



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE END OF ROL # 2120

Date Filmed 8/8/86 Camera No. --- 3

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FEDERAL ELECTION COMMISSION

Blue routing cards; GC Reports discussing conciliation; objection form for

GC Reports discussing conciliation; Index to File; File Tabs; Letter from

Respondent discussing conciliation; Request for Conciliation; Proposed Conciliation  
12 Day Pre Brief Report and Comments

Agreement; GC Report regarding request for conciliation; RAD Memorandum

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

35040610022

- |                                     |   |                          |  |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/>            | (2) 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 type="checkbox"/>            | (5) Internal Documents                                    |                          |  |

Signed Michelle Brown

date 8/5/86

perm



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 1, 1986

Bernard J. Sobel  
Sobel & Co.  
65 Livingston Avenue  
Roseland, New Jersey 07068

RE: MUR 2120  
Garden State Political  
Action Committee  
Bernard Sobel, as  
treasurer

Dear Mr. Sobel:

On July 15, 1986, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(iv), a provision 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

86040510023

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Garden State Political Action ) MUR 2120  
Committee )  
Bernard Sobel, 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 Garden State Political Action Committee (hereinafter "the Respondent") violated 2 U.S.C. § 434(a)(4)(A)(iv).

**NOW, THEREFORE,** the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Garden State Political Action Committee is a political committee registered with the Commission.

2. Bernard Sobel is the current treasurer of Garden State Political Action Committee, having assumed his responsibilities on January 1, 1986,

3. The Respondent was required to file the 1985 Mid-Year Report of Receipts and Disbursements by July 31, 1985. The report was filed on October 15, 1985, 76 days late.

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V. The Respondent's failure to file timely the 1985 Mid-Year Report of Receipts and Expenditures was in violation of 2 U.S.C. § 434(a)(4)(iv).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Six Hundred Dollars (\$600), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

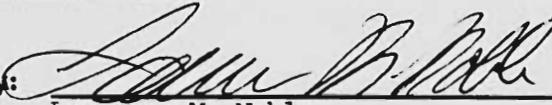
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent 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.

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

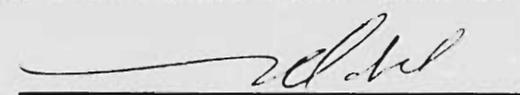
**FOR THE COMMISSION:**

**Charles N. Steele,  
General Counsel**

By:   
Lawrence M. Noble  
Deputy General Counsel

Date 7/30/86

**FOR THE RESPONDENTS:  
Garden State Political Action Committee**

By:   
Bernard Sobel, Treasurer

Date 8/1/86

35040610025

1039

GARDEN STATE PAC

May 21, 1986 55-218  
212

PAY TO THE ORDER OF Treasury of the U.S. \$ 600.00

six hundred & 00/100 DOLLARS

 **United Jersey Bank**  
65 Livingston Ave.  
Roseland, N. J. 07068

MEMO \_\_\_\_\_

⑆021202162⑆ 147⑈00513 2⑈ 1039

*[Signature]*

MEMORANDUM

CCC# 590

TO: Debra A. Reed TO: Judy Smith

FROM: Judy Smith FROM: Debra A. Reed

CHECK NO. 1039 (a copy of which is attached) RELATING  
 TO MUR 2120 (Brown) AND NAME Garden State Political Action Committee, Bernard Sobel, Treas.  
 WAS RECEIVED ON 5/29/86. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT (#95F3875.16)
- CIVIL PENALTIES ACCOUNT (#95-1099.160)
- OTHER \_\_\_\_\_

SIGNATURE Debra A. Reed DATE 5/29/86



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bernard J. Sobel  
Sobel & Co.  
65 Livingston Avenue  
Roseland, New Jersey 07068

RE: MUR 2120  
Garden State Political  
Action Committee  
Bernard Sobel, as  
treasurer

Dear Mr. Sobel:

On July 15, 1986, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(iv), a provision 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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2120  
Garden State Political Action )  
Committee )  
Bernard J. Sobel, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 28, 1986, the Commission decided by a vote of 6-0 to close the file in this matter.

