FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1351

Date Filmed 3-25-81 Camera No. --- 2

Cameraman GPC

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MUR 1351 2-26-81

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:
Mr. Robert C. Grant
114 East Ridgewood Pkwy.
Denville, New Jersey 07834

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	08E946	

(Always obtain signature of addressee or agent)

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

4. Gordie R. Grant

DATE OF DELIVERY 3-2-81

POSTMARK DENVILLE MAR 2 1981 07834

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS RCC

☆GPO : 1979-[illegible]

Callahan

FEDERAL ELECTION COMMISSION

_____

_____

_____

_____

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):

____ (1) Classified Information

____ (2) Internal rules and practices

____ (3) Exempted by other statute

____ (4) Trade secrets and commercial or financial information

X (5) Internal Documents

____ (6) Personal privacy

____ (7) Investigatory files

____ (8) Banking Information

____ (9) Well Information (geographic or geophysical)

Signed [signature]

date 3/2/87

FEC 9-21-77

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 26, 1981

CERTIFIED MAIL
RETURN RECIEPT REQUESTED

Mr. Robert C. Grant
Inter-Mark Associates
114 East Ridgewood Parkway
Denville, New Jersey 07834

Re: MUR 1351

Dear Mr. Grant:

The Federal Election Commission has reviewed the allegations of your complaint dated November 25, 1980, and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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RETURN RECIEPT REQUESTED

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Inter-Mark Associates
114 East Ridgewood Parkway
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Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

SMC 2/25/81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 26, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable James A. Courter
325 Cannon House Office Building
Washington, D.C. 20515

Re: MUR 1351

Dear Congressman Courter:

On December 12, 1980, the Commission notified you of a complaint alleging that you had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on February 23, 1981, determined that on the basis of the information contained in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

8 1 0 4 0 2 3 1 7 0 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable James A. Courter
325 Cannon House Office Building
Washington, D.C. 20515

Re: MUR 1351

Dear Congressman Courter:

On December 12, 1980, the Commission notified you of a complaint alleging that you had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January , 1981, determined that on the basis of the information contained in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

Sme 2/25/81

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 23, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: First GC Report - MUR 1351
Date of Transmittal 2/18/81

Please be advised that the above-referenced report contains a typographical error on page 2, paragraph 2, line 4, which should read "...in connection with his 1978 campaign" rather than 1980 campaign.

81040274711

February 23, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1351

Please have the attached Errata distributed to the Commission on an informational basis.

Thank you.

Attachment

pakayson

cc: Callahan

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1351
James A. Courter	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on Febraury 23, 1981, the Commission decided by a vote of 4-0 to take the following actions regarding MUR 1351:

1. Find NO REASON TO BELIEVE Congressman Courter has violated any provision of the FECA of 1971, as amended.

2. Approve the letter as attached to the First General Counsel's dated February 18, 1981.

3. Close the file.

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

Attest:

2/23/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-18-81, 2:37
Circulated on 48 hour vote basis: 2-19-81, 11:00

3 1 0 1 0 1 1 7 1 3

February 18, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1351

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

Attachment

pakayson

cc: Callahan

3 1 7 1 0 2 2 1 7 1 1

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

81 FEB 18 P2: 37

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2-18-81

MUR # 1351
DATE COMPLAINT RECEIVED
BY OGC 12/10/80
STAFF MEMBER Callahan

COMPLAINANT'S NAME: Robert C. Grant

RESPONDENT'S NAME: James A. Courter

RELEVANT STATUTE: 2 U.S.C. § 441a

INTERNAL REPORTS CHECKED: MUR 905

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On November 25, 1980, Robert C. Grant filed a complaint with the Commission alleging that Congressman James A. Courter may have submitted incorrect information to the Commission in MUR 905 based upon which it found no reasonable cause to believe and closed the file. Specifically, Grant alleged in MUR 905 that Courter violated 2 U.S.C. § 441a by accepting funds to purchase a home which he then mortgaged for the purpose of "laundering funds from an unknown source for the use in his campaign."

In response to the Commission's notification of the possible § 441a violation in MUR 905, both the respondent and his attorney submitted affidavits in connection with the transactions at issue as well as copies of documents pertaining to the property purchase in question. Based on that information, the Commission closed its file. Grant now contends that the Congressman recently made a statement which directly contradicts his affidavit.

