amended sheet for Line 17a of Schedule A.
3. On our October 10, 1979 report, the amount listed as owing to Creative Ink and Joe Ruben Company in the amounts of \$4,870.67 and \$5,278.21 with cumulative payments to date of \$799.02 and \$4,278.21 were correctly listed. However,

- cont.

CERTIFIED

FEB 20 1980

Federal Election Commission

-2-

February 19, 1980

we did discover, based upon your letter, that the amounts listed on our report for the period April 1, 1979 to June 30, 1979 were incorrectly listed for these two vendors. On the report for this period, we listed \$5,278.21 as being owed both to Creative Ink and Joe Rubin Company. This was incorrect. We are herewith submitting an amended Schedule C with respect to the debts for these two vendors.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Ray Mark, CPA
Treasurer

RM/kc

Encl.

00010037

CERTIFIED

COM 3269

FEB 28

Courter for Congress
Ray Mark, Treasurer
121 Shelley Drive, Suite 2B
Hackettstown, NJ 07840

Toll Free Number (800) 424-9530
Local Number (202) 523-4172

The following information is requested by our analyst, Mary Jo Mesner for the October 10 Report, covering July 1, 1979 through September 30, 1979.

On your previous report, you disclose the following outstanding debt:

Bennett Business Equipment \$120.00

However you fail to disclose the status of this debt

Section 104.8(a) of the Commission's Regulations requires continuous reporting of all debts until extinguished. Please submit a Schedule C, disclosing the status of these debts.

On Schedule C, your report discloses a loan(s) from James A. Courter. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loan(s) is from a bank, please provide the name and address of a lending institution and the interest rate and terms of the loan(s).

On Line 17a of the Detailed Summary Page and Line 13 of Schedule C you disclose a \$7,000 loan from the candidate. However, you have not shown this receipt on Line 17a of Schedule A. Please amend your report accordingly.

On your previous report, you disclose two debts to Creative Ink on 10/23/78 totalling \$5,278.21. The cumulative payment to date is listed as \$3,000. On this report, however, the original debt is disclosed as \$4,870.67 on 10/8/78 and the payment to date is \$799.02. Please amend your report to explain these discrepancies.

800175333

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

COURTIER
FEB 21 1980

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1
 Line Number
 (Use Separate Sheet Number)

Name of Candidate or Committee in Full		Date (month, day, year)	Amount
COURTIER FOR CONGRESS COMMITTEE		7/9/79	17.00
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
James A. Courtier Hatchery Road Hackettstown, N.J. 07840	U.S. House of Representatives Washington, DC 20515		
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$ 9,000.00	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount
SUBTOTAL of receipts this page (optional)			\$ 7.
TOTAL this period (last page this line number only)			\$ 7.

110011003



FEDERAL ELECTION COMMISSION

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

DECEMBER 10, 1977

MEMORANDUM

TO: CHARLES STEELE

THROUGH: ORLANDO B. POTTER *OBP*

FROM: THOMAS HASELHORST *TH*

SUBJECT: REFERRALS FOR NEW JERSEY GOP CONGRESSIONAL VICTORY FUND AND
COURTER FOR CONGRESS

Please note that the attached refferals are concerned with the same violation and should be reviewed concurrently.

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 2/21/79

ANALYST Dug Greevy *with you plus*

TO: Office of General Counsel

TEAM CHIEF Roberta Werfel *RW*

THROUGH: STAFF DIRECTOR *ORP*

COMPLIANCE REVIEW CB/ES

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JH*

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund

TREASURER: Walter T. Peters, Jr.

