



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 1896

DATE FILMED 2/13/87 CAMERA NO. 4

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- (1) Internal Routing Slips (2) 12 Day Reports
(3) 12 Day Pre-Briefs (4) Comment Sheets
(5) Conciliation Information (6) Internal
Memos

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

Signed Eric Kleinfield
 date Feb 4, 1987

8704741718



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1986

Thomas J. Spargo, Esquire
Republican State Committee
315 State Street
Albany, New York 12210

Re: MUR 1896
Sullivan for Congress and
Joseph E. Cannistra,
treasurer
Edna M. Sullivan

Dear Mr. Spargo:

On August 5, 1986, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), and 2 U.S.C. § 441a(a)(1)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. 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

Lawrence M. Noble (AZ)
BY: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

37740641519

plm

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Sullivan for Congress Committee)	MUR 1896
Joseph E. Cannistra, as treasurer)	
Edna M. Sullivan)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 5, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1896:

1. Accept the proposed conciliation agreement from Sullivan for Congress and Joseph E. Cannistra, as treasurer, and Edna M. Sullivan, subject to amendment as agreed during this meeting.
2. Direct the Office of General Counsel to send an appropriate letter.
3. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak, and McGarry voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

8-5-86
Date

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

87040641500

BEFORE THE FEDERAL ELECTION COMMISSION

AUG 18 8:49

In the Matter of)	
)	
Sullivan for Congress)	MUR 1896
Committee)	
Joseph E. Cannistra, as)	
treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, ("Respondents") violated 2 U.S.C. § 434(b)(3)(E) by failing to report properly the source of a loan. The Commission also found reason to believe that the Respondents violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Edna M. Sullivan. Finally, the Commission found reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(A)(1) by making an excessive contribution to the Sullivan for Congress Committee.

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

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondents enter voluntarily into this agreement with

[Handwritten signature]
8-11-49

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the Commission.

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

1. Respondent Sullivan for Congress Committee was the principal campaign committee of Peter Sullivan.

2. Respondent Joseph E. Cannistra is the treasurer of the Sullivan for Congress Committee, and the Respondent Edna M. Sullivan, is the candidate, Peter M. Sullivan's mother.

3. The 1984 April Quarterly report for the Sullivan for Congress Committee disclosed the receipt of a loan of \$25,000 on February 16, 1984, from Peter M. Sullivan.

4. The original source of the \$25,000 loan received by the Sullivan for Congress Committee was Edna M. Sullivan, a Respondent and the mother of the candidate, Peter M. Sullivan.

5. 2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

6. 2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

7. 2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

8. 2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any

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expenditure in violation of the \$1,000 limitation imposed upon contributions by any person under this section.

V. Respondents failed to report properly the source of a loan from Edna M. Sullivan in violation 2 U.S.C. § 434(b)(3)(E) .

VI. Respondents acceptance of a loan from Edna M. Sullivan that was \$24,000 in excess of contribution limits at 2 U.S.C. § 441a(a)(1)(A) was in violation 2 U.S.C. § 441a(f). Respondent Edna M. Sullivan made a contribution of \$24,000 in excess of statutory limits to the Sullivan for Congress Committee in violation of 2 U.S.C. section 441a(a)(1)(A).

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Thousand Five Hundred Dollars (\$2500), pursuant to 2 U.S.C. § 437a(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437a(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. 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. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

 8-11-88

no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: Lawrence M. Noble (L.M.N.) 9/22/86
Lawrence M. Noble Date
Deputy General Counsel

FOR THE RESPONDENTS:

Thomas J. Spargo June 30, 1986
Date
THOMAS J. SPARGO, ESQ.
Attorney for the Respondents

27040641524

[Signature] 8-11-86



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas J. Spargo, Esquire
Republican State Committee
315 State Street
Albany, New York 12210

Re: MUR 1896
Sullivan for Congress and
Joseph E. Cannistra,
treasurer
Edna M. Sullivan

Dear Mr. Spargo:

On _____, 1986, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), and 2 U.S.C. § 441a(a)(1)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. 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

BY: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

RLM



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 8, 1986

Thomas J. Spargo, Esquire
Republican State Committee
315 State Street
Albany, New York 12210

Re: MUR 1896
Sullivan for Congress and
Joseph E. Cannistra,
as treasurer
Edna M. Sullivan

Dear Mr. Spargo:

This letter is to confirm the Commission's receipt of your proposed conciliation agreement on July 8, 1986. The Commission has reviewed your counterproposal and has made the following change. The Commission has added a statement of its reason to believe finding concerning Edna M. Sullivan to the introductory paragraph.

Pursuant to your telephone discussion with staff on July 8, enclosed is a corrected version of the conciliation agreement signed by you on June 30, 1986. Provided you are in agreement with the corrected pages, please initial the bottom of each page of the agreement and return it to the Commission.

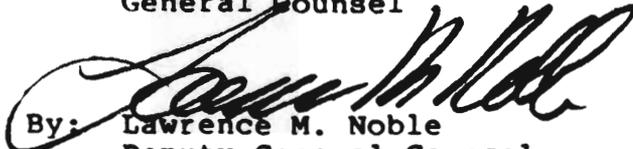
I am still hopeful that this matter can be settled through a conciliation agreement and I note that the Commission has been willing to include a number of your proposed changes in the agreement. Should you have any further questions, please call George Demougeot at (202) 376-8200. In light of the statute's mandatory 90 day limit for conciliation, you should respond to the Commission within 15 days of receipt of this notification.

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Our records indicate that the conciliation period in this matter expires September 17, 1986. (See 2 U.S.C. § 437g(a)(4)(A)(i)).

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

37010041307



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas J. Spargo, Esquire
Republican State Committee
315 State Street
Albany, New York 12210

Re: MUR 1896
Sullivan for Congress and
Joseph E. Cannistra,
as treasurer
Edna M. Sullivan

Dear Mr. Spargo:

This letter is to confirm the Commission's receipt of your proposed conciliation agreement on July 8, 1986. The Commission has reviewed your counterproposal and has made the following change. The Commission has added a statement of its reason to believe finding concerning Edna M. Sullivan to the introductory paragraph.

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I am still hopeful that this matter can be settled through a conciliation agreement and I note that the Commission has been willing to include a number of your proposed changes in the agreement. Should you have any further questions, please call George Demougeot at (202) 376-8200. In light of the statute's mandatory 90 day limit for conciliation, you should respond to the Commission within 15 days of receipt of this notification.

977413

Our records indicate that the conciliation period in this matter expires September 17, 1986. (See 2 U.S.C. § 437a(a)(4)(A)(i)).

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

27040041529

Demougo

THOMAS J. SPARGO, ESQ.

315 STATE STREET
ALBANY, NY 12210

2160

June 30 1986

29-7
213

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 2,500.00

Two thousand five hundred and no/100

DOLLARS



Key Bank N.A.
Park Office, Albany, N.Y. 12210

FOR MUR 1896

Thomas J. Spargo

⑈002160⑈ + ⑈021300077⑈ 11 10 639 5⑈

CC# 880

MEMORANDUM

TO: Debra A. Reed TO: Judy Smith

FROM: Judy Smith FROM: Debra A. Reed

CHECK NO. 2160 (a copy of which is attached) RELATING
TO MUR 1896 AND NAME Sullivan for Congress Committee
Joseph E. Cannistra, as Treasurer

WAS RECEIVED ON 7/8/86 PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT (#95F387506)
- / / CIVIL PENALTIES ACCOUNT (#95-1099.160)
- / / OTHER _____

SIGNATURE Debra A. Reed

DATE 7/9/86

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Sullivan for Congress Committee) MUR 1896
Joseph E. Cannistra, as treasurer)
Edna M. Sullivan)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 17, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1896:

1. Find probable cause to believe that the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f).
2. Find probable cause to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
4. Direct the Office of General Counsel to send appropriate letters pursuant to the above actions.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

8704041531
June 17, 1986
Date

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

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

JUN 17 1986

In the Matter of)
)
 Sullivan for Congress)
 Committee)
 Joseph E. Cannistra, as)
 treasurer)
 Edna M. Sullivan)

MUR 1896 : 17

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan.

On August 10, 1984, the Committee filed an amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate.

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

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2 U.S.C. § 431(8)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported a \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the source of the loan was not properly reported, the Commission opened a MUR and found reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 434(b)(3)(E). In addition, since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Commission found reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A), and that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

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IV. RECOMMENDATION

1. Find probable cause to believe that the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f).
2. Find probable cause to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the proposed letter.

Date

6 June 1986


Charles N. Steele
General Counsel

Attachments

- I. Respondents' Brief
- II. Proposed Conciliation Agreement
- III. Proposed letter to respondents

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AND DELIVERED
86 APR 22 AM 11:34
GOC 284

THOMAS J. SPARGO
ATTORNEY AT LAW
314 STATE STREET
ALBANY, NEW YORK 12210
TELEPHONE 518-462-6677

April 14, 1986

Federal Election Commission
Attn: George Demougeot
Counsel's Office
999 E Street, N.W.
Washington, D.C. 20463

86 APR 22 PM 3:30

Re: MUR 1896
Sullivan for Congress Committee and Joseph
E. Cannistra, as Treasurer, and Edna Sullivan

Dear Mr. Demougeot:

Please treat this letter as a written response on behalf of the Sullivan for Congress Committee, Joseph E. Cannistra, as Treasurer and Edna M. Sullivan, to the above Matter Under Review by the Commission.

As stated in your General Counsel's Brief, there is no disputed fact that the candidate's mother, Edna Sullivan, made a loan to her son in order that he might seek the Republican nomination for the congressional seat being vacated in Westchester County, New York, by the then incumbent Richard Ottinger.

The candidate, Peter Sullivan, was an incumbent state assemblyman in New York at the time, in early 1984, that he considered making a bid for the open congressional seat.

Although, Westchester County, New York, is a notoriously wealthy area of New York, Peter Sullivan, is not a man of individual means, nor is his family. Indeed, Peter needed the \$25,000 loan in order to get some seed money to make his congressional campaign viable.

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MUR 1896
Sullivan for Congress Committee
April 14, 1986

-2-

Last year, Peter Sullivan, wrote me briefly about his mother in a letter as follows: "My mother is 72 years old and my father 80. Although my parents own a modest vacation bungalow in Connecticut, they do not own their own home. My mother's loan to me constituted a substantial portion of her assets, which comprise almost the total assets of my parents. It was clearly understood by both of us that this was a bona fide loan which would have to be repaid."

In a later conversation Mr. Sullivan revealed that the assets which were pledged by his mother when she went to borrow the money to give to her son, constituted the substantial portion of her retirement nest egg, which she had accumulated during her professional career as a teacher.

As your notes may reflect, Mr. Sullivan folded his congressional campaign, not too long after it was announced that he would seek the Republican nomination, and he thereupon resumed his campaign for election to his state assembly seat.

You are aware from an examination of your records that Peter immediately undertook to repay his mother \$10,000 in May, 1984, and another \$5,000 in early July. These two repayments were made before there was any inquiry by the FEC into the committee's transactions, evidencing, if you will, the sense of purpose that was undertaken independently and quickly to restore his mother to her state of financial security.

By December of that same year, Mrs. Sullivan had been repaid the full amount of her loan, \$25,000, as well as interest in the amount of \$1,725.

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When the Ottinger seat became open, Peter Sullivan, whose state seat comprised a part of this congressional district, declared his candidacy and knew that this federal effort would require a financial commitment on his part and that he would need to borrow the money to begin.

At this point, rather than proceed himself through regular commercial channels to secure the loan, Peter's mother agreed to make her own commitment to her son's future by putting up her life's assets as the collateral for the loan to her son's congressional aspirations.

I am sure that over the last decade or more that the Commission has seen where rich families have endowed the political aspirations of their brightest sons and daughters with largess. Please distinguish the instant case from those other family relationships where money could be freely given by a parent to their child's political success, from the instant case where the aspiring candidate's mother risks her retirement assets in order that her son may have an unexpected chance to serve in this country's Congress in Washington.

This maternal aspiration and dream has been turned into, not just a nightmare of anguish at these allegations of wrongdoing, and the obvious embarrassment and strain that results however subtly between Mrs. Sullivan and her son, but more obviously in a very overwhelming demand for substantial resources which this family never had in the first place - otherwise why the mother's loan.

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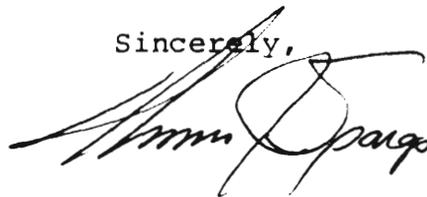
MUR 1896
Sullivan for Congress Committee
April 14, 1986

-4-

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I appreciate your courtesies and apologize for taking so much of your time with this application.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Dargatzis". The signature is written in dark ink and is positioned below the word "Sincerely,".

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Sullivan for Congress)
Committee)
Joseph E. Cannistra, as treasurer)
Edna M. Sullivan)

MUR 1896
35 APR 14 P 3: 27

COMPREHENSIVE INVESTIGATIVE REPORT

I. BACKGROUND

A brief on this matter was mailed to Respondents on March 5, 1986, making their response due on March 24. By letter dated March 23, Respondents requested an extension of 20 days in which to file their brief. Respondents' counsel indicated that additional time was needed to consult with his clients. Respondents' brief would therefore be due by April 14, 1986. A report to the Commission will be submitted shortly thereafter.

