



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3505

DATE FILMED 4/19/95 CAMERA NO. 2

CAMERAMAN EES

950433633549

OGC 4671

Gerald Weaver
3423 Brown St., NW
Washington, DC 20010

April 13, 1992

Mr. Lawrence Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR 3505

92 APR 13 PM 3:41

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Mr. Noble:

This is a complaint against a candidate for the Democratic nomination in the Fourth Congressional district of Pennsylvania. His name is Ron Klink. He has not filed a statement of candidacy. I can't give his candidate number.

In fact, that is part of my complaint. Mr. Klink has raised and spent money. He has placed advertisements on KDKA television and on KDKA radio and other stations in Pittsburgh (over \$5000.00 total). He held a fundraiser in New Castle, PA. He has been an announced candidate for Congress for over one month, but has not reported his contributions, his expenditures, or even stated his candidacy to the Federal Election Commission.

And it's no wonder, since Mr. Klink has violated Federal Election law. The receipt and expenditure of over \$5,000.00 without reporting is illegal. He is also reported to have used a corporate helicopter to fly around the district. This must be an illegal corporate contribution since costs of operating a helicopter are so prohibitively high that he would have not been able to use one otherwise.

Furthermore, Mr. Klink has stopped working and has not worked since he announced his candidacy over a month ago, but he is still being paid by the Westinghouse Broadcasting Company. He is in fact Westinghouse's candidate for Congress, and his salary should be considered another illegal corporate contribution.

I don't know how to contact him, since he has not filed a report, or how you can verify these facts since he has chosen to operate his campaign outside of the law.

Sincerely,

Gerald Weaver
Gerald Weaver

DISTRICT OF COLUMBIA:

Sworn & Subscribed to before me by Gerald Weaver
this 13th day of April, 1992

Lawrence M. Mole
Notary Public

My Commission Expires April 14, 1996

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1992

Gerald Weaver
3423 Brown Street, N.W.
Washington, DC 20010

RE: MUR 3505

Dear Mr. Weaver:

This letter acknowledges receipt on April 13, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink, the Ron Klink for Congress Committee, Westinghouse Broadcasting Company, KDKA-AM, and KDKA-TV. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043633551



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 21, 1992

Ron Klink for Congress Committee
107 South Second Street
Jeannette, PA 15644

RE: MUR 3505

Dear Treasurer:

The Federal Election Commission received a complaint which indicates that Ron Klink for Congress Committee ("Committee") and its treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and its treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

95043633552

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Ron Klink

95043633553



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1992

Ron Klink
226 Connor Drive
Jeannette, PA 15644

RE: MUR 3505

Dear Mr. Klink:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

95043633554

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

95043633565



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1992

B.B. Staniar, Chairman/CEO
Westinghouse Broadcasting Company
888 Seventh Avenue
New York, NY 10106

RE: MUR 3505

Dear Mr. Staniar:

The Federal Election Commission received a complaint which indicates that the Westinghouse Broadcasting Company may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Westinghouse Broadcasting Company in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

950433633557



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1992

Mr. Ted Jordan, General Manager
KDKA-AM
One Gateway Center
Pittsburg, PA 15222

RE: MUR 3505

Dear Mr. Jordan:

The Federal Election Commission received a complaint which indicates that KDKA-AM may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against KDKA-AM in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

95043633558

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

95043633559



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1992

Mr. Joe Berwanger, General Manager
KDKA-TV
One Gateway Center
Pittsburgh, PA 15222

RE: MUR 3505

Dear Mr. Berwanger:

The Federal Election Commission received a complaint which indicates that KDKA-TV may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3505. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against KDKA-TV in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

95043633561

Dennis M. Casey Company
1080 MCKENNA AVENUE
PITTSBURGH, PENNSYLVANIA 15205
(412) 921-3885 • facsimile (412) 921-8325

April 14, 1992

**Mr. Lawrence Noble
General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463**

Dear Mr. Noble:

I am writing to reply to a rather hysterical and inaccurate letter directed to you by one Gerald Weaver, Campaign Manager for an idiot Congressman, 3423 Brown Street, NW, Washington, DC, 20010, dated April 13, 1992.

I will try not to use big words so Mr. Weaver and his candidate can understand the contents of this letter. The allegations in the "complaint" against Democratic candidate Ron Klink (CD 4-PA), are false. Point by point, they are:

1. Candidate Klink has indeed filed a statement of candidacy on or about March 20, 1992. Copies have been provided to the Clerk of the House of Representatives by Federal Express, Airbill No. 324770790 1; however, for some reason, FEC Forms 1 and 2 apparently have not been logged onto the computer system as of yet, and the Office of Records and Registration is checking into this matter. I have been professionally employed in campaign management and media since Mr. Weaver was enraptured with the Nancy Drew series, and my company would not make a bush league mistake like that.

2. Mr. Klink has not "placed advertisements on KDKA television and KDKA Radio..." The KDKA-TV schedule did not start until 4/14, a full day after Mr. Weaver's letter to you, and neither we nor the Committee have placed any commercials whatsoever on KDKA Radio. Perhaps Mr. Weaver and his candidate heard these commercials on their dental bridgework...it is so hard to differentiate those dental radio signals from the other "voices" I am sure they hear.

3. Mr. Klink has at no time "violated federal election law." The date for reporting contributions and expenditures to the Clerk of the House is April 15, and the reports were sent via Federal Express --

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advance of that date, with copies to the Secretary of State of the Commonwealth of Pennsylvania, Harrisburg, PA, 17120, sent concurrently.

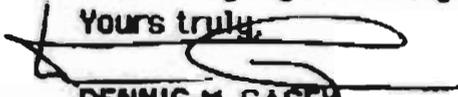
4. At no time did Mr. Klink "(use) a corporate helicopter to fly around the district (which must be) an illegal corporate contribution..." Any aircraft use has been properly reported on FEC Form 3. (Perhaps the whirlybird Mr. Weaver and his candidate saw or heard was the propeller on the beanie on top of their heads.)

5. Mr. Klink is not "Westinghouse's candidate for Congress" as alleged by this obviously disturbed attorney, whose law degree, I am sure, was issued by the Northern Wyoming School of Law and Animal Husbandry. We would welcome funds from this fine corporation, but over the years Mr. Weaver's client has managed to sponge them up time after time from Westinghouse, which has been their error in contributing to the candidacy of a man whose election has caused the overall IQ of the House to drop by 20 to 40 aggregate points. (This Congressman spoke the wonderful phrase "I am tired of seeing American jobs being lost overseas to Mexico.")

6. Mr. Weaver says he does not know how to contact Mr. Klink. Watch my tips: Call (412) 555-1212, and ask for the telephone number of either Ron Klink, in Jeannette, PA, the Ron Klink for Congress Committee, which has a tollfree number as well as two other numbers, or, by gosh, he could have called KDKA-TV, Pittsburgh, where Mr. Klink was seen by three-quarters of a million households every weeknight until he took a Leave of Absence to get rid of the Congressional abomination Mr. Weaver represents.

I now know why Mr. Weaver's candidate referred to himself in a published tape-recorded conversation as "a political whore."

Should you have any questions, do not hesitate to contact me directly. I would suggest you contact Mr. Weaver or his client, but they are still probably trying to figure out what number to call to get "911." I would have a Notary Public verify my signature, as Mr. Weaver did his, but she said she had to go home to wash her cat. Just take my word for it that this is my signature. My word is good, unlike some I could mention.

Yours truly,


DENNIS M. CASEY
Campaign Manager/Media Adviser-Ron Klink for Congress Cmte.

Att: TAMARA KAMEN

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL FICTION COMMISSION
OFFICE OF THE ATTORNEY GENERAL
92 APR 23 PM 3:18

NO. 3505
NAME OF COUNSEL: Dennis M. Casey
ADDRESS: 1060 McKenna Ave.
Pittsburgh, PA 15205
TELEPHONE: (412) 921-3885

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

4/23/92
Date Ron Klina
Signature

RESPONDENT'S NAME: RON KLINA
ADDRESS: 226 CONNOR RD
JENNINGS, PA 15144
HOME PHONE: (412) 523-9808
BUSINESS PHONE: _____

Please make public the findings, ASAP, before 4/28/92.

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAY 22 9 41 AM '92

Gerald Weaver
3423 Brown St., NW
Washington, DC 20010

MUR3505

May 20, 1992

Mr. Lawrence Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

92 MAY 22 PM 1:40

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Mr. Noble:

I respectfully withdraw my complaint against Ron Klink, candidate for Congress in the Fourth District of Pennsylvania. Attached is a copy of that complaint letter.

I have since learned that the circumstances which I believed to exist at the time, and which prompted me to file the complaint, did in fact not exist. Mr. Klink had filed a report. The helicopter flight was indeed paid for and reported. And vacation pay, or other pay, is not to be considered a contribution.

Thank you for your consideration. I hope this concludes this matter.

Sincerely,

Gerald Weaver
Gerald Weaver

Subscribed and Sworn before me on this day:

May 20th, 1992

My Commission Expires April 14, 1996

Julia Marie Mohr
Notary Public
My Commission
expires:

95043635

Gerald Weaver
3423 Brown St., NW
Washington, DC 20010

April 13, 1992

Mr. Lawrence Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Noble:

This is a complaint against a candidate for the Democratic nomination in the Fourth Congressional district of Pennsylvania. His name is Ron Klink. He has not filed a statement of candidacy. I can't give his candidate number.

In fact, that is part of my complaint. Mr. Klink has raised and spent money. He has placed advertisements on KDKA television and on KDKA radio and other stations in Pittsburgh (over \$5000.00 total). He held a fundraiser in New Castle, PA. He has been an announced candidate for Congress for over one month, but has not reported his contributions, his expenditures, or even stated his candidacy to the Federal Election Commission.

And it's no wonder, since Mr. Klink has violated Federal Election law. The receipt and expenditure of over \$5,000.00 without reporting is illegal. He is also reported to have used a corporate helicopter to fly around the district. This must be an illegal corporate contribution since costs of operating a helicopter are so prohibitively high that he would have not been able to use one otherwise.

Furthermore, Mr. Klink has stopped working and has not worked since he announced his candidacy over a month ago, but he is still being paid by the Westinghouse Broadcasting Company. He is in fact Westinghouse's candidate for Congress, and his salary should be considered another illegal corporate contribution.

I don't know how to contact him, since he has not filed a report, or how you can verify these facts since he has chosen to operate his campaign outside of the law.

Sincerely,

DISTRICT OF COLUMBIA:

Gerald Weaver
Gerald Weaver

Sworn & subscribed to before me by *Gerald Weaver*
this 13th day of April, 1992 *Louisa Marie Mohr*
Notary Public

My Commission Expires April 14, 1996

95043633566



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 27, 1992

Gerald Weaver
3423 Brown Street, N.W.
Washington, D.C. 20010

RE: MUR 3505

Dear Mr. Weaver:

This is in reference to your letter dated May 20, 1992, requesting that the complaint you filed against Ron Klink be withdrawn.

Under 2 U.S.C. § 437g, the Federal Election Commission is empowered to review a complaint properly filed with it and to take action which it deems appropriate under the Federal Election Campaign Act of 1971, as amended ("the Act"). A request for withdrawal of a complaint will not prevent the Commission from taking appropriate action under the Act. Your request will become part of the public record within 30 days after the entire file is closed.

If you have any further questions about this procedure, please contact me at (202) 219-3690.

Sincerely,

Tamara Kapper

Tamara Kapper
Paralegal

95043633567

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR #3505
DATE COMPLAINT RECEIVED
BY OGC: April 13, 1992
DATE OF NOTIFICATION TO
RESPONDENTS: April 21, 1992
STAFF MEMBER: Tamara Kapper

COMPLAINANT: Gerald Weaver

RESPONDENTS: Ron Klink for Congress Committee and
Paul Lynch, Jr., as treasurer
Ron Klink
Westinghouse Broadcasting Company
KDKA-AM
KDKA-TV

RELEVANT STATUTES: 2 U.S.C. § 431
2 U.S.C. § 432(e)(1) and (g)(1)
2 U.S.C. § 433(a)
2 U.S.C. § 434(a)
2 U.S.C. § 441b(a)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.7(a)(3)(iii)
11 C.F.R. § 114.12(c)(1)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On April 13, 1992, the Commission received a complaint from Mr. Gerald Weaver alleging that Ron Klink, a Democratic candidate seeking nomination in the Fourth Congressional District of Pennsylvania, had been fundraising and making expenditures without filing a Statement of Candidacy.¹ The

1. Ron Klink won the April 28, 1992 primary election in the state of Pennsylvania with 45% of the vote.

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complaint alleges that Mr. Klink placed advertisements on KDKA television and KDKA radio stations, held a fundraiser, and received and expended over \$5,000 without reporting this activity to the Commission. The complaint further alleges that Mr. Klink used a corporate-owned helicopter and was being paid by Westinghouse Broadcasting Company ("Westinghouse") even though he was not working for the company since he announced his candidacy. Attachment 1.² Ron Klink, Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer (the "Committee"), Westinghouse, KDKA-TV and KDKA-AM were notified of the complaint on April 21, 1992.

To date, this Office has received only one response which was from Dennis M. Casey, Campaign Manager for the Ron Klink for Congress Committee.

II. FACTUAL AND LEGAL ANALYSIS

A. The Law

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that any individual who seeks nomination for election to a Federal office shall be deemed a candidate if that individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Contributions are 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. 2 U.S.C. § 431(8)(A)(i). Expenditures are any

2. On May 20, 1992 Mr. Weaver submitted a request to withdraw his complaint. Attachment 3.

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purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(9)(A)(i). Pursuant to 2 U.S.C. § 441a(a)(1)(A) no person shall make a contribution to any candidate and his or her authorized political committees with respect to any election for Federal office, which exceeds \$1,000. In addition, no candidate or political committee shall knowingly accept any contribution from any person in excess of \$1,000, with respect to any election for Federal Office. 2 U.S.C. § 441a(f).

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It is unlawful for any corporation to make any contribution or expenditure in connection with any election to any political office and for any candidate, political committee or other person knowingly to accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Specifically, a corporation is prohibited from paying the employer's share of the cost of fringe benefits, such as health and life insurance and retirement for their employees on leave-without-pay to participate in Federal elections. 11 C.F.R. § 114.12(c)(1). However, if the time used by the employee to engage in political activity is bona fide, although compensable, vacation time or other earned leave time then no contribution by the corporation results. 11 C.F.R. § 100.7(a)(3)(iii).

Pursuant to 2 U.S.C. § 432(e)(1) each candidate for Federal office shall designate in writing a political committee to serve as the principal campaign committee of such candidate. This designation shall be made no later than 15 days after becoming a

candidate. The candidate shall designate his or her principal campaign committee by filing a Statement of Candidacy on FEC Form 2, or by filing a letter containing the same information. 11 C.F.R. § 101.1(a). Each principal campaign committee shall then file a Statement of Organization within 10 days of designation by the candidate. 11 C.F.R. § 102.1(a). All designations, statements, and reports required to be filed under the Act by a candidate or by the principal campaign committee of the candidate, for the nomination to the House of Representatives, shall be filed with the Clerk of the House of Representatives. 2 U.S.C. § 432(g)(1). Pursuant to 2 U.S.C. § 434(a)(1) each treasurer of a political committee is required to file reports of receipts and disbursements.

B. The Facts

1. Statements of Candidacy and Organization

The complainant alleges that,

Mr. Klink has raised and spent money. He has placed advertisements on KDKA television and on KDKA radio and other stations in Pittsburgh (over \$5,000.00 total). He held a fundraiser in New Castle, PA. He has been an announced candidate for Congress for over one month, but has not reported his contributions, his expenditures, or even stated his³ candidacy to the Federal Election Commission³.

Attachment 1.

According to the response submitted by Mr. Casey, Ron Klink, the candidate, filed a Statement of Candidacy around

3. Although this Office notified KDKA-TV and KDKA-AM as respondents in this matter, the complainant did not specifically allege that they might have violated the Act.

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March 20, 1992. Mr. Casey asserts that, "Copies have been provided to the Clerk of the House of Representatives by Federal Express, Airbill No. 3247707901; however, for some reason, FEC Forms 1 and 2 apparently have not been logged onto the computer system as of yet,..." Attachment 2, page 2. In addition, Mr. Casey contends that, "The KDKA-TV schedule did not start until 4/14, a full day after Mr. Weaver's letter to you, and neither we nor the Committee have placed any commercials whatsoever on KDKA Radio." Id.

Commission records indicate that the Committee filed its first disclosure report, the 1992 12 Day Pre-Primary Report, on April 14, 1992 covering activity from February 28, 1992 through April 13, 1992.⁴ The 12 Day Pre-Primary Report disclosed a total of \$59,480⁵ in receipts and a total of \$53,620 in disbursements. Subsequently, on April 16, 1992, the candidate filed his Statement of Candidacy (FEC Form 2) and on that same date a Statement of Organization (FEC Form 1) was filed for the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer.

After reviewing the Committee's 1992 12 Day Pre-Primary Report, it appears that the candidate expended more than \$5,000 as of March 4, 1992, thus crossing the threshold that triggers

4. The coverage dates on the Summary Page indicate that the report discloses activity from March 7, 1992 through April 13, 1992.

5. On April 11, 1992, the Committee submitted a 48 Hour Report of the receipt of a loan from the candidate and his wife, Ron and Linda Klink. The 1992 12 Day Pre-Primary Report disclosed the loan to be in the amount of \$51,000.

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candidate status at that time.⁶ Once a candidate has expended more than \$5,000 he or she is required to file a Statement of Candidacy within 15 days that designates a principal campaign committee. After designating a principal campaign committee, the committee should file a Statement of Organization within 10 days. According to this Office's calculations, Mr. Klink should have filed a Statement of Candidacy no later than March 19, 1992. Furthermore, the candidate's principal campaign committee should have filed a Statement of Organization no later than March 29, 1992. The candidate filed the Statement of Candidacy on April 16, 1992. Likewise, the Committee filed the Statement of Organization on April 16, 1992.

C. Analysis

Respondents assert that they filed a Statement of Candidacy around March 20, 1992. However, according to Commission records, the document was dated March 20, 1992 but not received

6. It appears that the candidate expended more than \$5,000 as of March 4, 1992. Thus, the Committee should have filed a 1992 April Quarterly Report covering the activity from February 28 through March 31, 1992 and a 1992 12 Day Pre-Primary Report disclosing the activity from April 1 through April 13, 1992. However, it appears the Committee filed a 1992 12 Day Pre-Primary Report covering the activity from February 28 through April 13, 1992, which combined the activity of the two reports. The Committee filed the combined report on April 14, 1992, in advance of the April 15, filing date as required by 2 U.S.C. § 434(a)(4)(A)(i) for all quarterly filers. Therefore, this Office makes no recommendation regarding the Committee's failure to file a 1992 April Quarterly Report.

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by the Clerk of the U.S. House of Representatives until April 16, 1992. This Office is unable to explain this apparent discrepancy. Therefore, it appears that the candidate filed his Statement of Candidacy 28 days late and the Committee filed its Statement of Organization 18 days late.⁸

In a similar matter, MUR 2902, a complaint generated matter, the Commission found reason to believe that U.S. Representative Jim Slattery violated 2 U.S.C. § 432(e)(1) for the failure to file timely a Statement of Candidacy for the 1990 election cycle. Rep. Slattery entered into a pre-probable cause conciliation agreement with the Commission and paid a \$300 civil penalty. See MUR 2902, closed on November 27, 1989.

In light of the foregoing, this Office believes the Commission should find reason to believe that Ron Klink violated the Act by failing to file timely a Statement of Candidacy with the Clerk of the U.S. House of Representatives. As previously stated, Mr. Klink won the Democratic primary in the Fourth Congressional District of Pennsylvania with 45% of the vote and appears to be a viable contender for election to Federal office. The Commission should not take lightly the late filing of Statements of Candidacy by any persons who may be engaging in

8. The coverage dates on the 1992 12 Day Pre-General Report appear to be incorrect. According to RAD, the reporting of incorrect coverage dates on a report is a mathematical discrepancy. RAD would address this discrepancy by sending the Committee a letter on an informational basis requesting that it amend its Summary Page to reflect the correct coverage dates. Since the Committee has disclosed properly all of its activity during the reporting period, this Office makes no recommendation regarding the incorrect coverage dates.

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political activity in order to be elected to Federal office regardless of whether the non-filing was intentional. The fact that a person may be seeking a Federal office should be public knowledge and should be placed on the public record. Therefore, the Office of the General Counsel recommends the Commission find reason to believe Ron Klink violated 2 U.S.C. § 432(e)(1) for the failure to file timely a Statement of Candidacy.

The Committee also failed to file timely its Statement of Organization but did timely file its 1992 12 Day Pre-Primary Report which included all activity since its inception. Thus, the Office of the General Counsel recommends that the Commission find reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 433(a), but find no reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 434(a).

As previously mentioned, a review of the Committee's 1992 12 Day Pre-Primary Report disclosed the receipt of a loan from Ron and Linda Klink totaling \$51,000. Although the report failed to disclose the date of receipt of the loan, a 48 Hour Notice submitted by Mr. Casey on April 11, 1992 notifying the Commission of the loan disclosed the dates of receipt to be April 9 and 10, 1992. Pursuant to 2 U.S.C. § 441a(a)(1)(A) no person shall make contributions in excess of \$1,000 to any candidate or his authorized political committee with regard to any election for Federal office. A candidate's spouse is considered to be a person under the Act and thus, would be

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prohibited from making contributions in excess of \$1,000 with regard to any election for Federal office. Pursuant to 2 U.S.C. § 431(8)(A)(i) a loan is considered to be a contribution.

Since Mrs. Klink is prohibited by the Act from making a contribution in excess of \$1,000 with regard to any Federal election, it appears Mrs. Klink violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution, in the form of a loan, in excess of \$1,000. Therefore, the Office of the General Counsel recommends the Commission find reason to believe Linda Klink violated 2 U.S.C. § 441a(a)(1)(A).

The Act also prohibits political committees from knowingly accepting contributions from individuals in excess of \$1,000 with regard to any election for Federal office. 2 U.S.C. § 441a(f). It appears the Committee accepted a contribution in the form of a loan from Linda Klink in excess of \$1,000. Therefore, the Office of the General Counsel recommends the Commission find reason to believe the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(f).

2. Alleged Corporate Contributions

The complaint alleges that a corporation gave Mr. Klink the use of a helicopter to fly around the voting district. Mr. Casey flatly denies that Mr. Klink received the use of a corporate-owned helicopter. He asserts that, "Any aircraft use has been properly reported on FEC Form 3." Attachment 2, page 3. According to the Committee's 1992 12 Day Pre-Primary Report, the Committee made a disbursement for "helicopter

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rental" on March 9, 1992 for \$1,615. The disbursement was made out to the Dennis Casey Company.

The complainant has offered no evidence in support of his allegation that a corporation gave Mr. Klink the use of its helicopter. The Committee's disclosure report properly discloses a payment made to Mr. Klink's campaign manager's company for the rental of the helicopter.

The complaint further alleges that Mr. Klink has not worked for Westinghouse since he announced his candidacy but is still paid a salary by the company. Respondents contend that Mr. Klink took a leave of absence from Westinghouse when he began his campaign for federal office. Id. However, Respondents did not clarify whether the leave of absence was paid or unpaid, what type of leave was used and how much leave time was used. In addition, Respondents did not reveal whether Mr. Klink received other benefits while on leave from his employer.

In Advisory Opinion ("AO") 1992-3, the Commission permitted an employer to pay fringe benefits for an employee who was on unpaid leave to pursue a federal office without considering the payment of benefits to be a corporate contribution. The Commission distinguished two (2) factors that rendered this activity permissible. First, the company had an existing policy that applied to all employees regarding the payment of fringe benefits to employees while on unpaid leave to pursue federal office. Second, the period of time the employee took unpaid leave was relatively short, 31 days.