EVIDENCE

Congressman Courter's affidavit of February 16, 1979, states in part,

> Every dollar placed in the Courter for Congress account by myself was the result of depleting checking and savings accounts, divesting myself of assets acquired years before the campaign and by placing directly in the campaign monies earned during 1978.

The affidavit details each transaction made by Courter in connection with his campaign and contains no evidence to indicate that Congressman Courter used any mortgage proceedings to finance his campaign. The facts and documentation submitted by the respondent in MUR 905 refuted all allegations made by the complainant.

Accordingly, on March 7, 1979, the Commission found no reasonable cause to believe Congressman Courter violated 2 U.S.C. § 441a and closed its file.

Grant's recent allegation is based on the contents of a newspaper article of October 5, 1980, in The New Jersey Herald newspaper. The article quotes Courter as making the following statement in connection with his 1980 campaign;

> First of all, whatever I earned that year, I have. It was not given to the campaign. All money in that campaign was properly reported, neatly and carefully.

Grant alleges that since the above news quote directly contradicts Courter's affidavit of February 16, 1979, that "It seems Mr. Courter lied to someone; whether to the reporter who wrote this story or to the FEC in his affidavit"

Robert Bodman, Administrative Assistant to Congressman Courter, filed a response to Grant's allegations on December 19, 1980. Bodman maintains that the sworn affidavit filed by the Congressman in MUR 905 is correct and the news article is inaccurate.

As previously stated, Congressman Courter not only filed an affidavit in MUR 905, but also submitted documents supporting his statement. There is no evidence in Grant's complaint of November 25, 1980, to indicate that Courter submitted misinformation in MUR 905. Further, the fact that Mr. Grant's allegation is based on a purported quote in a newspaper article and not on personal knowledge seriously affects the credibility of the allegation.

Accordingly, it is recommended that the Commission find no reason to believe that Congressman Courter has violated the Act.

Recommendations

1. Find no reason to believe Congressman Courter has violated any provision of the FECA of 1971, as amended.

2. Approve attached letter

3. Close the File

Attachments
Complaint
Response
Proposed notification letters (two)

(7 total pages)

3 1 0 2 3 7 1 5

PETER-MARK ASSOCIATES
114 E. RIDGEWOOD PARKWAY
DENVILLE, NEW JERSEY 07834
(201) 625-3983

80 DEC 10 P1:33
30 DEC 10 P2:22
RECEIVED
GENERAL COUNSEL

November 25, 1980

Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Dear sirs:

This is a formal complaint in the matter of MUR 905. I'm not sure it can be reopened, but toward that end I call your attention to the following:

Congressman James Courter stated to the FEC in an affidavit submitted answering my complaint the following:

"Every dollar placed in the Courter for Congress account by myself was the result of depleting checking and savings accounts...and by placing directly in the campaign monies earned during 1978..."

Early in October, 1980, Courter made the following statement relating to those "monies earned" during 1978. The statement was made to the New Jersey Herald newspaper and published in their edition of Oct. 5.

"First of all, whatever I earned that year (1978) I have. It was not given to the campaign."

It seems Mr. Courter lied to someone; either the

(more)

8 1 0 4 0 2 3 1 7 1 7

reporter who wrote this story, or to the FEC in his affidavit.

I would appreciate your looking into this matter. The newspaper article was sent to your office attached to my letter of Oct. 28, 1980.

I hereby swear that the above information is true to the best of my knowledge.

Very truly yours,

Robert C. Grant

RCG:jbt

DOUGLAS H. ROMAINE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Feb. 23, 1983

12/6/80

8 1 0 4 0 2 3 1 7 1 8

Courter pooh-poohs latest Stickle attack

N.J. Herald, Oct 5, 1980

By PAUL MARINACCIO
Staff Writer

HACKETTSTOWN — Rep. James Courter has called a charge by Democratic challenger Dave Stickle that he accepted $55,670 in illegal corporate donations during his 1978 election campaign an "act of deperateness" on the part of his opponent.

Stickle on Friday released a copy of a letter he sent to the Federal Election Commission in Washington which requested an investigation into the financing of Courter's 1978 campaign. Stickle claims that salaries Courter reported from two companies may have been laundered campaign contributions since Courter had pledged to campaign full time.

If Courter had earned the money legally, Stickle said in a prepared statement Friday, he "deceived" his supporters by pretending to campaign full time.