Charles N. Steele
General Counsel

April 14, 1986
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1986

Thomas J. Spargo, Esquire
314 State Street
Albany, NY 12210

RE: MUR 1896
Sullivan for Congress
Committee and Joseph E.
Cannistra, as treasurer
Edna M. Sullivan

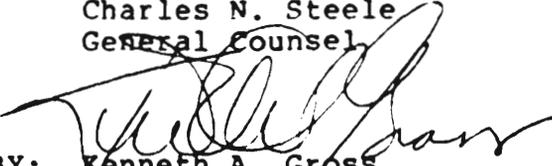
Dear Mr. Spargo:

This is in reference to your letter dated March 23, 1986, requesting an extension of 20 days to respond to the Commission's brief. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your response will be due on April 14, 1986.

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Thomas J. Spargo, Esquire
314 State Street
Albany, NY 12210

RE: MUR 1896
Sullivan for Congress
Committee and Joseph E.
Cannistra, as treasurer
Edna M. Sullivan

Dear Mr. Spargo:

This is in reference to your letter dated March 23, 1986, requesting an extension of 20 days to respond to the Commission's brief. After considering the circumstances presented in your letter, the Commission has determined to grant your requested extension. Accordingly, your response will be due on April 14, 1986.

If you have any questions, please contact George Demougeot, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

RVT

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06 MAR 27 AIO: 22

THOMAS J. SPARGO
ATTORNEY AT LAW
314 STATE STREET
ALBANY, NEW YORK 12210
TELEPHONE 518-462-6677

March 23, 1986

06 MAR 27 9:3:54

GEN

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

Re: MUR 1896
Sullivan for Congress Committee and Joseph E.
Cannistra, as treasurer, and Edna M. Sullivan

Attn: George Demougeot

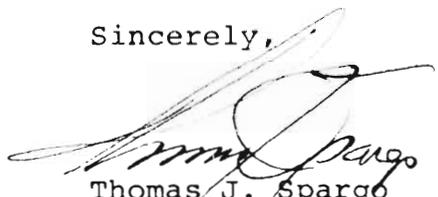
Dear Mr. Demougeot:

I am writing pursuant to your letter of March 5, 1986, over the signature of the General Counsel, Charles N. Steele, regarding the above matter.

In order that I may have time to consult with my clients and frame my response to the brief of the General Counsel, I am hereby requesting an extension of time within which to file my brief for a period of 20 days.

I expect that within a short period of time, I should have this writing filed with your office and I appreciate your courtesies.

Sincerely,


Thomas J. Spargo

9700041542

THOMAS J SPARGO

ALBANY NEW YORK 22 C



Federal Election Commission
Attn: George Demougnot
Office of General Counsel
999 F Street, N.W.
Washington, D.C. 20469

9:22



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
SECRETARY
SENSITIVE
00 MAR 6 P 2: 53

March 6, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *all*

SUBJECT: MUR 1896

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 5, 1986. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent

370904-345



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1986

Charles A. Goldberger, Esquire
Taylor, McCullough, Goldberger,
Geoghegan & Friedman
175 Main Street
White Plains, NY 10601

RE: MUR 1896
Sullivan for Congress
Committee and
Joseph E. Cannistra, as
treasurer
Edna M. Sullivan

Dear Mr. Goldberger:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on February 19, 1985, found reason to believe that Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), and that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).

After considering all the evidence available to the Commission, the Office of 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 if possible) 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, if possible.) 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.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

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.

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Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

07030641346

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Sullivan for Congress) MUR 1896
Committee)
Joseph E. Cannistra, as)
treasurer)
Edna M. Sullivan)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan.

On August 10, 1984, the Committee filed an amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate.

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

2 U.S.C. § 431(8)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported a \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the source of the loan was not properly reported, the Commission opened a MUR and found reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 434(b)(3)(E). In addition, since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Commission found reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A), and that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

37140341549

III. General Counsel's Recommendation

1. Find probable cause to believe that the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f).
2. Find probable cause to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the proposed letter.

Date 4 March 1906



 Charles N. Steele
 General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

*OGE
Docket*

SENSITIVE

MAR 6 P 2:53

March 6, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1896

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 5, 1986. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1986

Charles A. Goldberger, Esquire
Taylor, McCullough, Goldberger,
Geoghegan & Friedman
175 Main Street
White Plains, NY 10601

RE: MUR 1896
Sullivan for Congress
Committee and
Joseph E. Cannistra, as
treasurer
Edna M. Sullivan

Dear Mr. Goldberger:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on February 19, 1985, found reason to believe that Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), and that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).

After considering all the evidence available to the Commission, the Office of 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 if possible) 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, if possible.) 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.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extension beyond 20 days.

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.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Sullivan for Congress) MUR 1896
Committee)
Joseph E. Cannistra, as)
treasurer)
Edna M. Sullivan)

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On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan.

On August 10, 1984, the Committee filed an amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate.

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

070004133

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2. Find probable cause to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the proposed letter.

4 March 1906
Date



Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1986

Charles A. Goldberger, Esquire
Taylor, McCullough, Goldberger,
Geoghegan & Friedman
175 Main Street
White Plains, NY 10601

RE: MUR 1896
Sullivan for Congress
Committee and
Joseph E. Cannistra, as
treasurer
Edna M. Sullivan

Dear Mr. Goldberger:

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2704041534

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

97040641553

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Sullivan for Congress) MUR 1896
Committee)
Joseph E. Cannistra, as)
treasurer)
Edna M. Sullivan)

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2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

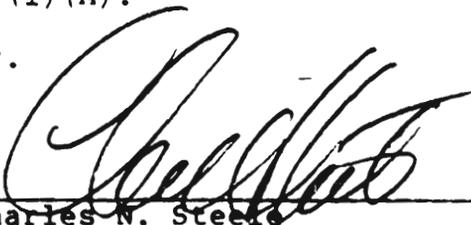
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37140641358

III. General Counsel's Recommendation

1. Find probable cause to believe that the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f).
2. Find probable cause to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the proposed letter.

4 March 1906
Date



Charles N. Steele
General Counsel

RECEIVED AT THE FEC
GCC # 8623
05 JUL 16 P 1: 29

SULLIVAN FOR CONGRESS
Post Office Box 63
Valhalla, N.Y. 10595

July 12, 1985

CERTIFIED MAIL - RRR
P 415 268 432

Mr. George Demougeot
Federal Election Commission
Washington, D. C. 20463

Identification Numbers: COO177800 / 109100

Reference: April 1984 Quarterly Report (Inception - March 31, 1984)

Dear Sir: RE: MUR 1896

As suggested by Thomas Spargo, Esq., Counsel of this Committee,
enclosed is a copy of the Report referred to above amended as
to Schedule A (Loans) and Schedule C.

Also enclosed for your convenience are copies of the July 1984,
October 1984 and January 1985 Quarterly Reports.

Very truly yours,

E. J. Sullivan
Edward J. Sullivan
Assistant Treasurer

CC: Thomas Spargo, Esq.

3714041559

JUL 17 AND: 2

**REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee**

RECEIVED AT THE FE
FEC

85 JUL 16 P 1: 29

(Summary Page)

<small>ALIGN AREA</small>	1. Name of Committee (in Full) <i>SULLIVAN FOR CONGRESS</i>	2. FEC Identification Number <i>C 00177600 / 109100</i>
	Address (Number and Street) <i>PO Box 63</i>	3. Is this Report an Amendment? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	City, State and Zip Code <i>VAL HALLA NEW YORK 10545</i>	<input type="checkbox"/> Check if address is different than previously reported.

4. TYPE OF REPORT

<input checked="" type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____
<input type="checkbox"/> January 31 Year End Report	_____ in the State of _____
<input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for - Primary Election General Election Special Election Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <i>INCEPTION</i> through <i>March 31 1984</i>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	<i>3150.00</i>	<i>3150.00</i>
(b) Total Contribution Refunds (from Line 20 (d))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	<i>3150.00</i>	<i>3150.00</i>
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	<i>10615.10</i>	<i>10,615.10</i>
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	<i>10615.10</i>	<i>10,615.10</i>
8. Cash on Hand at Close of Reporting Period (from Line 27)	<i>11234.20</i>	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	<i>25,000.00</i>	

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

Joseph E. Quinn
Type or Print Name of Treasurer

COPY

SIGNATURE OF TREASURER _____ **Date** _____

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

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

37040341560

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full) SULLIVAN FOR CONGRESS Report Covering the Period:
From: 1/1/01, in To: March 31, 1914

I. RECEIPTS

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	1100.00	1100.00	11 (a)
(Memo Entry Unitemized \$ <u>50.00</u>)			
(b) Political Party Committees			11 (b)
(c) Other Political Committees	2750.00	2,750.00	11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11 (a), 11 (b), 11 (c) and 11 (d)).	3850.00	3850.00	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	25,000.00	25,000.00	13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)).			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	28,850.00	28,850.00	16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES	10,615.80	10,615.80	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	10,615.80	10,615.80	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	- 0 -	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	28,850.00	24
25. SUBTOTAL (Add Line 23 and Line 24)	\$	28,850.00	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	10,615.80	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	18,234.20	27

3701041551

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) SULLIVAN WORK CENTERS

A. Full Name, Mailing Address and ZIP Code <u>J. KENT & MARTHA N. PEPPIE</u> <u>MARTIN ROAD</u> <u>1246 NY 10580</u>		Name of Employer <u>BURGESS & LEITH INC</u>	Date (month, day, year) <u>3/19/84</u>	Amount of Each Receipt this Period <u>750.00</u>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <u>Vice President</u>	Aggregate Year-to-Date-\$ <u>750.00</u>	
B. Full Name, Mailing Address and ZIP Code <u>THOMAS F. EBAN</u> <u>14 BILTAHNE DR</u> <u>1246 NY 10580</u>		Name of Employer <u>Langdon P. Cook & Co. Inc</u>	Date (month, day, year) <u>3/19/84</u>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <u>Vice President</u>	Aggregate Year-to-Date-\$ <u>300.00</u>	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date-\$	
SUBTOTAL of Receipts This Page (optional)				
TOTAL This Period (last page this line number only)				<u>1050.00</u>

0701041558

UNITEMIZED 50.00
1,100.00

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full) <i>SULLIVAN FOR CONGRESS</i>			
A. Full Name, Mailing Address and ZIP Code <i>CIBA-GEIGY Employee Credit Fund RINDLEY NY 10502</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period <i>500.00</i>
	Occupation	<i>3/9/84</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ <i>500.00</i>		
B. Full Name, Mailing Address and ZIP Code <i>CITICORP Voluntary Political Fund 399 PARK AVE 32nd Floor New York NY 10043</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period <i>250.00</i>
	Occupation	<i>3/21/84</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ <i>250.00</i>		
C. Full Name, Mailing Address and ZIP Code <i>N.I.A. Political Victory Fund 1600 Rhode Island Ave N.W. Washington D.C. 20036</i>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period <i>2000.00</i>
	Occupation	<i>2/13/84</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$ <i>2000.00</i>		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			<i>2750.00</i>
TOTAL This Period (last page this line number only)			<i>2750.00</i>

0714034150

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

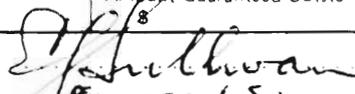
Name of Committee (in Full)			
<i>SULLIVAN FOR CONGRESS</i>			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Rep '94 40 NR 607 Box 1505 New Rochelle NY 10803</i>	<i>Dinner, Reception</i>	<i>2/17/84</i>	<i>500.00</i>
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Laura M. McLaughlin 59 South Ave New York NY 10012</i>	<i>Competition Expenses</i>	<i>3/18/84</i>	<i>3000.00</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Allen G. Piro 450 Breams St New York NY 10013</i>	<i>Competition Expenses</i>	<i>3/19/84</i>	<i>333.00</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>William P. Mc Guire 4100 Mass Ave NW Washington DC 20016</i>	<i>Consulting Services</i>	<i>3/26/84</i>	<i>500.00</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Woodward & Loeb Inc 2 Madison Ave White Plains NY 10606</i>	<i>Printing</i>	<i>2/21/84</i>	<i>410.51</i>
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Bill Johnson & Associates 367 Grand Ave Freeport NY 10833</i>	<i>Printing</i>	<i>2/21/84</i>	<i>5500.00</i>
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			<i>10243.51</i>
TOTAL This Period (last page this line number only)			<i>10243.51</i>

UNITEMIZED

372.29
10,615.80

COVERING PERIOD: INCEPTION THRU MAR. 31, 1984

LOANS
(LOANS OWED BY THIS COMMITTEE)

Name of Committee (in Full) SULLIVAN FOR CONGRESS				C 00177600 / 109100			
A. Full Name, Mailing Address and ZIP Code of Loan Source PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601		Original Amount of Loan \$25,000.00	Cumulative Payment To Date -0-	Balance Outstanding at Close of This Period \$25,000.00			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr)		<input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A							
1. Full Name, Mailing Address and ZIP Code ORIGINAL SOURCE: EDNA M. SULLIVAN P.O. BOX 123 VALHALLA, N.Y. 10595		Name of Employer STATE OF NEW YORK		Occupation DIST. OFFICE MGR.		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer		Occupation		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer		Occupation		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period			
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr)		<input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B							
1. Full Name, Mailing Address and ZIP Code		Name of Employer		Occupation		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer		Occupation		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer		Occupation		Amount Guaranteed Outstanding \$	
 				JUL 1 1 1985		EDWARD J. SULLIVAN, ASST. TREAS	
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.							