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It appears that the complainant has been supplied with more information than the Commission has been given regarding the conditions of the leave of absence the candidate took from his employer in order to campaign for Federal office. In Mr. Weaver's request to withdraw the complaint, he states that, "I have since learned that the circumstances which I believed to exist at the time, ...did in fact not exist.... And vacation pay, or other pay, is not to be considered a contribution." Attachment 3. Moreover, it is unclear if Westinghouse has paid the candidate's fringe benefits while he was on leave, whether Westinghouse has a pre-existing policy regarding leave taken by employees to pursue federal office, and how long Mr. Klink's leave of absence has been. Adding to the uncertainty of this issue, Mr. Klink's employer, Westinghouse, has not responded to the complaint. Thus, this Office has very little information regarding the circumstances surrounding Mr. Klink's leave of absence from his corporate employer. Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that Ron Klink and the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 441b(a) for the receipt of a corporate contribution. Additionally, this Office recommends that the Commission find reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a) for the making of a corporate contribution to a candidate for Federal Office.

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III. RECOMMENDATIONS

1. Find reason to believe Ron Klink violated 2 U.S.C. §§ 432(e)(1) and 441b(a).
2. Find reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. §§ 433(a), 441a(f) and 441b(a).
3. Find reason to believe Linda Klink violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a).
5. Find no reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 434(a)(1).
6. Approve the proposed Factual and Legal Analyses and the appropriate letters. Attachment 4.

Lawrence M. Noble
General Counsel

7/24/92
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachment

1. Complaint filed by Gerald Weaver, dated 4/13/92
2. Response from Dennis M. Casey, dated 4/14/92
3. Request to Withdrawal Complaint, dated 5/20/92
4. Proposed Factual and Legal Analyses (4)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3505
Ron Klink for Congress Committee and)
Paul Lynch, Jr., as treasurer;)
Ron Klink;)
Westinghouse Broadcasting Company;)
KDKA-AM;)
KDKA-TV.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 4, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3505:

1. Find reason to believe Ron Klink violated 2 U.S.C. §§ 432(e)(1) and 441b(a).
2. Find reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. §§ 433(a), 441a(f) and 441b(a).
3. Find reason to believe Linda Klink violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a).

(continued)

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5. Find no reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 434(a)(1).
6. Approve the proposed Factual and Legal Analyses and the appropriate letters as recommended in the General Counsel's report dated July 24, 1992.

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

Attest:

8-5-92
Date

Marjorie W. Enmons
Marjorie W. Enmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 11, 1992

Paul Lynch, Jr., Treasurer
Ron Klink for Congress Committee
107 South Second Street
Jeannette, PA 15644

RE: MUR 3505
Ron Klink for Congress Committee
and Paul Lynch, Jr., as treasurer

Dear Mr. Lynch:

On April 21, 1992, the Federal Election Commission notified the Ron Klink for Congress Committee ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on August 4, 1992, found that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(1), but that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 433(a), 441a(f) and 441b(a), provisions of 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 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.

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 the

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Paul Lynch, Jr.
Page 2

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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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 matter to be made public.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures
Designation of Counsel Form
Factual & Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Ron Klink for MUR: 3505
Congress Committee
and Paul Lynch, Jr.,
as treasurer

SUMMARY OF ALLEGATIONS

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This matter was generated by a complaint filed on April 13, 1992 by Gerald Weaver against the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer. It is alleged that the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer (the "Committee"), failed to file timely a Statement of Organization in violation of 2 U.S.C. § 433(a) and has failed for file reports of receipts and disbursements in violation of 2 U.S.C. § 434(a). It is further alleged that the Committee may have received corporate contributions when the candidate continued to receive a salary from Westinghouse Broadcasting Company ("Westinghouse") while campaigning for Federal office but no longer working for Westinghouse.

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that any individual who seeks nomination for election to a Federal office shall be deemed a candidate if that individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Contributions are 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. 2 U.S.C. § 431(8)(A)(i). Expenditures are any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(9)(A)(i). Candidates and political committees are prohibited from knowingly accepting contributions from individuals in excess of \$1,000 with regard to any election for Federal office. 2 U.S.C. § 441a(f).

It is unlawful for any corporation to make any contribution or expenditure in connection with any election to any political office and for any candidate, political committee or other person knowingly to accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Specifically, a corporation is prohibited from paying the employer's share of the cost of fringe benefits, such as health, life insurance, and retirement, for their employees on leave-without-pay to participate in Federal elections. 11 C.F.R. § 114.12(c)(1). However, if the time used by the employee to engage in political activity is bona fide, although compensable, vacation time or other earned leave time then no contribution by the corporation results. 11 C.F.R. § 100.7(a)(3)(iii).

In Advisory Opinion ("AO") 1992-3, the Commission permitted an employer to pay fringe benefits for an employee who was on unpaid leave to pursue a federal office without considering the payment of the benefits to be a corporate contribution. The Commission distinguished two (2) factors that rendered this

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activity permissible. First, the company had an existing policy that applied to all employees regarding the company's payment of fringe benefits to employees while on unpaid leave to pursue federal office. Second, the period of time the employee took unpaid leave was relatively short, 31 days.

Pursuant to 2 U.S.C. § 432(e)(1) each candidate for Federal office shall designate in writing a political committee to serve as the principal campaign committee of such candidate. This designation shall be made no later than 15 days after becoming a candidate. The candidate shall designate his or her principal campaign committee by filing a Statement of Candidacy on FEC Form 2, or by filing a letter containing the same information. 11 C.F.R. § 101.1(a). Each principal campaign committee shall then file a Statement of Organization within 10 days of designation by the candidate. 11 C.F.R. § 102.1(a). All designations, statements, and reports required to be filed under the Act by a candidate or by the principal campaign committee of the candidate, for the nomination to the U.S. House of Representatives, shall be filed with the Clerk of the U.S. House of Representatives. 2 U.S.C. § 432(g)(1). Treasurers of political committees are required to file reports of receipts and disbursements. 2 U.S.C. § 434(a)(1).

According to the Committee's disclosure reports, it appears that the candidate reached candidate status by expending more than \$5,000 by March 4, 1992 and should have filed a Statement of Candidacy no later than March 19, 1992. Furthermore, the Committee should have filed a Statement of Organization no later

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than March 29, 1992. The Committee filed the Statement of Organization on April 16, 1992. Therefore, there is reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 433(a).

Further review of the Committee's disclosure reports revealed the the receipt of an excessive contribution in the form of a loan from Linda Klink. On April 11, 1992 the the Commission was notified of the receipt of a \$51,000 loan from the candidate and his wife, Ron and Linda Klink by the Committee. Pursuant to 2 U.S.C. § 441a(a)(1)(A) individuals are limited to making contributions that do not exceed \$1,000 to any candidate or his authorized political committee with regard to any election for Federal office. In addition, candidates and political committees are prohibited from knowingly accepting contributions from individuals which exceed \$1,000 with regard to any election for Federal office. 2 U.S.C. § 441a(f). The Committee disclosed the receipt of a contribution, in the form of a loan, from Linda Klink in excess of \$1,000. Therefore, there is reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, violated 2 U.S.C. § 441a(f).

Information received by the Commission indicates that the candidate took a leave of absence from Westinghouse when he began his campaign for Federal office. However, it is unclear whether the leave was paid or unpaid, what type of leave was used and how much leave was used. Furthermore, it is uncertain whether Westinghouse paid the candidate's fringe benefits while

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he was on leave. Therefore, there is reason to believe
Ron Mlink for Congress Committee and Paul Lynch, Jr., as
treasurer, violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 11, 1992

Dennis M. Casey
1060 McKenna Avenue
Pittsburgh, PA 15205

RE: MUR 3505
Ron Klink

Dear Mr. Casey:

On April 21, 1992, the Federal Election Commission notified your client, Ron Klink, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to Mr. Klink at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your client, the Commission, on August 4, 1992, found that there is reason to believe Ron Klink violated 2 U.S.C. §§ 432(a)(1) and 441b(a), provisions of 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 Ron Klink. 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 along with answers to the enclosed questions within 30 days of 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 Ron Klink, 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 the 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 the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time.

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Dennis Casey
Page 2

so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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 matter to be made public.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures
Questions to Ron Klink
Factual & Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3505

Questions to Ron Klink

Please answer the following questions surrounding your employment with Westinghouse Broadcasting Company ("Westinghouse") while you were campaigning for a Federal office.

1. Are you currently employed by Westinghouse? If not, are you currently on a leave of absence from Westinghouse?

2. Please provide the date you publicly announced your candidacy for Federal office. Please provide the date that your leave of absence from Westinghouse became effective.

3. How long is your leave of absence?

4. Has Westinghouse compensated you during your leave of absence? If so, please provide the total amount that you were paid.

5. If your leave of absence was unpaid, did Westinghouse pay for your health insurance, life insurance and/or any other fringe benefits during your leave of absence? If so, please provide an estimate of the monetary worth of the benefits to you.

6. Does Westinghouse have a written policy granting a leave of absence to employees in order that they may campaign for a Federal office? If so, please describe the policy in detail. Does the policy apply to all persons employed by Westinghouse?

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ron Klink

MUR: 3505

SUMMARY OF ALLEGATIONS

This matter was generated in response to a complaint filed on April 13, 1992 by Gerald Weaver against Ron Klink. It is alleged that Mr. Ron Klink, a candidate seeking the Democratic nomination in the Fourth Congressional District of Pennsylvania in the 1992 election, failed to file a Statement of Candidacy in violation of 2 U.S.C. § 432(e)(1). Furthermore, it is alleged that Ron Klink has not worked for Westinghouse Broadcasting Company since he announced his candidacy but is still paid a salary by the company in violation of 2 U.S.C. § 441b(a).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that any individual who seeks nomination for election to a Federal office shall be deemed a candidate if that individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Contributions are 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. 2 U.S.C. § 431(8)(A)(i). Expenditures are any purchase, payment, distribution, loan, advance, deposit, or gift

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of money or anything of value, made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(9)(A)(i).

It is unlawful for any corporation to make any contribution or expenditure in connection with any election to any political office and for any candidate, political committee or other person knowingly to accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Specifically, a corporation is prohibited from paying the employer's share of the cost of fringe benefits, such as health, life insurance, and retirement, for their employees on leave-without-pay to participate in Federal elections. 11 C.F.R. § 114.12(c)(1). However, if the time used by the employee to engage in political activity is bona fide, although compensable, vacation time or other earned leave time then no contribution by the corporation results. 11 C.F.R. § 100.7(a)(3)(iii).

In Advisory Opinion ("AO") 1992-3, the Commission permitted an employer to pay fringe benefits for an employee who was on unpaid leave to pursue a federal office without considering the payment of benefits to be a corporate contribution. The Commission distinguished two (2) factors that rendered this activity permissible. First, the company had an existing policy that applied to all employees regarding the company's payment of fringe benefits to employees while on unpaid leave to pursue federal office. Second, the period of time the employee took unpaid leave was relatively short, 31 days.

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Pursuant to 2 U.S.C. § 432(e)(1) each candidate for Federal office shall designate in writing a political committee to serve as the principal campaign committee of such candidate. This designation shall be made no later than 15 days after becoming a candidate. The candidate shall designate his or her principal campaign committee by filing a Statement of Candidacy on FEC Form 2, or by filing a letter containing the same information. 11 C.F.R. § 101.1(a). All designations, statements, and reports required to be filed under the Act by a candidate or by the principal campaign committee of the candidate, for the nomination to the House of Representatives, shall be filed with the Clerk of the House of Representatives.

2 U.S.C. § 432(g)(1).

According to the documents filed with the Commission, it appears that Mr. Klink expended more than \$5,000 as of March 4, 1992, thus crossing the threshold that triggers candidate status at that time. Once a candidate has expended more than \$5,000 he or she is required to file a Statement of Candidacy within 15 days that designates a principal campaign committee. Pursuant to 2 U.S.C. § 432(e)(1) Mr. Klink should have filed a Statement of Candidacy no later than March 19, 1992. Mr. Klink filed a Statement of Candidacy on April 16, 1992, 28 days late. Therefore, there is reason to believe that Ron Klink violated 2 U.S.C. § 432(e)(1).

Information received by the Commission indicates that Mr. Klink took a leave of absence from Westinghouse when he began his campaign for Federal office. However, it is unclear

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whether the leave of absence was paid or unpaid, what type of leave was used and how much leave was used. Furthermore, it is uncertain if the company paid the candidate's fringe benefits while he was on leave. Therefore, there is reason to believe that Ron Klink violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 11, 1992

Linda Klink
226 Conner Drive
Jeannette, PA 15644

RE: MUR 3505
Linda Klink

Dear Mrs. Klink:

On April 21, 1992, the Federal Election Commission received of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). During the course of the investigation of the allegations contained in the complaint, the Commission, on August 4, 1992, found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of 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 you. 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 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 you, 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 the 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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Linda Klink
Page 2

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 matter to be made public.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures
Procedures
Designation of Counsel Form
Factual & Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Linda Klink

HUR: 3505

SUMMARY OF ALLEGATIONS

This matter was generated by a complaint filed on April 13, 1992 by Gerald Weaver. As a result of the Office of the General Counsel's investigation into this matter, it appears that Linda Klink made an excessive contribution, in the form of a loan, to the Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer (the "Committee").

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), defines a the term "contribution" 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. 2 U.S.C. § 431(8)(A)(i). Pursuant to 2 U.S.C. § 441a(a)(1)(A) no person shall make a contribution to any candidate and his authorized political committee with respect to any election for Federal office, which exceeds \$1,000.

A review of the Committee's 1992 12 Day Pre-Primary Report disclosed the receipt of a loan from the candidate and his wife, Ron and Linda Klink, totaling \$51,000. Thus, it appears that Linda Klink made a contribution to the Committee in excess of \$1,000. Therefore, there is reason to believe that Linda Klink violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 11, 1992

**B.B. Staniar, Chairman/CEO
Westinghouse Broadcasting Company
888 Seventh Avenue
New York, NY 10106**

**RE: MUR 3505
Westinghouse Broadcasting Company**

Dear Mr. Staniar:

On April 21, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on August 4, 1992, found that there is reason to believe Westinghouse Broadcasting Company ("Westinghouse") violated 2 U.S.C. § 441b(a), a provision of 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 Westinghouse. 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 along with answers to the enclosed questions within 30 days of 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 Westinghouse, 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 the 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 the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time

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B.B. Staniar
Page 2

so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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 matter to be made public.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures
Questions to Westinghouse
Designation of Counsel Form
Factual & Legal Analysis

9504363600

BEFORE THE FEDERAL ELECTION COMMISSION

NUR 3505

Questions to Westinghouse Broadcasting Company

Please answer the following questions surrounding the employment of Ron Klink while he was campaigning for a Federal office.

1. Is Ron Klink employed by Westinghouse Broadcasting Company ("Westinghouse")?

2. Did Mr. Klink take a leave of absence from Westinghouse Broadcasting Company ("Westinghouse") this year? If so, please provide the effective date of the leave of absence.

3. Was Mr. Klink paid a salary by Westinghouse during his leave of absence? Were health insurance, life insurance and/or any other employee benefits provided by Westinghouse to Mr. Klink while he was on leave from Westinghouse? If so, please indicate the total cost of the benefits provided by Westinghouse on behalf of Mr. Klink.

4. Does Westinghouse have a written policy regarding the granting of leave in order that an employee may campaign for a Federal office? If so, please describe the policy in detail. How long has the policy been in effect?

5. Does the policy apply to all persons employed by Westinghouse? If not, please describe in detail the employees to whom the policy does not apply.

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Westinghouse Broadcasting
Company

MUR: 3505

SUMMARY OF ALLEGATIONS

This matter was generated in response to a complaint filed on April 13, 1992 by Gerald Weaver against Westinghouse Broadcasting Company ("Westinghouse"). It is alleged that Westinghouse paid the salary of an employee during a period when the employee ceased working for the company and instead campaigned for Federal office in violation of 2 U.S.C. § 441b(a).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that any individual who seeks nomination for election to a Federal office shall be deemed a candidate if that individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Contributions are 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. 2 U.S.C. § 431(8)(A)(i). Expenditures are any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A)(i).

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It is unlawful for any corporation to make any contribution or expenditure in connection with any election to any political office and for any candidate, political committee or other person knowingly to accept or receive any contribution from a corporation. 2 U.S.C. § 441b(a). Specifically, a corporation is prohibited from paying the employer's share of the cost of fringe benefits, such as health, life insurance, and retirement, for their employees on leave-without-pay to participate in Federal elections. 11 C.F.R. § 114.12(c)(1). However, if the time used by the employee to engage in political activity is bona fide, although compensable, vacation time or other earned leave time then no contribution by the corporation results. 11 C.F.R. § 100.7(a)(3)(iii).

In Advisory Opinion ("AO") 1992-3, the Commission permitted an employer to pay fringe benefits for an employee who was on unpaid leave to pursue a federal office without considering the payment of the benefits to be a corporate contribution. The Commission distinguished two (2) factors that rendered this activity permissible. First, the company had an existing policy that applied to all employees regarding the company's payment of fringe benefits to employees while on unpaid leave to pursue federal office. Second, the period of time the employee took unpaid leave was relatively short, 31 days.

According to information received by the Commission pertaining to this matter, the employee took a leave of absence from Westinghouse when he began his campaign for Federal office. However, it is unclear whether the leave of absence was paid or

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unpaid, what type of leave was used and how much leave time was used. Furthermore, it is uncertain if Westinghouse paid the candidate's fringe benefits while he was on leave. Westinghouse has not submitted a response to rebut this allegation. Therefore, there is reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a).

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BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

JUL 17 12 41 PM '92

In the matter of:

Ron Klink for Congress Committee and
Paul Lynch, Jr., Treasurer

) MUR 3560
)
)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
92 JUL 17 PM 3:26

COMPLAINT

NOW COMES, Ann Hoskin of 2916 Clayton Avenue, Beaver Falls, Pennsylvania 15010, Janet A. Jackson of 42 Hemlock, Beaver, Pennsylvania 15009, Gordon R. Johnston of 1709 Tenth Avenue, Beaver, Pennsylvania 15009 and Joan Lanotot of 1463 Third Avenue, New Brighton, Pennsylvania 15066 (hereinafter ~~The~~ Citizens of Pennsylvania) to file this Complaint pursuant to 2 U.S.C. 437g(a)(1) and 11 C.F.R. 111.4 against Ron Klink for Congress Committee, Paul Lynch, Jr., Treasurer, of 107 S. Second Street, Jeannette, Pennsylvania 15644 (hereinafter Klink).

FACTS

The Citizens of Pennsylvania do hereby state the following facts:

1. Ron Klink for Congress Committee is the authorized principal campaign committee for Ron Klink, candidate for the United States House of Representatives from the Fourth District of Pennsylvania.

2. The basis for this complaint is reports filed, attached hereto as Exhibit A, with the Federal Election Commission by the Ron Klink for Congress Committee.

EXCESSIVE CONTRIBUTIONS

1. Klink reported receiving the following loans from Ron and Linda Klink:

Loan	(date not reported)	\$51,000
Loan	April 9, 1992	11,500
Loan	April 23, 1992	2,000
Loan	May 1, 1992	(amount not reported)

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REPORTING IRREGULARITIES

1. Klink has indicated on its FEC Form 1 Statement of Organization that it is, at the same time, a principal campaign committee; an authorized committee, not a principal campaign committee; and a committee supporting only one candidate, but not an authorized committee.

2. Klink's first and only report filed to date (hereinafter Report) indicates that it is both the April 15 Quarterly Report and the Twelfth day report preceding the primary yet does not cover a period consistent with either report filing period.

3. Klink's Report's Summary Page is missing information including all Column B Year-To-Date totals and line 10 Debts and Obligations Owed by the Committee even in light of activity evidenced in other schedules in the Report.

4. Klink's Report's Detailed Summary Page is missing information including the Name of the Committee, the reporting period, all Column B Year-To-Date totals and a sub-total on line 11(a)(iii). Additionally, Klink's Report's Detailed Summary Page receipt total is inaccurate as compared to schedules provided. The summary page indicates total receipts of \$7,480 while addition of the individual entries on Schedule A totals \$7,580.

5. Klink's Report fails to include important itemized receipt and disbursement information on Schedules A and B. Of the contributions in excess of \$200, not one of the employers is listed, nor are contributor's Year-To-Date totals given. The addresses of several persons from whom contributions were received and to whom disbursements were made are incomplete.

6. Klink's Report indicates an in-kind contribution from Frank Trigona on April 1, 1992 of \$100 and an in-kind contribution from Ron Bruno, whose occupation is listed as "videographer," on April 1, 1992 for \$1,000. Explanations as to the nature of the in-kind contributions are not given. Neither of these in-kind contributions is balanced by the required corresponding in-kind disbursement on Schedule B.

7. Klink's Report indicates an in-kind disbursement for Frank Trigona on April 6, 1992 for \$900 which is not balanced by a corresponding in-kind contribution on Schedule A.

8. Klink failed to report the \$51,000 joint loan from Ron and Linda Klink and the \$1,000 loan from Dennis Casey on Schedule A, line 13 as contributions on the report covering that time period. Klink failed to report the loans on the Summary Page, line 10. Klink failed to report the terms of the loans on Schedule C.

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9. Klink reported three loans from Ron and Linda Klink as late contributions. The dates were April 9, 23 and May 1. The amounts were \$11,500, \$2,000 and an undisclosed amount, respectively. The reports were received by the Federal Election Commission on April 16 (seven days after receipt), April 23, and May 4.

10. Klink received a contribution in the amount of \$1,000 on March 26, 1992, from the Kirkpatrick and Lockhart PAC and failed to report the receipt on Schedule A, line 11(a)(1).

11. Klink's "48-hour late contribution" notice, dated April 12, 1992 and received by the FEC on April 16, 1992, indicates that Klink received a loan in the amount of \$11,500 on April 9, 1990. Klink's Report indicates that it covers activity occurring between March 7, 1992 and April 13, 1992. If the loan was, in fact, received on April 9, 1992, then it should have been included in the Report because it occurred during the time period covered by the Report. If, on the otherhand, the loan was a late contribution, Klink should have filed a "48-hour late contribution notice" within 48 hours of receiving the late contribution. Klink has neither reported the loan on the Report, nor filed a "48-hour late contribution notice" within 48 hours of receiving the loan.

DISCUSSION OF LAW

Excessive Contributions

Pursuant to 11 C.F.R. 100.7(a)(1) a contribution is defined as:

A gift, subscription, loan (except for a loan made in accordance with 11 C.F.R. 100.7(b)(11), advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

The regulations provide that:

A candidate may use a portion of assets jointly owned with his or her spouse as personal funds. The portion of the jointly owned assets that shall be considered as personal funds of the candidate shall be that portion which is the candidate's share under the instrument(s) of conveyance or ownership. If no specific share is indicated by an instrument of conveyance or ownership, the value of one-half of the property used shall be considered as personal funds.

11 C.F.R. 110.10(b)(3). Individuals, including the candidate's family members, are limited to contributions of \$1,000 per election. 2 U.S.C. 441a(a)(1), 11 C.F.R. 110.1(a) and (b)(1).

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The contributions in the form of loans to Klink from Ron and Linda Klink, totaling at least \$64,500 as of May 1, 1992, exceed Linda Klink's contribution limit by \$31,250.

Prohibited Corporate Contributions

The Act prohibits contributions, including in-kind contributions, from corporations. 11 C.F.R. 114.2(a) and (b). Klink has listed an in-kind disbursement to The Videohouse. The Pennsylvania Secretary of State, Corporations Division has confirmed that The Videohouse is the fictitious name of a business owned by Renaissance Television Productions, Inc., a registered Pennsylvania corporation. Klink has reported receiving an illegal corporate contribution.