"If he did campaign full time, then how did he earn $55,670? If he did not campaign full time, then why did he tell the voters that he was? One way or another, Mr. Courter was not truthful with the people of our district."

As of Friday, the Federal Election Commission had not received Stickle's letter, a spokeswoman said. Copies circulated to reporters were dated Sept. 30.

Courter confirmed Friday that in 1978 he received $39,750 in salary from the Hackettstown law firm of Courter, Kobert & Hare, in which he serves as partner — $15,920 as vice president of Courter & Co. Inc., a mechanical contracting firm located in New York and owned by Courter's father, Joseph A. Courter Sr.

Rep. Courter denied that the salaries constituted corporate donations, which are illegal, and that he had run a part-time campaign in 1978.

"First of all, whatever I earned that year, I have. It was not given to the campaign," said Courter, reached at his campaign headquarters in Hackettstown. "All money in that campaign was properly reported, neatly and carefully."

Courter said he was able to canvass "10 to 12 hours a day" during the primary and general campaigns. Since the primary campaign did not heat up until March, he was free to tend to his law practice for two months, he said. Also, he worked weekends and for a period of time after his primary victory. He also was compensated for work "squeezed in" after long campaign days, and for cases that he had taken months or years earlier that resulted in settlements in 1978.

"Compensation does not enrich the law firm, in some cases, until years later," Courter said, adding that "when you join the Congress, you take no oath that you may not accept money that you have earned."

Concerning his father's firm, Courter said he performed legal duties on Sundays on a regular basis. Courter noted that he resigned from that company after his election to Congress and has not actively practiced law, although congressmen are permitted to perform some outside work.

"The claim is absolutely preposterous," the freshman Republican said. "It indicates to me the desperateness of his campaign. So far, he has not brought up issues, but merely things along that line."

Last month, Stickle challenged Courter to return and refuse contributions from corporate political action committees, which donate to candidates on behalf of employees. When Courter refused, Stickle decided to keep a $3,000 check from the United Auto Workers and to seek other such donations.

Stickle noted in his letter to the commission that Courter's income from the same two firms in 1977, when he presumably worked full weeks, was $2,370 less than during the 1978 campaign year.

"It is virtually impossible to campaign full time and draw a full-time salary at the same time," Stickle wrote in the letter. "My total income this year has been a $1,000 consulting fee for work performed earlier," continued Stickle, who is conducting door-to-door canvassing similar to the effort credited with helping Courter win in 1978.

The Federal Election Commission has received some 1,300 investigation requests on an escalating basis since its creation in 1975, said spokeswoman Sharon Snyder. Commission proceedings are secret, but results of requests that are deemed official complaints are made public, she noted. The commission will verify that an investigation request has been received, she said.

3

Callahan

911668

JIM COURTER
13TH DISTRICT, NEW JERSEY

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

RECEIVED
80 DEC 23 PM 4 4

DISTRICT OFFICES:
22 N. SUSSEX STREET
DOVER, NEW JERSEY 07801
(201) [illegible]
7 MAIN STREET
FLEMINGTON, NEW JERSEY 08822
(201) 788-2813
58 TRINITY STREET
NEWTON, NEW JERSEY 07860
(201) 383-6818

BCC # 3626

December 19, 1980

Mr. Charles Steele
General Counsel
Federal Election Committee
Washington, D.C. 20463

Re: MUR 1351

Dear Mr. Steele:

This letter constitutes a response to your letter of December 12, 1980 to Congressman James A. Courter.

First, I believe it is important to understand that this complaint is obviously not being filed by an objective third party motivated by a legitimate concern for the public interest. As you know, and as the record with the F.E.C. will reflect, Mr. Grant filed a complaint with the F.E.C. in early 1979 (MUR 905) alleging, preposterously, that a mysterious person gave Congressman Courter $125,000 cash for the purchase of a home, which he contended was later mortgaged for $100,000; that sum being placed in the 1978 campaign fund. After proper investigation, the F.E.C. quickly dismissed this preposterous complaint by a vote of 5-0. At the same time that Mr. Grant filed the aforementioned complaint, he mailed copies of the complaint to the news media in New Jersey, thus revealing his true motive. Nothing was heard from Mr. Grant until shortly before the November 1980 election, when he filed a Freedom of Information request for certain material contained in the MUR 905 file.