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

Attest:

7-28-86

Date

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

86040610028

Received in Office of Commission Secretary: Wed., 7-23-86, 5:02  
Circulated on 48 hour tally basis: Thurs., 7-24-86, 11:00  
Deadline for vote: Mon., 7-28-86, 11:00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Garden State Political Action ) MUR 2120  
Committee )  
Bernard J. Sobel, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 15, 1986, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 2120:

1. Accept the conciliation agreement signed by the respondent, as shown in the FEC General Counsel's report dated July 2, 1986.
2. Direct the Office of General Counsel to send the appropriate letter.

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

Attest:

7-15-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

26040510029

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Garden State Political Action ) MUR 2120  
Committee )  
Bernard J. Sobel, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 24, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2120:

1. Enter into conciliation with Garden State Political Action Committee and Bernard J. Sobel, as treasurer, prior to a finding of probalbe cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed April 21, 1986.

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

Attest:

4-24-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Mon., 3-21-86, 3:18  
Circulated on 48 hour tally basis: Tues., 3-22-86, 11:00  
Deadline for vote: Thurs., 3-24-86, 11:00

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RECEIVED AT THE FEC  
GCL# 9938  
Touche Ross & Co. 33

2/20

March 5, 1986

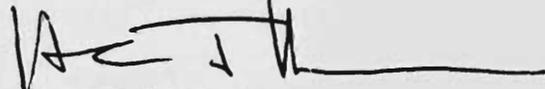
Ms. Michelle Brown  
Federal Election Commission  
Washington, D.C. 20463

Re: Garden State PAC

Dear Ms. Brown:

Pursuant to our discussion today, I hereby am requesting pre-probable cause conciliation with reference to the Garden State PAC. In addition, please be advised that the new Treasurer is Bernard J. Sobel, Sobel & Co., 65 Livingston Avenue, Roseland, New Jersey 07068 (telephone: (201) 994-9494).

Very truly yours,



Howard J. Menaker

HJM:cm

16 MAR 11 8:48

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*Duchie Ross & Co.*

Gateway One  
Newark, New Jersey 07102



Ms. Michelle Brown  
Federal Election Commission  
Washington, D.C. 20463

RECEIVED AT THE FEC

REC # 9609

TOUCHE ROSS & CO.

86 JAN 29

PI: 61

GATEWAY 1  
NEWARK, N. J. 07102

HOWARD J. MENAKER  
Partner

January 27, 1986

HAND DELIVERED

Ms. Joan D. Aikens  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2120  
Garden State Political Action Committee

Dear Ms. Aikens:

I am in receipt of your letter of January 13, 1986 in connection with your consideration of action being taken against the Garden State PAC and myself as Treasurer.

Please be advised of the following:

1. Due to the pressure of other work, we did not file the 6/30/85 report in a timely fashion, and for this I apologize.
2. The 12/31/85 report has been filed within the timetable prescribed by law.
3. Due to the pressures previously mentioned and to ensure that future reports will be submitted on a more timely basis, I personally have resigned as Treasurer of the Garden State PAC.

I hope this information is useful in your deliberations.

Very truly yours,



HJM:cm

Howard J. Menaker

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16 JAN 31 11:31

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☆ U.S. GOVERNMENT PRINTING OFFICE: 1984-747-701

<b>FEDERAL ELECTION COMMISSION</b> <b>CORRESPONDENCE CONTROL SLIP</b> <b>Do Not Separate From Document</b>	<b>For Division U.</b> 60131101910 11	<b>Suspense No.</b> 600396
	<b>Name and Address of Sender</b>	
	<b>Subject of Correspondence</b>	
	<b>Date Received</b> 03/20/86	<b>Suspense Date</b> 03/20/86
	<b>Referred to</b>	<b>Action (Optional)</b>
	1. CHIT	
	2. <i>Brown</i>	
	3.	
	4.	
	5.	
<b>Answer Date</b>	<b>File Designation</b> <i>4300</i>	
<b>Special Instructions:</b>		

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 13, 1986

Howard J. Menaker, Treasurer  
Garden State Political Action Committee  
P.O. Box 10  
Roseland, NJ 07068