Late Contribution Filing Requirements

The regulations provide:

If any contribution of \$1,000 or more is received by any authorized committee of a candidate after the 20th day, but more than 48 hours before 12:01 A.M. of the election, the principle campaign committee of that candidate shall notify the Commission, the Clerk of the House, the Secretary of the Senate and the Secretary of State, as appropriate, within 48 hours of receipt of the contribution. The notification shall include the . . . amount of the contribution.

11 C.F.R. 104.5(f). Klink's notification of a loan received on April 9, 1992 and filed with the FEC on April 16, 1992 and Klink's notice of a loan received on May 1, 1992 of an undisclosed amount violate the "48-hour late contribution" notice requirement of the regulations.

Specific Public Disclosure Filing Requirements

Klink has failed to comply with the specific reporting requirements as set forth under 11 C.F.R. 104.3, 102.2, repeatedly in its Report in the following manner:

- (a) The FEC Form 1 Statement of Organization fails to clearly identify what type of committee Klink is.
- (b) The Summary Page line 5, indicating the period covered by the report, fails to correspond to the dates of either the April 15 quarterly or the pre-primary reporting periods.
- (c) Summary Page Column B Year-To-Date and line 10 Debt Totals are left blank.
- (d) Schedule C loans are omitted from the Summary Page. Loans are not reported as required on Schedule A.

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- (e) Detailed Summary Page receipts total is inaccurate.
 - (f) Detailed Summary Page Column B Year-To-Date totals are omitted.
 - (g) Schedule A itemized receipts does not list the employer of any contributor.
 - (h) Schedule A itemized receipts does not list the year-to-date total for any contributor.
 - (i) Several Schedule A and B itemized receipts and disbursements fail to report complete addresses.
 - (j) An in-kind contribution from Ron Bruno of \$1,000 is not balanced by an in-kind disbursement of \$1,000. An in-kind contribution from Frank Trigona of \$100 is not balanced by an in-kind disbursement of \$100. An in-kind disbursement to Frank Trigona on April 6, 1992 for \$900 is not balanced by an in-kind contribution from Frank Trigona.
 - (k) The terms of the loans listed on Schedule C are omitted.
 - (l) The "48-hour late contribution" notice of May 6, 1992 fails to indicate the amount of the loan received on May 1, 1992.
 - (m) The Detailed Summary Page fails to report the contribution received from the Kirkpatrick and Lockhart PAC on line 11(c).

Best Efforts Requirements

The Act and regulations require a political committee to report the full name, mailing address, occupation and the employer of any contributor whose aggregate contributions for the year exceed \$200. 2 U.S.C. 434(b), 11 C.F.R. 104.3(d), 11 C.F.R. 100.12. The Act and regulations require the treasurer of a political committee to show "that best efforts have been used to obtain, maintain and submit the information required by the Act." 2 U.S.C. 432(i), 11 C.F.R. 104.7(a).

The regulations further provide:

With regard to reporting the identification . . . of each person whose contribution(s) to the committee and its affiliated committees aggregate in excess of \$200 in a calendar year . . . the treasurer will not be deemed to have exercised best efforts to obtain the required information unless he or she has made at

least one effort per solicitation either by a written request or by an oral request documented in writing to obtain such information from the contributor.

11 C.F.R. 104.7(b). Because Klink has not reported the employer of any of the contributors, it appears that Klink did not make the required best efforts to obtain and report this information.

PRAYER FOR RELIEF

Therefore, the Citizens of Pennsylvania respectfully request that the Federal Election Commission investigate these violations and find the following conclusions of law:

(1) Klink has submitted a report that omits significant required information in violation of the Federal Election Campaign Act and regulations;

(2) Klink has reported receiving contributions in the form of loans from Linda Klink in violation of the limits established for individuals pursuant to 2 U.S.C. 441a(a)(1) and 11 C.F.R. 110.1(a) and (b)(1);

(3) Klink has reported receiving an illegal contribution from a corporation pursuant to 2 U.S.C. 441b and 11 C.F.R. 114.2;

(4) Klink has failed to report late contributions timely as required by 2 U.S.C. 434(a)(2), 11 C.F.R. 104.5(f);

(5) Klink has failed to perform the required best efforts to obtain contributor information pursuant to 2 U.S.C. 434(b), 11 C.F.R. 104.3(d), 11 C.F.R. 100.12;

(6) Klink, in filing reports in such insufficient form, evidences no respect for or intention to comply with the provisions of the Federal Election Campaign Act, as amended, and such behavior constitutes a violation of the Act.

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Therefore, the Citizens of Pennsylvania further request that the Federal Election Commission assess all appropriate penalties for said violation of the above provisions in accordance with 2 U.S.C. 437g(a)(5)(A).

The above statements are true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

Aune Hoskin
Janet A. Johnson
Gordon R. Johnston
Janet [unclear]

Subscribed and sworn before me this 15 day of July, 1992.

Richard A. Fallonovich
(Notary Public)

My Commission expires: _____

Notarial Seal
Richard A. Fallonovich, Notary Public
Chippewa Township, Beaver County
My Commission Expires Aug. 11, 1992

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1992

Ann Hoskin
2916 Clayton Avenue
Beaver Falls, PA 15010

RE: MUR 3560

Dear Ms. Hoskin:

This letter acknowledges receipt on July 17, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3560. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043635612



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1992

Janet A. Jackson
42 Hemlock
Beaver, PA 15009

RE: MUR 3560

Dear Ms. Jackson:

This letter acknowledges receipt on July 17, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3560. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043635613



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1992

Gordon R. Johnston
1709 Tenth Avenue
Beaver, PA 15009

RE: MUR 3560

Dear Mr. Johnston:

This letter acknowledges receipt on July 17, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3560. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

9504333614



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1992

Joan Lanctot
1463 Third Avenue
New Brighton, PA 15066

RE: MUR 3560

Dear Ms. Lanctot:

This letter acknowledges receipt on July 17, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3560. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043633615



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1992

Ron Klink for Congress Committee
Paul Lynch, Jr., Treasurer
107 South Second Street
Jeannette, PA 15644

RE: MUR 3560

Dear Mr. Lynch:

The Federal Election Commission received a complaint which indicates that Ron Klink for Congress Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3560. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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Ron Klink for Congress Committee
Paul Lynch, Treasurer
Page 2

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Ron Klink

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JUL 29 16 00 AM '92

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the matter of:

MUR 3569

Ron Klink for Congress Committee and
Paul Lynch, Jr., Treasurer,
Patricia A. Mansueti

COMPLAINT

NOW COMES, Ann Hoskin of 2916 Clayton Avenue, Beaver Falls, Pennsylvania 15010, Janet A. Jackson of 42 Hemlock, Beaver, Pennsylvania 15009, Gordon R. Johnston of 1709 Tenth Avenue, Beaver, Pennsylvania 15009 and Joan Lanctot of 1463 Third Avenue, New Brighton, Pennsylvania 15066 (hereinafter The Citizens of Pennsylvania) and the National Republican Congressional Committee of 320 First Street, S.E., Washington, D.C. 20003 to file this Complaint pursuant to 2 U.S.C. 437g(a)(1) and 11 C.F.R. 111.4 against Ron Klink for Congress Committee, Paul Lynch, Jr., Treasurer of record and Patricia A. Mansueti, signator of the July 15 Quarterly and presumptive new Treasurer of 107 S. Second Street, Jeannette, Pennsylvania 15644 (hereinafter Klink).

FACTS

The Citizens of Pennsylvania and the National Republican Congressional Committee pursuant to the provisions of The Federal Election Campaign Act (Act) and the Federal Election Commission (FEC) regulations do hereby state the following facts:

1. Ron Klink for Congress Committee is the authorized principal campaign committee for Ron Klink, candidate for the United States House of Representatives from the Fourth District of Pennsylvania.
2. The basis for this Complaint is a July 15th Quarterly report filed by Klink and received by the Commission on July 15. Copy of said report is attached hereto as Exhibit A.

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OFFICE OF THE CLERK

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OTHER REPORTING IRREGULARITIES

1. Klink's Report indicates that it is the July 15 Quarterly Report. Klink has indicated that the period covered is April 14, 1992 through July 6, 1992.

2. Klink has reported 28 contributions totaling \$3,800 that were received prior to the period Klink has identified as covered by the July 15 Quarterly.

3. Klink has reported 5 disbursements totaling \$813.64 that were made prior to the period Klink has identified as covered by the July 15 Quarterly.

4. The majority of the contributions exceeding \$200 do not report the employer of the contributor.

5. Klink has not listed the Year-To-Date total for any contributor.

6. Several contributions, all in excess of \$50, on Klink's July 15 Quarterly do not list the complete address of the contributor.

7. Many of the disbursements reported do not indicate the complete address of the entity to whom the disbursement was made.

8. Klink did not list the contributions from political committees and political action committees on a separate schedule, nor list the totals for each type of contribution separately on the Detailed Summary Page.

9. Klink did not indicate the date on which a contribution from a National Bank PAC was received.

10. Klink has listed several disbursements by type of expenditure rather than to whom the disbursements were made.

11. Klink has reported an in-kind disbursement to Frank Trigona that is not balanced by an in-kind contribution.

12. Klink has failed to include many Year-To-Date totals on the Summary Page and the Detailed Summary Page.

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CORPORATE CONTRIBUTIONS

1. Klink has reported receiving a contribution from R&W Oil Products on Atlantic Avenue and John Street in McKeesport, Pennsylvania. The Pennsylvania Secretary of State, Corporations Division has confirmed that R&W Oil Products Co., Inc. on Atlantic Avenue and John Street in McKeesport Pennsylvania is a registered Pennsylvania corporation.

EXCESSIVE CONTRIBUTIONS

1. Klink has reported receiving a loan from Ron and Linda Klink for \$18,540.98.

2. Klink has reported contributions from Frank Trigona for the primary election in excess of \$1,000 .

MISREPORTING WITH REGARD TO LOANS AND DEBTS

1. Klink has not reported the terms of the \$18,540.98 loan reported on Schedule C.

2. Klink has not reported said loan as a contribution on Schedule A.

3. Two loans in the amounts of \$51,000 and \$1,000 reported on Klink's prior report are not mentioned as either outstanding or as paid in Klink's next report, the July 15 Quarterly.

4. Klink's July 15 Quarterly shows \$28,830.39 as the Outstanding Balance of Debts at the opening of this reporting period on schedule D. These outstanding obligations did not appear on the prior Klink report.

5. Klink filed three notices of late contributions which were loans totaling at least \$13,500 (one of the late notices failed to state the amount of the loan). These loans were not reported on the July 15 Quarterly.

6. Klink failed to report any debts owed by Klink on line 10 of the Summary Page even though such debts are reported in supporting schedules C and D.

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DISCUSSION OF LAW

Excessive Contributions

Pursuant to 11 C.F.R. 100.7(a)(1) a contribution is defined as:

A gift, subscription, loan (except for a loan made in accordance with 11 C.F.R. 100.7(b)(11), advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

The regulations provide that:

A candidate may use a portion of assets jointly owned with his or her spouse as personal funds. The portion of the jointly owned assets that shall be considered as personal funds of the candidate shall be that portion which is the candidate's share under the instrument(s) of conveyance or ownership. If no specific share is indicated by an instrument of conveyance or ownership, the value of one-half of the property used shall be considered as personal funds.

11 C.F.R. 110.10(b)(3). Individuals, including the candidate's family members, are limited to contributions of \$1,000 per election. 2 U.S.C. 441a(a)(1), 11 C.F.R. 110.1(a) and (b)(1). The contributions in the form of loans to Klink from Ron and Linda Klink, reported as \$18,540.98, exceed Linda Klink's contribution limit by \$9,270.49 (Linda Klink exceeded her limit in the previous reporting period by \$31,250. See previous Complaint filed on July 17, 1992). Klink has reported contributions (including in-kind contributions for office space) from Frank Trigona in excess of \$1,000 for the primary election. These reported contributions are: (See Exhibit B)

direct contribution	03/27/92	\$100
in-kind contribution	04/01/92	100
in-kind contribution	04/06/92	900
in-kind contribution	04/15/92-04/28/92	<u>180</u>
		\$1280

95043633621

Prohibited Corporate Contributions

The Act prohibits contributions from corporations. 11 C.F.R. 114.2(a) and (b). Klink has reported a contribution from R&W Oil Products on Atlantic Avenue and John Street in McKeesport, Pennsylvania. The Pennsylvania Secretary of State, Corporations Division has confirmed that R&W Oil Products Co., Inc. on Atlantic Avenue and John Street in McKeesport Pennsylvania is a registered Pennsylvania corporation. Klink has reported receiving an illegal corporate contribution.

Reporting Violations

Reporting violations, including the complete omission of \$52,000 in loans shown on the Pre-primary report on the July 15 Quarterly Report and the failure to acknowledge existing debts on the Pre-primary report in the amount of \$28,830.39 shown on the July 15 Quarterly, completely circumvent the public disclosure purpose and regulatory requirements of the Act. Klink's approach guarantees that it is impossible to accurately determine the actual sources of funding for Klink's campaign. Specifically:

1. The proper reporting period for the July 15 Quarterly in Pennsylvania, where the primary was on April 28, is April 9 through June 30, 1992. 2 U.S.C. 434(a)(2), 11 C.F.R. 104.5(a). Klink's Pre-primary report improperly indicated that it covered March 7 through April 13, 1992. To be in compliance, Klink's July 15 Quarterly should have covered April 9 through June 30, 1992.

2. The Act and regulations require an authorized campaign committee to report activity during the period covered by the report. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(3) and (b)(2). Klink has reported contributions received and disbursements made on dates prior to the period covered by the report in violation of the Act and regulations.

3. The Act and regulations require a political committee to report the full name, mailing address, occupation and the employer of any contributor whose aggregate contributions for the year exceed \$200. 2 U.S.C. 434(b), 11 C.F.R. 104.3(d), 11 C.F.R. 100.12. Klink has failed to report the employer of many contributors whose aggregate contribution for the year exceed \$200 in violation of the Act and regulations.

4. The Act and the regulations require political committees to report the Year-To-Date total for contributors whose aggregate contribution(s) exceed \$200 in a calendar year. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(4). Klink has not reported the Year-To-Date total of any of the contributors in violation of the Act and regulations.

95043633622

5. The Act and regulations require that the address of each contributor whose contribution(s) exceed \$200 and the address of each entity to whom disbursements are made over \$200 be reported. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(4) and (b)(4). Klink has failed to give the complete address of many of the contributors and entities to whom disbursements were made in violation of the Act and regulations.

6. The Act and regulations require that authorized committees report the total amount received in certain categories, specifically, in this case, contributions from other political committees as distinguished from other types of contributions. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(3)(iv).

7. The Act and regulations require that the date of receipt of contributions from committees be reported. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(4)(ii). Klink has failed to report the date on which a contribution from PNB Volpac was received in violation of the Act and regulations.

8. The Act and regulations require that in-kind contributions also be reported as expenditures. 11 C.F.R. 104.13(a). Klink has reported an in-kind disbursement to Frank Trigona without report of a corresponding in-kind contribution in violation of the Act and regulations.

9. The Act and regulations require that the dates loans are made to the committee be reported. 2 U.S.C. 434(b), 11 C.F.R. 104.3(a)(4)(iv). Klink has failed to report the date on which a loan for \$18,540.98 was made in violation of the Act and regulations.

10. The Act and regulations require that debts and obligations owed by a political committee be continuously reported until extinguished. 11 C.F.R. 104.11. Klink reported two loans on its first report totaling \$52,000 that are not reported as being extinguished or outstanding on the July 15 Quarterly. Additionally, Klink has reported debts outstanding at the beginning of the July 15 quarterly period as \$28,830.39. These obligations were not reported on the Pre-primary report. This failure to report the continuing obligation of loans and the failure to report incurred obligations are violations of the Act and regulations.

11. The Act and regulations require that late contributions, in addition to being reported on 48-hour late contribution notices, be reported on the next required report. 2 U.S.C. 434(a)(2), 11 C.F.R. 104.5(f). Klink filed three 48-hour late contribution notices, included as Exhibit C. These late contributions were not included in the July 15 Quarterly in violation of the Act and regulations.

95043633623

PRAYER FOR RELIEF

Therefore, the Citizens of Pennsylvania and the National Republican Congressional Committee respectfully request, that the Federal Election Commission investigate these violations and find the following conclusions of law:

- (1) Klink has submitted a report that omits significant required information in violation of the Federal Election Campaign Act and regulations;
- (2) Klink has reported receiving contributions in the form of loans from Linda Klink in violation of the limits established for individuals pursuant to 2 U.S.C 441a(a)(1) and 11 C.F.R. 110.1(a) and (b)(1);
- (3) Klink has reported receiving an improper contribution from a corporation pursuant to 2 U.S.C. 441b and 11 C.F.R. 114.2;
- (4) Klink, in filing reports in such insufficient form, evidences no respect for or intention to comply with the provisions of the Federal Election Campaign Act, as amended, and such behavior constitutes a violation of the Act.

Therefore, the Citizens of Pennsylvania and the National Republican Congressional Committee further request that the Federal Election Commission assess all appropriate penalties for said violation of the above provisions in accordance with 2 U.S.C. 437g(a)(5)(A).

The above statements are true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

Ann Hooker

Janet A. Jackson

Paula R. Johnston

Jean Lovelace

Subscribed and Sworn before me this 27th day of July, 1992.

Patricia J. Baker
 PATRICIA J. BAKER, Notary Public
 Beaver, Beaver Co. (Notary Public)
 My Commission Expires Aug. 30, 1993

My Commission expires:

95043633624

Thomas Cole

Thomas Cole,
Executive Director, National
Republican Congressional Committee

Subscribed and Sworn before me this 27th day of July, 1992.

Nicholas Lieder

Nicholas Lieder (Notary Public)
Notary Public, District of Columbia
My Commission Expires April 30, 1997

My Commission expires:

95043633625



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1992

Ann Hoskin
2916 Clayton Avenue
Beaver Falls, PA 15010

RE: MUR 3569

Dear Ms. Hoskin:

This letter acknowledges receipt on July 29, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer and Patricia A. Mansueti. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043635626



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1992

Janet A. Jackson
42 Hemlock
Beaver, PA 15009

RE: MUR 3569

Dear Ms. Jackson:

This letter acknowledges receipt on July 29, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer and Patricia A. Mansueti. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043633627



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1992

Gordon R. Johnston
1709 Tenth Avenue
Beaver, PA 15009

RE: MUR 3569

Dear Mr. Johnston:

This letter acknowledges receipt on July 29, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer and Patricia A. Mansueti. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

95043633628



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1992

Joan Lanctot
1463 Third Avenue
New Brighton, PA 15066

RE: MUR 3569

Dear Ms. Lanctot:

This letter acknowledges receipt on July 29, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer and Patricia A. Mansueti. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

9504363629



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1992

Thomas Cole, Executive Director
National Republican Congressional Committee
320 First Street, SE
Washington, DC 20003

RE: MUR 3569.

Dear Mr. Cole:

This letter acknowledges receipt on July 29, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ron Klink for Congress Committee, and Paul Lynch, Jr., as treasurer and Patricia A. Mansueti. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

950436330



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 5, 1992

**Ron Rlink for Congress Committee
Paul Lynch, Jr., Treasurer
107 South Second Street
Jeannette, PA 15644**

RE: MUR 3569

Dear Mr. Lynch:

The Federal Election Commission received a complaint which indicates that Ron Rlink for Congress Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

25043633631

Ron Klink for Congress Committee
Paul Lynch, Treasurer
Page 2

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Ron Klink

2504336332



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1992

Patricia A. Mansueti
c/o Ron Klink for Congress Committee
107 South Second Street
Jeannette, PA 15644

RE: MUR 3569.

Dear Ms. Mansueti:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3569. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

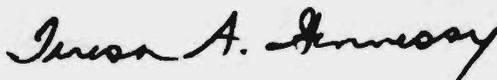
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

25043633633

Patricia A. Mansueti
Page 2

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Teresa A. Hennessy
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

950436534



RON KLINK

Congress

August 10, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
92 AUG 12 PH 3:20

Ms. Teresa Hennessy
Assistant General Counsel
Federal Election Commission
Washington, DC 20463

Dear Ms. Hennessy,

Please consider this request to combine complaints MUR3569 and MUR3560 filed against Ron Klink, candidate for Congress - Fourth District, Pennsylvania.

The candidate also requests a 20-day extension in which to reply to the complaints filed. This would give the candidate sufficient time to meet with legal counsel to review the charges filed.

On a separate note, the campaign filed notice of a new treasurer. Please verify that the Commission's records reflect this change. Paul Lynch has been replaced by Patricia Mansuetti.

Please notify me of the Commission's decision at your earliest convenience. If I can be of any assistance to you, please do not hesitate to contact me at (412) 281-8882. Thank you for your consideration.

Sincerely,

Dennis M. Casey
Campaign Manager and Media Advisor

cc: Tamara Kapper

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
AUG 12 12 02 PM '92

25043633635



RON KLINK

Congress

August 14, 1992

Ms. Teresa Hennessy
Assistant General Counsel
Federal Election Commission
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
92 AUG 17 PM 3:29

Dear Ms. Hennessy,

Please consider this request to combine complaints MUR3569 and MUR3560 filed against the Committee to Elect Ron Klink.

The committee also requests a 20-day extension in which to reply to the complaints filed. This would give the committee sufficient time to meet with legal counsel to review the charges filed.

Please notify me of the Commission's decision at your earliest convenience. If I can be of any assistance to you, please do not hesitate to contact me at (412) 281-8882. Thank you for your consideration.

Sincerely,

Patricia Mansueti
Treasurer, The Committee To Elect Ron Klink

cc: Tamara Kapper

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FEDERAL ELECTION COMMISSION
MAIL ROOM
Aug 17 11 52 AM '92

25043633636



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 18, 1992

Patricia Mansueti, Treasurer
Ron Klink for Congress Committee
107 South Second Street
Jeannette, PA 15644

RE: MURs 3560 & 3569
Ron Klink for Congress Committee
and Patricia Mansueti, as
treasurer

Dear Ms. Mansueti:

This is in response to your letter dated August 14, 1992, which we received on that same day, requesting an extension of 20 days to respond to the complaints. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your responses to MURs 3560 and 3569 are due by the close of business on August 31 and September 14, 1992, respectively.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Tamara Kapper
Paralegal

25043633637

OGC 6159

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

August 20, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CHIEF COUNSEL
92 AUG 20 PM 3:47

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C.

Re: MURs 3505 and 3560 - Ron Klink for Congress
Committee and Paul Lynch, Jr. as treasurer

Dear Mr. Noble:

Please find enclosed a facsimile copy of a designation of counsel for the above-referenced Matters Under Review. An original copy will be provided to the Commission as soon as it is received.

This letter also is to request that the two MURs be consolidated into a single matter. While the complaints address issues raised on two different FEC reports, the issues raised in each case are similar, if not identical. The need for a separate response to each complaint is burdensome and unnecessary.

I understand that the campaign has requested an extension of time to respond to the complaints. Our law firm was retained only yesterday to assist in preparing the response and the additional time will be necessary to obtain the necessary information. If the Commission's letter regarding the extension request has not already been sent, I would appreciate it if you could direct the response to my attention.

If you have any questions or need additional information, please contact one of the undersigned.