ADDRESS: Suite 612 - 28 W. State Street
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S): Excessive Contribution
to Candidate

CITE: 2 U.S.C. 441a

ATTACHMENT(S) 2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 2/21/79

ATTACHMENT

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

PERIOD COVERED FROM 9/15/78 TO 4/10/79

TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704

CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:

RESULTS OF REVIEW: *ATTACHMENT*

Letter received from committee indicating repayment of excessive amount of loan prior to mailing of SV notification by RAD. 5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*

Telecon: Greevy with Earling, 2/21/79 3

Telecon: Greevy with Peters, 6/11/79 4

REASON(S) FOR REFERRAL: *ATTACHMENT*

Excessive contribution (loan) meets RAD threshold for OGC Review

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*

None

OTHER RELEVANT INFORMATION:

Letter from Peters, 3/26/79 6

Partial Copy of Committee's April 10, 1979 report 7

RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 8/27/78. However, this apparently was not received by Commission. The six month requirement for qualified status would have been on 2/27/79 had that document RAD Form 1 been received. SEE REFERRAL FOR RECIPIENT COMMITTEE, COURTER FOR CONGRESS 1978

**SCHEDULE B
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, 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 1 of 1 for
Line Number 22A

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
New Jersey G.O.P. congressional Victory Fund			
Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Couter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			

Telecon:

Dug Greevy to Dave Earling
NJGOP Congressional Victory Fund
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~it~~ had ~~not~~ been sent ~~in~~ in August, but that he would send a copy with an original signature in case it ~~had~~ been lost in the mail.

I stated further that the committee had loaned the Courter for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.

NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION
COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS
Chairman

ANN D. FLYNN
Vice Chairman

ROBERT D. JONES
Treasurer

KATHLEEN A. THORPE
Secretary

March 12, 1979

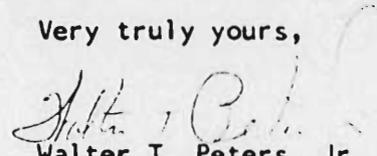
Mr. David Greevy
Federal Election Commission
1325 K Street NW
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

We wish that this notification be made a part of our official file.

Very truly yours,


Walter T. Peters, Jr.
Executive Director

WTP:rp

"Because We Care"

7903121062

NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 MAR 28 PM 1:36

March 26, 1979

DAVID F. NORCROSS
Chairman

ANN D. FLYNN
Vice Chairman

ROBERT D. JONES
Treasurer

KATHLEEN A. THORPE
Secretary

Federal Election Commission
Attn: David Greeny
1325 K. Street, N.W.
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund
#C00105676

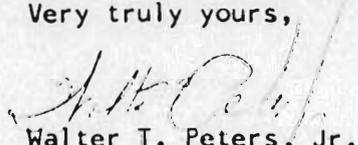
Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
 - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
 - (a) For missing or incorrect signature, see above.
 - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been repaid by the Courter Committee.

Very truly yours,


Walter T. Peters, Jr.
attachment

"Because We Care"

31010111313
79031223619

POSTAGE MAIL
APR 10 1979

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

**REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE**

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
 FEDERAL ELECTION
 COMMISSION

79 APR 16 AM 8

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND I.D. No. C0015676
 Name of Candidate or Committee (in full) Candidate/Committee
SUITE 612 - 28 W. STATE ST
 Address (number and street) 3. U.S. CONGRESS
 Office Sought, State/District (if applicable)
TRENTON, NEW JERSEY 08608
 City, State and ZIP Code Check if address is different than previously reported. Year of Election 1978

4. Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election (primary, general or convention) Termination Report

July 10 Quarterly Report on _____ in the State of _____ Amendment for _____

October 10 Quarterly Report Thirtieth day report following _____ election (which report)

January 31 Annual Report Thirtieth day report following _____ election (primary, general or convention)

Monthly Report _____ on _____ in the State of _____ (month) (date)

This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year To Date
Through <u>APR 10, 1979</u>		
6. Cash on hand January 1, 19		\$
7. Cash on hand at beginning of reporting period	\$ - 0 -	
8. Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9. Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1979 (Date) WALTER T. PETERS, JR. (Typed Name of Treasurer or Candidate) [Signature] (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441; (see reverse side of form).