0711041555

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

85 JUL 16 P 1: 30
ALIGN AREA

ALIGN AREA	1. Name of Committee (in Full) SULLIVAN FOR CONGRESS	2. FEC Identification Number C 00177600 / 109100
Address (Number and Street) PO BOX 63	3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
City, State and Zip Code VALHALLA	<input type="checkbox"/> Check if address is different than previously reported. New York 10595	

4. TYPE OF REPORT

- | | |
|---|---|
| <input type="checkbox"/> April 15 Quarterly Report | <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) |
| <input checked="" type="checkbox"/> July 15 Quarterly Report | election on _____ in the State of _____ |
| <input type="checkbox"/> October 15 Quarterly Report | <input type="checkbox"/> Thirtieth day report following the General Election on _____ |
| <input type="checkbox"/> January 31 Year End Report | _____ in the State of _____ |
| <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) | <input type="checkbox"/> Termination Report |

This report contains activity for Primary Election General Election Special Election Runoff Election

37910541357

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>April 1 1984</u> through <u>June 30 1984</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))		3850.00
(b) Total Contribution Refunds (from Line 20 (d))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		3850.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1667.58	12213.28
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	1667.58	12213.28
8. Cash on Hand at Close of Reporting Period (from Line 27)	6566.62	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	15,000.00	

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

Joseph E. Carraschio
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ **Date** _____

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

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

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

Name of Committee (in Full)		Report Covering the Period:	
SULLIVAN FOR CONGRESS		From: 4/1/84	To: 6/30/84
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS			
11	CONTRIBUTIONS (other than loans) FROM:		
	(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized \$ _____)		1100.00
	(b) Political Party Committees		
	(c) Other Political Committees		2750.00
	(d) The Candidate		
	(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d))		3850.00
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
13	LOANS:		
	(a) Made or Guaranteed by the Candidate		25000.00
	(b) All Other Loans		
	(c) TOTAL LOANS (add 13 (a) and 13 (b))		
14	OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
15	OTHER RECEIPTS (Dividends, Interest, etc.)		
16	TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	0	21550.00
II. DISBURSEMENTS			
17	OPERATING EXPENDITURES	1667.58	12213.31
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
19	LOAN REPAYMENTS:		
	(a) Of Loans Made or Guaranteed by the Candidate	10,000.00	10,000.00
	(b) Of All Other Loans		
	(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))		
20	REFUNDS OF CONTRIBUTIONS TO		
	(a) Individuals/Persons Other Than Political Committees		
	(b) Political Party Committees		
	(c) Other Political Committees		
	(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		
21	OTHER DISBURSEMENTS		
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	11667.58	22213.31
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	15234.20
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	0
25	SUBTOTAL (Add Line 23 and Line 24)	\$	15234.20
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	11667.58
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	6566.62

271174158

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) <i>SULLIVAN FOR CONGRESS</i>			
A. Full Name, Mailing Address and ZIP Code <i>THE BUREAU OF DEMOCRACY Washington D.C.</i>	Purpose of Disbursement <i>Travel</i>	Date (month, day, year) <i>4/23/84</i>	Amount of Each Disbursement This Period <i>212.28</i>
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code <i>GAZETTE PRESS INC. 16 School St JACKSON NY 10701</i>	Purpose of Disbursement <i>PRINTING</i>	Date (month, day, year) <i>5/5/84</i>	Amount of Each Disbursement This Period <i>825.83</i>
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			<i>1038.11</i>

07040341559

UNITEMIZED 629.47
1,667.58

PERIOD APRIL 1, 1984 THRU JUNE 30, 1984

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SULLIVAN FOR CONGRESS

I.D.# C00177600/109100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601	LOAN REPAYMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/17/84	\$10,000.00
B. Full Name, Mailing Address and ZIP Code COPY	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$10,000.00

070104370

COPY

SULLIVAN FOR CONGRESS
 Post Office Box 63
 Valhalla, N.Y. 10595

E. J. Sullivan
 E. J. SULLIVAN ASST. TREAS.

SEP 24 1984

REPORT OF RECEIPTS AND DISBURSEMENTS
For an Authorized Committee

RECEIVED BY THE FEC
85 JUL 16 P 1:30

(Summary Page)

1. Name of Committee (in Full)
SULLIVAN FOR CONGRESS

2. FEC Identification Number
C00177600/109100

Address (Number and Street)
P.O. Box 63

3. Is this Report an Amendment?
 YES NO

City, State and ZIP Code
VALHALLA, N.Y. 10595

Check if address is different than previously reported.

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

COPY

This report contains activity for — Primary Election General Election Special Election Runoff Election

SUMMARY		Column A	Column B
Covering Period <u>7/1/84</u> Through <u>9/30/84</u>		This Period	Calendar Year-to-Date
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e)	\$	25.00	\$ 3,875.00
(b) Total Contribution Refunds (from Line 20d)	\$		\$
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)	\$	25.00	\$ 3,875.00
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)	\$	36.45	\$ 12,319.83
(b) Total Offsets to Operating Expenditures (from Line 14)	\$		\$
(c) Net Operating Expenditures (Subtract Line 7b from 7a)	\$	36.45	\$ 12,319.83
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$	55.17	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	2,500.00	

0701000371

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

For further information, contact:

EDWARD J. SULLIVAN, ASST. TREAS.

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Type or Print Name of Treasurer

SIGNATURE OF TREASURER E. J. Sullivan Date 10/15/84

COPY

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

MAILED AT VALHALLA, N.Y. 10595

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

MAILED 10/15/84 @ 2 10 PM T } HOUSE CERTIFIED - RRR - # P-375-657-098
\$BE n 1 - # P-375-657-099

FEC FORM 3 (3/80)

SCHEDULE A

ITEMIZED RECEIPTS

7/1/84 THRU 9/30/84

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **SULLIVAN FOR CONGRESS # C00177600/109100**

<p>A. Full Name, Mailing Address and ZIP Code NUMBERCRUNCHERS, INC. 24 NORTH AVENUE NEW ROCHELLE, NY 10805</p>	<p>Name of Employer (PROCEEDS FROM SALE OF VARIOUS ITEMS ON HAND)</p> <p>Occupation</p>	<p>Date (month, day, year) 8/16/84</p>	<p>Amount of Each Receipt this Period 500.00</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>B. Full Name, Mailing Address and ZIP Code RICHARD J. BEHN 271 NORTH AVE. NEW ROCHELLE, NY 10801</p>	<p>Name of Employer (PROCEEDS FROM SALE OF VARIOUS ITEMS ON HAND)</p> <p>Occupation</p>	<p>Date (month, day, year) 8/16/84</p>	<p>Amount of Each Receipt This Period 5,500.00</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>C. Full Name, Mailing Address and ZIP Code</p> <p style="font-size: 2em; text-align: center;">COP</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year) COP</p>	<p>Amount of Each Receipt This Period</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>		<p>Aggregate Year-to-Date--\$</p>	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) **6,000.00**

070417

7/1/84 - thru 9/30/84

All information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SULLIVAN FOR CONGRESS # C00177600/109100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, NY 10601	LOAN REPAYMENT	7/9/84	5,000.00
B. Full Name, Mailing Address and ZIP Code PETER M. SULLIVAN (AS ABOVE)	LOAN REPAYMENT	8/27/84	5,000.00
C. Full Name, Mailing Address and ZIP Code PETER M. SULLIVAN (AS ABOVE)	LOAN REPAYMENT	9/7/84	2,500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			12,500.00

9704064174

COPY

COPY

LOANS
7/1/84 thru 9/30/84

Name of Committee (in Full) **SULLIVAN For Congress** H-**CO0177600/109100**

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - B301 WHITE PLAINS, N.Y. 10601	25,000.00	22,500.00	2,500.00

Election: Primary General Other (specify):
 Terms: Date Incurred **7/1/84** Date Due **CH DEMAND** Interest Rate _____ % (apr) Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
COPY	Occupation
	Amount Guaranteed Outstanding \$
	2. Full Name, Mailing Address and ZIP Code
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	3. Full Name, Mailing Address and ZIP Code
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period

Election: Primary General Other (specify):
 Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	2. Full Name, Mailing Address and ZIP Code
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$
	3. Full Name, Mailing Address and ZIP Code
	Name of Employer
	Occupation
	Amount Guaranteed Outstanding \$

SUBTOTALS This Period This Page (optional)	
TOTALS This Period (last page in this line only)	2,500.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

0701041375

TERMINATION

RECEIVED AT
E18
FEC

CC: Pm 1/2 of 85
85 JUL 16 P 1:30

SULLIVAN, EDWARD J.
P.O. Box 63
11705

0100117600/109100
[] YES [X] NO

COPY

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non election Year Only)
- Twelfth day report preceding election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	Oct. 1, 1984 through Dec. 31, 1984		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (e))		5,500.00	9,375.00
(b) Total Contribution Refunds (from Line 20 (d))			
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		5,500.00	9,375.00
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		3,055.17	15,375.00
(b) Total Offsets to Operating Expenditures (from Line 14)			
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		3,055.17	15,375.00
8. Cash on Hand at Close of Reporting Period (from Line 27)		ZERO	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		ZERO	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		ZERO	

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

EDWARD J. SULLIVAN, ASST. TREAS.
Type or Print Name of Treasurer

E. Sullivan
SIGNATURE OF TREASURER

JAN. 31, 1985
Date

COPY

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

MAILED AT WASHINGTON 1/31/85 ABOUT 10 AM
All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

37117041375

COPY

Name of Committee (in Full)

Subcommittee For Congress

\$ 600,177.00
109,100

Report Covering the Period

From Oct. 1, 1981

To Thru Dec. 31, 1981

COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	500.00	1,625.00	11 (a)
(b) Political Party Committees	5,000.00	5,000.00	11 (b)
(c) Other Political Committees		2,750.00	11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11 (a), 11 (b), 11 (c) and 11 (d))	5,500.00	9,375.00	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS			
(a) Made or Guaranteed by the Candidate		25,000.00	13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))		25,000.00	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)		6,000.00	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	5,500.00	40,375.00	16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES	3,055.17	15,375.00	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	2,500.00	25,000.00	19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	2,500.00	25,000.00	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	5,555.17	40,375.00	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	55.17	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	5,500.00	24
25. SUBTOTAL (Add Line 23 and Line 24)	\$	5,555.17	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	5,555.17	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	ZERO	27

COPY

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11(1)
(Use separate sheets for each category of the Detailed Summary Page)

As of 12/31/84

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for financial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

COPY

Name of Committee (in Full)
SULLIVAN FOR CONGRESS # C00177600/109100

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MARTHA N. PEPPER MARTIN ROAD RYE, N.Y. 10520 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation <i>HOUSEWIFE</i> Aggregate Year-to-Date-\$	10/1/84	500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			500.00

COPY

As of 12/31/84

COPY

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for any other purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SULLIVAN FOR CONGRESS

C00177600/109100

A. Full Name, Mailing Address and ZIP Code

VICTORY '84 COMMITTEE
315 STATE ST., ALBANY, NY 12210

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

11/2/84

2,500.00

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 2,500.00

B. Full Name, Mailing Address and ZIP Code

NEW YORK FEDERAL CAMPAIGN COMMITTEE
315 STATE ST., ALBANY, N.Y. 12210

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

12/6/84

2,500.00

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$ 2,500.00

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

5,000.00

COPY

As of 12/31/04

COPY

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for any other special purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SULLIVAN FOR CONGRESS #200177600/109100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NO BROADWAY, B-307 WHITE PLAINS, N.Y. 10601	INTEREST ON LOAN Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/12/04	1,725.00
B. Full Name, Mailing Address and ZIP Code PETER M. SULLIVAN 20 NO. BROADWAY - B307 WHITE PLAINS, N.Y. 10601	Purpose of Disbursement TRAVEL, MEALS, ENTERTAINMENT, PRINTING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	12/13/04	1,300.07
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

COPY

SUBTOTAL of Disbursements This Page (optional)	UNITEMIZED	30.10
TOTAL This Period (last page this line number only)		3,055.17

AS OF 12/31/24

COPY

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SULLIVAN FOR CONGRESS #C00177600/109100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M SULLIVAN 20 NO. BROADWAY - 1307 WHITE PLAINS, N.Y. 10601	FINAL LOAN REPAYMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/2/24	2,500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			2,500.00



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

FEC
GCC# 7767
85 JUN 18 9:01

PETER M. SULLIVAN
87TH DISTRICT
WESTCHESTER COUNTY

PLEASE REPLY TO:
COMMUNITY OFFICE
2 WILLIAM STREET
WHITE PLAINS, NEW YORK 10601
(914) 948-6839

XX ROOM 631
LEGISLATIVE OFFICE BUILDING
ALBANY, NEW YORK 12248
(518) 455-5397

June 13, 1985

15 JUN 18 11:46
GENERAL

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

RE: MUR1896

Dear Mr. Demougeot:

In reference to MUR1896, Sullivan for Congress Committee, I am hereby designating as my counsel Thomas A. Spargo, 315 State Street, Albany, New York 12210, 518/462-2601. He is authorized to receive any correspondence, communications and to act on my behalf before the Commission.

If you have any questions concerning this matter, you may contact me at the above phone numbers or at my home, 914/683-5454.

Sincerely,

PETER M. SULLIVAN
Member of Assembly

PMS/jak

cc: Thomas Spargo, Esq.

0704754159



THE ASSEMBLY
STATE OF NEW YORK
ALBANY

PETER M. SULLIVAN
87TH DISTRICT
WESTCHESTER COUNTY

PLEASE REPLY TO:
COMMUNITY OFFICE
2 WILLIAM STREET
WHITE PLAINS, NEW YORK 10601
(914) 948-6839

XX ROOM 631
LEGISLATIVE OFFICE BUILDING
ALBANY, NEW YORK 12248
(518) 455-5397

June 13, 1985

RECEIVED
GENERAL INVESTIGATIVE
DIVISION
JUN 18 11:47

Thomas Spargo, Esq.
315 State Street
Albany, NY 12210

RE: MUR1896

Dear Tom:

This is your authorization to represent me; my Congressional Committee, Sullivan for Congress; and my mother, Edna M. Sullivan, in any matters before the Federal Election Commission.