Very truly yours,



Judith L. Corley
Counsel to Respondents

[04031-0001/DA922330.032]

25043633638

STATEMENT OF DESIGNATION OF COUNSEL

NUM 3505/3560

NAME OF COUNSEL: Robert F. Bauer and Judith L. Corley, Perkins Cole

ADDRESS: 607 14th Street, NW

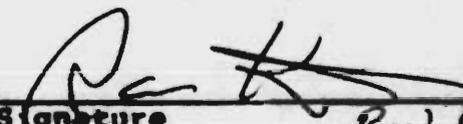
Suite 800

Washington, DC 20005

TELEPHONE: (202) 628-6600

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

8/19/92
Date


Signature

Ron Klink

Candidate

RESPONDENT'S NAME: Ron Klink for Congress Committee

ADDRESS: 107 South 2nd

Jeannette, PA 15644

HOME PHONE: _____

BUSINESS PHONE: _____

92 AUG 26 AM 10: 54

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, DC 20543

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

August 28, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 AUG 28 PM 3:51

Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MURs 3505, 3560 and 3569

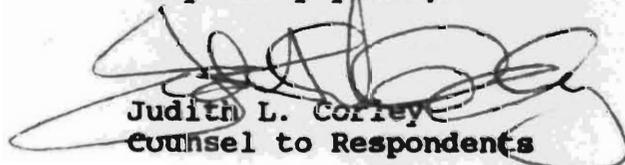
Dear Ms. Kapper:

Enclosed is a letter clarifying the designation of counsel for the above-referenced matters under review. As before, I will submit the original version when it is received.

As I mentioned to you on the phone, because our law firm was retained only late last week in these matters (and received a copy of MUR 3505 only today), it would be very difficult to gather adequate information and prepare a response in time to meet the Commission's current deadline of August 31 in MUR 3560. We would propose instead that a response to all three MURs be prepared and submitted to the Commission by Tuesday, September 8.

If you have any questions or need additional information, please let me know.

Very truly yours,



Judith L. Correy
Counsel to Respondents

[04031-0001/DA922400.061]

25043633640

August 27, 1992

Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3508, MUR 3560 and MUR 3569

Dear Ms. Kapper:

This is to clarify the designation of counsels for the above-referenced Matters Under Review.

The following law firm is designated to represent me, my wife and my campaign committee in all matters relating to these MURs:

Robert F. Bauer
Judith L. Corley
Perkins Cole
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005

202/628-6600

If you have any questions or need additional information on this designation of counsel, please do not hesitate to contact me.

Very truly yours,

Ron Klink
Ron Klink

Linda Klink
Linda Klink



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 31, 1992

Robert F. Bauer, Esquire
Judith L. Corley, Esquire
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005

RE: MURs 3505, 3560 & 3569
Ron Klink
Linda Klink
Ron Klink for Congress Committee
and Patricia Matsueti, as
treasurer

Dear Mr. Bauer and Ms. Corley:

This is in response to your letter dated August 28, 1992, which we received on that same day, requesting an extension until September 8, 1992 to respond to the Commission's reason to believe findings in MUR 3505 and to respond to the allegations in MURs 3560 and 3569. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on September 8, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script that reads "Tamara Kapper".

Tamara Kapper
Paralegal

05043633642

STEPHEN A. HILDEBRANDT
Chief Counsel



WESTINGHOUSE BROADCASTING COMPANY, INC.
400 NORTH CAPITOL STREET, N.W.
SUITE 550
WASHINGTON, D.C. 20001-1511
(202) 508-4470

September 4, 1992

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

Re: MUR 3505/Response of Westinghouse Broadcasting
Company, Inc.

Dear Ms. Aikens:

I am Chief Counsel and Assistant Secretary of Westinghouse Broadcasting Company, Inc., and am in receipt of your letter of August 11, 1992 to Burt Staniar, Chairman and CEO of Westinghouse Broadcasting Company, Inc. ("Westinghouse"). In your letter, you request that Westinghouse respond to specific questions concerning its employment of Ron Klink, a Westinghouse television reporter who took a leave of absence to campaign for federal office. On behalf of Westinghouse, I am herein responding to your specific questions:

1. Mr. Klink is currently not actively employed by Westinghouse. He is on an unpaid leave of absence.
2. Mr. Klink took a leave of absence from Westinghouse effective April 12, 1992.
3. Mr. Klink was not paid a salary by Westinghouse during his leave of absence. Mr. Klink announced his candidacy for federal office on March 8, 1992 and discontinued active employment with Westinghouse on that date. Prior to the start of his leave of absence, however, Mr. Klink had accrued five (5) weeks of paid vacation as a Westinghouse employee. Pursuant to Westinghouse standard policy, he was required to use his accrued vacation prior to the start of his unpaid leave of absence. In accordance with Westinghouse policy, Mr. Klink was paid for his vacation time. His vacation period ended on April 11, 1992, and his unpaid leave began April 12, 1992. Other than accrued vacation pay, Mr. Klink has been paid no money by Westinghouse during the period that he has not worked. Pursuant to 11 C.F.R. §100.7(a)(3)(iii), "no contribution results where the time used by the employee to engage

92 SEP - 8 PM 1:04

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FEDERAL ELECTION COMMISSION
OFFICE

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EAGLE

Ms. Joan D. Aikens
September 4, 1992
Page 2

in political activity is bona fide, although compensable, vacation time or other earned leave time." Therefore, Westinghouse's compensation to Mr. Klink for his earned vacation time does not constitute a contribution to his campaign.

Additionally, pursuant to standard Westinghouse leave of absence policy applicable to all employees, Mr. Klink was able to assure the continuity of his medical, dental and life insurance benefits during his unpaid leave by making payment to Westinghouse out of his personal funds. Assuring continuity of benefits by making payment out of unreimbursed personal funds is specifically allowed by 11 C.F.R. §114.12(c)(1), which provides, "An employee or member may, out of unreimbursed personal funds, assure the continuity of his or her fringe benefits during absence from work for political campaigning, and such payment would not be a contribution in-kind." Westinghouse will not reimburse Mr. Klink for any such payments made by Mr. Klink during his unpaid leave.

- 5043633644
4. Westinghouse's leave of absence policy allows employees to take an unpaid leave of absence in order to campaign for federal office. During the period of unpaid leave, an employee may assure the continuity of his fringe benefits during absence from work for political campaigning by making payments to Westinghouse out of his own funds. While we have been unable to track precisely when this policy began, it has been in place for many years, and at least since August 1, 1987. This policy is in accordance with 11 C.F.R. §114.12(c)(1), as noted above, and was the course of action taken by Mr. Klink.
 5. This standard Westinghouse policy applies to all persons employed by Westinghouse.

Ms. Joan D. Aikens
September 4, 1992
Page 3

Westinghouse takes seriously its obligations to comply with its federal responsibilities, and we are satisfied that we have fully complied with all applicable federal regulations as they pertain to this matter. If you have any further questions, please feel free to contact me.

Sincerely,



Stephen A. Hildebrandt
Chief Counsel and
Assistant Secretary

cc: T. Kapper

5043633645

STATEMENT OF DESIGNATION OF COUNSEL

NR 3505

NAME OF COUNSEL: Stephen A. Hildebrandt, Chief Counsel

ADDRESS: Westinghouse Broadcasting Company, Inc.

400 N. Capitol St. N.W. Suite 550

Washington, D.C. 20001

TELEPHONE: (202) 508-4470

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

September 4, 1992

Date

Signature



RESPONDENT'S NAME: Stephen A. Hildebrandt, Assistant Secretary

ADDRESS: Westinghouse Broadcasting Company, Inc.

400 N. Capitol St. N.W. Suite 550

Washington, D.C. 20001

HOME PHONE: _____

BUSINESS PHONE: (202) 508-4470

5043633646

PERKINS COIE

OG C6358

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

September 8, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 SEP - 8 PM 4: 29

Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MURs 3505, 3560 and 3569

Dear Ms. Kapper:

This is in response to the complaints filed against the Klink for Congress Committee ("the Committee") and the Commission's finding of reason to believe against the Committee and Ron and Linda Klink in the above-referenced Matters Under Review.

Statement of Candidacy/Statement of Organization

Attached as Exhibit A is a letter from Dennis Casey, campaign manager for Mr. Klink's campaign, in which he explains that the original Statement of Candidacy for Mr. Klink and the original Statement of Organization for the Committee were filed in March 1992 with the Clerk of the House. In an earlier response to the Commission, Mr. Casey submitted a copy of the Federal Express receipt number for the March filing. The campaign is obtaining a legible copy, and will submit it to the Commission as soon as it is available.

For reasons that have remained unexplained, the forms apparently were never transmitted to the FEC, or, at least, no record of their existence was entered into the FEC's computers. When this fact came to Mr. Casey's attention, he sought the advice of the Commission through its 800 Line and was told that the best remedy to the situation was to refile the forms. This he did.

Unfortunately, it is difficult to prove that documents for which there is no record were actually filed. The airbill for the Federal Express transmittal does not reveal the contents of the package. Because it was addressed to the Clerk of the House, however, Mr. Klink and the Committee should be given the benefit of the doubt in this case.

{04031-0001/DA922450.050}

TELEX 44-0277 PCSO UI • FACSIMILE (202) 434-1690

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Tamara Kapper
September 8, 1992
Page 2

Westinghouse Leave of Absence

The Commission submitted several questions to Mr. Klink regarding the leave of absence he took from his employer, Westinghouse Broadcasting Company, Inc. The responses to those questions, set out in Exhibit B, together with the response I understand will be submitted by Westinghouse, should put to rest any concern that the leave constituted a contribution in-kind to Mr. Klink's campaign. It is clear from the responses that the leave of absence fully meets the Commission's standards for such leaves as set out in its regulations.

Excessive Contribution by Linda Klink

The Commission has questioned certain loan transactions by Ron and Linda Klink to the Committee. It would appear that the loans were made from the personal funds of Ron Klink in accordance with Commission regulations and misreported by the Committee as coming from both Ron and Linda Klink.

From the information available to the Committee at this time, the funds for the loans came from joint checking and savings accounts of Ron and Linda Klink. Because of this, the Committee misreported the loans as from both husband and wife. As stated in the opinion of counsel attached as Exhibit C, under Pennsylvania law, Mr. Klink was considered to own "the entirety of that property at all time"

The Committee is gathering additional information with respect to the loans in order to amend the reports (see discussion below), and will submit a supplemental response, if needed, as soon as the information is available.

Reporting Issues

The two complaints filed by the National Republican Congressional Committee raise several issues relating to the reports filed by the Committee to date. The Committee is in the process of preparing amendments to these reports to bring its filings into compliance with the reporting regulations. These amendments will be submitted to you for review as soon as they are ready.

5043633648

Tamara Kapper
September 8, 1992
Page 3

The background of the Committee's origins will be helpful to the Commission in understanding the reason the reports were submitted as they were. In Pennsylvania, the redistricting process this year was very lengthy. The original date of the primary, May 15, had been pushed forward to April 28 to accommodate the presidential primary. Final redistricting lines were not drawn until just seven weeks before the election.

Because of the uncertainty over the lines, and over whether certain incumbent Members of Congress would seek reelection (and where), Mr. Klink did not decide to run for the House of Representatives until approximately seven weeks before the date of the primary. Mr. Klink was employed at the time as a television newscaster and, due to the sensitivity of his position, he could not actively prepare for a race or even publicize his consideration of the possibility of running before he actually made the decision to run.

Mr. Klink had never before sought any public office. He chose to challenge an incumbent in the Democratic primary. Because of the extremely short period of time between the declaration of his candidacy and the primary, and the difficulty of his race (running against a well-funded incumbent), Mr. Klink's campaign was small and under-staffed. During the pre-primary period, there were only two individuals working on the campaign besides Mr. Klink. Of the two, only the campaign manager, Dennis Casey, had any experience with federal campaigns, and that experience was somewhat dated and did not involve the reporting requirements.

As a result, the FEC reports prepared for the Committee were incomplete. Campaign staff did not have adequate time to get "up to speed" on the rules and regulations governing such reports before the reports were due. As a matter of policy, the Committee felt it was better to submit what information it did have available for the public record, with the understanding that the reports would be amended, as needed.

Some specific comments about the issues raised by the NRCC in its two complaints on these report issues are warranted:

- The 48-hour report of a loan with no dollar amount listed was corrected on the subsequent 48-hour

5043633649

report, where the loan was reported. As a result, the loan appears to have been again reported twice. An amended Schedule C will be submitted to accurately reflect the dates and amounts of the loans.

- The NRCC makes much of the fact that no occupation or employer is listed from many of the contributors. What it fails to note is that the majority of the contributions listed on the reports are \$200 or less, for which this information is not required. Further, the Committee has made "best efforts" to obtain the information not available at the time the report was filed and will submit all available information in its amendments.
- The in-kind contribution from Mr. Bruno was reported correctly. Mr. Bruno is the owner of the business reported on the disbursements schedule and paid his business to provide the campaign with services as a contribution in-kind. The contribution was reported in the manner advised by the Office of the Clerk of the House.
- The corporate contributions alleged to have been received by the Committee are all contributions from individuals who own the businesses in question. Further, the owner of R&W Oil has stated to the campaign repeatedly (see Exhibit D) that his company is a sole proprietorship and not a corporation. Nonetheless, to avoid any question, the Committee has refunded the \$60 contribution.

CONCLUSION

What the Commission has before it in this case is a campaign that was organized with too little time and little federal campaign experience to file perfect FEC reports. The result is obvious: inadvertent mistakes, incomplete reports, and confusing submissions. There has been no effort to avoid the campaign laws or to violate its provisions. Efforts to comply have been entirely in good faith, if not entirely successful.

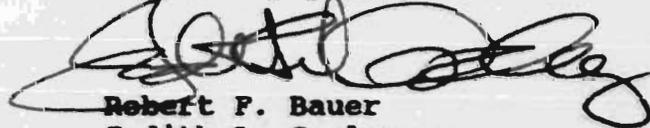
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Tamara Kapper
September 8, 1992
Page 5

This is not an attempt to excuse the mistakes that may have been made. The Committee and the candidate are aware that the public disclosure of information on the campaign is of the utmost importance to the public in making its decision on election day. To this end, the campaign has hired additional staff, including an individual with experience in accounting, to ensure that future reports and transactions are in compliance with the campaign laws and regulations. They have also retained this law firm for further assistance in this effort.

These factors should be significant in the Commission's consideration of this case. As noted above, additional information will be submitted to the Commission as it becomes available. If you have any questions, or need additional information in the interim, please do not hesitate to contact the undersigned.

Very truly yours,



Robert F. Bauer
Judith L. Corley
Counsel to Respondents

5043633651



RON KLINK Congress

789 P87
Exhibit A

SEP 03 '92 18:57

APRIL 12, 1992

Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mesdames or Sirs:

Be advised that in a telephone conversation with the FEC on Friday, April 10, 1992, I was advised that there is a possibility that the forms the RON KLINK FOR CONGRESS COMMITTEE had dispatched to the FEC in March may either not have been received properly by the Commission, or they may have been misfiled. In any event, to fully comply with the laws, I am resubmitting forms; specifically, they are FEC Form 1 (revised 4/87) and FEC Form 2 (revised 4/87).

Further be advised that Ron and Linda Klink, 226 Connor Road, Jeannette, PA, loaned the RON KLINK FOR CONGRESS COMMITTEE the sum of \$11,500 on April 9, 1992. This information is being made available in compliance with the '48-hour rule' of the FEC; it has been disclosed to the FEC prior to this, but I am including it in this communique to be absolutely certain that it is a verifiable matter of public record.

Thank you, and should there be any questions or comments, do not hesitate to contact me at the letter telephone number, or through the campaign office (800) 528-9444.

Yours truly,

DENNIS M. CASEY
Designated Agent

5043633652



RON KLINK

Congress

April 14, 1992

Mr. Lawrence Noble
 General Counsel
 Federal Election Commission
 999 E Street NW
 Washington, DC 20463

Dear Mr. Noble:

I am writing to reply to a rather hysterical and inaccurate letter directed to you by one Gerald Weaver, Campaign Manager for an idiot Congressman, 3423 Brown Street, NW, Washington, DC, 20010, dated April 13, 1992.

I will try not to use big words so Mr. Weaver and his candidate can understand the contents of this letter: The allegations in the "complaint" against Democratic candidate Ron Klink (CD 4-PA), are false. Point by point, they are:

1. Candidate Klink has indeed filed a statement of candidacy on or about March 20, 1992. Copies have been provided to the Clerk of the House of Representatives by Federal Express, Airbill No. 3247707901; however, for some reason, FEC Forms 1 and 2 apparently have not been logged onto the computer system as of yet, and the Office of Records and Registration is checking into this matter. I have been professionally employed in campaign management and media since Mr. Weaver was enraptured with the Nancy Drew series, and my company would not make a bush league mistake like that.

2. Mr. Klink has not "placed advertisements on KDKA television and KDKA Radio..." The KDKA-TV schedule did not start until 4/14, a full day after Mr. Weaver's letter to you, and neither we nor the Committee have placed any commercials whatsoever on KDKA Radio. Perhaps Mr. Weaver and his candidate heard these commercials on their dental bridgework...it is so

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hard to differentiate those dental radio signals from the other "voices" I am sure they hear.

3. Mr. Klink has at no time "violated federal election law." The date for reporting contributions and expenditures to the Clerk of the House is April 15, and the reports were sent via Federal Express on April 13, well in advance of that date, with copies to the Secretary of State of the Commonwealth of Pennsylvania, Harrisburg, PA, 17120, sent concurrently.

4. At no time did Mr. Klink "(use) a corporate helicopter to fly around the district (which must be) an illegal corporate contribution..." Any aircraft use has been properly reported on FEC Form 3. (Perhaps the whirlybird Mr. Weaver and his candidate saw or heard was the propellor on the beanie on top of their heads.)

5. Mr. Klink is not "Westinghouse's candidate for Congress" as alleged by this obviously disturbed attorney, whose law degree, I am sure, was issued by the Northern Wyoming School of Law and Animal Husbandry. We would welcome funds from this fine corporation, but over the years Mr. Weaver's client has managed to sponge them up time after time from Westinghouse, which has been their error in contributing to the candidacy of a man whose election has caused the overall IQ of the House to drop by 20 to 40 aggregate points. (This Congressman spoke the wonderful phrase "I am tired of seeing American jobs being lost overseas to Mexico.")

6. Mr. Weaver says he does not know how to contact Mr. Klink. Watch my lips: Call (412) 555-1212, and ask for the telephone number of either Ron Klink, in Jeannette, PA, the Ron Klink for Congress Committee, which has a tollfree number as well as two other numbers, or, by gosh, he could have called KDKA-TV, Pittsburgh, where Mr. Klink was seen by three-quarters of a million households every weeknight until he took a Leave of Absence to get rid of the Congressional abomination Mr. Weaver represents.

I now know why Mr. Weaver's candidate referred to himself in a published tape-recorded conversation as "a political whore."

Should you have any questions, do not hesitate to contact me directly. I would suggest you contact Mr. Weaver or his client, but they are still probably trying to figure out what number to call to get "911." I would have a Notary Public verify my signature, as Mr. Weaver did his, but she

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said she had to go home to wash her cat. Just take my word for it that this is my signature. My word is good, unlike some I could mention.
Yours truly,

DENNIS M. CASEY
Campaign Manager/Media Adviser-Ron Klink for Congress Cmte.

50436333655

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3505

Responses to Questions to Ron Klink

1. Are you currently employed by the Westinghouse Broadcasting Company, Inc. ("Westinghouse")? If not, are you currently on a leave of absence from Westinghouse?

Mr. Klink is not currently actively employed by Westinghouse. Mr. Klink is currently on a leave of absence from Westinghouse.

2. Please provide the date you publicly announced your candidacy for Federal office. Please provide the date that your leave of absence from Westinghouse became effective.

Mr. Klink publicly announced his candidacy for Federal office on March 8, 1992. His leave of absence from Westinghouse became effective on April 12, 1992. During the period between March 9, 1992 and April 12, 1992, Mr. Klink used paid vacation time accrued from Westinghouse.

3. How long is your leave of absence?

Mr. Klink's leave of absence will last until election day, November 3, 1992.

4. Has Westinghouse compensated you during your leave of absence? If so, please provide the total amount that you were paid.

Westinghouse has not compensated Mr. Klink during his leave of absence.

5. If your leave of absence was unpaid, did Westinghouse pay for your health insurance, life insurance, and/or any other fringe benefits during your leave of absence? If so, please provide an estimate of the monetary worth of the benefits to you.

Westinghouse has not and will not pay for Mr. Klink's health insurance, life insurance, and/or any other fringe benefits during his unpaid leave of absence. In order to assure continuity of the benefits he received as an employee,

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Mr. Klink, pursuant to Westinghouse's policy on leaves of absence, has made payment to Westinghouse out of his personal funds.

6. Does Westinghouse have a written policy granting a leave of absence to employees in order that they may campaign for a Federal office? If so, please describe the policy in detail. Does the policy apply to all persons employed by Westinghouse?

Mr. Klink does not have specific knowledge of the information sought in these questions. It is our understanding, however, that these questions were addressed in the response filed with the Commission by Westinghouse.

**CHARLES F. SCARLATA
&
ASSOCIATES
ATTORNEYS AT LAW
1550 KOPPERS BUILDING
436 SEVENTH AVENUE
PITTSBURGH, PENNSYLVANIA 15219-1818**

**CHARLES F. SCARLATA*
GEORGE P. IACCACCHIONE
JEAN KRKUC PERKINS
JOANNE D. NENE
*ALSO ADMITTED IN D.C.**

**(412) 765-2855
FAX 412-471-6897**

**125 E. NORTH STREET
SUITE 214
TEMPLE BUILDING
NEW CASTLE, PA. 16101
(412) 658-8931
FAX: (412) 658-1300**

September 4, 1992

**Judith L. Corley, Esquire
PERKINS COIE
607 14th St., N.W.
Suite 800
Washington, D. C. 20005**

Re: ROM KLINK FOR CONGRESS

Dear Ms. Corley:-

This is in regard to your inquiry concerning the state of the law in Pennsylvania as it relates to married couples.

In Pennsylvania, married persons typically hold jointly titled property as "tenants by the entireties." As you know, that means that both spouses own one hundred percent (100%) of the property at all times and either spouse is entitled to the benefits of that property when either he or she chooses. By way of example, in the area of realty, if one spouse dies the jointly titled property does not pass through the estate because the surviving spouse already owned all of it. A similar analysis is applicable to bank accounts and joint stock accounts held as husband and wife, with the right of survivorship.

As I understand the question you are addressing, the funds in question were generated from accounts which were held as husband and wife with the right of survivorship. As such, either Mr. or Mrs. Klink owned the entirety of that property at all times and either one would have been entitled to use it, however he or she saw fit. Thus, Mr. Klink's utilization of these funds is entirely consistent with the law of Pennsylvania which recognizes his entitlement to all of the proceeds in such jointly held accounts.

5043633658

Judith L. Corley
September 4, 1992
Page Two

Re: Ron Klink for Congress

I hope that this explanation is useful to you. Should you have any additional questions, please do not hesitate to contact me.

Very truly yours,


CHARLES F. SCARLATA

CFS:ja

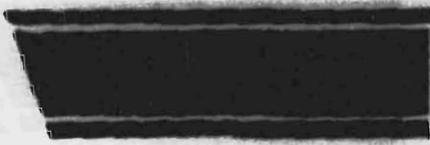
cc: Ron Klink

5043633659

PRODUCTS

TEL No .412-578-6122

Sep 3,92 16:14 No.010 P.02



SEPTEMBER 3, 1992

Committee to Elect Ron Klink
Patricia Manuetti, Treasurer
107 South Second Street
Jeannette, Pa 15644

Ms. Mansueti:

On June 24, 1992, R & W Oil sent you a check for a fund raising event from Mr. Eldo Bisacca in the amount of \$60.00. R & W Oil is a sole proprietorship owned and operated by Eldo Bisacca.

If there is any further problem, please advise.