For further information, contact:

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

or call 800/424 9530

Approved by GAO
 B 187620 (R0556)
 Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

7903126085

SCHEDULE A
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED RECEIPTS
 (Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 17A

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
COURTNEE FOR CONGRESS COMMITTEE 256 MAIN ST. HACKETTSTOWN, N.J. 07840	SAME	3/8/79	\$ 2,000.00
Receipt for LOAN REPAYMENT	Occupation		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code	Aggregate Year To Date \$		
	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for	<input type="checkbox"/> Check if Contributor is self-employed		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
SUBTOTAL of receipts this page (optional)			\$ 2,000.00
TOTAL (this period) (set page this line number only)			\$ 2,000.00

7003137851

Telecon:

Grecvy with Walter Peters
NJ GOP Congressional Victory Fund
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

SCHEDULE C
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

DEBTS AND OBLIGATIONS
 Supporting Line Numbers 12 and 13
 of FEC FORM 3

Page 1 of 1 for
 Line Number 12

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
COURTNEY FOR CONCRETE COMMITTEE 256 MAIN ST HACKETTSTOWN, N.J. 07840		\$3,000.00	\$2,000.00	\$1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS (the period this page (optional))		\$	\$	\$
TOTAL this period (last page this line number only)		\$ 3,000-	\$ 2,000-	\$ 1,000-

7005157871

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79

ANALYST Mary Jo Mesner *mjm*

TO: Office of General Counsel

TEAM CHIEF Suzanne Wilson *sw*

THROUGH: STAFF DIRECTOR *J.P.*

COMPLIANCE REVIEW Carroll Bowen *CB/PS*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13
TREASURER: Ray Mark
ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Accepted an excessive loan from a non-qualified committee	2 U.S.C. 441a	2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
 - Special Project:
- Other:

ATTACHMENT

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

PERIOD COVERED FROM 10/24/78 **TO** 11/27/78

TOTAL RECEIPTS \$ 61,558 **TOTAL EXPENDITURES \$** 58,865

CASH ON HAND \$ 3,273 **DEBTS \$** 104,760 (owed by committee)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Excessive loan disclosed on 30 Day Post-General report
Amount in excess was repaid by committee on April 10 report
prior to RAD notification of surface violation.

2
3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

Loan received by committee was \$2,000 in excess of limit
for non-qualified committees

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

Surface violation notice being processed for 30 Day Post General report
for two excessive in-kind contributions received from two
non-qualified committees. These contributions were received prior to
the General Election.

4

OTHER RELEVANT INFORMATION:

ATTACHMENT

Committee received excessive loan on 11/6/78 - one day prior to
general election. Candidate won general election with 52% of
vote.

See companion referral of New Jersey GOP Congressional
Victory Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

PREVIOUS MURS:

MUR 905, closed 3/6/79 (Candidate)

