



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3265

DATE FILMED 2/22/91 CAMERA NO. 4

CAMERAMAN AS

91040855357

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 16 January 1991

ANALYST: KAREN WHITE

I. COMMITTEE:

Friends of Phil McConkey
(C00230946)
Ted Resnick, Treasurer
(April 20, 1990-Present)
William G. Borchert, Treasurer
(August 10, 1988-April 19, 1990)
P.O. Box 287
Flemington, NJ 08822

II. RELEVANT STATUTE:

2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Friends of Phil McConkey (the "Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for four (4) contributions/loans totaling \$33,000 received prior to the 1990 Primary Election.

The candidate was involved in the 1990 Primary Election held on June 5, 1990. Prior Notice was sent to the Committee on April 30, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices on contributions of \$1,000 or more, received during the period May 17 through June 2, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt."

Schedule A of the 1990 July Quarterly Report indicates that the Committee failed to file four (4) 48-Hour Notices for contributions/loans received during the aforementioned reporting period (Attachment 3). The following is a list of the contributions/loans for which no 48-Hour Notices were filed:

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FRIENDS OF PHIL MCCONKEY
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

| <u>Contributor Name</u> | <u>Date</u> | <u>Amount</u> |
|-----------------------------------|-------------|---------------|
| Claudia Gittings | 6/02/90 | \$ 1,000 |
| Sandra Keegan | 5/25/90 | 1,000 |
| Carolyn Szlasa | 5/25/90 | 1,000 |
| Phillip McConkey (candidate loan) | 5/30/90 | 30,000 |

On October 23, 1990, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI noted on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requested the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice stated that although the Commission may take legal steps, any response would be taken into consideration.

On November 8, 1990, Mr. Resnick from the Committee called the Reports Analysis Division ("RAD") analyst to ask about the missing 48-hour notices. Mr. Resnick said that all last minute contributions had notices and he would send them to the Commission. (Attachment 5)

On November 15, the committee responded that to the best of their knowledge, they have "disclosed every "last minute" contribution as requested by the Act." The Committee's response included a 48-Hour Notice for June 4, 1990, itemizing a contribution from Claudia Gittings and a loan from Phil McConkey; however, the Commission has no record of receiving this notice. (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990

DATE 26DEC90

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

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

| | | | | | | | |
|---------------------------------|---------------------------|--|--|------------|---------------|---------------|------------------|
| MCCONKEY, PHILLIP J | HOUSE 12 REPUBLICAN PARTY | | | NEW JERSEY | 1990 ELECTION | ID# HONJ12089 | |
| 1. STATEMENT OF CANDIDATE | | | | | | | |
| 1990 STATEMENT OF CANDIDATE | | | | | 23MAY90 | | 1 90HSE/398/0771 |
| STATEMENT OF CANDIDATE | | | | | 23MAY90 | | 1 90HSE/399/1406 |
| 2. PRINCIPAL CAMPAIGN COMMITTEE | | | | | | | |