Sincerely,

Betty A. Bisacca

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

06C 7130
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

93 JUN 16 PM 4:24

June 16, 1993

Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MURs 3505, 3560 and 3569

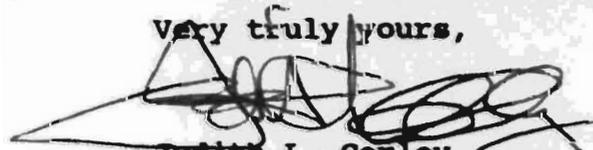
Dear Ms. Kapper:

In the response to the complaints filed against the Klink for Congress Committee, Respondents stated that they were in the process of preparing amendments to the Committee's reports to address issues raised in the complaints.

These amendments are attached to this letter for your review in this matter.¹ The amendments have not yet been filed with the Clerk of the House and Respondents would appreciate the guidance of the Commission as to the appropriate time for filing the amendments. Respondents do not wish to waive confidentiality of this matter while it is pending before the Commission. Further, Respondents would like the Commission to verify that the amendments address all of the reporting issues raised in the complaints so that additional amendments will not be required.

Respondents will await the Commission's response as to the timing of the filing of the amendments with the Clerk of the House. If you have any questions, or need additional information, please contact the undersigned.

Very truly yours,



Judith L. Corley
Counsel for Respondents

¹Also attached is an amendment to the Committee's Statement of Organization designating a new treasurer for the Committee.

[18912-0001/DA931670.023]

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL Citizens For Ron Klink <input checked="" type="checkbox"/> (Check if name is changed)	2. DATE 6-9-93
(b) Number and Street Address 141 Renfer Street <input type="checkbox"/> (Check if address is changed)	3. FEC IDENTIFICATION NUMBER 000265421
(c) City, State and ZIP Code Pittsburgh, PA 15237	4. IS THIS STATEMENT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|--------------------------------|---|---------------------------|--------------------------|
| Name of Candidate
Ron Klink | Candidate Party Affiliation
Democrat | Office Sought
Congress | State/District
PA 4TH |
|--------------------------------|---|---------------------------|--------------------------|
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

- Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Phone (412) 761-1573	Title or Position
Janice Kozey	7410 Brighton Road Pittsburgh, PA 15202	Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Janice Kozey	Same as # 7	
Jeanne Brummeier	141 Renfer Street Pittsburgh, PA 15237	Assistant Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
P.N.C. Bank	Fifth Avenue & Wood Street Pittsburgh, PA 15265

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

TYPE OR PRINT NAME OF TREASURER Janice Kozey	SIGNATURE OF TREASURER <i>Janice Kozey</i>	DATE 6/10/93
--	--	------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

5043633662

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL <input checked="" type="checkbox"/> (Check if name is changed) Citizens For Ron Klink	2. DATE 6-9-93
(b) Number and Street Address <input type="checkbox"/> (Check if address is changed) 141 Renfer Street	3. FEC IDENTIFICATION NUMBER 000265421
(c) City, State and ZIP Code Pittsburgh, PA 15237	4. IS THIS STATEMENT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Ron Klink	Candidate Party Affiliation Democrat	Office Sought Congress	State/District PA 4TH
---------------------------------------	--	----------------------------------	---------------------------------

- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

- Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

<small>Full Name</small>	<small>Mailing Address</small>	<small>Title or Position</small>
Janice Kozey	7410 Brighton Road Pittsburgh, PA 15202	Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

<small>Full Name</small>	<small>Mailing Address</small>	<small>Title or Position</small>
Janice Kozey	Same as # 7	
Jeanne Brimmeier	141 Renfer Street Pittsburgh, PA 15237	Assistant Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

<small>Name of Bank, Depository, etc.</small>	<small>Mailing Address and ZIP Code</small>
P.N.C. Bank	Fifth Avenue & Wood Street Pittsburgh, PA 15265

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

TYPE OR PRINT NAME OF TREASURER JANICE KOZEY	SIGNATURE OF TREASURER 	DATE 6/10/93
--	----------------------------	------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

	For further information contact: Federal Election Commission Toll-free 800-424-9530 Local 202-376-3120
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FEC FORM 1
(revised 4/87)

5043633663

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) RON KLINK FOR CONGRESS	Report Covering the Period:	
	From: 2/28/92	To: 4/08/92
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	\$ 2,221.00	
(ii) Unitemized	4,875.00	
(iii) Total of contributions from individuals	7,096.00	\$ 7,096.00
(b) Political Party Committees	NONE	NONE
(c) Other Political Committees (such as PACs)	1,000.00	1,000.00
(d) The Candidate	NONE	NONE
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	8,096.00	8,096.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	NONE	NONE
13. LOANS:		
(a) Made or Guaranteed by the Candidate	58,180.33	58,180.33
(b) All Other Loans	NONE	NONE
(c) TOTAL LOANS (add 13(a) and (b))	58,180.33	58,180.33
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	NONE	NONE
15. OTHER RECEIPTS (Dividends, Interest, etc.)	NONE	NONE
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	66,276.33	66,276.33
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	37,867.33	37,867.33
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	NONE	NONE
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	25,000.00	25,000.00
(b) Of All Other Loans	NONE	NONE
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	25,000.00	25,000.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	NONE	NONE
(b) Political Party Committees	NONE	NONE
(c) Other Political Committees (such as PACs)	NONE	NONE
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	NONE	NONE
21. OTHER DISBURSEMENTS	NONE	NONE
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	62,867.33	62,867.33
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ NONE	
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 66,276.33	
25. SUBTOTAL (add Line 23 and Line 24)	\$ 66,276.33	
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 62,867.33	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 3,409.00	

5043633665

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the listed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11.(a)(11)

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

NAME OF COMMITTEE (in Full)

ROW KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
38 Individual Contributions of \$200 or less. Unitemized.			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		\$ 4,875.00
	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		

5043633666

SUBTOTAL of Receipts This Page (optional)	\$ 4,875.00
TOTAL This Period (last page this line number only)	\$ 4,875.00

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 (in Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Michael Vucish 28 Brenda Avenue Jeannette, PA 15644	MVI Precision Company President	4/08/92	\$ 600.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 600.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ned Nakles, Sr. 1714 Lincoln Avenue Latrobe, PA 15650	Self-Employed Attorney	4/07/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 300.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frank Trigona 521 Clay Avenue Jeannette, PA 15644	Rufus, Inc. Owner	4/08/92	321.00 (In-Kind)
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 421.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ron Bruno Greentree Road Pittsburgh, PA 15220	The Video House Videographer	4/06/92	1,000.00 (In-Kind)
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

5043633667

SUBTOTAL of Receipts This Page (optional)	\$2,221.00
TOTAL This Period (last page this line number only)	\$2,221.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the stated Summary Page

PAUC 1 1
FOR LINE NUMBER 11.(c)

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NAME OF COMMITTEE (in Full)
RON KLING FOR CONGRESS

5043633668

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Kirkpatrick & Lockhart PAC 1500 Oliver Building Pittsburgh, PA 15222		3/30/92	\$1,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)	\$1,000.00
TOTAL This Period (last page this line number only)	\$1,000.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the listed Summary Page

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NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer Candidate	Date (month, day, year)	Amount of Each Receipt this Period
Ron Klink 226 Connor Drive Jeannette, PA 15644		2/28/92	\$ 5,000.00
	Occupation	4/02/92	\$ 3,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 33,180.33		4/06/92
Pittsburgh National Bank Jeannette, PA 15644		3/04/92	\$25,000.00
	Occupation		
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 25,000.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

5043633669

SUBTOTAL of Receipts This Page (optional)	\$58,180.33
TOTAL This Period (last page this line number only)	\$58,180.33

SCHEDULE B

ITEMS OF DISBURSEMENTS

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

5043633670

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cellular One 2630 Liberty Avenue Pittsburgh, PA 15222	Telephone Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/06/92	307.40
DeNunzio's Restaurant 600 Lowery Avenue Jeannette, PA 15644	Catering Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/09/92	255.08
Days Inn 300 Tarentum Bridge Road New Kensington, PA 15068	Catering Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/10/92	316.29
Dennis M. Casey Company 1060 McKenna Avenue Pittsburgh, PA 15205	Research Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/10/92	219.00
Lamplighter Restaurant 330 Route 22 Delmont, PA 15026	Catering Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/10/92	605.00
Bell of Pennsylvania 1500 Tech Center Drive Monroeville, PA 15146-3065	Telephone Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/11/92 4/02/92	1,275.00 109.15
Bell of Pennsylvania 1500 Tech Center Drive Monroeville, PA 15146	Telephone Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/02/92	501.67
Dennis M. Casey Company 1060 McKenna Avenue Pittsburgh, PA 15205	Payment for Consulting Services Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/06/92	10000.00
Dennis M. Casey Company 1060 McKenna Avenue Pittsburgh, PA 15205	Purchase of FAX Machine Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/12/92	497.00

SUBTOTAL of Disbursements This Page (optional) \$14,085.59

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

504363367

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Transportation Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/12/92	\$1,615.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AT & T Universal Post Office Box 9999 Columbus, GA 31997	Telephone Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/16/92	1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Commercial Printing 310 Beaver Street Greensburg, PA 15601	Printing Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/17/92	222.60
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pittsburgh National Bank Jeannette, PA 15644	Wired Filing Fee Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/18/92	152.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
United States Postal Service Jeannette, PA 15644	Postage Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/20/92	150.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ADAmerica American Senior Magazine Ligonier, PA 15658	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/20/92	425.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Photograph Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/20/92	809.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ron Klink for Congress Committee 107 South Second Street Jeannette, PA 15644	Petty Cash (Postage, Meals, Transp) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/10/92	300.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Kaylor Displays Greensburg, PA 15601	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/20/92	1,500.00

SUBTOTAL of Disbursements This Page (optional) \$6,173.60

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEM D DISBURSEMENTS

This separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/24/92 3/24/92	\$ 764.75 1000.00
Ron Klink for Congress Committee 107 South Second Street Jeannette, PA 15644	Petty Cash Meals, Transportation & Postage Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/20/92	1,000.00
ADs, Inc. Post Office Box 82538 Pittsburgh, PA 15218	Advertising Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/25/92	725.44
Allegheny County Democratic Club 401 Wood Street Pittsburgh, PA 15222	Contribution (Election Support)		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/31/92	500.00
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3/26/92 3/27/92	975.00 523.53
Raff Printing 70 Allen Street Pittsburgh, PA 15201	Printing Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/01/92	1,779.74
Busy Beaver Irwin, PA 15642	Advertising Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/02/92	625.40
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/01/92	6,415.00
Mr. Frank Trigona 521 Clay Avenue Jeannette, PA 15644	Office Space (In-Kind)		
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/08/92	321.00

SUBTOTAL of Disbursements This Page (optional) \$14,729.86

TOTAL This Period (last page this line number only)

5043633672

SCHEDULE B

ITEMIZED DISBURSEMENTS

a separate schedule(s)
for each category of the
Detailed Summary Page

PAGE OF
4 1 4
FOR LINE NUMBER
17.

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ron Bruno Greentree Road Pittsburgh, PA 15220	Video Services (In-Kind) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/06/92	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Unitized Disbursements of \$200 or less per item.	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		1,697.95
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pittsburgh National Bank Jeannette, PA 15644	Interest on Loan Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/06/92	180.33
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

5043633673

SUBTOTAL of Disbursements This Page (optional) 2,878.28

TOTAL This Period (last page this line number only) \$37,867.28

SCHEDULE B

ITEM DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ron Klink 226 Connor Drive Jeannette, PA 15644	Purpose of Disbursement Loan Repayment Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/06/92	\$25,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

5043633674

SUBTOTAL of Disbursements This Page (optional)	\$25,000.00
TOTAL This Period (last page this line number only)	\$25,000.00

Name of Committee (in Full) RON KLINK FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Pittsburgh National Bank Jeannette, PA 15644	\$25,000.00	\$25,000.00	NONE
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred <u>3/04/92</u> Date Due _____ Interest Rate <u>8</u> % (apr) <input checked="" type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Candidate	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Ron Klink 226 Connor Drive Jeannette, PA 15644	\$ 5,000.00 3,000.00 25,180.33	NONE NONE NONE	\$ 5,000.00 3,000.00 25,180.33
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code Personal Funds	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			\$33,180.33
TOTALS This Period (last page in this line only)			\$33,180.33
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

5043633675

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Commitment (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payments This Period	Outstanding Balance at Close of This Period
RON KLINK FOR CONGRESS				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	NONE	\$30,000.00	\$10,000.00	\$20,000.00
Nature of Debt (Purpose): Consulting Fee Expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor AT&T Universal Card Post Office Box 9999 Columbus, GA 31997	NONE	6,654.07	1,000.00	5,564.07
Nature of Debt (Purpose): Travel, Gas, Meals Expense				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Cellular One 2630 Liberty Avenue Pittsburgh, PA 15222	NONE	1,939.94	307.40	1,632.54
Nature of Debt (Purpose): Telephone Expense				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				\$27,286.61
2) TOTAL This Period (last page this line only)				27,286.61
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				33,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				60,286.61

5043633676

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) RON KLINK FOR CONGRESS		2. FEC IDENTIFICATION NUMBER 000265421
ADDRESS (number and street) <input checked="" type="checkbox"/> Check if different than previously reported. 226 Connor Drive		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE Jeannette, Pennsylvania 15644	STATE/DISTRICT PA/Fourth	

4. TYPE OF REPORT

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

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>4/08/92</u> through <u>6/30/92</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	\$34,535.00	\$ 42,631.00
(b) Total Contribution Refunds (from Line 20(d))	NONE	NONE
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	\$34,535.00	\$ 42,631.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	\$62,583.66	\$100,450.66
(b) Total Offsets to Operating Expenditures (from Line 14)	NONE	NONE
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	\$62,583.66	\$100,450.66
8. Cash on Hand at Close of Reporting Period (from Line 27)	\$ 3,639.08	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$81,264.38	

For further information contact:
Federal Election Commission
988 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-378-3120

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

Type or Print Name of Treasurer JANICE KOZEY	Date
Signature of Treasurer 	6/10/93

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

5043633677

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)	Report Covering the Period:	
RON KLINK FOR CONGRESS	From: 4/08/92	To: 6/30/92
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	\$ 5,623.00	
(ii) Unitemized	12,977.00	
(iii) Total of contributions from individuals	18,600.00	\$ 25,696.00
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	15,935.00	16,935.00
(d) The Candidate	NONE	NONE
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	34,535.00	42,631.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	NONE	NONE
13. LOANS:		
(a) Made or Guaranteed by the Candidate	28,278.98	86,459.31
(b) All Other Loans	NONE	NONE
(c) TOTAL LOANS (add 13(a) and (b))	28,278.98	86,459.31
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	NONE	NONE
15. OTHER RECEIPTS (Dividends, interest, etc.)	NONE	NONE
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	62,813.98	129,090.31
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	62,583.66	100,450.99
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	NONE	NONE
19. LOAN REPAYMENTS.		
(a) Of Loans Made or Guaranteed by the Candidate	NONE	25,000.00
(b) Of All Other Loans	NONE	NONE
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	NONE	25,000.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	NONE	NONE
(b) Political Party Committees	NONE	NONE
(c) Other Political Committees (such as PACs)	NONE	NONE
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	NONE	NONE
21. OTHER DISBURSEMENTS	NONE	NONE
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	62,583.66	125,450.99
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 3,409	
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 62,814	
25. SUBTOTAL (add Line 23 and Line 24)	\$ 66,223	
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 62,584	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 3,639	

5043633678

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the detailed Summary Page

PAGE 1 OF 3
FOR LINE NUMBER 11.(a)(1)

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 contributors.

NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Edward J. Lewis 4500 One Oxford Centre Pittsburgh, PA 15219	Oxford Development Corporation	4/28/92	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman		Aggregate Year-to-Date > \$ 250.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jayne Friedman 204 Litman Road Butler, PA 16005	Friedman's Market	4/27/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner		Aggregate Year-to-Date > \$ 900.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Marge Iasrappino 400 West Cunningham Street Butler, PA 16001	Self-Employed	4/27/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date > \$ 300.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Henry Fisher 6473 Kipling Road Pittsburgh, PA 15217	Self-Employed	6/22/92	240.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Bond Broker		Aggregate Year-to-Date > \$ 240.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Patrick Copple 1135 Wilmington Road New Castle, PA 16101	Patron Distributors	6/15/92	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner		Aggregate Year-to-Date > \$ 300.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Paul Lynch 2625 Wilmington Road New Castle, PA 16107	Self-Employed	4/13/92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Accountant		Aggregate Year-to-Date > \$ 500.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Charles Cohen CNG Tower Pittsburgh, PA 15222	Self-Employed	4/20/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney		Aggregate Year-to-Date > \$ 300.00

5043633679

SUBTOTAL of Receipts This Page (optional) \$ 2,090.00
TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

5043633680

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Donald Glenn 14940 Route 30 North Huntingdon, PA 15642	Glenn Engineering	4/21/92	\$ 300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Engineer/Owner		
	Aggregate Year-to-Date > \$ 300.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
George Kehm Post Office Box 130 Oakdale, PA 15071	Kehm Oil Company	4/22/92	100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner		
	Aggregate Year-to-Date > \$ 220.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Irving Bloom 800 Whitestown Road Butler, PA 16229	Self-Employed	4/23/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney		
	Aggregate Year-to-Date > \$ 300.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gregory Guise 1323 Carlsbad Drive Gaithersburg, MD 20879	WUSA-TV	4/23/92	200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation CAMERAMAN		
	Aggregate Year-to-Date > \$ 250.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Louis Schwartz 367 Lehigh Avenue Pittsburgh, PA 15232	Self-Employed	4/23/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney		
	Aggregate Year-to-Date > \$ 300.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
E. Jayne Friedman 204 Litman Road Butler, PA 16005	Friedman's Market	4/23/92	600.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner		
	Aggregate Year-to-Date > \$ 600.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bruce Buerkle 214 Sheldon Avenue Pittsburgh, PA 15220	Information Requested	4/24/92	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$ 300.00		

SUBTOTAL of Receipts This Page (optional)	\$ 2,100.00
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the stated Summary Page

PAGE 3 OF 3
FOR LINE NUMBER 11.(a)(1)

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

NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code

William Kozakiewicz
Summit View Drive
Jeannette, PA 15644

Name of Employer

Self-Employed

Date (month, day, year)

6/08/92

Amount of Each Receipt this Period

500.00

Receipt For: Primary General
 Other (specify):

Occupation
Trucking Co. Owner

Aggregate Year-to-Date > \$ 500.00

B. Full Name, Mailing Address and ZIP Code

Frank Trigona
521 Clay Avenue
Jeannette, PA 15222

Name of Employer

Rufus, Inc.

Date (month, day, year)

4/28/92

Amount of Each Receipt this Period

166.00
(In-Kind)

Receipt For: Primary General
 Other (specify):

Occupation
Owner

Aggregate Year-to-Date > \$ 587.00

C. Full Name, Mailing Address and ZIP Code

Frank Trigona
521 Clay Avenue
Jeannette, PA 15222

Name of Employer

Rufus, Inc.

Date (month, day, year)

6/30/92

Amount of Each Receipt this Period

767.00
(In-Kind)

Receipt For: Primary General
 Other (specify):

Occupation
Owner

Aggregate Year-to-Date > \$ 1,354.00

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional) \$ 1,433.00

TOTAL This Period (last page this line number only) \$ 5,623.00

5043633681

SCHEDULE A

UNITIZED RECEIPTS

Use separate schedule(s) for each category of the detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER

11.(A)(11)

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

NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code Unitemized Contributions of \$200 or less per item. Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period \$12,977.00
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

5043633682

SUBTOTAL of Receipts This Page (optional)	\$12,977.00
TOTAL This Period (last page this line number only)	\$12,977.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the stated Summary Page

PAGE 1 OF 2

FOR LINE NUMBER 11.(c)

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

NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

5043633683

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
House Leadership Fund 9600 River Road Potomac, MD 20854		5/04/92	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Laborers' Political League 905 - 16th Street, N.W. Washington, D.C. 20006		6/26/92	1,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
United Association Political Education Committee 901 Massachusetts Avenue, N.W. Washington, D.C. 20001		6/26/92	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
P.R.A.R.A. - P.A.C. 166 Curry Hollow Road Pittsburgh, PA 15236		6/26/92	60.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 60.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
United Steelworkers P.A.C. 390 Ohio River Boulevard Baden, PA 15005		6/12/92	2,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
United Steelworkers P.A.C. 390 Ohio River Boulevard Baden, PA 15005		6/12/92	2,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Transport Workers Union 60 West End Avenue New York, New York 10023		4/27/92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	

SUBTOTAL of Receipts This Page (optional)

\$10,060

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 2 OF 2

FOR LINE NUMBER 11.(c)

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

NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code

PNB VolPAC
Pittsburgh National Building
Fifth & Wood Streets
Pittsburgh, PA 15222

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

4/24/92 \$ 300.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 300.00

B. Full Name, Mailing Address and ZIP Code

I.U.E. - PAC
1126 - 16th Street, N.W.
Washington, D.C. 20036

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

6/24/92 5,000.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

C. Full Name, Mailing Address and ZIP Code

Township Association of Business
PAC
Irwin, PA 15642

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

4/16/92 300.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 300.00

D. Full Name, Mailing Address and ZIP Code

Murtha for Re-Election Committee
403 Fisher Building
Johnstown, PA 15901

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

6/23/92 50.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 50.00

E. Full Name, Mailing Address and ZIP Code

Elect Jeffrey Pavetti Committee
Box 853
Greensburg, PA 15601

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

4/10/92 100.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 100.00

F. Full Name, Mailing Address and ZIP Code

Commissioner Simon Campaign
Post Office Box 641
Greensburg, PA 15601

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

4/27/92 100.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 100.00

G. Full Name, Mailing Address and ZIP Code

Democratic Club of Westmoreland
County
Post Office Box 1102
Greensburg, PA 15601

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

6/30/92 25.00

Occupation

Receipt For: Primary General
 Other (specify):

Aggregate Year-to-Date > \$ 25.00

SUBTOTAL of Receipts This Page (optional)

\$5,875.00

TOTAL This Period (last page this line number only)

\$15,935.00

5043633684

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the attached Summary Page

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NAME OF COMMITTEE (in Full)

RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ron Klink 226 Connor Drive Jeannette, PA 15644	Candidate	4/13/92	\$18,540.98
		4/24/92	1,500.00
	Occupation	4/24/92	4,673.00
		4/25/92	100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 57,994.31		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ron Klink 226 Connor Drive Jeannette, PA 15644	Candidate	5/01/92	\$ 2,475.00
	Occupation	6/05/92	990.00
	Aggregate Year-to-Date > \$ 61,459.31		
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)	\$28,278.98
TOTAL This Period (last page this line number only)	\$28,278.98

5043633685

SCHEDULE B

ITEM D DISBURSEMENTS

(If separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (In Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/09/92	\$ 5,336.00
Chesterfield's Restaurant 12119 Route 30 No. Huntingdon, PA 15642	Catering Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/09/92	2,478.09
Raff Printing 70 Allen Street Pittsburgh, PA 15210	Printing Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/09/92 4/16/92	3,367.62 727.16
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/10/92	5,700.00
Kaylor Display 820 Sydney Street Greensburg, PA 15601	Printing Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/10/92	1,975.74
ADs, Inc. Post Office Box 82538 Pittsburgh, PA 15218	Printing Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/14/92	2,602.24
Journal Printing 18 Lincoln Highway Jeannette, PA 15644	Printing Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/20/92	267.12
KDKA-TV/Radio One Gateway Center Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/21/92	4,000.00
Dennis Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/23/92	1,200.00

SUBTOTAL of Disbursements This Page (optional) \$27,653.97

TOTAL This Period (last page this line number only)

5043633686

SCHEDULE B

ITEMS DISBURSEMENTS

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

5043633687

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Metrobase Cable Plum, Pennsylvania 15239	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/22/92	\$ 675.00
B. Full Name, Mailing Address and ZIP Code WTAE-TV/Radio 400 Ardmore Boulevard Pittsburgh, PA 15221	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/23/92	3,357.70
C. Full Name, Mailing Address and ZIP Code United States Postal Service Jeannette, PA 15644	Postage Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/23/92	105.85
D. Full Name, Mailing Address and ZIP Code Westmoreland Democratic Club Greensburg, PA 15601	Donation Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/24/92	2,000.00
E. Full Name, Mailing Address and ZIP Code Journal Printing 18 Lincoln Highway Jeannette, PA 15644	Printing Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/01/92	320.12
F. Full Name, Mailing Address and ZIP Code Four Seasons Travel Parkway Center Pittsburgh, PA 15205	Candidate's Transportation Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/06/92	780.00
G. Full Name, Mailing Address and ZIP Code Circleville Volunteer Fire Company No. Huntingdon, PA 15642	Rental Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/08/92	505.00
H. Full Name, Mailing Address and ZIP Code Political Cross-Roads Gateway Center Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/12/92	1,000.00
I. Full Name, Mailing Address and ZIP Code Bell of Pennsylvania 1500 Tech Center Drive Monroeville, PA 15146	Telephone Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/13/92	214.54

SUBTOTAL of Disbursements This Page (optional)	\$8,958.21
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEM D DISBURSEMENTS

(See separate schedule(s) for each category of the Detailed Summary Page)

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ad America American Senior Magazine Ligonier, PA 15658	Advertising Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/20/92	\$ 400.00
B. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Transportation Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/20/92	780.00
C. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Primary Election Consulting Fee Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/18/92	1,000.00
D. Full Name, Mailing Address and ZIP Code WBVP Radio 1316 Seventh Avenue Beaver Falls, PA 15010	Advertising Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/18/92	1,065.00
E. Full Name, Mailing Address and ZIP Code Renee Vid 16 Hoop Lane Greensburg, PA 16601	Travel Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/19/92	1,000.00
F. Full Name, Mailing Address and ZIP Code Ron Klink 107 So. Second Street Jeannette, PA 15644	Travel Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/23/92	600.00
G. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Primary Election Consulting Services Fee Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/26/92	850.00
H. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Primary Election Consulting Services Fee Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/26/92	5,000.00
I. Full Name, Mailing Address and ZIP Code Renee Vid 16 Hoop Lane Greensburg, PA 15644	Meal, Travel Expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/30/92	1,000.00

SUBTOTAL of Disbursements This Page (optional) \$11,695.00

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEM DISBURSEMENTS

Separate schedule(s) for each category of the Detailed Summary Page

PAGE 4 OF 5
FOR LINE NUMBER 17.