RE: MUR 2120  
Garden State Political Action  
Committee  
Howard J. Menaker, as  
treasurer

Dear Mr. Menaker:

On January 2, 1986, the Federal Election Commission determined that there is reason to believe Garden State Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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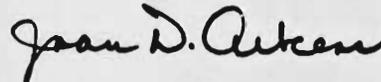
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Michele Brown, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens  
Chairman

Enclosures

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

35040610036



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Howard J. Menaker, Treasurer  
Garden State Political Action Committee  
P.O. Box 10  
Roseland, NJ 07068

RE: MUR 2120  
Garden State Political Action  
Committee  
Howard J. Menaker, as  
treasurer

Dear Mr. Menaker:

On January 2, 1986, the Federal Election Commission determined that there is reason to believe Garden State Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Michele Brown, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

*mb 1/8/86*

Joan D. Aikens  
Chairman

Enclosures

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

86040510038

**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. 2120

STAFF MEMBER(S) & TEL. NO.

Michele Brown 202-376-8200

**RESPONDENT:** Garden State Political Action Committee  
Howard J. Menaker, as treasurer

**SUMMARY OF ALLEGATIONS**

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on December 5, 1985.

The Garden State Political Action Committee ("Garden State PAC") and Howard J. Menaker, as treasurer, failed to file the 1985 Mid-Year Report of Receipts and Disbursements in a timely manner.

**FACTUAL BASIS AND LEGAL ANALYSIS**

Section 434(a)(4)(A)(iv) of Title 2, United States Code, requires, in any calendar year other than one in which a regularly scheduled general election is held, that political committees other than authorized committees of a candidate file, no later than July 31st, a report covering the period beginning January 1st and ending June 30th.

RAD notified Garden State PAC, on June 21, 1985, that the 1985 Mid-Year Report was due on July 31, 1985. RAD then sent a Non-Filer Notice on August 22, 1985. Garden State PAC did not file the Mid-Year Report until October 15, 1985. Because Garden State PAC did not file the Mid-Year Report on July 31st, as required by 2 U.S.C. § 434(a)(4)(A)(iv), there is reason to believe that Garden State PAC and Howard J. Menaker, as treasurer, violated that provision of the Act.

86040510039

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) RAD 85NF-136  
Garden State Political Action Committee )  
Howard J. Menaker, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 2, 1986, the Commission decided by a vote of 4-0 to take the followings actions in RAD 85NF-136:

1. Open a MUR.
2. Find reason to believe Garden State Political Action Committee and Howard J. Menaker, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve and send the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed December 23, 1985.

Commissioners Elliott, Harris, McDonald and McGarry voted affirmatively for this decision; Commissioners Aikens and Josefiak did not cast a vote.

Attest:

1-3-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Mon., 12-23-85, 5:11  
Circulated on 48 hour tally basis: Tues., 12-24-85, 11:00  
Deadline for vote: Thurs., 1-2-86, 4:00

85040610040



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Rad*  
DATE: December 23, 1985  
SUBJECT: RAD Ref. 85-136 - First General Counsel's Rpt.

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	[ xk	Compliance	[ xk
Sensitive	kx]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution	
Sensitive	[ ]	below)	[ ]
Non-Sensitive	[ ]		
Other	[ ]		

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

85040610041

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

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL BY \_\_\_\_\_ RAD Referral: 85NF-136  
OGC TO THE COMMISSION \_\_\_\_\_ Staff Member: Michele Brown

SOURCE OF REFERRAL: INTERNALLY GENERATED

RESPONDENTS' NAMES: Garden State Political Action Committee  
Howard J. Menaker, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iv)

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on December 5, 1985.

**SUMMARY OF ALLEGATIONS**

The Garden State Political Action Committee ("Garden State PAC") and Howard J. Menaker, as treasurer, failed to file the 1985 Mid-Year Report of Receipts and Disbursements in a timely manner.