| FRIENDS OF PHIL MCCONKEY | | | | ID #C00230946 | HOUSE | | |
|--|---------|---|---------|------------------|-------|-------------------|-----------------|
| 1990 STATEMENT OF ORGANIZATION - AMENDMENT | | | | 30APR90 | | 1 90HSE/397/1555 | |
| 48 HOUR CONTRIBUTION NOTICE | | | | 21MAY90 | | 1 90HSE/397/5237 | |
| STATEMENT OF ORGANIZATION - AMENDMENT | | | | 23MAY90 | | 1 90HSE/398/0772 | |
| 48 HOUR CONTRIBUTION NOTICE | | | | 23MAY90 | | 1 90HSE/398/0797 | |
| 48 HOUR CONTRIBUTION NOTICE | | | | 29MAY90 | | 1 90HSE/398/4298 | |
| 48 HOUR CONTRIBUTION NOTICE | | | | 1JUN90 | | 1 90HSE/399/0623 | |
| MISCELLANEOUS REPORT TO FEC | | | | 27JUL90 | | 1 90HSE/405/0797 | |
| APRIL QUARTERLY | | - | - | 3APR90 -15APR90 | | 9 90HSE/397/1537 | |
| APRIL QUARTERLY - AMENDMENT | | - | - | 1JAN90 -31MAR90 | | 3 90HSE/399/4611 | |
| APRIL QUARTERLY - AMENDMENT | | - | - | 1JAN90 -31MAR90 | | 3 90HSE/404/4605 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 3APR90 -15APR90 | | 2 90FEC/642/2256 | |
| REQUEST FOR ADDITIONAL INFORMATION 2ND | | | | 3APR90 -15APR90 | | 3 90FEC/644/5017 | |
| PRE-PRIMARY | 148,489 | | 127,267 | 3APR90 -16MAY90 | | 29 90HSE/398/1246 | |
| PRE-PRIMARY - AMENDMENT | 148,489 | | 127,267 | 3APR90 -16MAY90 | | 8 90HSE/404/3412 | |
| PRE-PRIMARY - AMENDMENT | | | | 3APR90 -16MAY90 | | 18 90HSE/404/4733 | |
| PRE-PRIMARY - AMENDMENT | 137,669 | | 116,467 | 3APR90 -16MAY90 | | 8 90HSE/417/4043 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 3APR90 -16MAY90 | | 2 90FEC/644/2939 | |
| JULY QUARTERLY | 155,532 | | 173,810 | 17MAY90 -30JUN90 | | 34 90HSE/403/1646 | |
| JULY QUARTERLY - AMENDMENT | | | | 17MAY90 -30JUN90 | | 7 90HSE/417/4051 | |
| REQUEST FOR ADDITIONAL INFORMATION | | | | 17MAY90 -30JUN90 | | 2 90FEC/667/0732 | |
| REQUEST FOR ADDITIONAL INFORMATION 2ND | | | | 17MAY90 -30JUN90 | | 3 90FEC/670/5285 | |
| NOTICE OF FAILURE TO FILE | | | | 13JUL90 -30SEP90 | | 1 90FEC/670/3090 | |
| TOTAL | 293,221 | 0 | 250,277 | | | 0 | 179 TOTAL PAGES |

3. AUTHORIZED COMMITTEES
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

ALL REPORTS HAVE BEEN REVIEWED.
DEBTS OWED TO THE COMMITTEE AS OF 6/30/90 \$0
DEBTS OWED BY THE COMMITTEE AS OF 6/30/90 \$11,200
CASH-ON-HAND AS OF 6/30/90 \$2944

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REPORT NOTICE

ATTACHMENT 2
Page 1 of 2

FEDERAL ELECTION COMMISSION

NEW JERSEY

April 30, 1990

| REPORT | REPORTING PERIOD1/ | REG./CERT. MAILING DATE2/ | FILING DATE |
|----------------|---------------------|---------------------------------|----------------|
| PRE-PRIMARY | 04/01/90 - 05/16/90 | 05/21/90 | 05/24/90 |
| JULY QUARTERLY | 05/17/90 - 06/30/90 | 07/15/90 | 07/15/90 |

WHO MUST FILE

PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek nomination in the regularly scheduled and special primaries on June 5, 1990, in New Jersey.

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use Form 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32.

WHERE TO FILE

Consult the instructions on the back of the Form 3 Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE CONTRIBUTIONS

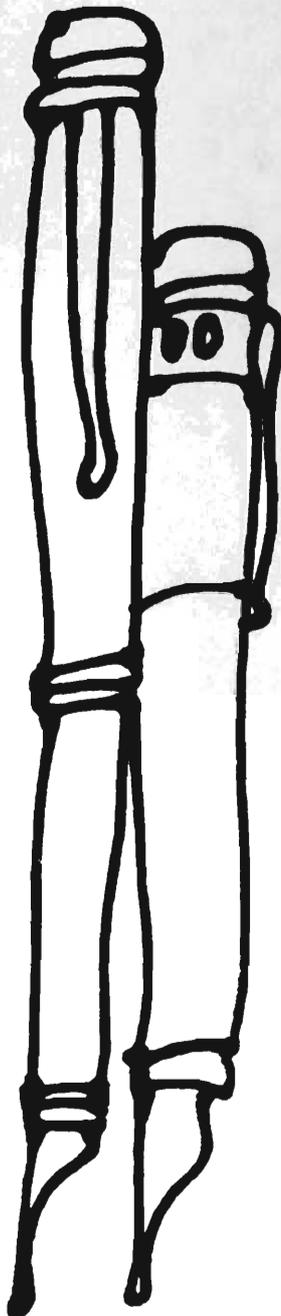
Committees must also file special notices on contributions of \$1,000 or more, received during the period May 17 through June 2, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 300/424-9530 or 202/376-3120

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NEW JERSEY

COMPLIANCE
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

NOTE: Committees that are authorized to report activity for both the regular primary and the special primary should indicate this on the summary page of Form 3 and supporting schedules, as appropriate. If the candidate has authorized a separate principal campaign committee for the special election, this committee must file a separate report to disclose the financial activity. See **WHAT MUST BE REPORTED**, above.