On September 30, 1980, Congressman Courter's Democratic opponent, Mr. David Stickle, filed a complaint with the F.E.C. making certain allegations regarding the 1978 campaign. Mr. Stickle overlooked or purposely neglected to have the complaint properly notarized. However, Mr. Stickle did not neglect to mail a copy of his complaint to the New Jersey news media. Although promptly informed by the F.E.C. of his responsibility to have the complaint properly notarized, Mr. Stickle, having succeeded in creating the issue with the media, never saw fit to file the complaint. The newspaper article to which Mr. Grant makes reference in MUR 1351, was a direct result of Mr. Stickle's improperly filed complaint of September 30, 1980. (See enclosed attachment).

With respect to Mr. Grant's complaint, the fact is that the newspaper article is inaccurate. I, in my capacity as Congressman Courter's campaign manager, discussed this matter with both the reporter and the editor of this newspaper.

The sworn statement that Congressman Courter submitted to the F.E.C. during the course of the investigation of MUR 905 is accurate and the Congressman stands by the affadavit.

It is my opinion, and that of Congressman Courter, that the only proper course of action in this matter is for the General Counsel to recommend to the full Commission that this complaint be summarily dismissed.

Sincerely,

Roger A. Bodman
Administrative Assistant
James A. Courter
Member of Congress

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECIEPT REQUESTED

Mr. Robert C. Grant
Inter-Mark Associates
114 East Ridgewood Parkway
Denville, New Jersey 07834

Re: MUR 1351

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Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

8 1 0 4 0 2 3 1 7 2 2

6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable James A. Courter
325 Cannon House Office Building
Washington, D.C. 20515

Re: MUR 1351

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The Commission, on January , 1981, determined that on the basis of the information contained in the complaint and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

7

12-23-80

Memo to file

Attachment was not enclosed with GCC# 3626.

JIM COURTER
12TH DISTRICT, NEW JERSEY

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

COMMITTEES:
ARMED SERVICES
POST OFFICE AND CIVIL SERVICE

G11668

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

RECEIVED
80 DEC 23 [illegible]

DISTRICT OFFICES:
22 N. SUSSEX STREET
DOVER, NEW JERSEY 07801
(201) [illegible]
7 MAIN STREET
FLEMINGTON, NEW JERSEY 08822
(201) 788-2513
50 TRINITY STREET
NEWTON, NEW JERSEY 07860
(201) 383-6818

BCC # 3624

December 19, 1980

Mr. Charles Steele
General Counsel
Federal Election Committee
Washington, D.C. 20463

Re: MUR 1351

Dear Mr. Steele:

This letter constitutes a response to your letter of December 12, 1980 to Congressman James A. Courter.

First, I believe it is important to understand that this complaint is obviously not being filed by an objective third party motivated by a legitimate concern for the public interest. As you know, and as the record with the F.E.C. will reflect, Mr. Grant filed a complaint with the F.E.C. in early 1979 (MUR 905) alleging, preposterously, that a mysterious person gave Congressman Courter $125,000 cash for the purchase of a home, which he contended was later mortgaged for $100,000; that sum being placed in the 1978 campaign fund. After proper investigation, the F.E.C. quickly dismissed this preposterous complaint by a vote of 5-0. At the same time that Mr. Grant filed the aforementioned complaint, he mailed copies of the complaint to the news media in New Jersey, thus revealing his true motive. Nothing was heard from Mr. Grant until shortly before the November 1980 election, when he filed a Freedom of Information request for certain material contained in the MUR 905 file.

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Mr. Charles Steele
Page two

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It is my opinion, and that of Congressman Courter, that the only proper course of action in this matter is for the General Counsel to recommend to the full Commission that this complaint be summarily dismissed.

Sincerely,

Roger A. Bodman
Administrative Assistant
James A. Courter
Member of Congress

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Mr. Roger A. Bodman
Congress of the United States
House of Representatives
Washington, D.C. 20515

OFFICIAL BUSINESS

Christmas USA 15c

Mr. Charles Steele
General Counsel
Federal Election Committee
Washington, D.C. 20515

RECEIVED
80 DEC 23 A11:14

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable James A. Courter
Hatchery Road
Hackettstown, New Jersey 07840

Re: MUR 1351

Dear Congressman Courter:

This letter is to notify you that on December 10, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1351. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter, please advise the Commission by 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.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

cc: Ray Marke, Treasurer
Courter for Congress Committee - 1980
121 Shelley Drive
Suite 28
Hackettstown, New Jersey 07840

8 1 0 1 0 2 3 1 7 2 9

1351 Callahan

RECEIVED

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.