**FACTUAL AND LEGAL ANALYSIS**

Section 434(a)(4)(A)(iv) of Title 2, United States Code, requires, in any calendar year other than one in which a regularly scheduled general election is held, that political committees other than authorized committees of a candidate file, no later than July 31st, a report covering the period beginning January 1st and ending June 30th.

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RAD notified Garden State PAC, on June 21, 1985, that the 1985 Mid-Year Report was due on July 31st. RAD then sent a Non-Filer Notice on August 22nd. Garden State PAC did not file the Mid-Year Report until October 15th. Because Garden State PAC did not file the Mid-Year Report on July 31st, as required by 2 U.S.C. § 434(a)(4)(A)(iv), the Office of General Counsel recommends that the Commission find reason to believe that Garden State PAC and Howard J. Menaker, as treasurer, violated that provision of the Act.

**RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe Garden State Political Action Committee and Howard J. Menaker, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve and send the attached letter and Factual and Legal Analysis.

Charles N. Steele  
General Counsel

December 23, 1985  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. RAD Referral
2. Letter to Respondents
3. General Counsel's Factual and Legal Analysis

85040510043

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE: 5 December 1985**

**ANALYST: Doris M. Gardner**

**I. COMMITTEE:** Garden State Political Action Committee  
(C00169136)  
Howard J. Menaker, Treasurer  
P.O. Box 10  
Roseland, NJ 07068

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(A)

**III. BACKGROUND:**

**Failure to Timely File the 1985 Mid-Year Report**

The Garden State Political Action Committee ("Garden State PAC") failed to file the 1985 Mid-Year Report of Receipts and Disbursements in a timely manner. Garden State PAC was notified on June 21, 1985 that the report was due on July 31, 1985 (Attachment 2). A Non-Filer Notice was sent to Garden State PAC on August 22, 1985 (Attachment 3).

On September 16, 1985 the Reports Analysis Division ("RAD") analyst made several attempts to reach Howard J. Menaker, the treasurer for Garden State PAC. The RAD analyst spoke with an Information Operator and requested the listing for Garden State. The Operator had no listing. The RAD analyst then obtained the home phone number for Mr. Menaker. The RAD analyst called Mr. Menaker at home on September 16, 1985, and there was no answer. Similar attempts were made on September 19th and 20th, and again, there was no answer (Attachment 4).

The 1985 Mid-Year Report was filed on October 15, 1985 (Attachment 5).

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

86040510044

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 4DEC85  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
GARDEN STATE PAC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00169136
1983	STATEMENT OF ORGANIZATION			9AUG83	2	83FEC/280/4215
	MID-YEAR REPORT	18,398	9,459	1JAN83 - 30JUN83	6	83FEC/280/4217
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 - 30JUN83	5	84FEC/311/0243
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 - 30JUN83	2	85FEC/372/2954
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 - 30JUN83	3	84FEC/306/3410
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 - 30JUN83	4	84FEC/311/3037
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 - 30JUN83	2	85FEC/368/366
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 - 30JUN83	13	85FEC/370/1295
	YEAR-END	3,444	6,828	1JUL83 - 31DEC83	5	84FEC/310/4409
	YEAR-END - AMENDMENT	-	-	1JUL83 - 31DEC83	2	85FEC/372/2954
	YEAR-END - AMENDMENT	-	-	1JUL83 - 31DEC83	2	85FEC/370/0504
	NOTICE OF FAILURE TO FILE			1JUL83 - 31DEC83	1	84FEC/308/1503
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 - 31DEC83	2	85FEC/368/3667
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 - 31DEC83	1	85FEC/370/2020
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 - 31DEC83	1	85FEC/370/5269
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 - 31DEC83	1	85FEC/373/0491
1984	APRIL QUARTERLY	15,100	11,016	1JAN84 - 31MAR84	7	84FEC/310/4402
	* APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 - 31MAR84	2	85FEC/372/2950
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 - 31MAR84	2	85FEC/368/3670
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 - 31MAR84	1	85FEC/370/2027
	JULY QUARTERLY	8,548	4,031	1APR84 - 30JUN84	7	85FEC/366/3957
	* JULY QUARTERLY - AMENDMENT	-	-	1APR84 - 30JUN84	2	85FEC/372/2964
	NOTICE OF FAILURE TO FILE			1APR84 - 30JUN84	1	85FEC/362/0492
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 - 30JUN84	2	85FEC/368/3673
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 - 30JUN84	1	85FEC/370/2026
	OCTOBER QUARTERLY	2,408	7,365	1JUL84 - 30SEP84	7	85FEC/366/3964
	* OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 - 30SEP84	2	85FEC/372/2962
	NOTICE OF FAILURE TO FILE			1JUL84 - 30SEP84	1	85FEC/362/206
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 - 30SEP84	2	85FEC/368/3676
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 - 30SEP84	1	85FEC/370/2025
	NOTICE OF FAILURE TO FILE			1OCT84 - 26NOV84	1	85FEC/362/2066
	YEAR-END	2,823	8,267	1OCT84 - 31DEC84	6	85FEC/366/3971
	* YEAR-END - AMENDMENT	-	-	1OCT84 - 31DEC84	2	85FEC/372/2960
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 - 31DEC84	2	85FEC/368/3679
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 - 31DEC84	1	85FEC/370/2029
	TOTAL	50,721	0	46,966	0	102 TOTAL PAGES