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Supplement
Schedule A

Itemized Receipts

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
Friends of Phil McDonkey

| Name/Address | Employer/Occup | Date | Amount |
|--------------|----------------|------|--------|
|--------------|----------------|------|--------|

| | | | |
|---|-----------|----------|--------|
| Eleanor Georgan 9 Bluestone Terrace Morristown, NJ 07960- | Requested | 06/01/90 | 300.00 |
|---|-----------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 300.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|--|-----------|----------|--------|
| M Celeste Gilbert Shalebrook Dr. Morristown, NJ 07960- | Requested | 05/29/90 | 500.00 |
|--|-----------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 500.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|---|-----------|----------|--------|
| Mary Billigan 20 Bradford Lane Basking Ridge, NJ 07920- | Requested | 06/01/90 | 300.00 |
|---|-----------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 300.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|---|------------------|----------|---------|
| Claudia Bittings P.O. Box 477 Cape May, NJ 08204- | self Attorney | 06/02/90 | 1000.00 |
|---|------------------|----------|---------|

| | | | |
|-----------------------|--------------------|--|---------|
| Receipt for : Primary | Aggregate for Year | | 1000.00 |
|-----------------------|--------------------|--|---------|

| | | | |
|---|-----------|----------|--------|
| Eileen Glynn Pleasant Hill Dr. Far Hills, NJ 07931- | Requested | 06/01/90 | 300.00 |
|---|-----------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 300.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|------------------------|-----------|----------|--------|
| Yvonne Bontard . NJ | Requested | 06/01/90 | 300.00 |
|------------------------|-----------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 300.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|--|------------------------------|----------|--------|
| Andy Goodman 324 Madison Ave New York, NY 10173- | Rosner & Goodman Attorney | 05/22/90 | 500.00 |
|--|------------------------------|----------|--------|

| | | | |
|-----------------------|--------------------|--|--------|
| Receipt for : Primary | Aggregate for Year | | 500.00 |
|-----------------------|--------------------|--|--------|

| | | | |
|-----------|--|--|---------|
| Subtotal: | | | 3200.00 |
|-----------|--|--|---------|

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1990 July Quarterly Report

Supplement
Schedule A

Itemized Receipts

Page 9 of 18
Line No. 11a

Any information copied from such reports and comments 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
Friends of Phil McConkey

| Name/Address | Employer/Occup | Date | Amount |
|---|------------------------------|--------------------|---------|
| Sandra Keegan 3 Theodora Dr. Randolph, NJ 07869- | homemaker | 05/25/90 | 1000.00 |
| Receipt for : Primary | | Aggregate for Year | 1000.00 |
| Peter Keller Rod's 1990 Madison Ave. Convent Station, NJ 07961- | Self Restauranteur | 05/25/90 | 300.00 |
| Receipt for : Primary | | Aggregate for Year | 300.00 |
| John Kelly NJ | Arthur Anderson Executive | 05/25/90 | 500.00 |
| Receipt for : Primary | | Aggregate for Year | 500.00 |
| Mike Kelly 265 E. 66th St. New York, NY 10021- | Self Financial Advise | 05/31/90 | 250.00 |
| Receipt for : Primary | | Aggregate for Year | 250.00 |
| Mary Kenny Box 241 New Vernon, NJ 07976- | Homemaker | 08/01/90 | 350.00 |
| Receipt for : Primary | | Aggregate for Year | 350.00 |
| Thomas Kenny NJ | Kenny Press Executive | 08/01/90 | 700.00 |
| Receipt for : Primary | | Aggregate for Year | 700.00 |
| Stephen Kepniss 51 Westview Rd. Short Hills, NJ 07078- | Requested | 08/01/90 | 300.00 |
| Receipt for : Primary | | Aggregate for Year | 300.00 |
| Subtotal: | | | 3400.00 |