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978

DATE 29NOV79
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURTESY FOR CONGRESS COMMITTEE								
1978	STATEMENT OF ORGANIZATION					3 JAN 78	3	78HSE/127/3608
	STATEMENT OF ORGANIZATION- AMENDMENT					11 JAN 78	3	78HSE/127/4500
	STATEMENT OF ORGANIZATION- AMENDMENT					27 JAN 78	4	78HSE/129/1343
	48 HOUR CONTRIBUTION NOTICE					6 JUN 78	1	78HSE/137/3622
	48 HOUR CONTRIBUTION NOTICE					8 JUN 78	1	78HSE/137/4093
	STATEMENT OF ORGANIZATION- AMENDMENT					31 AUG 78	1	78HSE/144/0329
	48 HOUR CONTRIBUTION NOTICE					30 OCT 78	1	78HSE/154/4380
	48 HOUR CONTRIBUTION NOTICE					24 OCT 78	1	78HSE/151/2241
	48 HOUR CONTRIBUTION NOTICE					26 OCT 78	1	78HSE/151/3169
	48 HOUR CONTRIBUTION NOTICE					27 OCT 78	1	78HSE/152/0081
	48 HOUR CONTRIBUTION NOTICE					26 OCT 78	1	78HSE/152/0787
	48 HOUR CONTRIBUTION NOTICE					23 OCT 78	1	78HSE/152/0814
	48 HOUR CONTRIBUTION NOTICE					29 OCT 78	1	78HSE/152/3505
	48 HOUR CONTRIBUTION NOTICE					3 NOV 78	1	78HSE/154/4246
	48 HOUR CONTRIBUTION NOTICE					6 NOV 78	1	78HSE/155/0190
	48 HOUR CONTRIBUTION NOTICE					6 NOV 78	1	78HSE/155/0293
	48 HOUR CONTRIBUTION NOTICE					9 NOV 78	1	78HSE/155/1415
1977	YEAR END REPORT		400			0 29 DEC 77 - 31 DEC 77	2	78HSE/127/4110
	YEAR END REPORT 36 - POSTCARD						1	78HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29 DEC 77 - 31 DEC 77	2	78FEC/083/5002
1978	APRIL 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION	27,252		26,872		1 JAN 78 - 31 MAR 78	18	78HSE/132/5173
	JULY 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION	36,666		28,496		1 JAN 78 - 31 MAR 78	2	78FEC/083/5005
	OCTOBER 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION	17,230		19,442		1 APR 78 - 22 MAY 78	17	78HSE/136/3041
	JANUARY 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION	0		5,464		1 APR 78 - 22 MAY 78	1	78FEC/083/5000
	APRIL 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION					23 MAY 78 - 26 JUN 78	12	78HSE/139/3772
	JULY 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION					23 MAY 78 - 26 JUN 78	1	78HSE/151/0187
	OCTOBER 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION		130,988		110,894	27 JUN 78 - 30 JUN 78	6	78HSE/140/4471
	JANUARY 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION		51,675		72,061	1 JUL 78 - 30 SEP 78	46	78HSE/148/2918
	APRIL 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION		61,558		58,865	1 OCT 78 - 23 OCT 78	33	78HSE/152/0105
	JULY 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION		6,268		8,594	24 OCT 78 - 27 NOV 78	42	78HSE/157/3813
	OCTOBER 10 QUARTERLY REQUEST FOR ADDITIONAL INFORMATION					28 NOV 78 - 31 DEC 78	19	78HSE/161/1994
	YEAR END REPORT						1	78FEC/099/2895
	REQUEST FOR ADDITIONAL INFO 2ND						230	TOTAL PAGES
	TOTAL	81,148	250,882	80,274	250,414			

All reports reviewed

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79

PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURTIER FOR CONGRESS COMMITTEE								ID# C00084269
1979	STATEMENT OF ORGANIZATION- AMENDMENT					6JUL79	1	79HSE/166/1118
	STATEMENT OF ORGANIZATION- AMENDMENT					26SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					2NOV79	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		7,259	1JAN79 -31MAR79	19	79HSE/164/2093
	JULY 10 QUARTERLY		5,825		6,753	1APR79 -30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		26,770		24,071	1JUL79 -30SEP79	19	79HSE/169/1916
	TOTAL	0	39,999	0	38,083		63	TOTAL PAGES

All reports reviewed

30 Day Post - General

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
James A. Courter Hatchery Road Hackettstown, NJ 07840	Courter, Robert & Hare Hackettstown, NJ 07840	11/1/78	\$5,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 70,000.00			
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608		11/6/78	\$3,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3,000.00			
SUBTOTAL of receipts this page (optional)			\$ 8,000.00
TOTAL this period (last page this line number only)			\$ 8,000.00

7301157333

FORM 3
 REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions to-Kind
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page _____ of _____
 Line Number 21 a

(Use Separate Schedules for
 each numbered line)

April 10 Quarterly

Name of Candidate or Committee in Full COURTNER FOR CONGRESS			
Full Name, Mailing Address and ZIP Code NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608 <i>220 K</i>	Particulars of Expenditure Repayment of Loan C00105676	Date (month, day, year) 2/28/79	Amount of each expenditure this period \$2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ 2,000.00
TOTAL this period (last page this line number only).....			\$ 2,000.00

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 125 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED RECEIPTS
 (Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for

Line Number 15 c

Also See the Schedule for each numbered line!