All reports have received review except those asterisked  
Cash-on-hand as of 12/31/84: \$3,775.00  
Debts owed to the committee as of 12/31/84: \$0  
Debts owed by the committee as of 12/31/84: \$0

ALBUM 111  
(Page 1 of 2)

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FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4DEC85  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
GARDEN STATE PAC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00169136
	1985 MID-YEAR REPORT	17,478	7,929	1JAN85 -31JUL85	8	85FEC/389/1216
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3135
	TOTAL	17,478	0	7,929	0	9 TOTAL PAGES

The report has been reviewed:  
 Cash-on-hand as of 6/30/85: \$13,324.00  
 Debts owed to the committee as of 6/30/85: \$0  
 Debts owed by the committee as of 6/30/85: \$0



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.\*

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1985.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 1985.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee; even if such amounts were not received during the current reporting period. See 11 CFR 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

- over -

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**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

**FOR INFORMATION CALL: Information Services Division**  
202/523-4068  
800/424-9530

86040510048



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RG-7

August 22, 1985

Edward J. Menaker, Treasurer  
Garden State PAC  
P.O. Box 10  
Roseland, NJ 07068

Identification Number: C00169136

Reference: Mid-Year Report (1/1/85-6/30/85)

Dear Mr. Menaker:

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact Doris Gardner on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

5311903510

**ANALYST:** Doris M. Gardner

**CONVERSATION WITH:** Long Distance Information Operator

**COMMITTEE:** Garden State Political Action Committee

**DATE:** September 16, 1985

**SUBJECT(S):** Failure to timely file the 1985 Mid-Year Report

On September 16, 1985, I spoke with an Information Operator and requested the telephone listing for Garden State Political Action Committee. The operator had no listing. I then tried to obtain the telephone number for Mr. Howard J. Menaker, treasurer of Garden State PAC. I phoned Mr. Menaker on:

September 16, 1985, there was no answer

September 19, 1985, there was no answer

September 20, 1985, there was no answer.

86040610050





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Howard J. Menaker, Treasurer  
Garden State Political Action Committee  
P.O. Box 10  
Roseland, NJ 07068

RE: MUR  
Garden State Political Action  
Committee  
Howard J. Menaker, as  
treasurer

Dear Mr. Menaker:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe Garden State Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Michele Brown, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

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

8 5 0 4 0 6 1 0 0 5 3

**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. \_\_\_\_\_

STAFF MEMBER(S) & TEL. NO.

Michele Brown 202-376-8200

RESPONDENT: Garden State Political Action Committee  
Howard J. Menaker, as treasurer

SUMMARY OF ALLEGATIONS

Based on information obtained in the normal course of its supervisory duties under the Federal Election Campaign Act of 1971, as amended, the Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on December 5, 1985.

The Garden State Political Action Committee ("Garden State PAC") and Howard J. Menaker, as treasurer, failed to file the 1985 Mid-Year Report of Receipts and Disbursements in a timely manner.