Key

1990 July Quarterly Report

Page 17 of 18
Line No. 11a

Supplement
Schedule A

Itemized Receipts

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting 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
Friends of Phil McConkey

| Name/Address | Employer/Occup | Date | Amount |
|---|--------------------------------|----------|---------|
| Carolyn Szlase 12 Erick Ct. Chester, NJ 07930- | Self Homemaker | 05/25/90 | 1000.00 |
| Receipt for : Primary | Aggregate for Year | | 1000.00 |
| John Szlase , NJ | T. Ferguson Assoc Executive | 05/25/90 | 1000.00 |
| Receipt for : Primary | Aggregate for Year | | 1000.00 |
| Linda Tucker P.O. Box 146 16 E. Main St. Brookside, NJ 07825- | Requested | 05/21/90 | 1000.00 |
| Receipt for : Primary | Aggregate for Year | | 1000.00 |
| PBA United NJ Sandy Hook 201 Edgewater Staten Island, NY 10305- | Requested | 05/25/90 | 250.00 |
| Receipt for : Primary | Aggregate for Year | | 250.00 |
| David I. Von Savage P.O. Box 1889 Wildwood, NJ 08264- | Self Insurance | 05/21/90 | 1000.00 |
| Receipt for : Primary | Aggregate for Year | | 1000.00 |
| William Wallace 139 Morristown Rd. Bernardsville, NJ 07924- | Self Chiropractor | 05/25/90 | 600.00 |
| Receipt for : Primary | Aggregate for Year | | 600.00 |
| George Welsh Eonam Forest Rookwood Rd. Charlottesville, VA 22921- | Univ. of Va. Football Coach | 06/02/90 | 500.00 |
| Receipt for : Primary | Aggregate for Year | | 500.00 |
| Subtotal: | | | 5350.00 |

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SCHEDULE A

ITEMIZED RECEIPTS
1990 July Quarterly Report

List amount schedule
for each category of the
Detailed Summary Page

PAGE 4 OF
FOR LINE NUMBER
136

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 which contributions from such committee.

NAME OF COMMITTEE: Full
Friends of Phil McConey

A. Full Name, Mailing Address and ZIP Code
Phil McConey
P.O. Box 287
Flamington, NJ 08822

Receipt For: Primary General
 Other (specify):

Name of Employer
Loan from Personal Funds

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)
5-30-90
5-31-90

Amount of Each Receipt this Period
30,000
35,000 *Kw*

B. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

C. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

D. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

E. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

F. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

G. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date > 8

Date (month, day, year)

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (next page and this line number only)

65,000

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

OCT 23 1990

Ted Resnick, Treasurer
Friends of Phil McConkey
P.O. Box 287
Flemington, NJ 08822

Identification Number: C00230946

Reference: July Quarterly Report (5/17/90-6/30/90)

Dear Mr. Resnick:

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:

-Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please amend your report to correct the Column B discrepancies for Line(s) 7(a)(c), 13(a)(c), 16, 17, 22, and any subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the year-to-date totals for calendar year 1990.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

-You have previously indicated that your committee has been using "best efforts" to obtain the occupation and

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name of employer for each contributor. This report discloses a significant increase in the number of entries for which the occupation and/or employer is not available. Please note that the treasurer of a political committee must make at least one effort per solicitation, either by a written request or by an oral request, documented in writing.

-When several loans are owed to the same person or bank, you must report each loan separately, including the original date, the amount, the outstanding balance and all other terms. These loans should not be combined into a single figure. Please amend your report to clarify this matter.

A written response or 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) 376-2480.

Sincerely,

Karen White

Karen W. White
Reports Analyst
Reports Analysis Division

91040855368

MEMORANDUM TO FILES:

DATE November 8, 1990

TELECON X
VISIT

NAME OF COMMITTEE: Friends of Phil McConkey C00230946

SUBJECT: 1990 July Quarterly Report

FEC REP: Karen White

COMMITTEE REP: Mr. Ted Resnick

Mr. Resnick called to state that to the best of his knowledge, the Committee had filed all of their 48- hour notices. The analyst gave Mr. Resnick the names of the contributors who were missing notices and he stated that he had them in front of him and they had all been sent. The analyst told him to send the notices that he had to the commission and the analyst would double check the information. The analyst had previously checked with the Clerk of the House of Representatives to see if they had received a copy of the missing notices.

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U.S. HOUSE OF REPRESENTATIVES
OFFICE OF THE CLERK

195836

Mr. Donald E. ...
Clerk of the House of Representatives
1036 Longworth House Office Building
Washington, DC 20541

Re: Friends of Bill McCuskey
720 2D 00230295
July Quarterly (5/17/90-8/30/90)

Dear Mr. ...

In response to your letter concerning the above mentioned report (copy enclosed) an itemization follows:

Column A Discrepancies: Enclosed please find our transmitted letter and our amended 12 Day Pro-Frisary Report. This amendment was filed with our July Quarterly report on July 14, 1990. As explained, an error was made regarding a receipt and a disbursement for \$1,000 as \$12,000. Thus, the \$10,000 difference in column B.

