



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 3900

DATE FILMED 10-16-91 CAMERA NO. 2

CAMERAMAN JMH

24043600813

BEFORE THE  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
94 JAN 21 PM 4:32

**CENTER FOR RESPONSIVE POLITICS**

1320 19th Street, N.W.  
Washington, D.C. 20036  
(202) 857-0044

v.

Complainant,

David M. Rosenberg

Respondent,

COMPLAINT

MUR 3900

**COMPLAINT OF CENTER FOR RESPONSIVE POLITICS**

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

**PARTIES**

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

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**APPLICABLE STATUTES AND REGULATIONS**

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

**GROUND FOR COMPLAINT**

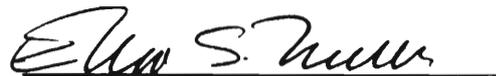
5. According to FEC records, respondent David M. Rosenberg made contributions subject to FECA in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent David M. Rosenberg made contributions attributed to the 1992 calendar year in the amount of \$47,000. These contributions exceeded by \$22,000 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

**RELIEF**

7. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,



Ellen S. Miller  
Executive Director  
CENTER FOR RESPONSIVE POLITICS  
1320 19th Street, N.W.  
Washington, D.C. 20036  
(202) 857-0044

Date: January 14, 1994

24043600815



**ROSENBERG, DAVID M**  
**Contributions Attributed to 1992**

Exhibit 1

**Summary of FEC Data**

Recipient	Amount	Date	FEC Microfilm Location
Burton, Dan	\$1,000	09/29/92	92HSE/469/1745
Clinton, Bill	\$500	01/27/92	93FEC/817/2961
Clinton, Bill	\$500	06/03/92	92FEC/769/5207
Kerrey, Robert	\$-1,000	06/03/92	92FEC/769/5207
Clinton, Bill	\$500	06/12/92	92FEC/760/5240
Democratic Senatorial Campaign Cmte	\$20,000	09/10/92	92SEN/025/1021
Engel, Eliot L	\$1,000	07/01/92	92HSE/465/3827
Erdreich, Ben	\$1,000	09/30/92	92HSE/473/2761
7 Gephardt, Richard A	\$1,000	07/07/92	92HSE/462/3603
— Kennedy, Joseph P II	\$500	10/13/92	92HSE/478/1667
8 Kostmayer, Peter H	\$250	08/28/91	91HSE/430/2073
U Kostmayer, Peter H	\$750	12/31/91	92HSE/437/4360
3 Manton, Thomas J	\$1,000	10/07/92	92HSE/479/1040
6 Menendez, Robert	\$1,000	10/31/92	92HSE/489/2019
4 National Republican Senatorial Cmte	\$10,000	09/16/92	92SEN/025/2507
0 Reid, Harry	\$1,000	08/05/92	92SEN/019/0113
4 Richardson, Bill	\$1,000	08/03/92	92HSE/470/2512
0 Ritter, Don	\$1,000	09/28/92	92HSE/471/1174
Schaefer, Dan	\$1,000	09/29/92	92HSE/472/1633
Shelby, Richard C	\$1,000	10/02/92	92SEN/026/0651
Swift, Al	\$1,000	09/30/92	92HSE/472/1218
Toricelli, Robert G	\$1,000	10/07/92	92HSE/481/0020
Toricelli, Robert G	\$1,000	12/31/91	92HSE/437/0516
Weldon, Curt	\$1,000	10/30/92	92HSE/486/1704

**Total Contributions Attributed to 1992: \$47,000**

**David Rosenberg**  
**Exhibit 2**

24043600818

Any information copied from this report may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes.