FACTUAL BASIS AND LEGAL ANALYSIS

Section 434(a)(4)(A)(iv) of Title 2, United States Code, requires, in any calendar year other than one in which a regularly scheduled general election is held, that political committees other than authorized committees of a candidate file, no later than July 31st, a report covering the period beginning January 1st and ending June 30th.

RAD notified Garden State PAC, on June 21, 1985, that the 1985 Mid-Year Report was due on July 31, 1985. RAD then sent a Non-Filer Notice on August 22, 1985. Garden State PAC did not file the Mid-Year Report until October 15, 1985. Because Garden State PAC did not file the Mid-Year Report on July 31st, as required by 2 U.S.C. § 434(a)(4)(A)(iv), there is reason to believe that Garden State PAC and Howard J. Menaker, as treasurer, violated that provision of the Act.

86040610054

REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 5 December 1985

ANALYST: Doris M. Gardner

I. COMMITTEE: Garden State Political Action Committee  
(C00169136)  
Howard J. Menaker, Treasurer  
P.O. Box 10  
Roseland, NJ 07068

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(A)

III. BACKGROUND:

Failure to Timely File the 1985 Mid-Year Report

The Garden State Political Action Committee ("Garden State PAC") failed to file the 1985 Mid-Year Report of Receipts and Disbursements in a timely manner. Garden State PAC was notified on June 21, 1985 that the report was due on July 31, 1985 (Attachment 2). A Non-Filer Notice was sent to Garden State PAC on August 22, 1985 (Attachment 3).

On September 16, 1985 the Reports Analysis Division ("RAD") analyst made several attempts to reach Howard J. Menaker, the treasurer for Garden State PAC. The RAD analyst spoke with an Information Operator and requested the listing for Garden State. The Operator had no listing. The RAD analyst then obtained the home phone number for Mr. Menaker. The RAD analyst called Mr. Menaker at home on September 16, 1985, and there was no answer. Similar attempts were made on September 19th and 20th, and again, there was no answer (Attachment 4).

The 1985 Mid-Year Report was filed on October 15, 1985 (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

86040610055

FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 4DEC85  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
GARDEN STATE PAC CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00169136
1983	STATEMENT OF ORGANIZATION			5AUG83	2	83FEC/280/4215
	MID-YEAR REPORT	18,398	9,459	1JAN83 -30JUN83	6	83FEC/280/4217
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	5	84FEC/311/0243
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	2	85FEC/372/2954
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	3	84FEC/306/3410
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	4	84FEC/311/3033
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	2	85FEC/368/3664
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	13	85FEC/370/1295
	YEAR-END	3,444	6,828	1JUL83 -31DEC83	5	84FEC/310/4409
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	2	85FEC/372/2956
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	2	85FEC/378/0504
	NOTICE OF FAILURE TO FILE			1JUL83 -31DEC83	1	84FEC/308/1503
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	85FEC/368/3667
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	1	85FEC/370/2028
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	85FEC/370/5269
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	1	85FEC/373/0491
1984	APRIL QUARTERLY	15,100	11,016	1JAN84 -31MAR84	7	84FEC/310/4402
	* APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	2	85FEC/372/2958
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	85FEC/368/3670
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	1	85FEC/370/2027
	JULY QUARTERLY	8,548	4,031	1APR84 -30JUN84	7	85FEC/366/3957
	* JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	2	85FEC/372/2964
	NOTICE OF FAILURE TO FILE			1APR84 -30JUN84	1	85FEC/362/0492
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	85FEC/368/3673
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	1	85FEC/370/2026
	OCTOBER QUARTERLY	2,408	7,365	1JUL84 -30SEP84	7	85FEC/366/3964
	* OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	2	85FEC/372/2962
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	85FEC/362/2067
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	2	85FEC/368/3676
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	85FEC/370/2025
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	85FEC/362/2066
	YEAR-END	2,823	8,267	1OCT84 -31DEC84	6	85FEC/366/3971
	* YEAR-END - AMENDMENT	-	-	1OCT84 -31DEC84	2	85FEC/372/2960
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -31DEC84	2	85FEC/368/3679
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -31DEC84	1	85FEC/370/2029
	TOTAL	50,721	0 46,966	0	102	TOTAL PAGES