All-Hour Notice: Enclosed are copies of all our 48-hour notices. In our phone conversation our staff member noted that the candidate loan of \$30,000 was not reported. Our letter dated June 4, 1990 reports this loan. The committee exercised its best efforts as evidenced by the enclosed letters. Furthermore, it has disclosed every "last minute" contribution as requested by the Act.

Occupation/Employer: Your letter indicates that there was a significant increase in contributions with unreported occupations and/or employers. The committee, as requested by the Act, has made at least one written request (Copy enclosed) for each contribution for which this information was unavailable. Please note that the committee was in its most active level during this period.

kw

Loan of Candidate: Mr. Bill McCuskey, the candidate, loaned the committee the following amounts:

| Date | Amount |
|---------|-------------|
| 4/10/90 | \$40,000.00 |
| 4/17/90 | 1,000.00 |
| 4/18/90 | 20,000.00 |
| 5/11/90 | 4,000.00 |
| 5/20/90 | 20,000.00 |
| 5/21/90 | 20,000.00 |
| TOTAL | 100,000.00 |

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Each of these receipts were individually reported on Schedule A line 12a.

The committee has repaid Mr. McCorkay the following:

| Date | Amount |
|---------|----------|
| 5/11/60 | 1,000.00 |
| 6/14/60 | 1,000.00 |
| Total | 2,000.00 |

Each of these disbursements were individually reported on Schedule B line 12a.

The committee is of the opinion that each of these advances increased the amount of the original loan due to the fact that the terms of interest and repayment are identical. Accordingly, the committee respectfully requests that our original filing of Schedule C remain reflecting a balance of owed Mr. McCorkay of \$111,200. Each advance was itemized as required by the Act and this loan is considered as one debt by the committee, funded "as needed" through the campaign cycle.

Should you have any questions, please call me at (201)-782-7662.

Sincerely,

Ted Resnick

Ted Resnick
Treasurer

96818174352

May 21, 1990

The Honorable Donald Anderson
Clerk of the House
1036 Longworth H.O.B.
Washington, D.C. 20515

From: Friends of Phil McConkey
Ted Resnick, Treasurer
ID # C00230946

Re: Contributions of \$1000 or more

This is to notify you that Phil McConkey, seeking election to the US House of Representatives NJ-12, has the following \$1000 or more contributions to his reelection campaign committee:

| <u>Date</u> | <u>Name of Contributor</u> | <u>Amount</u> |
|-------------|----------------------------|---------------|
| 05/21/90 | Ronald Schiavone | \$ 1000 |

9 7 9 1 0 4 7 0 4 3 5 5 3 7 2

MCCONKEY CONGRESS

May 29, 1990

The Honorable Donald Anderson
Clerk of the House
1036 Longworth H.O.B.
Washington, D.C. 20515

From: Friends of Phil McConkey
Ted Resnick, Treasurer
ID # C00230946

Re: Contributions of \$1000 or more

This is to notify you that Phil McConkey, seeking election to the US House of Representatives NJ-12, has the following \$1000 or more contributions to his reelection campaign committee:

| <u>Date</u> | <u>Name of Contributor</u> | <u>Amount</u> |
|-------------|----------------------------|---------------|
| 05/25/90 | Edward Gorzalski | \$ 1000 |
| 05/25/90 | Edward Keegan | \$ 1000 |
| 05/25/90 | John Szlaza | \$ 1000 |
| 05/25/90 | Thomas Ferguson | \$ 1000 |
| 05/25/90 | Patrick Brown | \$ 1000 |
| 05/25/90 | Russell Hughes Grimaldi | \$ 1000 |
| 05/27/90 | Peter Mancuso | \$ 1000 |
| 05/27/90 | Lois Mancuso | \$ 1000 |
| 05/27/90 | John Zweig | \$ 1000 |
| 05/27/90 | George Maloney | \$ 1000 |
| 05/27/90 | Mary Gorzalski | \$ 1000 |
| 05/27/90 | David Pizzo | \$ 1000 |
| 05/27/90 | Karen Pizzo | \$ 1000 |
| 05/27/90 | Joan Chiaviello | \$ 1000 |

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MCCONKEY CONGRESS

June 1, 1990

The Honorable Donald Anderson
Clerk of the House
1036 Longworth H.O.B.
Washington, D.C. 20515