NAME/MAILING ADDRESS	FOR	DATE	AMOUNT
Rosenberg, Charles B. (Mr.) 1675 North Beverly Glen Boulevard Los Angeles CA 90077	P 92	01-16-92	250.00
EMP: OCC: AGGREGATE YTD: \$ 250.00			
Rosenberg, David M. (Mr.) 209 Hedgemere Drive Devon PA 19333	P 92	01-27-92	500.00
EMP: Elsing OCC: Insurance AGGREGATE YTD: \$ 500.00			
Rosenberg, Marc A. (Mr.) 65 Lake Road Short Hills NJ 07078	P 92	01-31-92	250.00
EMP: Cushman & Wakefield Of New Jersey OCC: Real Estate Broker AGGREGATE YTD: \$ 250.00			
Rosenberg, Marjorie D. (Mrs.) 209 Hedgemere Drive Devon PA 19333	P 92	01-27-92	500.00
EMP: OCC: Homemaker AGGREGATE YTD: \$ 500.00			
Rosenberg, Sarah Anne (Mrs.) 1675 North Beverly Glen Boulevard Los Angeles CA 90077	P 92	01-16-92	250.00
EMP: Oakwood School OCC: Teacher AGGREGATE YTD: \$ 250.00			
Rosenblum, Jack J. (Mr.) River at Sunrise Deerfield MA 01342	P 92	01-14-92	200.00
EMP: The Atlanta Consulting Group OCC: Management Consultant AGGREGATE YTD: \$ 200.00			

SUBTOTAL of receipts this page - 1,950.00

24043600819

ITEMIZED RECEIPTS

Use space provided for each category of the General Summary Page

PAGE OF 110  
 LINE NUMBER

Consolidated  
 → August Disclosure

NAME OF COMMITTEE IN FULL: 82092 Publications

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.

DATE (MONTH, DAY, YEAR) AMOUNT EACH THIS

NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR (checkbox) Primary (checkbox) General	DATE (MONTH, DAY, YEAR)	AMOUNT EACH THIS
<u>Originally Reported</u> Paul M. Monrone Great Hill Shirley Hill, NY 10574			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	6/15/92	\$10
<u>As above</u> Paul M. Monrone (address above)			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	6/15/92	\$50
<u>As above</u> Suzanna G. Monrone (address above)			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	7/27/92	\$50
<u>As above</u> David H. Rosenberg 241 Edgeacre Drive Devon, PA 19333			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	6/3/92	\$10
<u>As above</u> David H. Rosenberg (address above)			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	6/3/92	\$50
<u>As above</u> Marjorie D. Rosenberg (address above)			<input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	7/2/02	\$50
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR (checkbox) Primary (checkbox) General		
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	OCCUPATION	RECEIPT FOR (checkbox) Primary (checkbox) General		

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SUBTOTAL OF RECEIPTS THIS PAGE (optional):

TOTAL THIS PERIOD (last page this line number only):

SCHEDULE A

FINANCIAL RECEIPTS

PAGE 10 OF 10 PAGES

LINE NUMBER 11(a)(1)

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

Name of Committee (in full): Postayer Campaign Committee  
C 00214567

12/31/91

NAME AND ADDRESS

DONOR/OCCUPATION

DATE AMOUNT

David M. Rosenborg  
202 Hodgeman Drive  
Houston, TX 77051

AGG. Total  
Attorney

12/31/91 250

EXPIRES: 1/1/2000

Aggregate total to date 250

David M. Rosenborg  
202 Hodgeman Drive  
Houston, TX 77051

Attorney

12/31/91 250

EXPIRES: 1/1/2000

Aggregate total to date 500

Paul G. Sherry  
41 Crescent Avenue  
Houston, TX 77052

Attorney

12/31/91 500

EXPIRES: 1/1/2000

Aggregate total to date 500

Paul G. Sherry  
41 Crescent Avenue  
Houston, TX 77052

Attorney  
Postmaster

12/31/91 500

EXPIRES: 1/1/2000

Aggregate total to date 750

RECEIVED BY: [Signature]

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SCHEDULE A ITEMIZED RECEIPTS