80 DEC 23 A10:09

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:
Ray Marks, Treas

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	947580	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 11/17/80

POSTMARK DEC 17 1980 USPO

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO : 1979-288-848

1351 Callahan

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:
Hon James Courter

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	49 5 Lhb	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
J H Courter

4. DATE OF DELIVERY 12/17/80

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO : 1979-288-848

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert C. Grant
Inter-Mark Associates
114 E. Ridgewood Parkway
Denville, New Jersey 07834

Dear Mr. Grant:

This letter is to acknowledge receipt of your complaint of November 7, 1980, against Congressman James Courter which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent(s) will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

3 1 0 2 3 1 7 3 1

✓ 1351 Callahan

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:
   Robert C Grant

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	185166	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
Inter-Mark
Joan Taylor

4. DATE OF DELIVERY
DEC 17 1980

5. ADDRESS (Complete only if requested)
00 DEC 23 A10:50

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

DEC 17 1980

☆GPO : 1979-[illegible]

INTER-MARK ASSOCIATES
114 E. RIDGEWOOD PARKWAY
DENVILLE, NEW JERSEY 07834
(201) 625-3983

13511 G11511
RECEIVED
80 DEC 10 P1:33
80 DEC 10 P2:22

November 25, 1980

Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Dear sirs:

This is a formal complaint in the matter of MUR 905. I'm not sure it can be reopened, but toward that end I call your attention to the following:

Congressman James Courter stated to the FEC in an affidavit submitted answering my complaint the following:

"Every dollar placed in the Courter for Congress account by myself was the result of depleting checking and savings accounts...and by placing directly in the campaign monies earned during 1978..."

Early in October, 1980, Courter made the following statement relating to those "monies earned" during 1978. The statement was made to the New Jersey Herald newspaper and published in their edition of Oct. 5.

"First of all, whatever I earned that year (1978) I have. It was not given to the campaign."

It seems Mr. Courter lied to someone; either the

(more)

reporter who wrote this story, or to the FEC in his affidavit.

I would appreciate your looking into this matter. The newspaper article was sent to your office attached to my letter of Oct. 28, 1980.

I hereby swear that the above information is true to the best of my knowledge.

Very truly yours,

Robert C. Grant

RCG:jbt

DOUGLAS H. ROMAINE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Feb. 23, 1983

12/6/80

9 1 0 1 0 2 3 1 7 3 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert C. Grant
Inter-Mark Associates
114 E. Ridgewood Parkway
Denville, New Jersey 07834

Dear Mr. Grant:

We have received your letter of October 28, 1980, inquiring into the possibility of a violation of the Federal Election Campaign Act of 1971, as amended (the "Act").

As set forth in 2 U.S.C. § 437g(a)(1), any person who believes that there has been a violation of any law within the Commission's jurisdiction may file a written complaint. In order for the Commission to take action on such a complaint, its contents must be sworn to and signed in the presence of a notary, and notarized. Your letter did not satisfy this requirement of the Act.

In addition, Commission Regulations, found at 11 C.F.R. § 111.4, provide that a complaint:

(1) must contain the full name and address of the person making the complaint;

(2) should clearly identify as a respondent each person or entity who is alleged to have committed a violation;

(3) should identify the source of information upon which the complaint is based;

3 1 2 1 2 3 1 7 3 5

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:
The Honorable Tom Courter

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	947141	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
11-8-80

POSTMARK
NOV 4 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

316

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:
Courter for Congress Cmte - 1980

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	947142	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
11-8-80

POSTMARK
NOV 4 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GCC #3169

☆GPO : 1979-288-848

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.
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- ☐ 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:
Robert C. Grant

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	947147	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
X Gordon C. Grant

4. DATE OF DELIVERY
11-8-80

POSTMARK
NOV 4 1980

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GCC #3164

☆GPO : 1979-288-848

(4) should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction; and

(5) should be accompanied by supporting documentation if known and available to the person making the complaint.

Finally, please include your telephone number, as well as the full names and addresses of all respondents.