From: Friends of Phil McConkey
Ted Resnick, Treasurer
ID # C00230946

Re: Contributions of \$1000 or more

This is to notify you that Phil McConkey, seeking election to the US House of Representatives NJ-12, has the following \$1000 or more contributions to his election campaign committee:

| <u>Date</u> | <u>Name of Contributor</u> | <u>Amount</u> |
|-------------|---|---------------|
| 05/30/90 | Barbara Sobel | \$1000. |
| 05/31/90 | Auto Dealers & Drvrs for Free Trade PAC | \$1000. |
| 05/31/90 | Margo Muratore | \$1000. |
| 05/31/90 | Robert Muratore | \$1000. |
| 06/01/90 | Phil McConkey | \$35,000. |

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MCCONKEY CONGRESS

May 20, 1990

Mr. Andrew Robustelli
30 Spring St
Stamford, CT 06901

Dear Mr. Robustelli

I would like to thank you for your support of Phil McConkey's election campaign. Federal Election Law regulations require that I request from you the following information: occupation, employer, and whether or not you are self-employed.

Would you kindly use the space below to inform me of this information, and return in the enclosed envelope.

Again, thank you for your support and your cooperation in this matter.

Sincerely,

Cristyne Latogano
Finance Director

Occupation Video Production

Employer Self

Are you self-employed?

900414172057

MCCONKEY CONGRESS

June 4, 1990

The Honorable Donald Anderson
Clerk of the House
1936 Longworth H.O.B.
Washington, D.C. 20515

From: Friends of Phil McConkey
Ted Resnick, Treasurer
ID # C00230946

Re: Contributions of \$1000 or more

This is to notify you that Phil McConkey, seeking election to the US House of Representatives NJ-12, has the following \$1000 or more contributions to his reelection campaign committee:

| Date | Name of Contributor | Amount |
|----------|---------------------|----------|
| 06/02/90 | Claudia Gittings | \$ 1000 |
| 05/30/90 | Phil McConkey | \$30000. |

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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #91L-4
STAFF MEMBER Noriega E. James

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

RESPONDENTS: Friends of Phil McConkey and
Ted Resnick, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)(A)
11 C.F.R. § 104.5(f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Friends of Phil McConkey (the "Committee"), and Ted Resnick, as treasurer, to the Office of the General Counsel for failing to report within 48 hours the receipt of four (4) contributions for \$1,000 or more, totaling \$33,000, which were received after the 20th day, but more than 48 hours before an election. 2 U.S.C. § 434(a)(6)(A).¹

II. FACTUAL AND LEGAL ANALYSIS

See Attachment 2.

III. Discussion of Conciliation and Proposed Civil Penalty

1. Phillip McConkey lost the 1990 Primary Election in New Jersey's 12th Congressional District receiving 30.8% of the vote.

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III. RECOMMENDATIONS

- 1. Open a NUR.
- 2. Find reason to believe that Friends of Phil McConkey and Ted Resnick, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into pre-probable cause conciliation with the Respondents.
- 3. Approve the appropriate letter and attached Factual and Legal Analysis and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date 4/11/91

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

- 1. Referral Materials
- 2. Factual and Legal Analysis
- 3. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Phil McConkey and)
Ted Resnick, as treasurer.)

RAD Referral #91L-4

(MUR 3265)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission do hereby certify that on April 16, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #91L-4:

1. Open a MUR.
2. Find reason to believe that Friends of Phil McConkey and Ted Resnick, as treasurer, violated 2 U.S.C. § 434(a) (6)(A), and enter into pre-probable cause conciliation with the Respondents.
3. Approve the appropriate letter and Factual and Legal Analysis and proposed conciliation agreement, as recommended in the General Counsel Report dated April 11, 1991.

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

Attest:

4-17-91
Date

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

Received in the Secretariat: Fri., April 12, 1991 9:55 a.m.
Circulated to the Commission: Fri., April 12, 1991 12:00 p.m.
Deadline for vote: Tues., April 16, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 24, 1991

Ted Resnick, Treasurer
Friends of Phil McConkey
217 Hancock Avenue
Bridgewater, NJ 08807

RE: MUR 3265
Friends of Phil McConkey and
Ted Resnick, as treasurer

Dear Mr. Resnick:

On April 16, 1991, the Federal Election Commission found that there is reason to believe Friends of Phil McConkey ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

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Ted Resnick, Treasurer
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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 the General Counsel ordinarily will not 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 authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 Noriega E. James, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3265

RESPONDENTS: Friends of Phil McConkey and Ted Resnick, as treasurer,

The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). According to the Act a contribution is 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. See 2 U.S.C. § 431(8)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B).