Sincerely,


PETER M. SULLIVAN
Member of Assembly

PMS/jak

cc: George Demougeot, Esq., Federal Election Commission

37110641584

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 1896
Sullivan for Congress)	
Committee)	
Joseph E. Cannistra, as)	
treasurer)	
Edna M. Sullivan)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1896:

1. Enter into pre-probable cause conciliation with Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer.
2. Enter into pre-probable cause conciliation with Edna M. Sullivan.
3. Approve the conciliation agreement submitted with the General Counsel's Report signed May 10, 1985.
4. Approve and send the letter attached to the General Counsel's Report signed May 10, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

5-17-85
Date

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

Received in Office of Commission Secretary:	5-13-85, 9:10
Circulated on 48 hour tally basis:	5-13-85, 4:00

37040641585

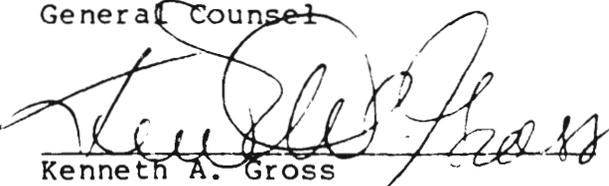
27010641533

III. RECOMMENDATIONS

1. Enter into pre-probable cause conciliation with the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer.
2. Enter into pre-probable cause conciliation with Edna M. Sullivan.
3. Approve the attached conciliation agreement.
4. Approve and send the attached letter.

Charles N. Steele
General Counsel

May 16, 1965
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

- I. Letter from Respondents
- II. Proposed Letter
- III. Conciliation Agreements

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Sullivan for Congress) MUR 1896
Committee)
Joseph E. Cannistra, as)
treasurer)
Edna M. Sullivan)

SENSITIVE

GENERAL COUNSEL REPORT

I. BACKGROUND

This matter was referred to the Office of General Counsel by the Reports Analysis Division. On February 19, 1985, the Commission found reason to believe that the Sullivan for Congress Committee ("the Committee") and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f). Also on that date, the Commission found reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A). On March 5, 1985, notification letters were mailed to the respondents. In response to the Commission's findings, the respondents have requested to enter into pre-probable cause to believe conciliation.

27010041537

11

contribution from Edna M. Sullivan, the Commission found reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A) and that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

In view of the respondents' request, the Office of General Counsel recommends that the Commission enter into negotiations directed towards reaching a conciliation agreement prior to a finding of probable cause. The attached proposed conciliation agreements provide for civil penalties totalling \$5000 (\$2500 each) in settlement of this matter. This amount seems appropriate considering that amount of the excessive contribution involved.

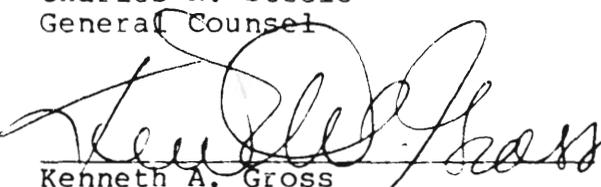
III. RECOMMENDATIONS

1. Enter into pre-probable cause conciliation with the Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer.
2. Enter into pre-probable cause conciliation with Edna M. Sullivan.
3. Approve the attached conciliation agreement.
4. Approve and send the attached letter.

Charles N. Steele
General Counsel

2711054158
Date May 14, 1985

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

- I. Letter from Respondents
- II. Proposed Letter
- III. Conciliation Agreements

Gy 0002

RECEIVED AT THE FEC
85 APR 22 P12:30

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK

10601

(914) 949-5921

BENJAMIN I. TAYLOR
FRANK S. McCULLOUGH, JR.
CHARLES A. GOLDBERGER
JOHN A. GEOGHEGAN
S. WILLIAM FRIEDMAN
JAMES STAUDT

STEPHEN HICKS*
MICHAEL A. KRAMER**

FRANK S. McCULLOUGH
ALFRED D. FREDERICKS
JULIAN LIBERMAN
COUNSEL

HARRISON OFFICE
550 MAMARONECK AVENUE
HARRISON, NY 10520
TEL. (914) 381-4300

April 15, 1985

OUR FILE NO. WP 7355

APR 22 P 2:20

* ALSO ADMITTED IN CT
** ALSO ADMITTED IN VA AND DC

Federal Election Commission
Washington, D. C. 20463

Attention: Mr. George Demougot

Re: MUR 1896

Dear Mr. Demougot:

We have not heard from you with respect to the above matter and our letter to you dated March 27th, 1985, copy of which is attached.

Please communicate with me.

Very truly yours,

Charles A. Goldeberger
CHARLES A. GOLDEERGER

CAG:jb
Enclosure

0
1
2
3
4
5
6
7
8
9

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK

BENJAMIN I. TAYLOR
FRANK S. McCULLOUGH, JR.
CHARLES A. GOLDBERGER
JOHN A. GEOGHEGAN
S. WILLIAM FRIEDMAN
JAMES STAUDT

10601

(914) 949-5921

FRANK S. McCULLOUGH
ALFRED D. FREDERICKS
JULIAN LIBERMAN
COUNSEL

HARRISON OFFICE
550 MAMARONECK AVENUE
HARRISON, NY 10528
TEL. 914 38-4300

STEPHEN HICKS*
MICHAEL A. KRAMER**

* ALSO ADMITTED IN CT
** ALSO ADMITTED IN VA AND DC

OUR FILE NO. WP 7355

March 27th, 1985

Federal Election Commission
Washington, D.C. 20463

Att: Mr. George Demougot

Re: MUR 1896

Dear Mr. Demougot:

Confirming our telephone conversation, please be advised that I represent Edna M. Sullivan, Joseph E. Cannistra and the Sullivan for Congress Committee with respect to the above matter.

My review of this situation indicates that all of the monies which were borrowed have been repaid.

Furthermore, the monies were borrowed from the candidate's mother, without any knowledge that this procedure was contrary to the provisions of the Federal Election Campaign Act.

Very truly yours,

CHARLES A. GOLDBERGER

CAG:cg

87010641300

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK

35 MAR 1 1985 09:22

BENJAMIN I. TAYLOR
FRANK S. McCULLOUGH, JR.
CHARLES A. GOLDBERGER
JOHN A. GEOGHEGAN
S. WILLIAM FRIEDMAN
JAMES STAUDT

10601
—
(914) 949-5921

FRANK S. McCULLOUGH
ALFRED D. FREDERICKS
JULIAN LIBERMAN
COUNSEL

HARRISON OFFICE
550 MAMARONECK AVENUE
HARRISON, NY 10528
TEL. 914. 381. 4300

STEPHEN HICKS*
MICHAEL A. KRAMER**

*ALSO ADMITTED IN CT
**ALSO ADMITTED IN VA AND DC

OUR FILE NO. WP 7355

March 27th, 1985

Federal Election Commission
Washington, D.C. 20463

Att: Mr. George Demougot

Re: MUR 1896

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Furthermore, the monies were borrowed from the candidate's mother, without any knowledge that this procedure was contrary to the provisions of the Federal Election Campaign Act.

Very truly yours,

CHARLES A. GOLDBERGER

CAG:cq

9701041501

1
PR: 20

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK
10601



Federal Election Commission
Washington, D.C. 20463

Att: Mr. George Demougot

NOV 21 4 59:21



#7062

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK

BENJAMIN I. TAYLOR
FRANK S. McCULLOUGH, JR.
CHARLES A. GOLDBERGER
JOHN A. GEOGHEGAN
S. WILLIAM FRIEDMAN
JAMES STAUDT

10601
APR 4 11:12
(914) 949-5921

FRANK S. McCULLOUGH
ALFRED D. FREDERICKS
JULIAN LIBERMAN
COUNSEL

HARRISON OFFICE
550 MAMARONECK AVENUE
HARRISON, NY 10528
TEL. (914) 381-4300

STEPHEN HICKS*
MICHAEL A. KRAMER**

*ALSO ADMITTED IN CT
**ALSO ADMITTED IN VA AND DC

OUR FILE NO. WP 7355

March 27th, 1985

Federal Election Commission
Washington, D.C. 20461

Att: Mr. John Warren McGarry
Chairman

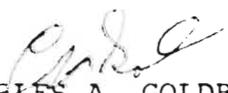
Re: Joseph E. Cannistra
MUR 1896

Dear Mr. McGarry:

Please be advised that we represent Mr. Joseph E. Cannistra with respect to the above matter and your recent correspondence dated March 15th, 1985, copy of which is attached. I am enclosing herewith Statement of Designation of Counsel regarding this matter.

If you have any questions with respect to any aspect of this matter, please do not hesitate to communicate with me.

Very truly yours,


CHARLES A. GOLDBERGER

CAG:cg
Enclosures

37040491500

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1896

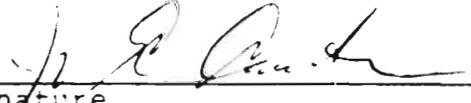
NAME OF COUNSEL: CHARLES A. GOLDBERGER, ESQ.

ADDRESS: 175 Main Street - Suite 407
White Plains, N.Y. 10601

TELEPHONE: (914) 949-5921

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

March 22, 1985
Date


Signature
JOSEPH E. CANNISTRA

RESPONDENT'S NAME: JOSEPH E. CANNISTRA

ADDRESS: Lake Drive
Somers, New York 10589

HOME PHONE: _____

BUSINESS PHONE: (914) 241-3605

87040541504

MAR 15 1985



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, New York 10595

RE: MUR 1896

Dear Mr. Cannistra:

On February 19, 1985, the Federal Election Commission determined that there is reason to believe that Sullivan for Congress Committee (the "Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

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

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TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN

ATTORNEYS AT LAW

175 MAIN STREET

WHITE PLAINS, NEW YORK

10601



Federal Election Commission
Washington, D.C. 20461

Att: Mr. John Warren McGarry
Chairman

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TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN
ATTORNEYS AT LAW
175 MAIN STREET
WHITE PLAINS, NEW YORK

BENJAMIN I. TAYLOR
FRANK S. McCULLOUGH, JR.
CHARLES A. GOLDBERGER
JOHN A. GEOGHEGAN
S. WILLIAM FRIEDMAN
JAMES STAUDT

10601
—
(914) 949-5921

FRANK S. McCULLOUGH
ALFRED D. FREDERICKS
JULIAN LIBERMAN
COUNSEL

HARRISON OFFICE
550 MAMARONECK AVENUE
HARRISON, NY 10528
TEL. (914) 381-4300

STEPHEN HICKS*
MICHAEL A. KRAMER**

*ALSO ADMITTED - N.C.T.
**ALSO ADMITTED - N.V.A. AND D.C.

March 13th, 1985

OUR FILE NO. WP 7355

Federal Election Commission
Washington, D.C. 20461

Att: Mr. John Warren McGarry
Chairman

Re: Edna M. Sullivan
MUR 1896

Dear Mr. McGarry:

Please be advised that we represent Mrs. Edna Sullivan with respect to the above matter and your recent correspondence dated March 5th, 1985, copy of which is attached. I am enclosing herewith Statement of Designation of Counsel regarding this matter.

If you have any questions with respect to any aspect of this matter, please do not hesitate to communicate with me.

Very truly yours,


CHARLES A. GOLDBERGER

CAG:cg
Enclosure

9704047307

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1896

NAME OF COUNSEL: CHARLES A. GOLDBERGER, ESQ.

ADDRESS: 175 Main Street - Suite 407
White Plains, New York 10601

TELEPHONE: (914) 949-5921

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

March 11th, 1985
Date


Signature EDNA M. SULLIVAN

RESPONDENT'S NAME: EDNA M. SULLIVAN

ADDRESS: P.O. Box 123
Valhalla, New York 10595

HOME PHONE: (914) 946-4908

BUSINESS PHONE: (914) 948-6839

97040641398



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Edna M. Sullivan
P.O. Box 123
Valhalla, New York 10595

Rec'd. 3/9/85

ANSWER WITHIN
15 DAYS

RE: MUR 1896

Dear Mrs. Sullivan:

On February 19, 1985, the Federal Election Commission determined that there is reason to believe that you have violated 2 U.S.C. §441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to the Sullivan for Congress Committee. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

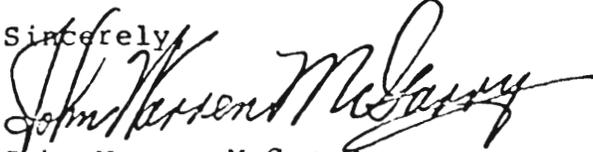
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

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Edna M. Sullivan
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

John Warren McGarry
Chairman

- Enclosures
- General Counsel's Factual and Legal Analysis
- Procedures
- Designation of Counsel Statement

87040041570

TAYLOR, McCULLOUGH, GOLDBERGER, GEOGHEGAN & FRIEDMAN

ATTORNEYS AT LAW

175 MAIN STREET

WHITE PLAINS, NEW YORK

10601



Federal Election Commission
Washington, D.C. 20461

Att: Mr. John Warren McGarry
Chairman

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SEP 10 1966
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Edna M. Sullivan
P.O. Box 123
Valhalla, New York 10595

RE: MUR 1896

Dear Mrs. Sullivan:

On February 19, 1985, the Federal Election Commission determined that there is reason to believe that you have violated 2 U.S.C. §441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to the Sullivan for Congress Committee. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

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

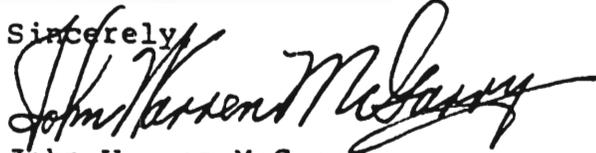
The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

97047741502

Edna M. Sullivan
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

87040341600

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1896
STAFF MEMBER(S) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT'S NAME: Edna M. Sullivan

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

SUMMARY OF ALLEGATIONS

97040651594
The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan. On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan

was from Mr. Sullivan's parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond.