Friend of Bob Torricelli, Inc.  
P.O. Box 809, Teaneck, New Jersey 07666

FOR LINE # 11a

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
Jack Bosen Robin Lane	Continental Health Chairman	12/31/91	\$1000.00	Primary -92
Alpine YEAR TO DATE	NJ 07620		\$1000.00	
Joseph Bosen 17 York Place	Continental Health Vice President	12/31/91	\$1000.00	Primary -92
Tenafly YEAR TO DATE	NJ 07670		\$1000.00	
David Rosenberg 209 Hedgemere Drive	Environmental Comp Executive V.P.	12/31/91	\$1000.00	Primary -92
Devon YEAR TO DATE	PA 19333		\$1000.00	
Steven Bothman 471 Clinton Avenue	Self Attorney	09/19/91	\$250.00	Primary -92
Wyckoff YEAR TO DATE	NJ 07481		\$250.00	
Leonard Rubin 11 Berkeley Drive	Carolace Chairman	07/01/91	\$1000.00	Primary -92
Tenafly YEAR TO DATE	NJ 07670		\$1000.00	
Dimitrios Sakkas 317 Iroquis Lane	Stony Hill Inn Owner	10/28/91	\$1000.00	Primary -92
Franklin Lakes YEAR TO DATE	NJ 07417		\$1000.00	
David Samson 54 East 81st Street	Wolff & Samson, PA Attorney	10/01/91	\$1000.00	General-91
New York YEAR TO DATE	NY 10021		\$2000.00	
Alfred Sensari P.O. Box 2187	Sensari Enterprises President	12/12/91	\$500.00	Primary -92
S. Hackensack YEAR TO DATE	NJ 07606		\$500.00	

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<p>Full Name and Mailing Address Lustave Tapera 201 8th Street North Bergen NJ 0704</p> <p>Receipt for General Election</p>	<p>Employer: Gonzalez &amp; Tapera</p> <p>Occupation: President</p> <p>Aggregate Year to Date: \$1,600.00</p>	<p>Date: 10/15/92</p>	<p>Amount: \$1000.00</p>
<p>Full Name and Mailing Address Norman A Patel 600 Pavonia Ave Jersey City NJ 0730</p> <p>Receipt for General Election</p>	<p>Employer: Pavonia Medical Assoc</p> <p>Occupation: Physician</p> <p>Aggregate Year to Date: \$250.00</p>	<p>Date: 11/02/92</p>	<p>Amount: \$250.00</p>
<p>Full Name and Mailing Address Adel Harsh</p> <p>Information Requested</p> <p>Receipt for General Election</p>	<p>Employer: Cedars Realty Co.</p> <p>Occupation: Owner</p> <p>Aggregate Year to Date: \$250.00</p>	<p>Date: 10/19/92</p>	<p>Amount: \$250.00</p>
<p>Full Name and Mailing Address Orlando Gru 448 Kane Truck Rd Edgewater NJ 0706</p> <p>Receipt for General Election</p>	<p>Employer: Self-employed</p> <p>Occupation: Real Estate Contractor</p> <p>Aggregate Year to Date: \$200.00</p>	<p>Date: 10/19/92</p>	<p>Amount: \$200.00</p>
<p>Full Name and Mailing Address Evelle Guller 297 Florida Ave Paterson NJ 07650</p> <p>Receipt for General Election</p>	<p>Employer: President Supermarket</p> <p>Occupation: Owner</p> <p>Aggregate Year to Date: \$1,500.00</p>	<p>Date: 10/12/92</p>	<p>Amount: \$1000.00</p>
<p>Full Name and Mailing Address Daniel Malachuk 1775 Sargentina Ave Union City NJ 0708</p> <p>Receipt for General Election</p>	<p>Employer: C. F. Malachuk &amp; Sons</p> <p>Occupation: Semi-retired</p> <p>Aggregate Year to Date: \$1,000.00</p>	<p>Date: 11/05/92</p>	<p>Amount: \$1000.00</p>
<p>Full Name and Mailing Address David H Rosenberg and Redpore Dr. Dover PA 17033</p> <p>Receipt for General Election</p>	<p>Employer: E C B Ins.</p> <p>Occupation: Insurance</p> <p>Aggregate Year to Date: \$1,000.00</p>	<p>Date: 10/31/92</p>	<p>Amount: \$1000.00</p>
<p>Success of Receipts This Page (Optional).....&gt; Total this Period (last page this line number only).....&gt;</p>			

11-01-92 2011



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Full Name of Committee: WELDON FOR CONGRESS COMMITTEE

A. Full Name, Address, Zip Employer/Occupation Date Receipts

Hubert L. DeLozier  
639 Foxfield Road Riddle Health Care Center 10/26/92 1000.00  
Bryn Mawr, PA 19010 MD., DC