78011573932

Name of Candidate or Committee in Full COURTNER FOR CONGRESS 30 Day Post Card			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Rackettstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,238.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,385.24
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$302.64
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$37.12
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Politics Box 1728 Washington, DC 20013	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	Date (month, day, year) 10/12/78	Amount of each Receipt this Period \$2.26
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$ 2,965.26
TOTAL this period (last page this line number only)			\$ 2,965.26

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 1225 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 1 of 1 for
 Line Number 15 c

(Use Separate Schedules for
 each numbered line)

78011573932

Name of Candidate or Committee in Full		COURTIER FOR CONGRESS <i>30 Day Post Gen</i>	
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Rackettstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Politics Washington, DC 20013	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	Date (month, day, year) 10/12/78	Amount of each Receipt this Period \$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)			\$ 2,965.26
TOTAL this period last page this line number only)			\$ 2,965.26

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Use Separate Schedules for
 each numbered line!

Name of Candidate or Committee in Full		COURTESY FOR CONGRESS		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Warren County Republican Finance Campaign Committee Backettstown, NJ 07840		Principal Place of Business Share of Billboard Advertising Occupation		10 '78	331.82
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional)					\$ 331.82
TOTAL this period (last page this line number only)					\$ 331.82



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1100

Date Filmed 4/22/81 Camera No. --- 2

Cameraman BPC



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1100.

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912737

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P. O. BOX 1298

TRENTON, NEW JERSEY 08607

(609) 392-2100

10 NASSAU STREET
PRINCETON, N. J. 08540
(609) 924-2108

SUITE 600
1150 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036
(202) 296-3432

JOEL H. STERNS
RICHARD K. WEINROTH
MICHAEL J. HERBERT
FRANK J. PETRINO
WILLIAM J. BIGHAM
W. S. GERALD SKEY
JOHN H. DUMONT
JOHN M. DONNELLY
ANN MARIE VAURIO
MARK D. SCHORR
SIMON KIMMELMAN
R. KEVIN McGRORY
NIELSEN V. LEWIS

February 17, 1981

OF COUNSEL
RICHARD J. HUGHES

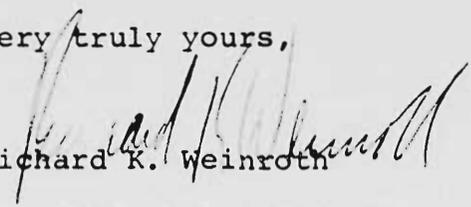
Ms. Suzanne Callahan
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1100

Dear Ms. Callahan:

Pursuant to our discussion, enclosed please find a check drawn on the Republican Party of New Jersey made payable to the Treasurer of the United States in the amount of \$250.00.

Very truly yours,


Richard K. Weinroth

RKW/cm

enclosure

cc: H. David Earling

912737

FEB 19 1981
P 1:32

REPUBLICAN PARTY OF NEW JERSEY
25 WEST STATE STREET, SUITE 612
TRENTON, N. J. 08604

PAY TO THE ORDER OF

James L. Anderson of the United States
The National State Bank

STATE STREET OFFICE
TRENTON, NEW JERSEY

⑆021200986⑆

200 518 071 00

Howard S. ...