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate. On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid. The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment to the candidate, Peter Sullivan.

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the \$10,000 partial repayment disclosed on the 1984 July Quarterly Report. Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment. On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's.

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On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report, Schedule B, which disclosed a \$10,000 loan repayment to Peter Sullivan on May 17, 1984. On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Peter Sullivan has repaid a total of \$22,500 to Edna Sullivan.

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed the three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

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2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported the \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Office of General Counsel recommends that the Commission find reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).

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DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

3704741609



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, New York 10595

RE: MUR 1896

Dear Mr. Cannistra:

On February 19, 1985, the Federal Election Commission determined that there is reason to believe that Sullivan for Congress Committee (the "Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

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

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Joseph E. Cannistra
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Peter Sullivan

37040641311

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER(S) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT'S NAME: Sullivan for Congress Committee
Joseph E. Cannistra, Treasurer^{1/}

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

SUMMARY OF ALLEGATIONS

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan. On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan

^{1/} Mr. Cannistra is currently the treasurer; however, an accident involving his son forced the candidate, beginning in August, to assume all reporting responsibilities. The candidate stated that he would name a new treasurer and amend the Committee's Statement of Organization to show the change.

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was from Mr. Sullivan's parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond.

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate. On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid. The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment to the candidate, Peter Sullivan.

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the \$10,000 partial repayment disclosed on the 1984 July Quarterly Report. Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment. On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's.

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On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report, Schedule B, which disclosed a \$10,000 loan repayment to Peter Sullivan on May 17, 1984. On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Peter Sullivan has repaid a total of \$22,500 to Edna Sullivan.

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed the three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

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2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported the \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the source of the loan was not properly reported, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 434(b)(3)(E). In addition, since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Office of General Counsel recommends that the Commission find reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

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DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

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Obc

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	RAD Referral 84L-30
Sullivan for Congress Committee)	
Joseph E. Cannistra, treasurer)	
Edna M. Sullivan)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 19, 1985, the Commission decided by a vote of 4-0 to take the following actions in RAD Referral 84L-30:

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1. Open a MUR.
2. Find reason to believe that Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. § 434(b)(3)(E) and 2 U.S.C. § 441a(f).
3. Find reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the letters and factual and legal analysis attached to the First General Counsel's Report signed February 13, 1985.

Commissioners Elliott, Harris, McDonald and Reiche voted affirmatively in this matter; Commissioners Aikens and McGarry did not cast a vote.

Attest:

2-20-85
Date

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

Received in Office of Commission Secretary:	2-14-85, 9:58
Circulated on 48 hour tally basis:	2-14-85, 4:00

SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

05 FEB 14 10:58

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 2/14/85-10:00 RAD 84L-30
STAFF MEMBER(S)
George Demougeot

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

RESPONDENTS' NAME: Sullivan for Congress Committee
Joseph E. Cannistra, Treasurer^{1/}
Edna M. Sullivan

RELEVANT STATUTE: 2 U.S.C. § 434(b)(3)(E)
2 U.S.C. § 441a(f)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 431a(8)
11 C.F.R. § 100.7(a)(1)(i)(A)

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The

^{1/} Mr. Cannistra is currently the treasurer; however, an accident involving his son forced the candidate, beginning in August, to assume all reporting responsibilities. The candidate stated that he would name a new treasurer and amend the Committee's Statement of Organization to show the change.

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Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan. On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan was from Mr. Sullivan's parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond.

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate. On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid. The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment to the candidate, Peter Sullivan.

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the \$10,000 partial repayment disclosed on the 1984 July Quarterly Report. Also, on

August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment. On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's.

On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report, Schedule B, which disclosed a \$10,000 loan repayment to Peter Sullivan on May 17, 1984. On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Peter Sullivan has repaid a total of \$22,500 to Edna Sullivan.

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed the three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

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2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported the \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the source of the loan was not properly reported, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 434(b)(3)(E). In addition, since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Office of General Counsel recommends that the Commission find reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A) and that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

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RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Sullivan for Congress Committee and Joseph E. Cannistra, as treasurer, violated 2 U.S.C. § 434(b)(3)(E) and 2 U.S.C. § 441a(f).
3. Find reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the attached letters and factual and legal analysis.

Charles N. Steele
General Counsel

February 13, 1985
Date

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

- I. RAD Referral
- II. Proposed General Counsel's Factual and Legal Analysis
- III. Proposed letters

27040641623



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

October 26, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JS*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JG*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE SULLIVAN FOR CONGRESS COMMITTEE

27110341624

(1)

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: October 26, 1984

ANALYST: Stuart N. Herschfeld

I. COMMITTEE: Sullivan for Congress (C00177600)
Joseph E. Cannistra, Treasurer^{1/}
P.O. Box 63
Valhalla, NY 10595

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C (Attachment 3).

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond (Attachment 4). On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan (Attachment 5). On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan was from Mr. Sullivan's

^{1/} Mr. Cannistra is currently the treasurer; however, an accident involving his son forced the candidate, beginning in August, to assume all reporting responsibilities. The candidate stated that he would name a new treasurer and amend the Committee's Statement of Organization to show the change.

Attachment I

(2)

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parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond (Attachment 6).

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate (Attachment 7). On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid (Attachment 8). The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment (Attachment 9).

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the partial repayment disclosed on the 1984 July Quarterly Report (Attachment 10). Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment (Attachment 11). On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's (Attachment 12).

On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report disclosing the Schedule B and a \$10,000 loan repayment to Peter Sullivan on May 17, 1984 (Attachment 13). On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Mr. Sullivan has repaid a total of \$22,500 to Edna Sullivan, thus leaving a balance of \$2,500 still to be repaid (Attachment 14).

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

Attachment I

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SULLIVAN FOR CONGRESS COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid (Attachment 15).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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Attachment I
④

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CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
SULLIVAN, PETER M	HOUSE 20	REPUBLICAN PARTY			NEW YORK		1984 ELECTION	IDW HARY20030	
1. STATEMENT OF CANDIDATE									
1984 STATEMENT OF CANDIDATE							21FEB84		1 84HSE/255/1039
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
SULLIVAN FOR CONGRESS									
- 1984 STATEMENT OF ORGANIZATION									IDW C00177600 HOUSE
APRIL QUARTERLY			20,800		10,615		16FEB84		1 84HSE/255/1039
APRIL QUARTERLY - AMENDMENT							31MAR84		6 84HSE/259/1072
APRIL QUARTERLY - AMENDMENT							31MAR84		3 84HSE/261/4887
APRIL QUARTERLY - AMENDMENT			20,800		10,615				9 84HSE/266/5473
APRIL QUARTERLY - AMENDMENT									1 84HSE/269/0069
REQUEST FOR ADDITIONAL INFORMATION									1 84FEC/315/2410
REQUEST FOR ADDITIONAL INFORMATION 2ND									2 84FEC/316/5227
REQUEST FOR ADDITIONAL INFORMATION									3 84FEC/326/1842
REQUEST FOR ADDITIONAL INFORMATION 2ND							0 04 - 31MAR84		5 84FEC/328/1958
JULY QUARTERLY			0		11,667		1APR84 - 30JUN84		5 84HSE/266/5395
JULY QUARTERLY - AMENDMENT							1APR84 - 30JUN84		2 84HSE/269/0070
NOTICE OF FAILURE TO FILE							31MAR84 - 30JUN84		1 84FEC/324/2261
REQUEST FOR ADDITIONAL INFORMATION							1APR84 - 30JUN84		1 84FEC/326/1840
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR84 - 30JUN84		1 84FEC/328/1936
OCTOBER QUARTERLY			6,025		12,536		1JUL84 - 30SEP84		5 84HSE/271/0899
TOTAL			14,825	0	34,810				46 TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All reports except October Quarterly have been reviewed.

Cash-On-Hand (9/30/84) \$55.17

Debts (9/30/84) \$2,500.00

Attachment I
5

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

1984 April Quarterly Report

Name of Committee (in Full)	Period Covering the Period		
<i>California 11th District</i>	<i>From 1/1/84 to</i>	<i>11/30/84</i>	
	COLUMN A	COLUMN B	
	Total This Period	Calendar Year to Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than in-kind)			
(a) Individuals (Persons Other Than Political Committees)			11 (a)
(b) Political Party Committees			11 (b)
(c) Other Political Committees			11 (c)
(d) TOTAL CONTRIBUTIONS (add 11 (a), 11 (b), and 11 (c))			11 (d)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
II. LOANS			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Repayments)			14
15. OTHER RECEIPTS (Dividend Income, etc.)			15
16. TOTAL RECEIPTS (add 11 (d), 12, 14, 15, and 16)			16
III. DISBURSEMENTS			
17. OPERATING EXPENDITURES			17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals (Persons Other Than Political Committees)			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d), and 21)			22
III. CASH SUMMARY			
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD			23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)			24
25. SUBTOTAL (add Line 23 and Line 24)			25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)			26
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD			27

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Attachment I
6

SCHEDULE D
(Part of 370)

DEBTS AND OBLIGATIONS
Excluding Loans

1984 April Quarterly Report

Name of Committee (in Full)	Outstanding Balance Explaining This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance or Close of This Period
<i>SULLIVAN FIRE COACHES</i>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Peter A. Sullivan 20 A</i>		<i>25,000.00</i>	<i>...</i>	<i>25,000.00</i>
Nature of Debt (Purpose) <i>...</i>				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Part (Section D)				
2) TOTAL This Period (See Page One and Two)				
3) TOTAL OUTSTANDING LOANS from Section C (Page One)				
4) ADD 2) and 3) and carry forward to Schedule B Part of Summary Page (See page one)				

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Attachment II



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EQ-2
May 22, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Report (Inception-3/31/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses a loan from the candidate on the debt Schedule (Schedule D). Please note that each person who makes a loan to your committee or to the candidate acting as an agent of the committee, must be reported on Schedule A and Schedule C. The itemization on Schedule A must include the person's full name, mailing address, and zip code, along with the name of his/her employer, the date of the contribution/loan and the aggregate year-to-date amount of contributions made by the person. Schedule C must include any endorser or guarantor of the loan, the date the loan was made and all other terms of the loan. If the loan is from the candidate, please indicate if it is from his/her personal funds. (11 CFR 104.3(a)(4)(iv))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Pat Sheppard Attachment I

Pat Sheppard
Reports Analyst
Reports Analysis Division

8

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EO-3

June 14, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Report (Inception-3/31/84)

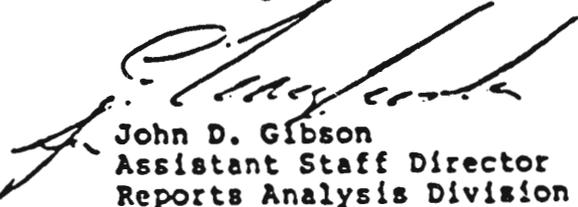
Dear Mr. Cannistra:

This letter is to inform you that as of June 13, 1984, the Commission has not received your response to our request for additional information, dated May 22, 1984. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

Attachment I
⑨

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SCHEDULE A

ITEMIZED RECEIPTS

Use this space for each category of the Original Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full) <i>SULLIVAN FOR CONGRESS</i>			
A. Full Name, Mailing Address and ZIP Code <i>John A Sullivan 20 N Broadway White Plains NY 10601</i>		Name of Employer <i>N.Y. State</i>	Date (month, day, year) <i>2/16/84</i>
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation <i>NY State</i>	Amount of Each Receipt This Period <i>25,000.00</i>
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Amount of Each Receipt This Period
GRAND TOTAL of Entries This Page (optional)			
TOTAL THIS PERIOD (Net Payable line number only)			<i>25,000.00</i>

3794261418933

Certified Mail June 20, 1984

Received June 20, 1984 Attachment #5

FD-1013 (Rev. 1-2-82)

LOANS

File copies of this report for each individual loan

Name of Committee (in Full)			
SULLIVAN FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Payments Made To Date
Peter M Sullivan 20 N Broadway White Plains NY 10601 (Election Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____)		25,000.00	None
Balance Outstanding at Close of This Period			25,000.00
Terms Date Incurred <u>2/16/84</u> Date Due <u>2/15/85</u> Interest Rate <u>9%</u> (Year)			<input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
None		Occupation	
		Amount Guaranteed Outstanding \$	
		2. Full Name, Mailing Address and ZIP Code	Name of Employer
		Occupation	
		Amount Guaranteed Outstanding \$	
		3. Full Name, Mailing Address and ZIP Code	Name of Employer
		Occupation	
		Amount Guaranteed Outstanding \$	
		B. Full Name, Mailing Address and ZIP Code of Loan Source	
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____			
Terms Date Incurred _____ Date Due _____ Interest Rate _____ (Year)			<input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
		2. Full Name, Mailing Address and ZIP Code	Name of Employer
		Occupation	
		Amount Guaranteed Outstanding \$	
		SUBTOTALS TO DATE OF THIS REPORT	
TOTALS TO DATE OF THIS REPORT			

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Attachment 2
11

MEMORANDUM FOR FILES:TELECON

SUBJECT: Source of Candidate Loan

DATE: 7/18/84

FROM: Pat Sheppard

TO: Joseph E. Cannistra, Treasurer

NAME OF COMMITTEE: Sullivan for Congress / NY House
(914) 241-3601

97747541535

I called the treasurer to state that I had received the amended April Quarterly Report, but that the Committee had not noted the source of the candidate loan. Mr. Cannistra stated that he believed that Mr. Sullivan did not borrow the money from any lending institution. He said that he had heard that the money was borrowed from the parents of the candidate. I informed him that if this were true, he should amend the report to show the loan from the parents. I also informed him that this would result in an excessive contribution, since the money would be coming from the parents. Mr. Cannistra said that he was not sure, but he would investigate and give me a response within the next week. He also stated that the loan has been repaid and would be noted in the next report.