Receipt for: General Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts

Robert M. Valentini Bell of PA 10/15/92 500.00 EAR  
One Parkway - 18th Philadelphia PA 19102 President/CEO

\* EAR = Contribution Earmarked Thru Bell of Pennsylvania PAC

Receipt for: General Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts

Industrial Rehabilitation Assoc. St Agnes Medical Ctr 10/26/92 1000.00  
Philadelphia PA 19145 (See Memo Schedules)

Receipt for: Primary Year-to-Date Total: \$ 3000.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts

Industrial Rehabilitation Assoc. St Agnes Medical Ctr 10/26/92 2000.00  
Philadelphia PA 19145 (See Memo Schedules)

Receipt for: General Year-to-Date Total: \$ 3000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts

David M. Rosenberg Environmental Complan 10/30/92 1000.00  
209 Hedgemere Drive Devon PA 19333 Information Requested

Receipt for: General Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts

William J. Murdock III Information Requested 11/02/92 1000.00  
805 Montgomery Avenue Fort Washington PA 19034 Information Requested

Receipt for: General Year-to-Date Total: \$ 1000.00

SUBTOTAL of Receipts This Page 6000.00

TOTAL This Period

R

SCHEDULE A  
ITEMIZED RECEIPTS  
Contributions from Individuals/Persons

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

NAME OF COMMITTEE (in Full)  
Manton for Congress Inc C00188508

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Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
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David Rosenberg 1 East Uwchlan Avenue #300 Exton, PA 19341-	ARCO Sr. Dir. & Counsel	10/07/92	\$1000.00
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Receipt for [X]General Aggregate YTD > \$1000.00

Beatrice Schuman 945 Fifth Avenue New York, NY 10021-	Self Housewife	10/06/92	\$1000.00
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Receipt for [X]General Aggregate YTD > \$1000.00

Doug Walgren 8312 Hunting Hill Lane Mc Lean, VA 22102-	Self Attorney	10/07/92	\$100.00
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Receipt for [X]General Aggregate YTD > \$600.00

SUBTOTAL of Receipts This Page.....> \$2100.00

TOTAL This Period.....> \$2100.00

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ITEMIZED RECEIPTS (92- 5)  
Individual Contributions

Citizens for Joe Kennedy

C00222455

Page: 2 of 7

Donor Name & Address	Emp./Occup./YTD	Date	\$ Amount
Dr. David Pladziewicz 72 Woburn Street Medford, MA 02155	Self-employed Physician	10/01/92	400.00 G92 In-Kind

prim: genl: X othr: YTD \$ 1300.00

Mr. Sumner M. Redstone 98 Baldpate Hill Road Newton, MA 02159	Redstone Mgmt. NE Theatre Corp. President	10/13/92	325.00 G92
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prim: genl: X othr: YTD \$ 325.00

Mr. David M. Rosenberg, - Esq One E Uwchlan Avenue #300 Exton, PA 19341	Environmental Compliance Servc Exec. V.P.	10/13/92	500.00 G92
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prim: genl: X othr: YTD \$ 0.00

Mr. Allen W. Sanborn 76 Woodcliff Road Wellesley Hills, MA 02181	Best Effort	10/13/92	200.00 G92
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prim: genl: X othr: YTD \$ 200.00

Mr. Albert N. Thompson 235 West 154th Street New York, NY 10039	Consolidated Beverage President	10/13/92	500.00 G92
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prim: genl: X othr: YTD \$ 750.00

Dr. Kathryn I. Vitiello - D.M.D 17 Washington Street Somerville, MA 02143	Dentist	10/01/92	400.00 G92 In-Kind
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prim: genl: X othr: YTD \$ 1300.00

Ms. Sissy Weinberg 10 Estabrook Road West Newton, MA 02165	Self Consultant	10/13/92	200.00 G92
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prim: genl: X othr: YTD \$ 200.00

SUBTOTAL of receipts (optional) ..... 2525.00

TOTAL this period (last page).....

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SCHEDULE A ITEMIZED RECEIPTS

Friends of Bob Torricelli, Inc.  
P.O. Box 809, Teaneck, NJ 07666  
NAME AND ADDRESS

FOR LINE 0 11a  
AMOUNT ELECTION

Gertrude Richman                      Homemaker                      10/14/92                      \$100.00                      General-92  
245 Prospect Avenue

Hackensack                      NJ 07601  
YEAR TO DATE                      \$275.00

David Rosenberg                      Environmental Comp                      10/07/92                      \$1000.00                      General-92  
209 Hedgemere Drive                      Executive V.P.