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NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cellular One 2630 Liberty Avenue Pittsburgh, PA 15222	Telephone Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/30/92	\$1,632.00
B. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Primary Election Consulting Services Fee Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/30/92	2,300.00
C. Full Name, Mailing Address and ZIP Code Ron Klink 107 South Second Street Jeannette, PA 15644	Purpose of Disbursement (Wash., D.C.) Meals, lodging, & Transportation Expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/22/92	1,500.00
D. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/24/92	1,500.00
E. Full Name, Mailing Address and ZIP Code Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	Advertising Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2/24/92	4,673.00
F. Full Name, Mailing Address and ZIP Code Frank Trigona 521 Clay Avenue Jeannette, PA	Office Space (In-Kind) Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/29/92	166.00
G. Full Name, Mailing Address and ZIP Code Frank Trigona 521 Clay Avenue Jeannette, PA 15222	Office Space (In-Kind) Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/30/92	767.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

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SUBTOTAL of Disbursements This Page (optional)	\$ 12,538.00
TOTAL This Period (last page this line number only)	

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

NAME OF COMMITTEE (in Full)
RON KLINK FOR CONGRESS

5043633690

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Unitemized Disbursements of \$200 or less per item.	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		\$ 1,738.48
	<input type="checkbox"/> Other (specify)		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	\$ 1,738.48
TOTAL This Period (last page this line number only)	\$ 62,583.66

Name of Committee (in Full) RON KLINK FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Ron Klink 226 Connor Drive Jeannette, PA 15644 Station: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$24,813.98	NONE	\$24,813.98
Terms: Date Invoiced _____ Date Due _____ Interest Rate _____ % (year) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Candidate's Personal Funds	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Ron Klink 226 Connor Drive Jeannette, PA 15644 Station: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	\$ 3,465.00	NONE	\$ 3,465.00
Terms: Date Invoiced _____ Date Due _____ Interest Rate _____ % (year) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code Candidate's Personal Funds	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			\$28,278.98
TOTALS This Period (last page in this line only)			\$28,278.98
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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Name of Committee (in Full) RON KLINK			
A. Full Name, Mailing Address and ZIP Code of Loan Source Ron Klink 226 Connor Drive Jeannette, PA 15644 Station: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Original Amount of Loan \$33,180.33	Cumulative Payments To Date NONE	Balance Outstanding at Close of This Period \$33,180.33
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Candidate's Personal Funds (Previously Reported)	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source Station: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
RON KLINK FOR CONGRESS				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Cellular One 2630 Liberty Avenue Pittsburgh, PA 15222	\$ 1,632.54	2,082.25	1,632.54	\$ 2,082.25
Nature of Debt (Purpose): Telephone Expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
AT&T Universal Card 2630 Liberty Avenue Pittsburgh, PA 15222	5,654.07	1,399.08	-0-	7,053.15
Nature of Debt (Purpose): Travel, Meals, Lodging Expenses				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Dennis M. Casey Company Five Gateway Center, #601 Pittsburgh, PA 15222	20,000.00	-0-	9,150.00	10,850.00
Nature of Debt (Purpose): Consulting Fee				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				\$19,985.40
2) TOTAL This Period (last page this line only)				19,985.40
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				61,459.31
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				81,444.71

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 6, 1993

Judith L. Corley, Esq.
Perkins Cole
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MURs 3505, 3560,
and 3569

Dear Ms. Corley:

Attached to your letter dated June 16, 1993 was the Klink Committee's ("the Committee") amended statement of organization, an amended 1992 Pre-Primary Report, and an amended 1992 July Quarterly Report. In your letter, you stated that the Committee would appreciate the guidance of the Commission as to the appropriate time for filing the amendments. You also stated that the Committee does not wish to waive confidentiality of this matter while it is pending before the Commission. You further requested that the Commission verify that the amendments address all of the reporting issues raised in the complaints.

Pursuant to our conversation of June 18, 1993, the Committee will not waive its confidentiality in MURs 3505, 3560, and 3569 by merely filing an amended statement of organization, an amended 1992 Pre-Primary Report, and an amended 1992 July Quarterly Report.

With regard to your second concern, once the amendments are filed, the Reports Analysis Division can review them. Then, we can let you know of any other revisions that will need to be made.

If you have any questions, please contact me.

Sincerely,

Joi L. Roberson
Joi L. Roberson
Attorney

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION 9 31 AM '95

In the matter of)

Citizens for Ron Klink)
et al.)

) MUR 3505
) MUR 3560¹
) MUR 3569¹
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

MUR 3505 was generated by a complaint filed by Gerald Weaver. Subsequently, Mr. Weaver requested the withdrawal of his complaint. This Office notified Mr. Weaver, however, that the Commission may review allegations contained in a complaint despite the complainant's request to withdraw it. On August 4, 1992, the Federal Election Commission (the "Commission") made the following determinations in MUR 3505: (1) there is reason to believe that Ron Klink for Congress Committee and Paul Lynch, Jr., as treasurer, ("the Klink Committee" or "Respondents") violated 2 U.S.C. §§ 433(a), 441a(f), and 441b(a); (2) there is no reason to believe the Klink Committee and its treasurer violated 2 U.S.C. § 434(a)(1); (3) there is reason to believe that Ron Klink violated 2 U.S.C. §§ 432(e)(1) and 441b(a); (4) there is reason to believe that Linda Klink violated 2 U.S.C. § 441a(a)(1)(A); and (5) there is reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a).

1. This report contains "NRA" recommendations concerning MUR 3505 and will serve as the First General Counsel's Report for MURs 3560 and 3569.

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This report contains recommendations to assure that MUR 3505 conforms to the court's opinion in FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), cert. dismissed for want of jurisdiction, 63 U.S.L.W. 4027 (U.S. Dec. 6, 1994) (No. 93-1151) ("NRA"). This report also examines Westinghouse's response submitted after the reason to believe finding in MUR 3505 and, based upon this additional information, recommends that the Commission find no reason to believe Westinghouse, the Klink Committee, and Ron Klink violated 2 U.S.C. § 441b(a). In addition, this report reviews the complaints and responses in MURs 3560 and 3569 and recommends that the Commission make additional reason to believe findings against the Respondents. We also recommend that the Commission merge MURs 3560 and 3569 into MUR 3505. Finally, as discussed below, in light of the limited nature of the violations; the fact that the Klink Committee has amended its reports; and the inexperience of the Committee in its first election cycle, we recommend that the Commission take no further action as to all violations and close the file in this matter.

II. RECOMMENDED ACTIONS IN LIGHT OF FEC v. NRA

Based upon the complaint and responses filed in MUR 3505, and consistent with the Commission's November 9, 1993, decisions concerning compliance with the NRA opinion, this Office recommends that the Commission revoke the determinations to: (1) find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as

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treasurer,² violated 2 U.S.C. § 433(a); (2) find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 434(a)(1); and (3) find reason to believe that Representative Ron Klink violated 2 U.S.C. § 432(e)(1). This Office further recommends that the Commission approve the attached Factual and Legal Analyses, which have been revised to reflect only these findings in MUR 3505 revoted upon by the Commission.³ Because of the Committee's inexperience during the 1992 election cycle and because the required documents were filed (one document was two weeks late and the other, a month late), this Office recommends that the Commission take no further action as to these violations. For the convenience of the Commission, this Office has attached the certification in this matter dated August 5, 1992. (Attachment 6.)

III. FACTUAL AND LEGAL ANALYSIS

In all three matters, Complainants⁴ allege that during the 1992 election cycle Respondents made numerous reporting errors and received excessive and prohibited contributions. For example, all

2. On June 21, 1993, the Klink Committee filed an amended Statement of Organization. The Committee changed its name from Ron Klink for Congress Committee to Citizens for Ron Klink. Also, on March 24, 1994, the Committee filed an amended Statement of Organization which designated Jeanne Brimmeier as the new treasurer.

3. Upon approval of our other recommendations, we will send a redacted copy of the General Counsel's Report to Respondents.

4. Subsequent to Mr. Weaver's complaint in MUR 3505, Ann Hoskin, Janet Jackson, Joan Lanctot, and Gordon Johnston filed complaints against the Klink Committee, which form the bases of MURs 3560 and 3569. (Thomas Cole, Executive Director of the National Republican Congressional Committee, joined the complaint in MUR 3569.)

three matters allege that Citizens for Ron Klink and its treasurer filed inaccurate reports for the same reporting periods -- the 1992 Pre-Primary, the April Quarterly, and the July Quarterly Reports. These matters also involve the same misreporting and excessive contribution issues allegedly arising from loans the Klinks made to the Committee. These matters also similarly allege that Citizens for Ron Klink and its treasurer received prohibited contributions.

Because the issues raised in the complaints overlap, Respondents submitted one response and requested that the Commission merge these matters. (Attachment 1.) This Office concurs with Respondents' request because merger will facilitate a uniform resolution of these matters. Accordingly, this Office recommends that the Commission merge MURs 3560 and 3569 into MUR 3505, and hereafter refer to this matter as MUR 3505. Finally, because of the overlapping issues, this report discusses the allegations without distinguishing between the different complaints.

A. Failure to File Accurate Reports

1. Statement of Organization, 1992 Pre-Primary, and 1992 Quarterly Reports

The Federal Election Campaign Act of 1971, as amended, (the "Act") states that a "principal campaign committee" is a political committee designated and authorized by a candidate pursuant to 2 U.S.C. § 432(e)(1). 2 U.S.C. § 431(5). An "authorized committee" is a principal campaign committee or any other political committee authorized by a candidate under section

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432(e)(1) of the Act to receive contributions or make expenditures on behalf of the candidate. 2 U.S.C. § 431(6).

Principal campaign committees are required to file a statement of organization no later than 10 days after designation pursuant to Section 432(e)(1). 2 U.S.C. § 433(a). The statement of organization must include, inter alia, the committee's name, address, type, and the name and address of its treasurer. 2 U.S.C. § 433(b).

The Act and Commission regulations require a committee's treasurer to file complete and accurate reports of receipts and disbursements on the appropriate forms. 2 U.S.C. § 434(a) and 11 C.F.R. § 104.14(d). In particular, a committee's treasurer must file quarterly reports no later than the 15th day after the last day of each quarter. 2 U.S.C. § 434(a)(2)(A)(iii). A committee must also file a pre-primary report no later than the 12th day before the primary, which must be complete as of the 20th day before the primary. 2 U.S.C. § 434(a)(2)(A)(i).

Complainants allege that Respondents failed to file their 1992 April Quarterly Report and filed inaccurate 1992 Pre-Primary and 1992 July Quarterly Reports, and an inaccurate Statement of Organization. Respondents apparently filed one report, which combined both the 1992 April Quarterly and 1992 Pre-Primary reporting periods. The combined report covered the period of March 7 through April 13, 1992. As separate reports, the 1992 April Quarterly Report covered the reporting period of January 1 through March 31, 1992; the 1992 Pre-Primary Report covered the period of April 1 through April 8, 1992. Similarly, Respondents'

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1992 July Quarterly Report was allegedly inaccurate because it covered the period of April 14 through July 6, 1992 -- not April 9 through June 30, 1992. Finally, Respondents' Statement of Organization was incorrect because the Klink Committee checked all three boxes on the form indicating that it was "a principal campaign committee"; "an authorized committee--not a principal campaign committee"; and "a committee supporting only one candidate, but not an authorized committee."

Respondents do not dispute that they filed inaccurate reports. Respondents explain that the errors were caused by Mr. Klink's late entry into the primary process; the fact that the Committee was "small and under-staffed"; and the inexperience of the campaign's staff. (Attachment 2, at 3.) "The Committee felt it was better to submit what information it did have available for the public record, with the understanding that the reports would be amended, as needed." (Id.) In fact, on June 16, 1993, Respondents did file an amended Statement of Organization, 1992 Pre-Primary Report, and 1992 July Quarterly Report.⁵ (Attachment 4.)

Our review of the Respondents' reports confirms that their 1992 April and July Quarterly Reports were inaccurate because the

5. Respondents submitted the amended reports to this Office along with a request for guidance as to the appropriate time for filing the amendments. Respondents requested that the Commission verify that the amendments addressed all of the reporting issues. Respondents also questioned whether their filing of the amendments would waive confidentiality in these matters. (See Attachment 4, at 1.) This Office notified Respondents that the Reports Analysis Division could review the amendments once they were filed. (Attachment 5.)

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reports failed to cover the required reporting periods, and their Statement of Organization was inaccurate, as alleged. We also found that Respondents failed to file their 1992 Pre-Primary Report, but the information for that period was included on their combined report that was filed.⁶ Respondents have now amended all of these reports to cover the required reporting periods and amended their Statement of Organization. Because there is no dispute that these violations occurred, this Office recommends that the Commission find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C §§ 433(b), 434(a)(2)(A)(i), and 434(a)(2)(A)(iii).

2. Year-to-Date Totals

For each reporting period and calendar year, authorized political committees are required to disclose the total amount of all receipts and the total amount of all receipts by certain specific categories. 2 U.S.C. § 434(b)(2) and 11 C.F.R. § 104.3(a)(3).

Complainants allege that Respondents failed to include year-to-date totals by category on their 1992 Pre-Primary Report Schedule A, Summary Page, Detailed Summary Page and on their 1992 July Quarterly Report.⁷ Respondents do not dispute

6. Respondents' combined report was dated April 13, 1992, and both boxes were checked indicating that it was Respondents' April Quarterly and Pre-Primary Report.

7. Complainants also allege that the Detailed Summary Page of Respondents' Pre-Primary Report indicates total receipts of \$7,480 while the individual entries on Schedule A total \$7,580. This Office's review of the 1992 Pre-Primary Report Schedule A found no such discrepancy.

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that they failed to include this information in their reports but, as discussed above, they assert that these reporting errors were caused by the inexperience of their campaign staff. (See Attachment 2.)

A review of these reports confirms that Respondents failed to include year-to-date totals on their 1992 Pre-Primary and 1992 July Quarterly Reports. Respondents have since amended their reports to include this information. Based on the foregoing, this Office recommends that the Commission find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C § 434(b)(2)(A).

3. Individual Contributor and Disbursement Information

An authorized political committee must report the name, address, and employer of each person who makes a contribution during the reporting period, whose contribution or contributions aggregate in excess of \$200 per calendar year, and the date of receipt and amount of the contributions. 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4). An authorized political committee must also report the total amount of all disbursements for the reporting period and calendar year. 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3(b). Further, if the committee makes expenditures for operating expenses to a person during a calendar year, which expenditures have an aggregate value greater than \$200, then the committee must report the name and address of the person

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along with the date, amount, and purpose of the expenditures.
2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4(i)).

A political committee's treasurer must use best efforts to obtain, maintain and submit information required by the Act and must keep a record of such efforts. 11 C.F.R. §§ 102.9(d) and 104.7(a). In order to demonstrate that best efforts have been made, a treasurer must make at least one written or oral request for required information.⁸ 11 C.F.R. § 104.7(b). If a committee demonstrates that best efforts were made, the committee's reports will be deemed to be in compliance with the Act. 11 C.F.R. § 104.7(a).

Complainants allege that Respondents failed to identify their contributors' employers for all contributions on their 1992 Pre-Primary Report and for a significant number of contributors on their 1992 July Quarterly Report. Complainants also allege that Respondents failed to provide complete addresses for several contributors and that they listed disbursements by category and not by entity.

Respondents do not deny that they did not provide employer information and addresses for all contributors. Instead, Respondents argue that the complaint "makes much of the fact that no occupation or employer is listed from many of the contributors. What it fails to note is that the majority of the contributions listed on the reports are \$200 or less, for

8. The activity in these matters occurred during the 1992 election cycle, prior to the effective date of the Commission's revised rules regarding "best efforts."

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which this information is not required." (Attachment 2, at 4.) Respondents further contend that they utilized "best efforts to obtain the information not available at the time the report was filed and will submit all available information in its amendments." (Attachment 2, at 4.)

Based on this Office's review of Respondents' reports, it appears that many of the contributions did, in fact, total less than \$200 and, thus, the "missing" contributor information was not required. 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4). However, on each of these reports, complete information was not reported for six contributors who contributed in excess of \$200. Further, Respondents listed several disbursements only by category, and not by entity.

Respondents argue that they used best efforts to obtain contributor information, but they did not offer documentation of their efforts as required by the regulations. See 11 C.F.R. §§ 102.9(d) and 104.7. Of more importance, however, Respondents did amend their 1992 Pre-Primary and 1992 July Quarterly Reports to include the required contributor information. Nevertheless, based upon the delay in providing complete contributor information and the misreporting of disbursements, this Office recommends that the Commission find reason to believe Citizens for Ron Klink and Jeanne Briemeier, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and 434(b)(5)(A).

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4. Contributions from Political Committees

Authorized political committees are required to disclose total contributions from other political committees for the reporting period and calendar year. 2 U.S.C. § 434(b)(2)(D). The committee must also disclose the name of the other political committee and the date and amount of any such contribution. 2 U.S.C. § 434(b)(3)(B) and see 11 C.F.R. § 104.3(a)(4)(ii).

Complainants allege that Respondents failed to specify the total amount of "other" political committee contributions on their Detailed Summary Page, Schedule A, line 11(c). Specifically, Respondents received \$1,000 from Kirkpatrick and Lockhart PAC. This amount was disclosed on Schedule A as an itemized receipt and included on the Detailed Summary Page line 11(a)(i) with contributions from individuals, but this was not reported on the Detailed Summary Page, line 11(c), as a contribution from "other political committees." Complainants further allege that Respondents failed to report on their 1992 July Quarterly Report the date they received a contribution from PNB Volpac.

Respondents do not deny complainants' allegations, but again argue, among other things, that the reporting mistakes were made because of the inexperience of the campaign's staff. This Office's review of Respondents' reports confirms that they omitted the date of PNB Volpac's contribution and reported a \$1,000 receipt from Kirkpatrick & Lockhart PAC with the individual contributions and not as a political committee

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Contribution. Respondents' amended report does correctly disclose this information on line 11(c) of the Detailed Summary Page. (Attachment 4, at 5.) Based on the foregoing, this Office recommends that the Commission find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(3)(B).

5. In-kind Contributions

An authorized political committee must report each in-kind contribution as both a contribution and as an expenditure on the appropriate schedule. 11 C.F.R. §§ 104.13, 104.3(a) and (b).

Complainants allege that Respondents' 1992 Pre-Primary Report disclosed on Schedule B a \$900 "in-kind" disbursement to Frank Trigona, but this was not balanced as an in-kind contribution on Respondents' Schedule A. Complainants further assert that Respondents' 1992 Pre-Primary Report disclosed two in-kind contributions on Schedule A, a \$100 in-kind contribution from Frank Trigona and a \$1,000 in-kind contribution from Ron Bruno, but these were not balanced by corresponding entries on Schedule B as disbursements. Respondents also did not explain the nature of these in-kind contributions.

Respondents do not contest that they inaccurately reported the in-kind contribution from Frank Trigona. (See Attachment 2.) In fact, Respondents amended Schedules A and B of their 1992 Pre-Primary Report to disclose "unitemized" contributions and disbursements of \$200 or less. (Attachment 4.)

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Presumably, Mr. Trigona's \$100 contribution fell within those unitemized contributions and disbursements. Respondents further contend that the in-kind contribution from Ron Bruno "was reported correctly." (Id. at 4.) Respondents argue that "Mr. Bruno is the owner of the business reported on the disbursements schedule and paid his business to provide the campaign with services as a contribution in-kind. The contribution was reported in the manner advised by the Office of the Clerk of the House." (Id.)

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Despite Respondents' argument to the contrary, the in-kind contribution from Ron Bruno was inaccurately reported. Specifically, Schedule A of Respondents' 1992 Pre-Primary Report discloses an in-kind contribution from an individual, Ron Bruno.⁹ However, Schedule B does not include a corresponding entry for a disbursement to Mr. Bruno. Respondents subsequently amended Schedule B of their report, in June 1993, to include a disbursement to Mr. Bruno. Based on the foregoing, this Office recommends that the Commission find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 11 C.F.R. § 104.13(a).

6. Inaccurate Reporting of Loans

Complainants allege that Respondents inaccurately reported several loans on their 1992 Pre-Primary and July Quarterly Reports and also inaccurately disclosed loans received during the 48 hour notice period.

9. Respondents also did not report Mr. Bruno's employer.

a. 1992 Pre-Primary and July Quarterly Reports

An authorized political committee must disclose the identification of each person who makes a loan during the reporting period, identify any endorser or guarantor of such loan, and report the date and amount of such loan. 2 U.S.C. § 434(b)(3)(E). The committee must also disclose, for both the reporting period and the calendar year, the total amount of all loans made or guaranteed by the candidate to the authorized committee. 2 U.S.C. § 434(b)(2)(G). Further, the total amount of all other loans as well as the total amount of outstanding debts and obligations owed by the principal campaign committee must be disclosed for the reporting period and the calendar year. 2 U.S.C. §§ 434(b)(2)(H) and 434(b)(8). Outstanding debts must be continuously reported until extinguished. 11 C.F.R. § 104.11. These debts and obligations also have to be reported on a separate schedule along with a statement explaining the circumstances and conditions under which each debt and obligation was incurred. Id.