Attachment I

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AUG 8 1984
REGULAR MAIL

For Authorized Committee

Page 1 of 2

(Summary Page)

1984 April Quarterly Report

1 Name of Committee: ALABAMA FOR CONSERVATION

2 FEC Identification Number: 6-00177615

3 Is this report by memorandum? YES NO

Check if address is different than previously reported: YES NO

City/State/Zip: 1000 1st St, 10000

TYPE OF REPORT

- Annual Report (Required)
- July 31 Quarterly Report
- October 15 Quarterly Report
- January 15 Quarterly Report
- July 31 1st Year Report (First Election Year Only)
- Termination Report
- 1st Qtr Report (Pending)
- Third Qtr Report (Following the General Election or in the State of _____)

This report contains activity for: Primary Election General Election Special Election Municipal Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year to Date
5 Contributions Received (Schedule A through D) (1)		
6 Total Contributions (other than from Line 11) (1)	2700.00	
7 Total Contributions Refunded (from Line 20) (1)		
8 Net Contributions (other than from Line 6 (b) from 6 (a)) (1)	2700.00	
9 Net Operating Expenditures		
10 Total Operating Expenditures (from Line 12) (1)	1065.00	
11 Total Disbursements (from Line 14) (1)		
12 Net Operating Expenditures (subtract Line 7 (b) from 7 (a)) (1)	1065.00	
13 Cash on Hand at Close of Reporting Period (from Line 27) (1)	11234.20	
14 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D) (1)		
15 Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D) (1)	25,000.00	

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

For further information, contact
Federal Election Commission
Tell: 1-800-426-6926
Local: 202-533-4000

Joseph E. Panastira
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

[Signature]
DATE

NOTE: Submission of false information or incomplete information may subject the person signing this Report to the penalties of 2 USC 437g

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

FEC FORM 3 (1980)

Attachment I

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9720P 2A 13 13753

Name of Committee (in Full)			
SULLIVAN FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
EDNA M SULLIVAN (MILWAUKEE Candidate) PO BOX 123 VALHALLA NY 10595		25,000.00	25,000.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Cumulative Payments To Date	
Terms: Date Incurred <u>7/1/84</u> Date Due <u>Demanded</u> Interest Rate _____ % (APR) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding \$
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding \$
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	Amount Guaranteed Outstanding \$
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period (This Page optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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Attachment I
14

MEMORANDUM FOR FILES:TELECON

SUBJECT: April Quarterly, RFAI

DATE: 8/15/84

PROM: Pat Sheppard

TO: Mr. Sullivan (Candidate)

NAME OF COMMITTEE: Sullivan for Congress Committee/NY
(914) 948-6839

97747541633
I called Mr. Sullivan to see if I could get a response to the RFAI for the 1984 April Quarterly asking for the source of a \$25,000 candidate loan. Mr. Sullivan stated that the July Quarterly report will show that the loan was from his mother. I explained that his mother could only donate a \$1,000 per election to his campaign. Mr. Sullivan did not understand how a loan was considered a contribution, I explained that if there was no way to repay the loan then it would turn into a contribution and therefore would result in an excessive one. He said that at this point he really did not care what happened to him and that he really was not worried about what the Commission thought about the loan.

Attachment I
(15)

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

1984 July Quarterly Report

Name of Committee or Fund		Report Covering the Period	
SULLIVAN FOR CONGRESS		From 4/1/84	To 6/30/84
		COLUMN A Total This Period	COLUMN B Calendar Year to Date
I. RECEIPTS			
11	CONTRIBUTIONS (other than loans) FROM		
	(a) Individuals/Persons Other Than Political Committee (Memo Entry, Unitemized \$)		1150.00 11 (a)
	(b) Political Party Committees		11 (b)
	(c) Other Political Committees	2750.00	11 (c)
	(d) The Candidate		11 (d)
	(e) TOTAL CONTRIBUTIONS (other than loans) (add 11 (a), 11 (b), 11 (c), and 11 (d))	2750.00	11 (e)
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		12
13	LOANS		
	(a) Made or Guaranteed by the Committee		25000.00 13 (a)
	(b) All Other Loans		13 (b)
	(c) TOTAL LOANS (add 13 (a) and 13 (b))		13 (c)
14	OFFSETS TO OPERATING EXPENSES (Includes Related to)		14
15	OTHER RECEIPTS (Dividends, Interest, etc.)		15
16	TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)		21150.00 16
II. DISBURSEMENTS			
17	OPERATING EXPENDITURES	1667.58	12213.37 17
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		18
19	LOAN REPAYMENTS		
	(a) Of Loans Made or Guaranteed by the Candidate	15,000.00	15,000.00 19 (a)
	(b) Of All Other Loans		19 (b)
	(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))		19 (c)
20	REFUNDS OF CONTRIBUTIONS TO:		
	(a) Individuals/Persons Other Than Political Committees		20 (a)
	(b) Political Party Committees		20 (b)
	(c) Other Political Committees		20 (c)
	(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		20 (d)
21	OTHER DISBURSEMENTS		21
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	11667.58	22213.37 22
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	8	15234.20 23
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	8	- 0 - 24
25	SUBTOTAL (Add Line 23 and Line 24)	8	15234.20 25
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	8	11667.58 26
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	8	6566.62 27

1 2 3 4 5 6 7 8 9
 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Attachment I
16

SCHEDULE C
Form 3 BC

LOANS

Page 1 of 1
LINE NUMBER 15
Full separate schedule
to each numbered line

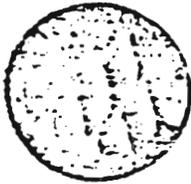
1984 July Quarterly Report

Name of Lender		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
1. Name, mailing address and ZIP Code of Lender: SDAW 1111111111 (Pleasant 1111111111 1111111111		25,000.00	10,000.00	15,000.00
2. Name, mailing address and ZIP Code of Lender: _____ _____ _____		\$		
3. Name, mailing address and ZIP Code of Lender: _____ _____ _____		\$		
4. Name, mailing address and ZIP Code of Lender: _____ _____ _____		\$		

Name of Lender		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
1. Name, mailing address and ZIP Code of Lender: _____ _____ _____				
2. Name, mailing address and ZIP Code of Lender: _____ _____ _____				
3. Name, mailing address and ZIP Code of Lender: _____ _____ _____				

Name of Lender		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
1. Full Name, Mailing Address and ZIP Code: _____ _____ _____				
Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____				
2. Full Name, Mailing Address and ZIP Code: _____ _____ _____				
Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____				
3. Full Name, Mailing Address and ZIP Code: _____ _____ _____				
Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____				

3704034600



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

ES-2

AS 21 104

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Amendment (Inception-3/31/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(a) of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contribution(s) in question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

The Commission notes your partial repayment of the excessive contribution(s) on your 1984 July Quarterly Report. Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your action in repaying the excessive amount(s) will be taken into consideration.

Attachment I

18

94033061842
37740341641

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact us on our toll-free number, (600) 424-9530. My local number is (202) 523-4046.

Sincerely,



Pat Sheppard
Reports Analyst
Reports Analysis Division

37747541512
R1033:61843

Attachment I
19



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

EQ-2

RECEIVED

Joseph B. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule B to support the amount reported on Line 19(a), 19(b) and/or 19(c), Column A of the Detailed Summary Page. Each loan repayment made by the committee must be itemized on a supporting Schedule B, regardless of the amount of the repayment. (11 CFR 104.3(b)(4)(iii) and (iv))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Pat Sheppard
Reports Analyst
Reports Analysis Division

Attachment I
(20)

3744064161040



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

RQ-3

September 13, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Amendment (Inception-3/31/84) and
July Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Cannistra:

This letter is to inform you that as of September 12, 1984, the Commission has not received your response to our requests for additional information, dated August 21, 1984. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

84733231557

Attachment I
(21)

COPY

SULLIVAN FOR CONGRESS
Post Office Box 63
Valhalla, N.Y. 10595

September 24, 1964

Federal Election Commission
Reports Analysis Division
Washington, D. C. 20463

Identification Numbers: C00177600 / 109100

Reference: July Quarterly Report (4/1/64 - 6/30/64)

Gentlemen:

Responsive to your letter of September 18, 1964 and your previous letter of August 21, 1964, enclosed is a Schedule B to support the amount reported on Line 19 (a), Column A of Detailed Summary Page.

Very truly yours,

E. J. Sullivan
Edward J. Sullivan
Assistant Treasurer

cc: Clerk of the House of Representatives
Office of Records and Registration
1030 Longworth House Office Building
Washington, D. C. 20515

New York State Board of Elections
99 Washington Street
Albany, N.Y. 12210

COPY

Attachment I

22

147074: 4: 2: 4: 1: 0: 4: 5

SCHEDULE B

ITEMIZED DISBURSEMENTS

File properly with the Secretary of the Central Executive Board

PERIOD APRIL 1, 1984 THRU JUNE 30, 1984

Any information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **SULLIVAN FOR CONGRESS** I.D.# **C00177600/109100**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601	LOAN REPAYMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/17/84	\$10,000.00
B. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code [REDACTED]	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (continued)

TOTAL This Period (last page this line number only) **\$10,000.00**

SULLIVAN FOR CONGRESS
Post Office Box 83
White Plains, N.Y. 10605

E. Sullivan
A. E. SULLIVAN, PRES.

Attachment I

SEP. 24 1984 (23)

2012571071
 3

OCT 15 1984

(Summary Page)

Attachment 15
 Page 1 of 3 - 10/15/84
 1984 October Quarterly Report

1. Name of Committee (in Full)
SULLIVAN FOR CONGRESS

2. PFC Identification Number
C10177600/109100

Address (Number and Street)
P. O. Box 63

3. Is this Report an Amendment?
 "YES" NO

City, State and ZIP Code Check if address is different than previously reported
VALHALLA, N.Y. 10595

RECEIVED
 OCT 18 1984
 FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C.

TYPE OF REPORT

- April 15 Quarterly Report
 - July 15 Quarterly Report
 - October 15 Quarterly Report
 - January 31 Year End Report
 - July 31 Mid Year Report (Non-election Year Only)
 - Twelfth day report preceding election on _____ in the State of _____
 - Thirtieth day report following the General Election on _____ in the State of _____
 - Termination Report
- This report contains activity for - Primary Election General Election Special Election Runoff Election

89
 139
 50
 53
 7
 22
 7
 3
 40
 7
 4
 3
 2

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/84</u> Through <u>9/30/84</u>		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e)		\$ 25.00	\$ 3,875.00
(b) Total Contribution Refunds (from Line 20d)		\$	\$
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$ 25.00	\$ 3,875.00
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$ 36.45	\$ 12,319.83
(b) Total Offsets to Operating Expenditures (from Line 14)		\$	\$
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$ 36.45	\$ 12,319.83
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$ 55.17	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 2,500.00	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-523-4088

EDWARD J. SULLIVAN, ASST. TREAS.

Type or Print Name of Treasurer

E. J. Sullivan
 SIGNATURE OF TREASURER

10/15/84
 Date

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

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

Attachment I

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FEC FORM 3 1980

27

SCHEDULE B

ITEMIZED DISBURSEMENTS

1111
FILE NUMBER 1111
 (Use separate schedules for each category of the Detailed Summary Page)

7/1/84 thru 9/30/84

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)

SULLIVAN FOR CONGRESS # C00177600/109100

3724064151373

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - 8307 WHITE PLAINS, NY 10601	LOAN REPAYMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/9/84	5,000.00
PETER M. SULLIVAN (AS ABOVE)	LOAN REPAYMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/27/84	5,000.00
PETER M. SULLIVAN (AS ABOVE)	LOAN REPAYMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/7/84	2,500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

NET TOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

12,500.00

Attachment I
 (28)

LOANS
7/1/84 thru 9/30/84

Form 1 of 2
LOAN SCHEDULE
Use separate schedules
for each numbered loan

Name of Committee (in Full) SULLIVAN FOR CONGRESS # COU177600/109100			
A. Full Name, Mailing Address and ZIP Code of Loan Source PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601		Original Amount of Loan 25,000.00	Balance Outstanding at Close of This Period 2,500.00
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date 22,500.00	
Terms: Date Incurred 2/16/84 Date Due ON DEMAND Interest Rate: _____ % (year) Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
		Name of Employer	
2. Full Name, Mailing Address and ZIP Code		Occupation	
		Amount Guaranteed Outstanding \$	
		Name of Employer	
		Occupation	
3. Full Name, Mailing Address and ZIP Code		Amount Guaranteed Outstanding \$	
		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (year) Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
		Name of Employer	
2. Full Name, Mailing Address and ZIP Code		Occupation	
		Amount Guaranteed Outstanding \$	
		Name of Employer	
		Occupation	
3. Full Name, Mailing Address and ZIP Code		Amount Guaranteed Outstanding \$	
		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period (This Page Optional)			
TOTALS This Period (last page in this line only)			2,500.00

970403416507
04012730907

Carry outstanding balances only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of **Attachment I**
(29)

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER(S) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT'S NAME: Sullivan for Congress Committee
Joseph E. Cannistra, Treasurer^{1/}

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

SUMMARY OF ALLEGATIONS

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan. On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan

^{1/} Mr. Cannistra is currently the treasurer; however, an accident involving his son forced the candidate, beginning in August, to assume all reporting responsibilities. The candidate stated that he would name a new treasurer and amend the Committee's Statement of Organization to show the change.

Attachment II

97940341651

was from Mr. Sullivan's parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond.