Devon                      PA 19333  
YEAR TO DATE                      \$1000.00

Robert Ross                      Retired                      10/07/92                      \$1000.00                      General-92  
2387 Linwood Avenue

1st Floor  
Fort Lee                      NJ 07024  
YEAR TO DATE                      \$1050.00

Leonard Rabin                      Carolane                      10/07/92                      \$1000.00                      General-92  
11 Berkeley Drive                      Chairman

Tenafly                      NJ 07670  
YEAR TO DATE                      \$1000.00

Roger Schwarz                      PEE&G                      10/05/92                      \$250.00                      General-92  
102 Sequoia Court, 10                      Executive

Princeton                      NJ 08540  
YEAR TO DATE                      \$250.00

Indarjit Singh                      Self                      10/05/92                      \$500.00                      General-92  
15434 Silver Glen Drive                      Physician

Montclair                      VA 22026  
YEAR TO DATE                      \$500.00

Saini Singh                      Info. Requested                      10/09/92                      \$200.00                      General-92  
1040 Carper Street

McLean                      VA 22101  
YEAR TO DATE                      \$200.00

Robert Sommer                      MW Strategic Comm.                      10/13/92                      \$1000.00                      General-92  
319 Fairmount Road                      Exec. Vice Pres.

Ridgewood                      NJ 07450  
YEAR TO DATE                      \$2000.00

3249043600897



SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category for the Detailed Summary Page

PAGE 28  
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CONTRIBUTIONS FROM INDIVIDUALS/PERSONS

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): Bon Endreich for Congress Committee

FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. D. L. Creel P. O. Box A Haleyville, AL 35565	NAME OF EMPLOYER Franklin Homes, Inc.	DATE (MM/DD/YY) 9/26/92	AMOUNT OF EACH RECEIPT THIS PERIOD 200.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION:	AGGREGATE YEAR-TO-DATE > 200.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Bishop, York, & Delahay 210 S. 28th St. Birmingham, AL 35233	NAME OF EMPLOYER	DATE (MM/DD/YY) 9/26/92	AMOUNT OF EACH RECEIPT THIS PERIOD 200.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION:	AGGREGATE YEAR-TO-DATE > 200.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. Eric R. Hansen 1321 Duke Street, No. 200 Alexandria, VA 22314	NAME OF EMPLOYER	DATE (MM/DD/YY) 9/28/92	AMOUNT OF EACH RECEIPT THIS PERIOD 500.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION:	AGGREGATE YEAR-TO-DATE > 500.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. David Rosenberg One E. Uchlan Ave., Ste. 300 Exton, PA 19341	NAME OF EMPLOYER Environmental Compliance Services	DATE (MM/DD/YY) 9/30/92	AMOUNT OF EACH RECEIPT THIS PERIOD 1,000.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION:	AGGREGATE YEAR-TO-DATE > 1,000.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. Doug Cook 2671 Monte Vista Drive Birmingham, AL 35216	NAME OF EMPLOYER self	DATE (MM/DD/YY) 9/30/92	AMOUNT OF EACH RECEIPT THIS PERIOD 500.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION:	AGGREGATE YEAR-TO-DATE > 500.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. Milton D. Jacobson 3300 Faring Rd. Birmingham, AL 35223	NAME OF EMPLOYER	DATE (MM/DD/YY) 9/30/92	AMOUNT OF EACH RECEIPT THIS PERIOD 500.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION: retired	AGGREGATE YEAR-TO-DATE > 500.00	
FULL NAME, MAILING ADDRESS AND ZIP CODE Mr. Roscoe Pile 10495 W. 17th Ave. Lakewood, CO 80215	NAME OF EMPLOYER	DATE (MM/DD/YY) 9/30/92	AMOUNT OF EACH RECEIPT THIS PERIOD 1,000.00 Cash
RECEIPT: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Election <input type="checkbox"/> Other (specify):	OCCUPATION: retired	AGGREGATE YEAR-TO-DATE > 1,000.00	