Enclosed please find a copy of §§ 111.4 - 111.10 of Commission regulations which deal with preliminary enforcement procedures. I hope that an examination of these materials will answer most of your questions, and will enable you to be specific in any assertions or allegations you might make in the event you wish to file a legally sufficient complaint with the Commission.

Please contact Elissa Garr, 202-523-4073, of this office should you have any questions about the procedures which should be followed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel
202-523-4175

Enclosure

cc: The Honorable James Courter
Courter for Congress Committee-1980

910988

INTER-MARK ASSOCIATES
114 E. RIDGEWOOD PARKWAY
DENVILLE, NEW JERSEY 07834
(201) 625-3983

RECEIVED
90 OCT 30 P2:36
GCC#
3.69

October 28, 1980

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

Dear Ms. Callahan:

I'm not sure that the matter of MUR 905 can be reopened, but toward that end I call your attention to the following:

Congressman James Courter stated to the FEC in an affidavit submitted answering my complaint the following:

"Every dollar placed in the Courter for Congress account by myself was the result of depleting checking and savings accounts...and by placing directly in the campaign monies earned during 1978..."

Early in October, 1980, Courter made the following statement relating to those "monies earned" during 1978. The statement was made to the New Jersey Herald Newspaper and published in their edition of Oct. 5.

"First of all, whatever I earned that year (1978) I have. It was not given to the campaign."

90 OCT 30 P3:15

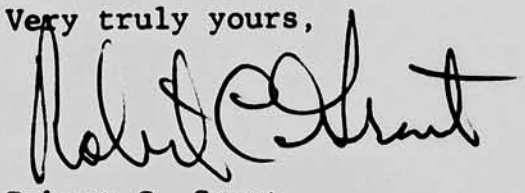
(more)

910988

It seems Mr. Courter lied to someone; either the reporter who wrote this story, or to the FEC in his affidavit.

I would appreciate your looking into this matter.

Very truly yours,



Robert C. Grant

Robert C. Grant

RCG:jbt

encl.

Courter pooh-poohs latest Stickle attack

N.J. Herald, Oct 5, 1980

By PAUL MARINACCIO
Staff Writer

HACKETTSTOWN — Rep. James Courter has called a charge by Democratic challenger Dave Stickle that he accepted $55,670 in illegal corporate donations during his 1978 election campaign an "act of deperateness" on the part of his opponent.

Stickle on Friday released a copy of a letter he sent to the Federal Election Commission in Washington which requested an investigation into the financing of Courter's 1978 campaign. Stickle claims that salaries Courter reported from two companies may have been laundered campaign contributions since Courter had pledged to campaign full time.

If Courter had earned the money legally, Stickle said in a prepared statement Friday, he "deceived" his supporters by pretending to campaign full time.

If he did campaign full time, then how did he earn $55,670? If he did not campaign full time, then why did he tell the voters that he was? One way or another, Mr. Courter was not truthful with the people of our district."

As of Friday, the Federal Election Commission had not received Stickle's letter, a spokeswoman said. Copies circulated to reporters were dated Sept. 30.

Courter confirmed Friday that in 1978 he received $39,750 in salary from the Hackettstown law firm of Courter, Kobert & Hare, in which he serves as partner, and $15,920 as vice president of Courter & Co. Inc., a mechanical contracting firm located in New York and owned by Courter's father, Joseph A. Courter Sr.

Rep. Courter denied that the salaries constituted corporate donations, which are illegal, and that he had run a part-time campaign in 1978.

"First of all, whatever I earned that year, I have. It was not given to the campaign," said Courter, reached at his campaign headquarters in Hackettstown. "All money in that campaign was properly reported, neatly and carefully."

Courter said he was able to canvass "10 to 12 hours a day" during the primary and general campaigns. Since the primary campaign did not heat up until March, he was free to tend to his law practice for two months, he said. Also, he worked weekends and for a period of time after his primary victory. He also was compensated for work "squeezed in" after long campaign days, and for cases that he had taken months or years earlier that resulted in settlements in 1978.

"Compensation does not enrich the law firm, in some cases, until years later," Courter said, adding that "when you join the Congress, you take no oath that you may not accept money that you have earned."

Concerning his father's firm, Courter said he performed legal duties on Sundays on a regular basis. Courter noted that he resigned from that company after his election to Congress and has not actively practiced law, although congressmen are permitted to perform some outside work.