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate. On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid. The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment to the candidate, Peter Sullivan.

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the \$10,000 partial repayment disclosed on the 1984 July Quarterly Report. Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment. On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's.

Attachment II

27740041572

On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report, Schedule B, which disclosed a \$10,000 loan repayment to Peter Sullivan on May 17, 1984. On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Peter Sullivan has repaid a total of \$22,500 to Edna Sullivan.

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed the three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

Attachment II
(31)

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported the \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the source of the loan was not properly reported, the Office of General Counsel recommends that the Commission open a MUR and find reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 434(b)(3)(E). In addition, since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Office of General Counsel recommends that the Commission find reason to believe that the Sullivan for Congress Committee violated 2 U.S.C. § 441a(f).

2704041534

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No.
STAFF MEMBER(S) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT'S NAME: Edna M. Sullivan

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

SUMMARY OF ALLEGATIONS

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The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000. A Request for Additional Information ("RAFI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C.

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond. On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan. On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan

Attachment II
33

was from Mr. Sullivan's parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond.

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate. On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid. The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment to the candidate, Peter Sullivan.

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the \$10,000 partial repayment disclosed on the 1984 July Quarterly Report. Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment. On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's.

Attachment II

On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report, Schedule B, which disclosed a \$10,000 loan repayment to Peter Sullivan on May 17, 1984. On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Peter Sullivan has repaid a total of \$22,500 to Edna Sullivan.

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed the three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any candidate and his authorized committees with respect to any Federal office which, in the aggregate, exceeds \$1,000.

2 U.S.C. § 431(a)(A) states that a loan is a contribution. 11 C.F.R. § 100.7(a)(1)(i)(A) states that a loan that exceeds the contribution limitations is unlawful whether or not the loan is repaid.

Attachment II
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27040641657

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify any person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

2 U.S.C. § 441a(f), states that no candidate or political committee shall knowingly accept or make any expenditure in violation of the \$1,000 aggregate limitation imposed on contributions under this section.

In its 1984 April Quarterly Report, the Committee reported the \$25,000 loan as a loan from Peter Sullivan, the candidate. The Committee, responding to a RFAI from the Reports Analysis Division, amended the April Quarterly Report to indicate that the original source of the loan was Edna M. Sullivan. Since the loan resulted in a \$24,000 excessive contribution from Edna M. Sullivan, the Office of General Counsel recommends that the Commission find reason to believe that Edna M. Sullivan violated 2 U.S.C. § 441a(a)(1)(A).

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Attachment II

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, New York 10595

RE: MUR

Dear Mr. Cannistra:

On _____, 1985, the Federal Election Commission determined that there is reason to believe that Sullivan for Congress Committee (the "Committee") and you, as treasurer of the Committee, have violated 2 U.S.C. §§ 434(b)(3)(E) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

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

Attachment III

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97040:41659

Joseph E. Cannistra
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

cc: Peter Sullivan

3704041550

Attachment III

38



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edna M. Sullivan
P.O. Box 123
Valhalla, New York 10595

RE: MUR

Dear Mrs. Sullivan:

On _____, 1985, the Federal Election Commission determined that there is reason to believe that you have violated 2 U.S.C. §441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to the Sullivan for Congress Committee. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be 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 investigation to be made public.

Attachment III
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Edna M. Sullivan
Page 2

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

37147541652

Attachment III

40

REPORTS ANALYSIS REFERRAL
 TO
 OFFICE OF GENERAL COUNSEL

DATE: October 26, 1984

ANALYST: Stuart N. Herschfeld

- I. COMMITTEE: Sullivan for Congress (C00177600)
 Joseph E. Cannistra, Treasurer^{1/}
 P.O. Box 63
 Valhalla, NY 10595
- II. RELEVANT STATUTE: 2 U.S.C. §441a(f)
- III. BACKGROUND:

The 1984 April Quarterly Report for the Sullivan for Congress Committee (the "Committee") disclosed the receipt of a loan on February 16, 1984, from Peter M. Sullivan, the candidate. The loan was reported on a Schedule D in the amount of \$25,000 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the Committee on May 23, 1984, stating that the \$25,000 loan should be properly disclosed on a Schedule A and Schedule C (Attachment 3).

On June 14, 1984, a Second Notice was mailed to the Committee for failure to respond (Attachment 4). On June 20, 1984, the Committee filed an Amended 1984 April Quarterly Report. The Amended Report disclosed the loan on a Schedule A and Schedule C, but it did not disclose the source of the loan (Attachment 5). On July 18, 1984, a Reports Analysis Division ("RAD") analyst contacted the treasurer of the Committee, Joseph E. Cannistra. Mr. Cannistra was informed by the RAD analyst that the Committee had not disclosed the source of the loan. Mr. Cannistra said that he had heard that the loan was from Mr. Sullivan's

^{1/} Mr. Cannistra is currently the treasurer; however, an accident involving his son forced the candidate, beginning in August, to assume all reporting responsibilities. The candidate stated that he would name a new treasurer and amend the Committee's Statement of Organization to show the change.

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SULLIVAN FOR CONGRESS COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

parents. The RAD analyst informed the treasurer that if the candidate's parents are the source of the loan, it would result in an excessive contribution. He said that he would investigate the matter and respond (Attachment 6).

On August 10, 1984, the Committee filed a second amendment to the 1984 April Quarterly Report. This Amended Report disclosed the source of the loan as Edna M. Sullivan, the mother of the candidate (Attachment 7). On August 15, 1984, the RAD analyst contacted the candidate and the candidate verified that the loan was from Edna M. Sullivan. The analyst explained to Mr. Sullivan that Mrs. Sullivan could only contribute \$1,000 per election to his campaign and that \$24,000 of the loan was in excess of her contribution limit and must be repaid (Attachment 8). The 1984 July Quarterly Report disclosed on Schedule C a \$10,000 loan repayment (Attachment 9).

On August 21, 1984, the Committee was sent an RFAI for the Amended 1984 April Quarterly Report. It informed the Committee of the excessive contribution and it noted the partial repayment disclosed on the 1984 July Quarterly Report (Attachment 10). Also, on August 21, 1984, the Committee was sent an RFAI for the 1984 July Quarterly Report because Schedule B had not been provided to disclose the loan repayment (Attachment 11). On September 13, 1984, a Second Notice was mailed to the Committee for failure to respond to both RFAI's (Attachment 12).

On September 24, 1984, the Committee filed an Amended 1984 July Quarterly Report disclosing the Schedule B and a \$10,000 loan repayment to Peter Sullivan on May 17, 1984 (Attachment 13). On September 25, 1984, the Committee filed a third Amended 1984 April Quarterly Report. This Amended Report noted that there have been three additional payments on the loan, totalling \$12,500. It stated that Mr. Sullivan has repaid a total of \$22,500 to Edna Sullivan, thus leaving a balance of \$2,500 still to be repaid (Attachment 14).

On October 15, 1984, the Committee filed a 1984 October Quarterly Report. This report disclosed three loan repayments totalling \$12,500 to Peter Sullivan. The Committee disclosed these repayments as follows:

July 7, 1984	\$5,000
August 27, 1984	\$5,000
September 7, 1984	\$2,500

SULLIVAN FOR CONGRESS COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

The Committee now reports an outstanding balance of \$2,500 that still remains to be repaid (Attachment 15).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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37010641555

NOTE: SPLIT

PAGE 1

RE - (E)

CANDIDATE/COMMITTEE/DOCUMENT OFFICE SOUGHT/ PARTY PRIMARY RECEIPTS GENERAL DISBURSEMENTS PRIMARY GENERAL COVERAGE DATES TYPE OF FILER # OF PAGES MICROFILM LOCATION

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	PRIMARY	RECEIPTS	GENERAL	DISBURSEMENTS	PRIMARY	GENERAL	COVERAGE DATES	TYPE OF FILER	# OF PAGES	MICROFILM LOCATION
SULLIVAN, PETER M	HOUSE 20 REPUBLICAN PARTY				NEW YORK			1984 ELECTION	ID# H4NY20030		
1. STATEMENT OF CANDIDATE											
1984 STATEMENT OF CANDIDATE											
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES											
3. PRINCIPAL CAMPAIGN COMMITTEE											
SULLIVAN FOR CONGRESS											
1984 STATEMENT OF ORGANIZATION											
APRIL QUARTERLY			28,800								
AMENDMENT								31MAR84	HOUSE	1	84HSE/255/1040
APRIL QUARTERLY											
AMENDMENT								31MAR84		6	84HSE/259/1972
APRIL QUARTERLY			28,800								
AMENDMENT								31MAR84		3	84HSE/261/4887
APRIL QUARTERLY											
AMENDMENT								31MAR84		9	84HSE/266/5473
REQUEST FOR ADDITIONAL INFORMATION											
2ND								31MAR84		1	84HSE/269/0069
REQUEST FOR ADDITIONAL INFORMATION											
2ND								31MAR84		1	84FEC/315/2413
REQUEST FOR ADDITIONAL INFORMATION											
2ND								31MAR84		2	84FEC/316/5227
JULY QUARTERLY											
AMENDMENT								31MAR84		3	84FEC/326/1842
NOTICE OF FAILURE TO FILE											
REQUEST FOR ADDITIONAL INFORMATION								0 04		5	84FEC/328/1558
2ND								1APR84		5	84HSE/266/5395
OCTOBER QUARTERLY											
AMENDMENT								1APR84		2	84HSE/269/0070
NOTICE OF FAILURE TO FILE											
REQUEST FOR ADDITIONAL INFORMATION								1APR84		1	84FEC/324/2261
2ND											
REQUEST FOR ADDITIONAL INFORMATION								1APR84		1	84FEC/326/1840
OCTOBER QUARTERLY											
AMENDMENT								1APR84		1	84FEC/328/1936
JULY QUARTERLY											
AMENDMENT								1JUL84		5	84HSE/273/0899
TOTAL										46	TOTAL PAGES
4. AUTHORIZED COMMITTEES											
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES											
			34,818	0						0	
			10,615								
			10,615								
			11,667								
			12,536								
			34,818	0							

All reports except October Quarterly have been reviewed.
 Cash-on-Hand (9/30/84) \$55.17
 Debts (9/30/84) \$2,500.00

1984 April Quarterly Report

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
<i>SULLIVAN FOR CONGRESS</i>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Peter A. Sullivan 25 A. Ireland St. White Plains, NY 10601</i>		<i>25,000.00</i>	<i>0.00</i>	<i>25,000.00</i>
Nature of Debt (Purpose): <i>Loan to the Committee</i>				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

001251977



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BQ-2
May 22, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Report (Inception-3/31/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses a loan from the candidate on the debt Schedule (Schedule D). Please note that each person who makes a loan to your committee or to the candidate acting as an agent of the committee, must be reported on Schedule A and Schedule C. The itemization on Schedule A must include the person's full name, mailing address, and zip code, along with the name of his/her employer, the date of the contribution/loan and the aggregate year-to-date amount of contributions made by the person. Schedule C must include any endorser or guarantor of the loan, the date the loan was made and all other terms of the loan. If the loan is from the candidate, please indicate if it is from his/her personal funds. (11 CFR 104.3(a)(4)(iv))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Pat Sheppard
Reports Analyst
Reports Analysis Division

84033152413



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EQ-3

June 14, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Report (Inception-3/31/84)

Dear Mr. Cannistra:

This letter is to inform you that as of June 13, 1984, the Commission has not received your response to our request for additional information, dated May 22, 1984. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

J. D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

R 4 0 3 3 1 6 5 2 2 7

(This receipt is not to be reported separately for each category of the General Summary Page)

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees

Name of Committee (in Full)
SULLIVAN FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code <i>Peter M Sullivan 20 N Broadway White Plains NY 10601</i>	Name of Employer <i>NY State</i>	Date (month, day, year) <i>2/16/84</i>	Amount of Each Receipt This Period <i>25.00</i>
	Occupation <i>Accountant</i>	Aggregate Year-to-Date—\$	

Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date—\$	

TOTAL of Receipts This Page (optional)			
TOTAL This Period (see page this line number only)			<i>25.00</i>

34012614893

State Certified Mail June 20, 1984

Received June 22, 1984

FORM 6
Revised 3/83

LOANS

Use separate schedules for each numbered item

Name of Committee (in Full) <i>SULLIVAN FOR CONGRESS</i>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <i>Peter M Sullivan 20 N Broadway White Plains NY 10601</i>		Original Amount of Loan <i>25,000.00</i>	Balance Outstanding at Close of This Period <i>25,000.00</i>
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Cumulative Payments To Date <i>None</i>	
Terms Date Incurred <i>2/16/84</i> Date Due <i>21 Dec 84</i> Interest Rate <i>9.0 % (apr)</i>		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code <i>None</i>		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Cumulative Payments To Date	
Terms Date Incurred _____ Date Due _____ Interest Rate _____ (Apr)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
TOTALS This Period (This Page Only)			
TOTALS This Period (All Pages of This Report)			
Every endorsement made by the donor to the committee, and every loan made to a candidate, must be reported to the committee.			

34012614899

MEMORANDUM FOR FILES:TELECON**SUBJECT:** Source of Candidate Loan**DATE:** 7/18/84**FROM:** Pat Sheppard**TO:** Joseph E. Cannistra, Treasurer**NAME OF COMMITTEE:** Sullivan for Congress / NY House
(914) 241-3601

37040541573

I called the treasurer to state that I had received the amended April Quarterly Report, but that the Committee had not noted the source of the candidate loan. Mr. Cannistra stated that he believed that Mr. Sullivan did not borrow the money from any lending institution. He said that he had heard that the money was borrowed from the parents of the candidate. I informed him that if this were true, he should amend the report to show the loan from the parents. I also informed him that this would result in an excessive contribution, since the money would be coming from the parents. Mr. Cannistra said that he was not sure, but he would investigate and give me a response within the next week. He also stated that the loan has been repaid and would be noted in the next report.