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SCHEDULE A

ITEMIZED RECEIPTS

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Name of Committee (in full): Al Swift for Congress Committee

A. Full Name, Address and ZIP Code	Name of Employer	Date	Amount
MICHAEL RENTFROW 700 FAIRVIEW AVE WAYNESBORO, PA	SELF Occupation Medical Industries	09/14/92	250.00

Receipt for:  Primary  General  
 Other (specify): | Aggr YTD >\$ 250.00

B. Full Name, Address and ZIP Code	Name of Employer	Date	Amount
DAVID ROSENBERG ONE EAST UWCHLAN AVE #300 EXTON, PA 19341	ENVIRO COMPLIANCE Occupation MANAGER	09/30/92	1,000.00

Receipt for:  Primary  General  
 Other (specify): | Aggr YTD >\$ 1,000.00

C. Full Name, Address and ZIP Code	Name of Employer	Date	Amount
A VIC ROSENFELD 2495 NW NICOLAI ST BOX 10067 PORTLAND, OR 97210	CALBAG METALS Occupation EXEC DIR	09/14/92	1,000.00

Receipt for:  Primary  General  
 Other (specify): | Aggr YTD >\$ 1,000.00

D. Full Name, Address and ZIP Code	Name of Employer	Date	Amount
EDWARD RUBATINO 2613 TAYLOR EVERETT, WA 98203	Occupation Unknown	08/31/92	250.00

Receipt for:  Primary  General  
 Other (specify): | Aggr YTD >\$ 250.00

E. Full Name, Address and ZIP Code	Name of Employer	Date	Amount
ROBERT SCHWARTZ 3828 FORT WORTH AVE ALEXANDRIA, VA 22304	MCDERMOTT, WILL Occupation Attorneys	09/24/92	250.00

Receipt for:  Primary  General  
 Other (specify): | Aggr YTD >\$ 400.00

Subtotal of Receipts This Page (optional).....\$ 2,750.00  
 Total This Period (last page this line number only).....\$

SCHEDULE A

ITEMIZED RECEIPTS

Contributions from Individuals/Persons

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

PAGE 15 OF 18  
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) Lehigh Valley Citizens for Don Ritter (AKA Citizens for Don Ritter) C00092056/077542

240436008314

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
✓ Avard Rosenberg 1000 Lehigh Avenue Allentown, PA 19341 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		9/28/92	\$1,000.00
		Occupation	Aggregate Year-to-Date > \$1,000.00
B. Full Name, Mailing Address and ZIP Code Ronald M. Sandmeyer One Sandmeyer Lane Philadelphia, PA 19116 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Sandmeyer Steel Company Occupation President	Date (month, day, year) 9/30/92	Amount of Each Receipt this Period \$1,000.00
		Aggregate Year-to-Date > \$1,000.00	
C. Full Name, Mailing Address and ZIP Code Piyush A. Shah 6916 Gun Club Road Coopersburg, PA 18036 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Fabric Development Inc. Occupation Engineer	Date (month, day, year) 8/3/92	Amount of Each Receipt this Period \$200.00
		Aggregate Year-to-Date > \$200.00	
D. Full Name, Mailing Address and ZIP Code R S. Sheets 3204 W. Cedar Street Allentown, PA 18104 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Retired	Date (month, day, year) 9/28/92	Amount of Each Receipt this Period \$50.00
		Aggregate Year-to-Date > \$250.00	
E. Full Name, Mailing Address and ZIP Code Alexander F. Smith Cricket Springs Gelgertown, PA 19523 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Gilbert Associates, Inc. Occupation Chairman and President	Date (month, day, year) 9/14/92	Amount of Each Receipt this Period \$1,000.00
		Aggregate Year-to-Date > \$1,000.00	
F. Full Name, Mailing Address and ZIP Code Charles D. Snelling 2949 Greenleaf Street Allentown, PA 18104 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self Occupation Venture Capital	Date (month, day, year) 7/9/92	Amount of Each Receipt this Period \$1,000.00
		Aggregate Year-to-Date > \$1,000.00	

SUBTOTAL of Receipts This Page (optional) ..... \$4,250.00  
 TOTAL This Period (last page this line number only).....