Complainants allege that Respondents inaccurately reported several loans and debts. First, the Klink Committee received a \$51,000 loan from Representative Klink and Linda Klink and a \$1,000 loan from Dennis Casey, which were reported on Respondents' 1992 Pre-Primary Report, but not reported as being extinguished or outstanding on Respondents' 1992 July Quarterly Report. Complainants also allege that Respondents did not fully disclose the \$1,000 loan from Dennis Casey on their 1992 Pre-Primary Report because they did not include it on their Detailed Summary Page and Summary Page and failed to report the terms of the loan on

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Schedule C. Second, Complainants allege that Respondents' 1992 July Quarterly Report, Schedule D, disclosed debts and obligations at the beginning of the period totaling \$28,830.39, which presumably existed prior to the July reporting period and had not been reported on Respondents' previous report, the 1992 Pre-Primary Report. Third, Complainants allege that Respondents failed to report on their 1992 July Quarterly Report the date on which a loan for \$18,540.39 was made.

Respondents do not dispute that they misreported the above-described loans. Respondents again rely primarily on the argument that these reporting errors were caused by the lack of campaign staff and the inexperience of the campaign staff they had. (See Attachment 2.)

The public record substantiates Complainants' allegations. First, Respondents' 1992 Pre-Primary Report, Schedule C, itemized loans received from Ron and Linda Klink and Dennis Casey, but Respondents' next report, the 1992 July Quarterly Report, did not include an itemization of those loans on Schedule C. The Detailed Summary Page of Respondents' 1992 July Quarterly Report, however, does include the total amount of the Klink and Casey loans and all other outstanding loans. Second, Respondents' 1992 July Quarterly Report, Schedule D, discloses debts and obligations apparently originating during the 1992 April Quarterly Reporting period that were not disclosed in the prior period. Third, Respondents failed to include loan terms on their 1992 July Quarterly Report, Schedule D, for a \$18,540.98 loan from Ron and Linda Klink. Fourth, Respondents apparently failed to fully disclose the terms

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of a \$1,000 loan from Dennis Casey. Further, Respondents did not disclose these loans as receipts on Schedule A.

As discussed earlier, Respondents filed amended reports which provide most of the missing information.¹⁰ Based on the foregoing, this Office recommends that the Commission find that there is reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(G), 434(b)(2)(H), 434(b)(3)(E), 434(b)(8), and 11 C.F.R § 104.11.

b. 48 Hour Notices

The Act requires that a principal campaign committee notify in writing the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, 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 notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions is in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

10. A few questions remain regarding those amendments. For example, the amended reports no longer include a loan from Dennis Casey, and do not appear to explain how that debt was extinguished. Further, Respondents amended 1992 Pre-Primary Report, Schedule C includes candidate loans totaling \$33,000, but does not include the specific dates the loans were incurred or their terms.

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The Primary Election in Pennsylvania was held on April 28, 1992. Pursuant to the Act, Respondents were required to notify the Commission, in writing, of all contributions of \$1,000 or more received from April 9 through April 25, 1992, within 48 hours of their receipt.

Complainants allege that Respondents filed a 48 Hour Notice on April 9, 1992, which disclosed the receipt of a \$11,500 loan from Representative Klink and Linda Klink, but they did not also report the loan on their 1992 Pre-Primary Report. Complainants also allege that Respondents filed a 48 Hour Notice on May 4, 1992, which disclosed a May 1st loan from Ron and Linda Klink, but did not include the amount of the loan; further, Respondents did not also report the loan on their 1992 July Quarterly Report. Third, Respondents filed a 48 Hour Notice on April 23, 1992, which disclosed that Ron and Linda Klink loaned the Committee \$2,000 on that same date, but allegedly did not include this contribution on their 1992 July Quarterly Report.

Respondents do not address all of these allegations. Instead, they state that "the 48 Hour Notice of a loan with no dollar amount was corrected on the subsequent 48 Hour Notice, where the loan was reported. As a result, the loan appears to have been again reported twice." (See Attachment 2, at 3-4.) They also state that they will submit an amended Schedule C to "accurately reflect the dates and amounts of the loans." (Id.)

Commission records indicate that Respondents filed the required 48 Hour Notices. In fact, Respondents filed a notice

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for the May 1st loan for which 48 hour notification was not required. Based on the foregoing, this Office recommends that the Commission find that there is no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

B. Excessive Contributions

Pursuant to 2 U.S.C. § 441a(a)(1)(A), it is unlawful for any person to make a contribution to a candidate for federal office or to his or her authorized campaign committee, in excess of \$1,000 per election. "This limitation applies to the spouse or family member of a candidate" AO 1991-10. The Act defines "contribution" to include any loan, advance, deposit of money, or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A). The term "loan" includes a guarantee, endorsement, and any other form of security. 11 C.F.R. § 100.7(a)(1)(i). Pursuant to 2 U.S.C. § 431(11), the term "person" includes an individual or a committee that does not qualify as a multicandidate political committee. Candidates and political committees are prohibited from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f).

A candidate may make unlimited expenditures from personal funds. 11 C.F.R. § 110.10(a). Personal funds are defined as "[a]ny assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had

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either: (1) [l]egal and rightful title, or (2) [a]n equitable interest." 11 C.F.R. § 110.10(b)(1). A candidate may use a portion of assets jointly owned with his spouse as personal funds. 11 C.F.R. § 110.10(b)(3). The candidate's portion will be the share he or she owns under the instrument of conveyance or ownership. Id. If no specific share is indicated by the instrument of conveyance or ownership, then the value of one-half of the property used will be considered the candidate's portion of the jointly-owned asset. Id.

Generally, joint bank accounts are the exception to the "one-half interest rule" because each account holder has access and control over the whole. For example, in MUR 2292, the General Counsel's Report, dated February 24, 1988, at 5, stated: "In a joint bank account where joint tenancy is established, each party has 'access to and control over' the entire bank account, as either can withdraw any part, or the entire amount, of the funds from such account."

A candidate may also obtain loans on behalf of his or her political committee. See 11 C.F.R. §§ 101.2 and 100.7(a)(1). Further, a candidate's spouse may co-sign for a loan if jointly-owned assets are used as collateral for the loan. If the candidate's share of the property used as collateral equals the amount of the loan, the spouse will not be considered a contributor to the candidate's campaign. 11 C.F.R. § 100.7(a)(i)(1)(D).

Under 11 C.F.R. § 103.3(b), the treasurer of a political committee is responsible for examining all contributions received

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for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions from the same contributor, exceed the contribution limitations. Contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If deposited, the treasurer may request redesignation or reattribution of the contribution. If the reattribution or redesignation is not obtained, the treasurer must, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Complainants allege that Respondents received excessive contributions totaling \$1,280 from Frank Trigona for the primary election. Complainants also allege that Respondents received loans from Representative Klink and Linda Klink totaling \$83,000.00 and, thus, Linda Klink exceeded the Act's contribution limitation by approximately \$40,000.

Commission records indicate that Mr. Trigona contributed \$1,000 to the Klink Committee for the general election and \$321 for the primary election. It appears that Respondents originally reported incorrectly contributions that Mr. Trigona made to the Klink Committee. See pp.12-13. Respondents have amended their reports to correct these errors and, thus, it does not appear that Mr. Trigona made an excessive contribution to the Klink Committee as alleged. Accordingly, this Office recommends that the Commission find no reason to believe that Frank Trigona violated

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2 U.S.C. § 441a(a)(1)(A) and, correspondingly, find no reason to believe that Citizens for Ron Klink and Jeanne Brimmer, as treasurer, violated 2 U.S.C. § 441a(f).

Regarding the funds the Klinks loaned to the Committee, Respondents argue that the candidate made the loans from his personal funds, but the Committee misreported the loans as received from both Ron and Linda Klink. Respondents state:

[f]rom the information available to the Committee at this time, the funds for the loans came from joint checking and savings accounts of Ron and Linda Klink. Because of this, the Committee misreported the loans as from both husband and wife. As stated in the opinion of counsel ..., under Pennsylvania law, Mr. Klink was considered to own "the entirety of that property at all times"

(Attachment 2, at 2.) Respondents also submit an opinion from Pennsylvania counsel, who states that "married persons in Pennsylvania typically hold jointly titled property as tenants by the entireties ... [which] means that both spouses own one hundred percent (100%) of the property at all times and either spouse is entitled to the benefits of that property when either he or she chooses." (Attachment 2, at 12.) Counsel does not cite any legal authority in support. Counsel opines that "either Mr. or Mrs. Klink owned the entirety of that property at all times and either one would have been entitled to use it, however he or she saw fit." (Id.)

The candidate in this matter is a Pennsylvania resident, and the financial transactions apparently occurred in Pennsylvania. In accordance with 11 C.F.R. § 110.10(b)(1), a brief review of the applicable Pennsylvania state law follows because it is relevant

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to determine the legal status of the candidate's ownership of joint bank assets that he held with his wife. Under Pennsylvania law, funds held by husband and wife in a joint account are presumptively held in tenancy by the entirety.¹¹ As the court in In re Brose's Estate, 206 A.2d 301, 304 (1965), noted:

A deposit in a bank account or in a checking account or in a savings account, which is opened or registered in the name of a husband and wife...created a tenancy by the entireties irrespective of whether the money deposited is payable to the husband and wife or to husband or wife, or is denominated a joint account or a joint tenancy.

See also Constitution Bank v. Olson, 620 A.2d 1146, 1151 (1993); Simon v. Simon, 429 A.2d 1, 2 (1980).

Pennsylvania case law also establishes that "[t]he agency or authority of either spouse to withdraw funds on deposit payable to either exists by implication, and either may withdraw [the] entire account" Madden v. Gosztonyi Savings & Trust, Inc., 200 A. 624, 631 (1938). However, the power to withdraw funds from a joint account must be exercised in good faith for the mutual benefit of both. Berhalter v. Berhalter, 173 A. 172, 173 (1934).

The evidence in this matter indicates that the funds for the loans in question were drawn from joint checking and savings accounts, which were owned by the Klinks as tenants by the entirety. Jointly held bank accounts have been viewed differently

11. A tenancy by the entirety is a form of co-ownership held by husband and wife. The characteristics of a tenancy by the entirety include unity of interest, time, title, possession. Madden v. Gosztonyi Savings & Trust, Inc., 200 A. 624, 627 (1938). The unity of the husband and wife as one legal entity must also be present. Id.

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from other types of jointly held property. Memorandum to the Commission, dated October 30, 1981, and see MUR 2292. The Commission has determined that bank accounts are an exception to the one-half interest rule and, thus, it is presumed that all funds in the joint account are the candidate's "personal funds." MUR 2292. Under Pennsylvania state law, Representative Klink had the authority to withdraw all funds from the account he held jointly with his wife as long as his use of the funds was for the mutual benefit of both of them. Pennsylvania state law on this issue -- joint bank accounts -- is similar to that of other states in that either spouse has a right of access to the whole account and may withdraw all funds from the account. Although it may be a close call, it appears that an argument can be made that the use of these funds for Mr. Klink's congressional election was for their mutual benefit for purposes of Pennsylvania state law. Consequently, it appears that Mr. Klink did have legal control over the joint bank accounts to the extent necessary to qualify the entire accounts as "personal funds." 11 C.F.R. § 110.10(b)(3). Thus, this Office recommends that the Commission find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441a(f). This Office further recommends that the Commission find no reason to believe that Linda Klink violated 2 U.S.C. § 441a(a)(1)(A).

C. Prohibited Contributions

It is unlawful for any corporation to make a contribution or expenditure in connection with any election to federal office, or for any principal campaign committee to knowingly accept or

receive any corporate contribution. 2 U.S.C. § 441b(a). It is also unlawful for any officer or director of any corporation to consent to any contribution or expenditure by the corporation prohibited by Section 441b. Id. The definition of "contribution" and "expenditure" include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services or anything of value. 2 U.S.C. § 441b(b)(2).

As discussed above, the Commission previously found reason to believe that Westinghouse Broadcasting Company ("Westinghouse") and Ron Klink violated 2 U.S.C. § 441b(a) because Mr. Klink apparently received wages and fringe benefits from his employer, Westinghouse, while he was on leave to campaign for federal office. At the time the Commission made its reason to believe determination, Westinghouse had not responded to the complaint.

In its subsequent response, Westinghouse asserts that Mr. Klink discontinued his active employment on March 8, 1992, when he announced his candidacy for office. (See Attachment 3, at 1.) Prior to the start of his leave of absence, Mr. Klink had accrued five weeks of paid vacation, which he was required by Westinghouse policy to use before he could be placed on unpaid leave status. (Id.) Thus, Representative Klink's leave of absence from Westinghouse became effective April 12, 1992. (Id.) Westinghouse further states that, "[o]ther than accrued vacation pay, Mr. Klink has been paid no money by Westinghouse during the period that he has not worked." (Id.) Additionally, according to Westinghouse, the company's leave of absence policy allowed Mr. Klink to continue his insurance benefits while on unpaid leave "by

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making a payment out of unreimbursed personal funds." (Id.) The response from Representative Klink concurs with the response from Westinghouse. (See Attachment 2, at 10-11.)

From the responses, it appears that Westinghouse did not make a corporate contribution and Mr. Klink did not receive a corporate contribution. 2 U.S.C. § 441b(a). Based on the foregoing, this Office recommends that the Commission find no reason to believe that Westinghouse Broadcasting Company violated 2 U.S.C. § 441b(a). This Office also recommends that the Commission find no reason to believe that Representative Ron Klink violated 2 U.S.C. § 441b(a) and no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse.

Complainants further allege that Respondents received several additional prohibited corporate contributions. First, Respondents allegedly received a \$100 contribution from R & W Oil Products on April 6, 1992. Respondents argue that R & W Oil Products is not a corporation. Respondents submit a letter from Eldo Bisacca, owner of R & W Oil Products, in support of this contention. See (Attachment 2, at 14.) Respondents further assert that the contribution from R & W Oil Products was refunded.

Contrary to Mr. Bisacca's assertion, this Office has found that R & W Oil Products Company, Inc. is listed as a corporation in good standing by the Pennsylvania Secretary of State Corporation Division, and Eldo Bisacca is its Chief Executive Officer. Thus, Respondents apparently received a corporate

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contribution from R & W Oil Products. Respondents refunded this contribution, but their 1992 October Quarterly Report confirms that the contribution was refunded on September 13, 1992, which was outside the 30 day period permitted by 11 C.F.R. § 103.3(b)(1).

Based upon the foregoing, this Office recommends that the Commission find reason to believe that R & W Oil Products and Eldo Bisacca, as chief executive officer, violated 2 U.S.C. § 441b(a). Because of the small amount of the contribution and the fact that it has been refunded, we further recommend that the Commission take no further action concerning this violation.

Complainants also allege that Respondents reported a \$1,000 in-kind disbursement to "The Videohouse" for video services and, thus, Respondents may have received a prohibited corporate contribution in the form of corporate services. Respondents claim that the in-kind disbursement to The Videohouse was not a corporate contribution. Mr. Bruno, the owner of "The Videohouse" and its parent corporation, Renaissance T.V. Productions, Inc., paid his business to provide the services as an in-kind contribution. (Attachment 2, at 4.) Respondents further contend that this in-kind contribution was reported in the manner advised by the Office of the Clerk of the House.

Respondents' 1992 Pre-Primary Report disclosed a \$1,000 in-kind disbursement to The Videohouse. That report also discloses a \$1,000 in-kind receipt from Ron Bruno for video services.¹² Respondents argue that these entries are for the same

12. Of note, this appears to be the same activity that Respondents misreported on their combined 1992 April Quarterly/Pre-Primary Report discussed above. See p. 13.

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video services and that Mr. Bruno paid for the services from personal funds. However, they do not provide evidence substantiating that Mr. Bruno paid for the services from his personal account. Further, our research indicates that Renaissance T.V. Productions, Inc., is doing business as "The Videohouse" in Pennsylvania. Renaissance T.V. Productions, Inc. is a registered Pennsylvania corporation in good standing, and Ronald J. Bruno is its Chief Executive Officer. Thus, it appears that Renaissance T.V. Productions, Inc., through the "The Videohouse", may have provided these video services. If so, Respondents received a corporate contribution from Renaissance T.V. Productions, Inc.

Based upon the foregoing, this Office recommends that the Commission find reason to believe that Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer, violated 2 U.S.C. § 441b(a). In light of the small amount of money involved and giving Respondents the benefit of the doubt that Mr. Bruno himself paid for the services, as they assert and reported, this Office recommends that the Commission take no further action regarding this violation.

This Office further recommends that the Commission find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) by accepting corporate contributions from R & W Oil Products and Eldo Bisacca, as chief executive officer, and Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer.

5043633/21

D. Conclusion

The record in this matter indicates that the Klink Committee has, in fact, amended its reports, and it appears that these minor reporting violations were due to the inexperience of the Committee in its first election cycle. Similarly, it appears that there was some confusion as to who the contributor was concerning the possible Section 441b violations. Since the filing of the complaints in this matter, the Klink Committee has corrected its problems. In fact, during the 1992 and 1994 election cycles, neither the Audit Division nor the Reports Analysis Division referred this Committee to our Office for review of possible violations of the Act. Further, no other complaints have been filed against the committee during these election cycles. Thus, in light of the limited nature of the violations; the fact that this was Mr. Klink's first Congressional run; the inexperience of the Committee in its first election cycle; and the corrected public record, this Office recommends that the Commission take no further action as to the reason to believe findings against Citizens for Ron Klink and Jeanne Brimmeier, as treasurer. Upon approval of our no further action recommendations, this Office will send an admonishment letter to all of the Respondents concerning the reason to believe findings.

IV. RECOMMENDATIONS

1. Merge MURs 3560 and 3569 into MUR 3505 and hereafter refer to this entire matter as MUR 3505.
2. Find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), 434(b) and 11 C.F.R. §§ 104.11 and 104.13(a), but take no further action.

3. Find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f).
4. Find reason to believe that Representative Ron Klink violated 2 U.S.C. § 432(e)(1), but take no further action.
5. Find no reason to believe that Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A).
6. Find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.
7. Find reason to believe that R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc., but take no further action.
8. Approve the attached Factual and Legal Analyses.
9. Close the file.
10. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

5043633/23
Date

3/2/95

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Request for extension of time and merger.
2. September 8, 1992 Response from Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, Ron Klink, and Linda Klink.
3. September 4, 1992 Response from Westinghouse Broadcasting Company.
4. June 16, 1993 letter and amended reports from Citizens for Ron Klink and Jeanne Brimmeier, as treasurer.
5. July 6, 1993 letter to Citizens for Klink Committee.
6. Certification dated August 5, 1992.
7. Factual and Legal Analyses.

Attorney assigned: Richard M. Denholm II

5043635724

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for Ron Klink, et al.) MURS 3505,
) 3560, and
) 3569

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 8, 1995, the Commission decided by a vote of 6-0 to take the following actions in MURS 3505, 3560, and 3569:

1. Merge MURS 3560 and 3569 into MUR 3505 and hereafter refer to this entire matter as MUR 3505.
2. Find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), 434(b) and 11 C.F.R. §§ 104.11 and 104.13(a), but take no further action.
3. Find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f).
4. Find reason to believe that Representative Ron Klink violated 2 U.S.C. § 432(e)(1), but take no further action.
5. Find no reason to believe that Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A).
6. Find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

(continued)

5043635/25

7. Find reason to believe that R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc., but take no further action.
8. Approve the Factual and Legal Analyses, as recommended in General Counsel's Report dated March 2, 1995.
9. Close the file.
10. Approve the appropriate letters, as recommended in the General Counsel's Report dated March 2, 1995.

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

Attest:

3-8-95
Date

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

Received in the Secretariat: Fri., Mar. 03, 1995 9:31 a.m.
Circulated to the Commission: Fri., Mar. 03, 1995 12:00 p.m.
Deadline for vote: Wed., Mar. 08, 1995 4:00 p.m.

bjr

5043633/26



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Ann Hoskin
2916 Clayton Avenue
Beaver Falls, PA 15010

RE: MUR 3505

Dear Ms. Hoskin:

This is in reference to the complaints you filed with the Federal Election Commission ("Commission") on July 17 and July 29, 1992, which were referred to as MUR 3560 and MUR 3559. On March 8, 1995, the Commission determined to merge MUR 3560 and MUR 3569 with MUR 3505 and to refer to these matters as MUR 3505.

On that same date, based on the complaints and responses filed in this matter, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a) of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

5043633727

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

5043633728



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Janet A. Jackson
42 Hemlock
Beaver PA 15009

RE: MUR 3505

Dear Ms. Jackson:

This is in reference to the complaints you filed with the Federal Election Commission ("Commission") on July 17 and July 29, 1992, which were referred to as MUR 3560 and MUR 3569. On March 8, 1995, the Commission determined to merge MUR 3560 and MUR 3569 with MUR 3505 and to refer to these matters as MUR 3505.

On that same date, based on the complaints and responses filed in this matter, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a) of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

5043635729

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

15043635730



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gordon R. Johnston
1709 10th Avenue
Beaver, PA 15009

RE: MUR 3505

Dear Mr. Johnston:

This is in reference to the complaints you filed with the Federal Election Commission ("Commission") on July 17 and July 29, 1992, which were referred to as MUR 3560 and MUR 3569. On March 8, 1995, the Commission determined to merge MUR 3560 and MUR 3569 with MUR 3505 and to refer to these matters as MUR 3505.

On that same date, based on the complaints and responses filed in this matter, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a) of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

15043633732



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Joan Lanctot
1463 Third Avenue
New Brighton, PA 15066

RE: MUR 3505

Dear Ms. Lanctot:

This is in reference to the complaints you filed with the Federal Election Commission ("Commission") on July 17 and July 29, 1992, which were referred to as MUR 3560 and MUR 3569. On March 8, 1995, the Commission determined to merge MUR 3560 and MUR 3569 with MUR 3505 and to refer to these matters as MUR 3505.

On that same date, based on the complaints and responses filed in this matter, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a) of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

15043633734



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gerald Weaver
3423 Brown St., N.W.
Washington, D.C. 20010

RE: MUR 3505

Dear Mr. Weaver:

This is in reference to the complaint you filed with the Federal Election Commission ("Commission") on April 13, 1992, concerning the Citizens for Ron Klink committee.

Based on that complaint, and similar complaints filed in MUR 3560 and MUR 3569, on March 8, 1995, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a), of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

5043633736



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1995

Mr. Terry Cozen, General Manager
KDKA-TV
One Gateway Center
Pittsburgh, PA 15222

RE: MUR 3505

Dear Mr. Cozen:

On April 21, 1992, the Federal Election Commission (the "Commission") notified KDKA-TV of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On March 8, 1995, based on the complaint and responses filed, the Commission closed its file in this matter. The Commission never took any action with regards to KDKA-TV.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply, and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

5043633757



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 27, 1995

Mr. Frank Trigona
521 Clay Avenue
Jeannette, PA 15644

RE: MUR 3505

Dear Mr. Trigona:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission considered the issue of whether you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making excessive contributions to the Citizens for Ron Klink committee during 1992. On March 8, 1995, the Commission found no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). Accordingly, the Commission has closed the file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in black ink, appearing to be "L. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

5043633738



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

Mr. Stephen A. Hildebrandt, Esq.
Chief Counsel
Westinghouse Broadcasting Company, Inc.
400 N. Capitol Street, N.W.
Suite 550
Washington, D.C. 20001-1511

RE: MUR 3505
Westinghouse Broadcasting
Company, Inc.

Dear Mr. Hildebrandt:

On April 21, 1992, the Federal Election Commission (the "Commission") notified Westinghouse Broadcasting Company, Inc. of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On August 4, 1992, the Commission found that there is reason to believe that Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a). A Factual and Legal Analysis, which formed a basis for the Commission's action, was forwarded to you on August 11, 1992.