Phillip J. McConkey ran in the Primary for the Twelfth (12th) Congressional District in New Jersey held on June 5, 1990. In order to comply with the Act's reporting requirements for that election, the candidate's committee was required to report, within 48 hours of receipt, each contribution of \$1,000 or more received from May 17, through June 2, 1990. When reviewing the Committee's July Quarterly Report, the Reports Analysis Division ("RAD") determined that

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between May 25, and June 2, 1990, the Committee received four contributions of \$1,000 or more, totaling \$33,000, which had not been reported within 48 hours of receipt. These contributions are as follows:

| <u>Contributor</u> | <u>Date</u> | <u>Amount</u> |
|-------------------------|-------------|---------------|
| Claudia Gittings | 6/02/90 | \$1,000 |
| Sandra Keegan | 5/25/90 | \$1,000 |
| Carolyn Szlasa | 5/25/90 | \$1,000 |
| Phillip McConkey (loan) | 5/30/90 | \$30,000 |

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On October 23, 1990, RAD informed the Committee of its apparent failure to file these reports. In an amendment dated November 14, 1990, the Committee stated that the "committee exercised its best efforts as evidenced by the enclosed letters. Furthermore, it has disclosed every last minute contribution as requested by the Act." The "enclosed letters" that the Respondents are referring to are copies of apparent 48 hour notices Respondents contend have already been filed. One of the enclosed notices, which is dated June 4, 1990, appears to itemize the contributions from Claudia Gittings and Phillip McConkey that are being presented here. However, the Commission has no record of ever receiving this notice. In any case, if the notice had been filed on June 4, 1990, the date that appears on the notice, then the \$1,000 contribution from Claudia Gittings, which has a receipt date of June 2, 1990, would have been filed timely; but, the \$30,000 contribution from Phillip McConkey, which has a receipt date of May 30, 1990, would not have been filed timely. The amendment did not include

a copy of a 48 hour notice disclosing the \$1,000 contributions from Sandra Keegan and Carolyn Szlasa.

The Act requires notice of the receipt of contributions for \$1,000, or more be filed with the Clerk, Secretary, or the Commission within 48 hours, not merely that it be sent within that time period. 2 U.S.C. § 434(a)(6)(A). See A.O. 1988-32. As there are no records that notices for the four (4) contributions, totaling \$33,000, were filed within 48 hours of receipt, it appears that the Committee did not comply with this requirement. Therefore, there is reason to believe Friends of Phil McConkey and Ted Resnick, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

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06-C 1062

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

FRIENDS OF PHIL MCCONKEY
217 HANCOCK AVENUE
BRIDGEWATER, NJ 08807

91 MAY -8 AM 9:47

May 7, 1991

Noriega E. James, Esq.
Federal Election Commission
999 E Street NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 MAY -9 PM 12:46

Re: MUR 3265
Friends of Phil McConkey
and Ted Resnick, as Treasurer

Dear Mr. James:

On April 30, 1991, we received your letter dated April 24, 1991 indicating that the Commission found that there is reason to believe that the Committee and me, as treasurer violated 2 U.S.C. §434(a)(6)(A) of the Federal Election Campaign Act.

I would like to point out some facts that I believe will support our argument that no action should be taken.

• **Contributions Not Reported Within Forty-Eight Hours**

Your analysis lists three contributions for \$1,000 each and a loan made by the candidate to his committee as items not properly disclosed in our forty-eight hour notices. After carefully reviewing our records, the following two contributions were not properly reported within the forty-eight hour period and they are as follows:

| <u>Contributor</u> | <u>Date</u> | <u>Amount</u> |
|--------------------|-------------|---------------|
| Sandra Keegen | 5/25/90 | \$1,000 |
| Carolyn Szlasa | 5/25/90 | \$1,000 |

Both of the above contributions were received May 25, 1990 along with contributions from their husbands in similar amounts. I am sure it is this husband/wife relationship that created confusion and caused these contributions to go unreported. It should be noted that the Committee received 16 other contributions of \$1,000 on this date from a fund raiser. The Committee was staffed with practically an all volunteer force. In the majority of cases, this was the first federal campaign that any of the volunteers had participated in. Accordingly to become familiar with the FEC rules and regulations, the Committee's finance director tried to brief the volunteers handling the fund raising events.

• **June 4, 1990 Forty-Eight Hour Notice**

In your factual and legal analysis, the Commission indicates that they had not received our copy of the June 4th Forty-Eight Hour Notice. With regards to proof of deliver, the Committee does not have any record of delivery receipt for this Form. The normal procedure was to maintain a copy of all our correspondence with the Clerk. This is all we have as proof of Delivery.