2/13 1981

5250.00
65-9871
212 51

DOLLARS

1283

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STERNS. HERBERT & WEINROTH

A PROFESSIONAL CORPORATION
COUNSELLORS AT LAW
186 WEST STATE STREET
P. O. BOX 1298
TRENTON, NEW JERSEY 08607



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

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JIM COURTER
13TH DISTRICT, NEW JERSEY

WASHINGTON OFFICE:
325 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-8801

COMMITTEES:
ARMED SERVICES
POST OFFICE AND CIVIL SERVICE

Congress of the United States
House of Representatives
Washington, D.C. 20515

February 29, 1980

MAR 1980 200 # 551

DISTRICT OFFICES:
22 N. SUSSEX STREET
DOVER, NEW JERSEY 07801
(201) 366-0974
7 MAIN STREET
FLEMINGTON, NEW JERSEY 08822
(201) 786-2813
58 TRINITY STREET
NEWTON, NEW JERSEY 07860
(201) 383-9818

Mr. Robert O. Tiernan
Federal Election Commission
Washington, DC 20463

008710

RE: MUR 1100

Dear Mr. Tiernan:

This letter is in response to your letter of February 22, 1980 to my Campaign Treasurer, Mr. Ray Mark.

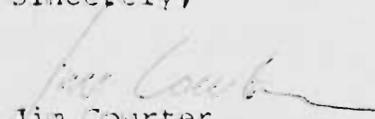
On November 3, 1978, Mr. Roger Bodman, my Campaign Manager, accepted a check from the New Jersey GOP Congressional Victory Fund, an arm of the New Jersey Republican State Committee, in the amount of \$3,000.00. This contribution was in the nature of a loan.

On or about February 21, 1979, Mr. Bodman, who now serves as my Administrative Assistant, received a call from Mr. Walter Peters, Executive Director of the New Jersey Republican State Committee, who informed us that the loan made on November 3, 1978 was in excess of the amount permitted by law. We immediately issued a check in the amount of \$2,000.00 in order to bring the loan into accordance with the law. A copy of the check and a copy of my letter to Mr. David Norcross, Chairman of the New Jersey Republican State Committee, are enclosed.

2 U.S.C.-441a (f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C.-441(a) (1) (A). The Courter for Congress Committee did not knowingly accept this contribution in violation of the law. In fact, the Committee assumed that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multi-candidate committee legally able to contribute up to \$5,000.00 per candidate in the general election of 1978. Obviously this was not the case. Had we known in November of 1978 that this Committee was not properly registered with the Federal Election Commission, we certainly would not have accepted the check.

I hope that this explanation will assist in this inquiry.

Sincerely,


Jim Courter
Member of Congress

JAC/rs
Enclosures

February 28, 1979

Mr. David Norcross, Chairman
N.J. Republican State Committee
Room 612
28 West State St.
Trenton, N.J. 08608

Dear David:

As you know, there seems to be some question concerning the loan that the N.J. G.O.P. Congressional Victory Fund made to my campaign. I was assured, by Walt Peters, that this transaction was approved by the Federal Election Commission.

We, of course, noted this loan on our reports to the F.E.C. — as the law requires.

It has now come to my attention, however, that there is possibly a problem with this loan. I am, therefore, enclosing a check from the Courter for Congress Committee in the amount of \$2000.00, which will reduce the loan to the \$1,000.00 limit permitted by the F.E.C.

Although I sincerely appreciate the loan made to my campaign, I cannot help but feel that this problem could have been avoided with proper investigation of F.E.C. regulations by the State Committee.

I would hope that this type of problem could be avoided in the future.

Sincerely,

Jim Courter
Member of Congress

JAC/rb
Enc.
CC: Walter Peters

COURTIER FOR CONGRESS COMMITTEE

256 MAIN STREET
HACKETTSTOWN, N. J. 07840

797

85-32/212

PAY TO THE ORDER OF

N.J. GOP Congressional Victory Fund

2/28 1979

\$ 2000.00

Two thousand & 00/100

DOLLARS



GARDEN STATE NATIONAL BANK
PARAMUS, NEW JERSEY
Hackettstown Office - Hackettstown, N.J. 07840

Roger A. Bohman

Ruth L. Wendler

FOR

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For Report Only
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ALBANY, N.Y.
APR 6 1969

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Congress of the United States
House of Representatives

Washington, D.C. 20515

OFFICIAL BUSINESS



Mr. Robert O. Tiernan
Federal Election Commission
Washington, DC 20463



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1100.

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