As you may be aware, on October 22, 1993, the D.C. Circuit declared the Commission unconstitutional on separation of powers grounds due to the presence of the Clerk of the House of Representatives and the Secretary of the Senate or their designees as members of the Commission. FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), cert. dismissed for want of jurisdiction, 63 U.S.L.W. 4027 (U.S. Dec. 6, 1994) (No. 93-1151). The Commission took several actions to comply with the Court of Appeals' decision. The Commission, consistent with that opinion, remedied any possible constitutional defect identified by the Court of Appeals by reconstituting itself as a six member body without the Clerk of the House and the Secretary of the Senate or their designees. In addition, the Commission adopted specific procedures for revoting or ratifying decisions pertaining to open enforcement matters.

5043633739

Mr. Stephen A. Hildebrandt, Esq.
Page 2

On March 8, 1995, based on additional information provided by you in this matter, the Commission determined that there was no reason to believe that Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a). Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply, and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

5043635740



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

Mr. Ted Jordan, General Manager
KDKA-AM
One Gateway Center
Pittsburgh, PA 15222

RE: MUR 3505

Dear Mr. Jordan:

On April 21, 1992, the Federal Election Commission (the "Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On March 8, 1995, based on the complaint and responses filed, the Commission closed its file in this matter. The Commission never took any action with regards to KDKA-AM.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply, and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

504363741



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Maria Cino, Executive Director
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3505

Dear Ms. Cino:

This is in reference to the complaint filed by Thomas Cole on behalf of the National Republican Congressional Committee with the Federal Election Commission ("Commission") on July 29, 1992, which was referred to as MUR 3569. On March 8, 1995, the Commission determined to merge MUR 3569 with MUR 3505 and to refer to these matters as MUR 3505.

On that same date, based on the complaints and responses filed in this matter, the Commission found that there was reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(a), 433(b), 434(a)(2)(A), and 434(b) of the Federal Election Campaign Act of 1971, as amended, (the "Act") and 11 C.F.R. §§ 104.11 and 104.13(a) of the Commission's regulations. In addition, the Commission found reason to believe that: (1) Representative Ron Klink violated 2 U.S.C. § 432(e)(1); and (2) R & W Oil Products and Eldo Bisacca, as chief executive officer; Renaissance T.V. Productions, Inc. and Ronald J. Bruno, as chief executive officer; and Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 441b(a) with respect to corporate contributions from R & W Oil Products and Renaissance T.V. Productions, Inc. After considering the circumstances of this matter, the Commission determined to take no further action against these Respondents regarding these violations.

In addition to the foregoing, the Commission found no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 434(a)(1), 434(a)(6)(A), and 441a(f); (2) Linda Klink and Frank Trigona violated 2 U.S.C. § 441a(a)(1)(A); and (3) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer; Representative Ron Klink; and Westinghouse Broadcasting Company, Inc. violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.

15043633742

Accordingly, the Commission closed the file in this matter on March 8, 1995. This matter will become part of the public record within 30 days. The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

Enclosure
General Counsel's Report

5043633743



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1995

**Mr. Ron Bruno, President
Renaissance Television Productions, Inc.
975 Greentree Road
Pittsburgh, PA 15220**

RE: MUR 3505

Dear Mr. Bruno:

On July 17, 1992, the Federal Election Commission ("Commission") received a complaint which indicated that Renaissance Television Productions, Inc. had made prohibited contributions to the Citizens for Ron Klink committee. Based upon the complaint, the public record, and the response in this matter, on March 8, 1995, the Commission found reason to believe that Renaissance Television Productions, Inc. and you, as chief executive officer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

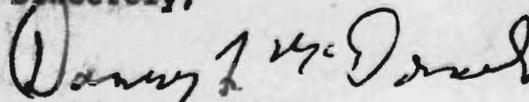
The Commission reminds you that it is a violation of 2 U.S.C. § 441b(a) for a corporation to make contributions in connection with any federal election. You should take steps to ensure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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If you have any questions, please contact Richard M. Denholm II,
the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Danny L. McDonald
Chairman

Enclosure
General Counsel's Report

5043633745



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

Mr. Eldo Bisacca, Chief Executive Officer
R & W Oil Products
Atlantic and John Streets
McKeesport, PA 15132

RE: MUR 3505

Dear Mr. Bisacca:

On July 29, 1992, the Federal Election Commission ("Commission") received a complaint which indicated that R & W Oil Products had made prohibited contributions to the Citizens for Ron Klink committee. Based upon the complaint, the public record, and the response in this matter, on March 8, 1995, the Commission found reason to believe that R & W Oil Products and you, as chief executive officer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). After considering the circumstances of this matter, however, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

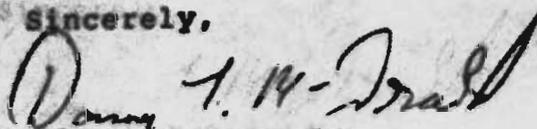
The Commission reminds you that it is a violation of 2 U.S.C. § 441b(a) for a corporation to make contributions in connection with any federal election. You should take steps to ensure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

5043633746

If you have any questions, please contact Richard M. Denholm II,
the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Danny L. McDonald
Chairman

Enclosure
General Counsel's Report

15043633747



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1995

Mr. Robert F. Bauer, Esq.
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005

RE: MUR 3505
Citizens for Ron Klink
and Jeanne Brimmeier, as
treasurer; Representative
Ron Klink; and Linda Klink

Dear Mr. Bauer:

On April 21, July 22, and August 5, 1992, the Federal Election Commission (the "Commission") notified your clients, Citizens for Ron Klink (formerly known as Ron Klink for Congress Committee) and its treasurer; Representative Ron Klink; and Linda Klink, of complaints alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). These matters were referred to as MUR 3505, MUR 3560, and MUR 3569, respectively.

On August 4, 1992, the Commission found that there was reason to believe Citizens for Ron Klink and its treasurer (the "Committee") violated 2 U.S.C. §§ 433(a), 441a(f), and 441b(a). The Commission also found no reason to believe that the Committee violated 2 U.S.C. § 434(a)(1). On that same date, the Commission also found reason to believe that Representative Ron Klink violated 2 U.S.C. §§ 432(e)(1) and 441b(a) and that Linda Klink violated 2 U.S.C. § 441a(a)(1)(A). The Factual and Legal Analyses, which formed the bases for the Commission's action, were forwarded to your clients on August 11, 1992.

As you are aware, on October 22, 1993, the D.C. Circuit declared the Commission unconstitutional on separation of powers grounds due to the presence of the Clerk of the House of Representatives and the Secretary of the Senate or their designees as members of the Commission. FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), cert. dismissed for want of jurisdiction, 63 U.S.L.W. 4027 (U.S. Dec. 6, 1994) (No. 93-1151). The Commission took several actions to comply with the Court of Appeals' decision. The Commission, consistent with that opinion, remedied any possible constitutional defect identified by the Court of Appeals by reconstituting itself as a six member

body without the Clerk of the House and the Secretary of the Senate or their designees. In addition, the Commission adopted specific procedures for revoting or ratifying decisions pertaining to open enforcement matters.

On March 8, 1995, the Commission revoted to find reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 433(a) and revoted to find reason to believe that Representative Ron Klink violated 2 U.S.C. § 432(e)(1). Enclosed for your reference are revised Factual and Legal Analyses, which formed a basis for the Commission's findings. After considering the circumstances underlying these violations, however, the Commission determined to take no further action. In addition, the Commission revoted to find no reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 434(a)(1).

Also on March 8, 1995, the Commission determined to merge MUR 3560 and MUR 3569 with MUR 3505. All of these matters are now known as MUR 3505. Based on the complaints and responses filed in this matter, the Commission on that same date further determined that there is reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 433(b), 434(a)(2)(A), 434(b), 441b(a) and 11 C.F.R. §§ 104.11 and 104.13(a). After considering the circumstances underlying these violations, however, the Commission determined to take no further action. The Commission further determined that there was no reason to believe that: (1) Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, and Representative Klink violated 2 U.S.C. § 441b(a) with respect to Representative Klink's employment at Westinghouse Broadcasting Company, Inc.; (2) the Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(a)(6)(A); and (3) Linda Klink violated 2 U.S.C. § 441a(a)(1)(A). A copy of the General Counsel's Report, which formed a basis for these findings, is enclosed.

By this letter, the Commission reminds your clients that incomplete and inaccurate reports are in violation of the Act. In addition, accepting corporate contributions is specifically prohibited by the Act. Your clients should take steps to ensure that such activities do not occur in the future.

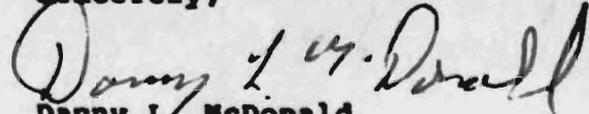
The Commission has closed the entire file in this matter. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply, and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as

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possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Richard M. Denholm II, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analyses
General Counsel's Report

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purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office.

2 U.S.C. § 431(9)(A)(i).

Pursuant to 2 U.S.C. § 432(e)(1), each candidate for Federal office shall designate in writing a political committee to serve as the principal campaign committee of such candidate. This designation shall be made no later than 15 days after becoming a candidate. The candidate shall designate his or her principal campaign committee by filing a Statement of Candidacy on FEC Form 2, or by filing a letter containing the same information. 11 C.F.R. § 101.1(a). Each principal campaign committee shall then file a Statement of Organization within 10 days of designation by the candidate. 11 C.F.R. § 102.1(a). All designations, statements, and reports required to be filed under the Act by a candidate or by the principal campaign committee of the candidate, for the nomination to the U.S. House of Representatives, shall be filed with the Clerk of the U.S. House of Representatives. 2 U.S.C. § 432(g)(1). Treasurers of political committees are required to file reports of receipts and disbursements. 2 U.S.C. § 434(a)(1).

According to the Committee's disclosure reports, it appears that the candidate reached candidate status by expending more than \$5,000 by March 4, 1992, and should have filed a Statement of Candidacy no later than March 19, 1992. Furthermore, the Committee should have filed a Statement of Organization no later

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than March 29, 1992. The Committee filed the Statement of Organization on April 16, 1992. Therefore, there is reason to believe that Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 433(a). Because the Committee filed reports of receipts and disbursements, there is no reason to believe that the Citizens for Ron Klink and Jeanne Brimmeier, as treasurer, violated 2 U.S.C. § 434(a)(1).

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ron Klink

NUR: 3505

SUMMARY OF ALLEGATIONS

This matter was generated in response to a complaint filed on April 13, 1992, by Gerald Weaver against Ron Klink. It is alleged that Mr. Klink, as a candidate seeking the Democratic nomination in the Fourth Congressional District of Pennsylvania in the 1992 election, failed to file a Statement of Candidacy in violation of 2 U.S.C. § 432(e)(1).

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires that any individual who seeks nomination for election to a Federal office shall be deemed a candidate if that individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Contributions are 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. 2 U.S.C. § 431(8)(A)(i). Expenditures are any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A)(i).

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Pursuant to 2 U.S.C. § 432(e)(1), each candidate for Federal office shall designate in writing a political committee to serve as the principal campaign committee of such candidate. This designation shall be made no later than 15 days after becoming a candidate. The candidate shall designate his or her principal campaign committee by filing a Statement of Candidacy on FEC Form 2, or by filing a letter containing the same information. 11 C.F.R. § 101.1(a). All designations, statements, and reports required to be filed under the Act by a candidate or by the principal campaign committee of the candidate, for the nomination to the House of Representatives, shall be filed with the Clerk of the House of Representatives. 2 U.S.C. § 432(g)(1).

According to the documents filed with the Commission, it appears that Mr. Klink expended more than \$5,000 as of March 4, 1992, thus crossing the threshold that triggers candidate status at that time. Once a candidate has expended more than \$5,000, he or she is required to file a Statement of Candidacy within 15 days that designates a principal campaign committee. Pursuant to 2 U.S.C. § 432(e)(1), Mr. Klink should have filed a Statement of Candidacy no later than March 19, 1992. Mr. Klink filed a Statement of Candidacy on April 16, 1992, 28 days late. Therefore, there is reason to believe that Ron Klink violated 2 U.S.C. § 432(e)(1).

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

APR 7 2 14 PM '95

April 4, 1995

Mr. Richard M. Demholm II
FEDERAL ELECTION COMMISSION
999 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 3505

Dear Mr. Demholm,

This letter is written in response to your letter of 3/27/95. Your letter states that the Commission received a complaint which indicated that R&W Oil Products made prohibited contributions to the Citizens for Ron Klink committee. Based upon this complaint, the public record, and some kind of response in this matter, the Commission, on March 8, 1995, found reason to believe that R&W Oil Products and Eldo Bisacca violated a provision of the Federal Election Campaign Act of 1971.

Let this letter set the record straight.

Through shoddy investigation, the Commission, came to the wrong conclusion. The commission confused two separate entities as the same. The Commission mistakenly concluded that the contribution in question made by Eldo Bisacca, d.b.a. R&W Oil Products, (sole proprietorship) was made by R&W Oil Products Company Inc. (corporation).

I am enclosing from the Commonwealth of Pennsylvania, Department of State, Office of the Secretary of the Commonwealth, the filed statement that Eldo Bisacca was added to the fictitious name R&W Oil Products, on November 5th, 1958.

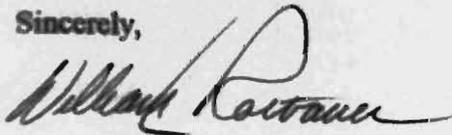
Also enclosed, are the Inactive Pa Corporate Tax Reports of 1991 and 1992 for R&W Oil Products Company Inc.

Had the Commission examined all of the public records, the Commission, would have come to the conclusion that Eldo Bisacca made the contribution. This neglect to examine all public records, in light of the letter by Eldo Bisacca submitted by the respondents is inexcusable.

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I believe that the Commission owes Eldo Bisacca an apologize for the admonishment letter that you sent.

Sincerely,



William J. Rothbauer
Controller

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Commonwealth of Pennsylvania
Department of State

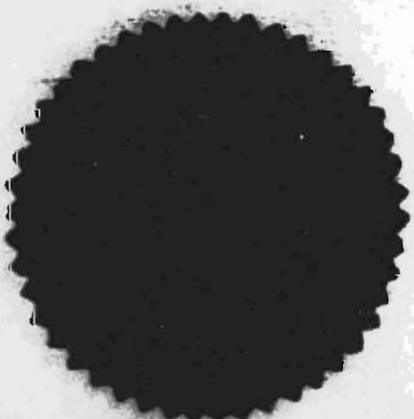


Office of the
Secretary of the Commonwealth

To all to whom these Presents shall come, Greeting:

I DO HEREBY CERTIFY, That by a statement filed in this office on
the _____th day of _____ November
A. D. 1958, it appears that ELDO BIRACCA has been added as a party
to the fictitious name R. MID W. OIL PRODUCTS. The name of A. G. DUVALL has
been deleted from this registration.

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IN TESTIMONY WHEREOF, I have hereunto set my hand
and caused the Seal of the Secretary's Office to
be affixed at the City of Harrisburg the day and
year above written.

J. Rice

Secretary of the Commonwealth

INACTIVE PA CORPORATE TAX REPORT 1991 RCT-101-I

OFFICIAL USE ONLY
DATE RECEIVED

STEP A
Tax Year

1. Tax Year Beginning MM DD YY Ending MM DD YY
11/01/91 10/31/92

STEP B
Label

2. Use post-off PA, Corp Tax label from the cover of the Tax Instruction Book (REV-1200 or PA-205-I).
3. Otherwise, print or type.
4. Check if address change 5. Check if filing period change

AFFIX LABEL HERE →

Depositor Name: **R+W OIL PRODUCTS CO INC** Tax Number: **1209-207**
Number and Street: **ATLANTIC + JOHN STS** Federal ID:
City or Town, State, and Zip Code: **McKEESPORT PA 15132**

DLR
DRS \$ DRT A

TAX ID#

STEP C
Check Applicable Block(s)

6. COMPOSITE REPORT (MULTIPLE YEARS) 7. FIRST REPORT 8. LAST REPORT

STEP D
Tax Summary

9. Compute tax liability for Capital Stock/Franchise Tax, other minimum \$300 or this amount prorated for the number of days in the tax period (if less than a full year).

	A. TAX LIABILITY FROM TAX REPORT	B. ESTIMATED PAYMENTS AND CREDITS ON DEPOSIT FOR THE CURRENT YEAR	C. CALCULATION (Col. A minus Col. B Positive or Negative)	ENTER
CAPITAL STOCK FRANCHISE TAX <input checked="" type="checkbox"/>	300	300	0	WHOLE DOLLARS ONLY
LIQUOR TAX <input type="checkbox"/>				
WARRANTY TAX <input type="checkbox"/>				
TOTAL <input type="checkbox"/>	0	0	0	

10. If Column C TOTAL is greater than zero, complete STEP E.
11. If Column C TOTAL is less than zero, an overpayment exists. Skip to STEP F.
12. If Column C TOTAL is zero, no payment is due. Skip to STEP G.

STEP E
Tax Payment Application

13. Apply Column C TOTAL from Step D by tax.

TOTAL PAYMENT must equal the Column C TOTAL from STEP D.	CAPITAL STOCK FRANCHISE TAX WARRANTY TAX TOTAL PAYMENT	<table border="1"> <tr><th colspan="2">PAYMENT</th></tr> <tr><td style="text-align: center;">0</td><td rowspan="3" style="vertical-align: middle;">ENTER WHOLE DOLLARS ONLY</td></tr> <tr><td style="text-align: center;">0</td></tr> <tr><td style="text-align: center;">0</td></tr> </table>	PAYMENT		0	ENTER WHOLE DOLLARS ONLY	0	0
PAYMENT								
0	ENTER WHOLE DOLLARS ONLY							
0								
0								

Make check for this amount payable to: "PA DEPT. of REVENUE"

STEP F
Overpayment

14. Check ONLY THE APPROPRIATE box to select a refund or transfer method:
A. Automatically transfer overpayment(s) to current tax year underpaid taxes and the remaining portion to the next tax year.
B. Refund the overpayment from the current tax year in the amount of \$ _____
C. REV-855 Custom Refund/Transfer Request Coupon has been submitted separately. (A prior year is involved.)

STEP G
Signature

15. Check one box in support of filing the INACTIVE REPORT (RCT-101-I):
A. This PENNSYLVANIA CORPORATION, to which a charter was granted by the Commonwealth of Pennsylvania, did not conduct any business, had no assets, no income, and did not exercise any corporate rights or privileges whatsoever during the tax year(s) ended (MM/DD/YY): **10/31/92**
B. This FOREIGN (OUT-OF-STATE) CORPORATION, chartered under the laws of a state other than PA, did not conduct any business, own property, or exercise any corporate rights or privileges of any kind whatsoever during the tax year(s) ended (MM/DD/YY): _____

I hereby affirm under penalties provided by law that this report (including any accompanying Schedules and Statements) has been examined by me and to the best of my knowledge and belief is true, correct and complete report, if prepared by a person other than the taxpayer, the declaration is based on all information of which he has any knowledge.

STEP H
Settlement Mailing Address

17. Check box to mail settlement notice to preparer's address. Preparer's address must be printed or typed below.

NAME OF PREPARER OR FIRM'S INDICATOR OF PREPARER		FIRM'S INDICATOR OR FIRM'S NAME	
NAME: Fernando R Donato		FERNANDO R DONATO	
TITLE: CPA		INDIVIDUAL OR FIRM'S STREET ADDRESS: 636 HARTRANFT ST	
DATE: 11/24/92		CITY STATE ZIP CODE: PITTSBURGH PA 15226	
PREPARER'S EIN OR SEN: 25 1187637			

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INACTIVE PA CORPORATE TAX REPORT 1992 RCT-101-I

OFFICIAL USE ONLY
DATE RECEIVED

STEP A
Tax Year

1. Tax Year Beginning MM DD YY Ending MM DD YY
11 | 01 | 92 10 | 31 | 93

DLN

STEP B
Label

2. Use post-off PA Corp Tax label from the cover of the Tax Instruction Book (REV-1200 or PA-205-1).
3. Otherwise, print or type.
4. Check if address change 5. Check if filing period change

AFFIX LABEL HERE →

Corporate Name: **R-W OIL PRODUCTS CO INC** Tax Number: **1209-207**

DR6 S DR7 A

Owner and Share: **ATLANTIC + JOHN STS** Federal ID:

TAX DLN

City or Town, State, and Zip Code: **Mt KEESPORT PA 15132**

STEP C
Check Applicable Block(s)

6. COMPOSITE REPORT (MULTIPLE YEARS) 7. FIRST REPORT 8. LAST REPORT

STEP D
Tax Summary

9. Compute tax liability for Capital Stock/Franchise Tax, either minimum \$300 or this amount prorated for the number of days in the tax period (if less than a full year).

- CAPITAL STOCK FRANCHISE TAX
- LONG TAX
- CORPORATE NET INCOME TAX
- TOTAL

A. TAX LIABILITY FROM TAX REPORT	B. ESTIMATED PAYMENTS AND CREDITS ON DEFERS FOR THE CURRENT YEAR	C. CALCULATION Cal. A minus Cal. B. Positive or (Negative)
300	300	0
300	300	0

ENTER
WHOLE
DOLLARS
ONLY

- 10. If Column C TOTAL is greater than zero, complete STEP E.
- 11. If Column C TOTAL is less than zero, an overpayment exists. Skip to STEP F.
- 12. If Column C TOTAL is zero, no payment is due. Skip to STEP G.

STEP E
Tax Payment Application

13. Apply Column C TOTAL from Step D by tax:

TOTAL PAYMENT must equal the Column C TOTAL from STEP D.
Make check for THIS amount payable to: "PA DEPT. of REVENUE"

PAYMENT	ENTER WHOLE DOLLARS ONLY
CAPITAL STOCK FRANCHISE TAX	
LONG TAX	
CORPORATE NET INCOME TAX	
TOTAL PAYMENT	0

Please check this block if payment was made by Electronic Funds Transfer (EFT)

STEP F
Overpayment

14. Check ONLY ONE box to select a refund or transfer method.
A. Automatically transfer overpayment(s) to current tax year underpaid taxes and the remaining portion to the next tax year.
B. Automatically transfer \$_____ of the current tax year overpayment(s) to the next tax year after paying any current tax year underpaid taxes and refund the remaining portion of the current tax year overpayment(s).
C. Refund the overpayment from the current tax year and apply against tax year underpaid taxes.

STEP G
Signature

15. Check one box in support of filing the INACTIVE REPORT (RCT-101-I).
A. THIS PENNSYLVANIA CORPORATION, to which a charter was granted by the Commonwealth of Pennsylvania, did not conduct any business, had no assets, no income, and did not exercise any corporate rights or privileges whatsoever during the tax year(s) ended (MM/DD/YY): **10 31 93**
B. THIS FOREIGN (OUT-OF-STATE) CORPORATION, chartered under the laws of a state other than PA., did not conduct any business, own property, or exercise any corporate rights or privileges of any kind whatsoever during the tax year(s) ended (MM/DD/YY):

I hereby affirm under penalties prescribed by law that this report (including any accompanying Schedules and Statements) has been examined by me and to the best of my knowledge and belief is a true, correct and complete report. If prepared by a person other than the taxpayer, his declaration is based on all information of which he has any knowledge.
SIGNATURE OF OFFICER OF COMPANY: _____ TITLE: _____ DATE: _____ TELEPHONE NUMBER: _____

STEP H
Settlement Mailing Address

17. Check here to mail settlement notice to preparer's address. Preparer's address must be printed or typed below.
18. **Fernando R Donato** PREPARING NUMBER: **412 341 5034** INDIVIDUAL OR FIRM'S STREET ADDRESS: **636 HARTMAN ST**
TITLE: **CPA** PREPARER'S EIN OR SSN: **251187637** CITY: **PITTSBURGH** STATE: **PA** ZIP CODE: **15226**
DATE: **12/13/93**

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3505

DATE FILMED 4/19/95 CAMERA NO. 2

CAMERAMAN SES

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