"The claim is absolutely preposterous," the freshman Republican said. "It indicates to me the desperateness of his campaign. So far, he has not brought up issues, but merely things along that line."

Last month, Stickle challenged Courter to return and refuse contributions from corporate political action committees, which donate to candidates on behalf of employees. When Courter refused, Stickle decided to keep a $3,000 check from the United Auto Workers and to seek other such donations.

Stickle noted in his letter to the commission that Courter's income from the same two firms in 1977, when he presumably worked full weeks, was $2,370 less than during the 1978 campaign year.

"It is virtually impossible to campaign full time and draw a full-time salary at the same time," Stickle wrote in his letter. "My total income this year has been a $1,000 consulting fee for work performed earlier," continued Stickle, who is conducting door-to-door canvassing similar to the effort credited with helping Courter win in 1978.

The Federal Election Commission has received some 1,300 investigation requests on an escalating basis since its creation in 1975, said spokeswoman Sharon Snyder. Commission proceedings are secret, but results of requests that are deemed official complaints are made public, she noted. The commission will verify that an investigation request has been received, she said.

INTER-MARK ASSOCIATES
114 E. RIDGEWOOD PKW., DENVILLE N.J. 07834

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert C. Grant
Inter-Mark Associates
114 E. Ridgewood Parkway
Denville, N.J. 07834

Dear Mr. Grant:

We have received your letter of November 7, 1980, inquiring into the possibility of a violation of the Federal Election Campaign Act of 1971, as amended (the "Act").

As set forth in 2 U.S.C. § 437g(a)(1), any person who believes that there has been a violation of any law within the Commission's jurisdiction may file a written complaint. In order for the Commission to take action on such a complaint, its contents must be sworn to and signed in the presence of a notary, and notarized. Your letter did not satisfy this requirement of the Act.

In addition, Commission Regulations, found at 11 C.F.R. § 111.4, provide that a complaint:

(1) must contain the full name and address of the person making the complaint;

(2) should clearly identify as a respondent each person or entity who is alleged to have committed a violation;

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8 1 0 1 0 2 3 1 7 1 2

PS Form 3811, Jan. 1979

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- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery.$____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Robert C. Grant

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 947379 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

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

OCC# 3346

☆GPO : 1979-289-848

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery.$____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: The Hon. James Courtee

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 947378 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. Carmen Courtee DATE OF DELIVERY 11-4-80 | POSTMARK

5. ADDRESS (Complete only if requested)

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

OCC# 3346

☆GPO : 1979-289-848

1351

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.

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- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery.$____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Courtee for Congress

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 947377 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. Kay Mark DATE OF DELIVERY 11/24/80 | POSTMARK NOV 24 1980

5. ADDRESS (Complete only if requested)

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

OCC# 3346

☆GPO : 1979-289-848

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Please contact Elissa Garr, 202-523-4073, of this office should you have any questions about the procedures which should be followed.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel
202-523-4175

Enclosure

cc: Congressman James Courter
Courter for Congress Committee

RECEIVED

9 1 0 1 0 2 3 1 7 1 4

INTER-MARK ASSOCIATES
114 E. RIDGEWOOD PARKWAY
DENVILLE, NEW JERSEY 07834
(201) 625-3983

911270
GCC# 3346

80 NOV 17 A11:03

November 7, 1980

Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Dear sirs:

This is a formal complaint in the matter of MUR 905. I'm not sure it can be reopened, but toward that end I call your attention to the following:

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(more)

reporter who wrote this story, or to the FEC in his affadavit.

I would appreciate your looking into this matter. The newspaper article was sent to your office attached to my letter of Oct. 28, 1980.

Very truly yours,

Robert C. Grant 11/12/80

Robert C. Grant

RCG:jbt

DOUGLAS H. ROMAINE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Feb. 23, 1983

DOUGLAS H. ROMAINE
NOTARY ... NEW JERSEY
My Com... 23, 1983

8 1 0 4 0 2 3 1 7 1 5

INTER-MARK ASSOCIATES
114 E. RIDGEWOOD PKW., DENVILLE N.J. 07834

Office of the General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1351

Date Filmed 3-25-81 Camera No. --- 2

Cameraman GPC

8 1 0 4 0 2 3 1 7 1 8