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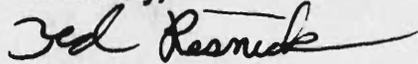
With regards to the Candidates loan of May 30th being later than the forty-eight hour required time period, it should be noted that the Committee had originally failed to report this loan due to the fact it was a loan verses a contribution. The June 4th report was adjusted to disclose this loan.

• **Other Facts and Circumstances**

As of December 31, 1990, the Committee was \$107,700 in debt and had \$1,360 of cash on hand. The staff subsequent to the election has been volunteer to help reduce the debt in its entirety. The Committee has been fund raising in an attempt to reduce the debt and allow for a normal termination.

I appreciate your consideration and should you have any further questions, please contact me.

Sincerely,



Ted Resnick,
Treasurer

91040855386

In the Matter of
Friends of Phil McConkey and
Ted Resnick, as treasurer

)
) MUR 3265
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jim Flannery, accountant, on behalf of Friends of Phil McConkey and Ted Resnick, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on June 19, 1991. The civil penalty payment of \$1,000 was received on July 15, 1991.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Friends of Phil McConkey and Ted Resnick, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/25/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Noriega E. James

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Phil McConkey and) MUR 3265
Ted Resnick, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 30, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3265:

1. Accept the conciliation agreement with Friends of Phil McConkey and Ted Resnick, as treasurer.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 25, 1991.

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

Attest:

7-30-91
Date

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

Received in the Secretariat: Thurs., July 25, 1991 5:08 p.m.
Circulated to the Commission: Fri., July 26, 1991 12:00 p.m.
Deadline for vote: Tues., July 30, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

FILED
AUG 7 1991

August 7, 1991

Ted Resnick, Treasurer
Friends of Phil McConkey
217 Hancock Avenue
Bridgewater, NJ 08807

RE: MUR 3265
Friends of Phil McConkey and
Ted Resnick, as treasurer

Dear Mr. Resnick:

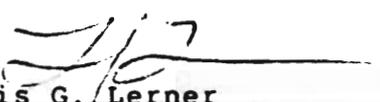
On July 30, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of Friends of Phil McConkey and you, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Friends of Phil McConkey and you, as treasurer.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Noriega E. James, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure

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91 JUL 15 AM 9:25

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3265
Friends of Phil McConkey and)
Ted Resnick, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Friends of Phil McConkey and Ted Resnick, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(6)(A).

91 JUL 17 PM 8:25
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

NOW, THEREFORE, the Commission and the Respondents, 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 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 the Commission.

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

1. The Friends of Phil McConkey is the principal campaign committee of Phillip McConkey (the "Candidate"), within the meaning of 2 U.S.C. § 431(5).

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2. Ted Resnick is the treasurer of Friends of Phil McConkey.

3. The Federal Election Campaign Act of 1971, as amended (The "Act"), requires principal campaign committees of candidates for federal office to notify the Commission, the Clerk of the House, Secretary of the Senate and the Secretary of State, as appropriate, in writing, of each contribution totaling \$1,000 or more received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires this notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and the office sought by the candidate, identification of the contributor, the date of receipt and the amount of the contribution. The Notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

4. Pursuant to 2 U.S.C. § 431(8)(A) a contribution is defined as 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.

5. The Candidate was involved in the Primary Election for the Twelfth Congressional District in New Jersey, held on June 5, 1990.

6. In order to comply with 2 U.S.C. § 434(a)(6)(A), the Respondents were required to file notices for all contributions of \$1,000 or more received from May 17, through June 2, 1990.

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7. Respondents received three (3) contributions of \$1,000 and a loan from the candidate for \$30,000, between May 25, 1990 and June 2, 1990, for which Respondents failed to file 48 hour notices.

V. Respondents failed to file notices, within 48 hours of receipt, for the above mentioned contributions and loans, received after the 20th day but more than 48 hours before the Primary Election in violation of 2 U.S.C. § 434(a)(6)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Dollars (\$1,000), 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. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

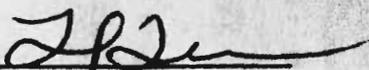
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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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 enforceable.

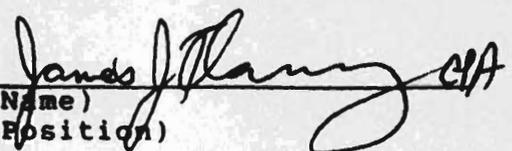
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

8/16/91
Date

FOR THE RESPONDENTS:


(Name)
(Position) CIA

7/12/91
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3265

DATE FILMED 8/22/91 CAMERA NO. 1

CAMERAMAN AS

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