AUG 8 1984
REGULAR MAIL

For Authorized Committee

Attachment 7
Page 1 of 2

(Summary Page)

Amended 1984 April Quarterly Report

1. Name of Committee in Full: ILLINOIS FOR CONGRESS

2. FEC Identification Number: 2-00177610

3. Is this report by amendment? YES NO

Address, number and street: 1111 N. 6th St

City, State and Zip Code: SPRINGFIELD, ILLINOIS 62765

Check if address is different than previously reported

AUG 10 PM 12 00
 RECEIVED
 FEDERAL ELECTION COMMISSION

TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 15 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Two 15 day report preceding election on _____

Thirtieth day report following the General Election or _____ in the State of _____

Termination Report

This report contains activity for: Primary Election General Election Special Election Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to Date
5. Covering Period: <u>12/1/83</u> through <u>12/31/83</u>			
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (from Line 11 (a))			
(b) Total Contribution Refunds (from Line 20 (a))			
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))			
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 12)			
(b) Total Offsets to Operating Expenditures (from Line 14)			
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))			
8. Cash on Hand at Close of Reporting Period (from Line 27)		15,234.20	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)			
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		25,000.00	

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

For further information, contact
Federal Election Commission
Tel: Free 800-424-9670
Loc: 202-523-4600

Joseph E. Partridge
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

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

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

FEC FORM 3 (3/80)

14012505473

Name of Committee (in Full)			
SULLIVAN FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source EDNA M SULLIVAN (MILWAUKEE Candidate) PO BOX 123 VALHALLA NY 10595		Original Amount of Loan 25,000.00	Balance Outstanding at Close of This Period 25,000.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Cumulative Payments To Date	
Terms: Date Incurred 2/14/84 Date Due December Interest Rate % (april) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source			
		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Cumulative Payments To Date	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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MEMORANDUM FOR FILES:TELECON**SUBJECT:** April Quarterly RFAI**DATE:** 8/15/84**FROM:** Pat Sheppard**TO:** Mr. Sullivan (Candidate)**NAME OF COMMITTEE:** Sullivan for Congress Committee/NY
(914) 948-6839

9701041575

I called Mr. Sullivan to see if I could get a response to the RFAI for the 1984 April Quarterly asking for the source of a \$25,000 candidate loan. Mr. Sullivan stated that the July Quarterly report will show that the loan was from his mother. I explained that his mother could only donate a \$1,000 per election to his campaign. Mr. Sullivan did not understand how a loan was considered a contribution, I explained that if there was no way to repay the loan then it would turn into a contribution and therefore would result in an excessive one. He said that at this point he really did not care what happened to him and that he really was not worried about what the Commission thought about the loan .

DETAILED SUMMARY OF
Receipts and Disbursements
(Page 2, FEC FORM 3)

1984 July Quarterly Report

Name of Committee (in Full)		Report Covering the Period	
SULLIVAN FOR CONGRESS		From 4/1/84	To 6/30/84
		COLUMN A	COLUMN B
		Total This Period	Calendar Year to Date
I. RECEIPTS			
11	CONTRIBUTIONS (other than loans) FROM		
	(a) Individuals/Persons Other Than Political Committee (Memo Entry Unitemized \$)		1150.00 11 (a)
	(b) Political Party Committees		11 (b)
	(c) Other Political Committees		2750.00 11 (c)
	(d) The Candidate		11 (d)
	(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b), 11(c), and 11(d))		3150.00 11 (e)
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		12
13	LOANS		
	(a) Made or Guaranteed by the Candidate		25000.00 13 (a)
	(b) All Other Loans		13 (b)
	(c) TOTAL LOANS (add 13 (a) and 13 (b))		13 (c)
14	OFFSETS TO OPERATING EXPENDITURES (Returns, Refunds, etc.)		14
15	OTHER RECEIPTS (Dividends, Interest, etc.)		15
16	TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)		31150.00 16
II. DISBURSEMENTS			
17	OPERATING EXPENDITURES	1667.54	12213.31 17
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		18
19	LOAN REPAYMENTS		
	(a) Of Loans Made or Guaranteed by the Candidate	10,000.00	10,000.00 19 (a)
	(b) Of All Other Loans		19 (b)
	(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))		19 (c)
20	REFUNDS OF CONTRIBUTIONS TO		
	(a) Individuals/Persons Other Than Political Committees		20 (a)
	(b) Political Party Committees		20 (b)
	(c) Other Political Committees		20 (c)
	(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		20 (d)
21	OTHER DISBURSEMENTS		21
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	11667.54	22213.31 22
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	8	15234.20 23
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	8	-0- 24
25	SUBTOTAL (Add Line 23 and Line 24)	8	15234.20 25
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	8	11667.54 26
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	8	6566.62 27

101 1695395

SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER 12
Use separate schedules
for each numbered line.

Name of Committee (in Full)		1984 July Quarterly Report		
<p><u>WILLIAM W. RICE</u> <u>3061005</u></p>				
<p>A. Full Name, Mailing Address and ZIP Code of Loan Source</p> <p><u>DAW</u> <u>1700 W. 11th St.</u> <u>PA (Pittsburgh)</u></p> <p><u>15216</u> <u>123</u></p> <p><u>WILLIAM W. RICE</u> <u>10595</u></p> <p>Term: <u>1/1/84</u> to <u>12/31/84</u> Date Due: <u>12/31/84</u></p> <p>List A. Endorser or guarantors of any of Item A</p> <p>1. Full Name, Mailing Address and ZIP Code</p> <p>2. Full Name, Mailing Address and ZIP Code</p> <p>3. Full Name, Mailing Address and ZIP Code</p>	<p>Original Amount of Loan</p> <p><u>25,000.00</u></p>	<p>Cumulative Payment To Date</p> <p><u>10,000.00</u></p>	<p>Balance Outstanding at Close of This Period</p> <p><u>15,000.00</u></p>	
<p>B. Full Name, Mailing Address and ZIP Code of Loan Source</p> <p>Term: _____ Date Due: _____ Interest Rate: _____ Secured: _____</p> <p>List A. Endorser or guarantors of any of Item B</p> <p>1. Full Name, Mailing Address and ZIP Code</p> <p>2. Full Name, Mailing Address and ZIP Code</p> <p>3. Full Name, Mailing Address and ZIP Code</p>		<p>Original Amount of Loan</p>	<p>Cumulative Payment To Date</p>	<p>Balance Outstanding at Close of This Period</p>
<p>C. (PT. TA, S. This Page optional)</p> <p>T. TA, S. This Page optional (last page in this line only)</p> <p>Carry outstanding balance only to LINE 3, Schedule D for this line. If no Schedule D carry forward to appropriate line of Summary.</p>				

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NO-2

APR 21 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Amendment (Inception-3/31/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(a) of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contribution(s) in question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

The Commission notes your partial repayment of the excessive contribution(s) on your 1984 July Quarterly Report. Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your action in repaying the excessive amount(s) will be taken into consideration.

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An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Pat Sheppard
Reports Analyst
Reports Analysis Division

RI033:61R43



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

80-2

AD 21 104

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Cannistra:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule B to support the amount reported on Line 19(a), 19(b) and/or 19(c), Column A of the Detailed Summary Page. Each loan repayment made by the committee must be itemized on a supporting Schedule B, regardless of the amount of the repayment. (11 CFR 104.3(b)(4)(iii) and (iv))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Pat Sheppard
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-3

September 13, 1984

Joseph E. Cannistra, Treasurer
Sullivan for Congress
P.O. Box 63
Valhalla, NY 10595

Identification Number: C00177600

Reference: April Quarterly Amendment (Inception-3/31/84) and
July Quarterly (4/1/84-6/30/84) Reports

Dear Mr. Cannistra:

This letter is to inform you that as of September 12, 1984, the Commission has not received your response to our requests for additional information, dated August 21, 1984. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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COPY

SULLIVAN FOR CONGRESS
Post Office Box 63
Valhalla, N.Y. 10595

September 24, 1984

Federal Election Commission
Reports Analysis Division
Washington, D. C. 20462

Identification Numbers: C0C177600 / 109100

References: July Quarterly Report (4/1/84 - 6/30/84)

Gentlemen:

Responsive to your letter of September 18, 1984 and your previous letter of August 21, 1984, enclosed is a Schedule B to support the amount reported on Line 19 (a), Column A of Detailed Summary Page.

Very truly yours,

E. J. Sullivan
Edward J. Sullivan
Assistant Treasurer

CC: Clerk of the House of Representatives
Office of Records and Registration
1030 Longworth House Office Building
Washington, D. C. 20515

New York State Board of Elections
99 Washington Street
Albany, N.Y. 12210

COPY

9701236740786

SCHEDULE B

ITEMIZED DISBURSEMENTS

Also required when used for each category of the Detailed Summary Page

PERIOD APRIL 1, 1984 THRU JUNE 30, 1984

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Name of Committee (in Full) **SULLIVAN FOR CONGRESS** I.D.# **C00177600/109100**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601	LOAN REPAYMENT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	5/17/84	\$10,000.00
COPY	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	COPY	
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (list page this line number only)			\$10,000.00

07147
012671071

SULLIVAN FOR CONGRESS
Post Office Box 83
Valhalla, N.Y. 10595

E. Sullivan SEP. 24 1984
A SULLIVAN ASST. FORM

CERTIFIED MAIL

SULLIVAN FOR CONGRESS
Post Office Box 63
Valhalla, N.Y. 10595

109100

September 24, 1984

Federal Election Commission
Reports Analysis Division
Washington, D. C. 20463

COPY

Identification Numbers: C00177600 / 109100

Reference: April Quarterly Amendment (Inception - 3/31/84)

Gentlemen:

Responsive to your letter of September 13, 1984 and your previous letter of August 21, 1984, Peter M. Sullivan, the candidate, lent \$25,000.00 to this committee from his personal funds and received a demand note in exchange.

Mr. Sullivan had previously borrowed \$25,000.00 from Edna M. Sullivan, his mother, and had given her a demand note in exchange.

As we reported in our 1984 July Quarterly Report, the committee made a partial repayment of \$10,000.00 of the loan to Mr. Sullivan. The following additional partial repayments of the loan have been made to Mr. Sullivan by the committee:

July 9, 1984	\$5,000.00
August 27, 1984	5,000.00
September 7, 1984	2,500.00

making a total repayment of \$22,500.00 to date and leaving a balance of \$2,500.00 owed by the committee to Mr. Sullivan. That balance will be repaid in the near future.

Mr. Sullivan has repaid \$22,500.00 to Mrs. Sullivan to date and he will repay the balance of \$2,500.00 to her as soon as the committee repays him.

Very truly yours,

E. Sullivan
Edward J. Sullivan
Assistant Treasurer

CC: Clerk of the House of Representatives
Office of Records and Registration
1036 Longworth House Office Building
Washington, D. C. 20516

COPY

New York State Board of Elections
99 Washington Street
Albany, N. Y. 12210

SEP 25 1984

SEP Certified Sept 25, 1984
Received Sept 27, 1984

UNITED STATES

REPORT OF RECEIPTS AND DISBURSEMENTS
For an Authorized Committee

Oct. 15, 1984 Report

Attachment 15

Page 1 of 3

1984 October Quarterly Report

OCT 15 1984

(Summary Page)

1. Name of Committee (in Full)
SULLIVAN FOR CONGRESS

Address (Number and Street)
P.O. Box 63

City, State and ZIP Code
VALHALLA, N.Y. 10595

2. FEC Identification Number
C 00177600 / 109100

3. Is this Report an Amendment?
" YES NO

Check if address is different than previously reported

RECEIVED
FEDERAL ELECTION COMMISSION
OCT 18 1984
9 34

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Twelfth day report preceding election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

This report contains activity for - Primary Election General Election Special Election Runoff Election

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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/84</u> Through <u>9/30/84</u>		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11e)		\$ 25.00	\$ 3,875.00
(b) Total Contribution Refunds (from Line 20d)		\$	\$
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$ 25.00	\$ 3,875.00
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$ 36.45	\$ 12,319.83
(b) Total Offsets to Operating Expenditures (from Line 14)		\$	\$
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$ 36.45	\$ 12,319.83
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$ 55.17	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 2,500.00	

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

For further information, contact

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4088

EDWARD J. SULLIVAN, ASST. TREAS.
Type or Print Name of Treasurer

E. J. Sullivan 10/15/84
SIGNATURE OF TREASURER Date

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

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

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FEC FORM 3 (3-80)

SCHEDULE C
(Revised 3/80)

LOANS
7/1/84 THRU 9/30/84

Page 1 of 3
List all loans
Use separate schedules
for each numbered item

Name of Committee (or Full) SULLIVAN FOR CONGRESS #COU177600/109100				
A Full Name, Mailing Address and ZIP Code of Loan Source PETER M. SULLIVAN 20 NORTH BROADWAY - B307 WHITE PLAINS, N.Y. 10601		Original Amount of Loan 25,000.00	Cumulative Payments To Date 22,500.00	Balance Outstanding at Close of This Period 2,500.00
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Terms Date Incurred 2/16/84 Date Due ON DEMAND Interest Rate _____ % (per)		Secured
List All Endorsers or Guarantors (if any) to Item A				
1 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
2 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
3 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
B Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Terms Date Incurred _____ Date Due _____ Interest Rate _____ % (per)		Secured
List All Endorsers or Guarantors (if any) to Item B				
1 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
2 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
3 Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding \$			
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)			2,500.00	
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary				

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 1896
DATE FILMED 2/13/87 CAMERA NO. 4
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