All reports have received review except those asterisked  
 Cash-on-hand as of 12/31/84: \$3,775.00  
 Debts owed to the committee as of 12/31/84: \$0  
 Debts owed by the committee as of 12/31/84: \$0

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FEDERAL ELECTION COMMISSION  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4DEC85  
 PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
GARDEN STATE PAC						
CONNECTED ORGANIZATION:	NONE					
				NON-PARTY QUALIFIED		ID #C00169136
	1985 MID-YEAR REPORT	17,478	7,929	1JAN85 -31JUL85	8	85FEC/389/1216
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3135
	TOTAL	17,478	0	7,929	0	9 TOTAL PAGES

The report has been reviewed:  
 Cash-on-hand as of 6/30/85: \$13,324.00  
 Debts owed to the committee as of 6/30/85: \$0  
 Debts owed by the committee as of 6/30/85: \$0



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 1985

**SEMIANNUAL REPORT NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL POLITICAL COMMITTEES currently registered with the Commission (except committees filing monthly) must file a semiannual report by July 31, 1985.

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1985. Unauthorized political committees that have not previously filed a financial disclosure report should report all financial activity from date of registration, through June 30, 1985.\*

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business July 31, 1985.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees filing on a monthly schedule need not file a semi-annual report. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month. The next monthly report must be filed by July 20, 1985, and should disclose all financial activity of the committee from June 1 through June 30, 1985.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee; even if such amounts were not received during the current reporting period. See 11 CFR 101.3; 104.3(a) and (b). Activity which occurred prior to 1985 should be reported separately.

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**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Information Services Division  
202/523-4068  
800/424-9530

86040610059



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

August 22, 1985

Howard J. Menaker, Treasurer  
 Garden State PAC  
 P.O. Box 10  
 Roseland, NJ 07068

Identification Number: C00169136

Reference: Mid-Year Report (1/1/85-6/30/85)

Dear Mr. Menaker:

It has come to the attention of the Federal Election Commission ("the Commission") that you may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer. See 2 U.S.C. §439.

If the report in question was filed, please submit documentation for the public record. Although the Commission may take further legal steps concerning this matter, your prompt response will be taken into consideration.

If you have any questions, please contact Doris Gardner on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

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**ANALYST:** Doris M. Gardner

**CONVERSATION WITH:** Long Distance Information Operator

**COMMITTEE:** Garden State Political Action Committee

**DATE:** September 16, 1985

**SUBJECT(S):** Failure to timely file the 1985 Mid-Year Report

On September 16, 1985, I spoke with an Information Operator and requested the telephone listing for Garden State Political Action Committee. The operator had no listing. I then tried to obtain the telephone number for Mr. Howard J. Menaker, treasurer of Garden State PAC. I phoned Mr. Menaker on:

September 16, 1985, there was no answer

September 19, 1985, there was no answer

September 20, 1985, there was no answer.

86040610061

REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

0508TIS 09:11

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)

Garden State PAC

Address (Number and Street)

P.O. Box 10

City, State and ZIP Code

Roseland N.J. 07068

Check here if address is different than previously reported.

2. FEC Identification Number

C00169163

This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report  October 15 Quarterly Report

July 15 Quarterly Report  January 31 Year End Report

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

Monthly Report for \_\_\_\_\_

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

(b) Is this Report an Amendment?

YES

NO

SUMMARY

5. Covering Period 11/1/85 through 7/31/85

6. (a) Cash on hand January 1, 1985

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

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)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

	\$ 3775	\$ 3775
	\$ 3775	
	\$ 17478	\$ 17478
	\$ 21253	\$ 21253
	\$ 7929	\$ 7929
	\$ 13,324	\$ 13,324
	\$ -	
	\$ -	

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

Howard J. Menaker

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

For further information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 523 4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 4373.

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

FEC FORM 3-80

86040510062

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2120

Date Filmed 8/8/86 Camera No. --- 3

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