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.

DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE

Name, Mailing Address and ZIP Code	Employer/ Occupation	Date	Amount
Oliver Rosenberg 709 S. Front Street Harrisburg, PA 17104	Self Real Estate Broker	9/24/92	\$1,500.00
	Y-T-D		\$1,500.00
David Rosenberg One East Uchlan Ave. Suite 300 Eaton, PA 19341	Environmental Compliance Services Vice President	9/10/92	\$20,000.00
	Y-T-D		\$20,000.00
Robert M. Rosencrans 331 Round Hill Road Greenwich, CT 06830	Columbia International President	9/25/92	\$1,000.00
	Y-T-D		\$1,000.00
Rick Rosen 9 Executive Drive 8125 Fairview Heights, IL 62206	Rosen & Associates, P.C. Attorney	9/23/92	\$1,000.00
	Y-T-D		\$1,500.00
Edward P. Roaki, Jr. 13191 Crossroads Parkway North Sixth Floor City of Industry, CA 91746	Information Requested	9/29/92	\$5,000.00
	Y-T-D		\$5,000.00
Robert Ross 300 East 75th Street New York, NY 10021	Self Doctor	9/29/92	\$1,500.00
	Y-T-D		\$1,500.00
Jeffrey R. Roth 5105 West Bloomfield Lake Road West Bloomfield, MI 48323	Frigid Food Productions Executive	9/22/92	\$1,000.00
	Y-T-D		\$1,000.00
Subtotal of Receipts This Page .....			\$31,000.00

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

REPORT COVERING PERIOD FROM 9/ 1/92 THRU 9/30/92 OVER \$200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. DAVID ROSENBERG ONE E. UMCHLAN AVENUE EXTON, PA 19341			\$10000.00
EXECUTIVE V.P.	9/16/92	\$10000.00	✓
DR. L. E. ROSENBLAD PO BOX 2700 TEXAS CITY, TX 77590			\$270.00
	9/ 4/92	\$10.00	
INFORMATION REQUESTED			
MR. MAURICE ROSENFELD 208 SOUTH LASALLE STREET CHICAGO, IL 60604			\$300.00
INFORMATION REQUESTED			
MR. DAVID ROSENKRANS 1500 SAINT CHARLES PLACE PEMBROKE PINES, FL 33026			\$1413.00
STAMP DEALER	9/ 2/92	\$60.00	
	9/ 4/92	\$15.00	
	9/21/92	\$50.00	
	9/21/92	\$75.00	
MR. STANLEY C. ROSENSTOCK 23 MARKET EDENVILLE, NY 12420			\$1000.00
VICE PRESIDENT	9/ 4/92	\$1000.00	
MR. JULIAN ROSENTHAL 7145 HARRON STREET FLUSHING, NY 11375-5957			\$305.00
INFORMATION REQUESTED	9/24/92	\$60.00	
MRS. SYLVIA ROGER 6601 WEST MAPLE WICHITA, KS 67209-2140			\$373.35
RETIRED	9/ 1/92	\$25.00	
	9/ 9/92	\$5.00	
	9/17/92	\$30.00	
	9/21/92	\$20.00	

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 2 OF 3  
FOR LINE NUMBER 11 (a) (1)

CONTRIBUTIONS - INDIVIDUAL

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)

SCHAEFER TO CONGRESS

CO 0165209

29420041316078455

<p>A. Full Name, Mailing Address and ZIP Code RAY KOGOVSEK 8 KNIGHTSBRIDGE PUEBLO, CO 81001</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer KOGOVSEK &amp; ASSOCIATES</p> <p>Occupation PRESIDENT</p> <p>Aggregate Year-to-Date &gt; \$ 250.00</p>	<p>Date (month, day, year) 9/30/92</p>	<p>Amount of Each Receipt this Period 250.00</p>
<p>B. Full Name, Mailing Address and ZIP Code CHRISTINE MULICK 6905 EAST BRIARWOOD DRIVE LAKEWOOD, CO 80112</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer KOGOVSEK &amp; ASSOCIATES</p> <p>Occupation LOBBYIST</p> <p>Aggregate Year-to-Date &gt; \$ 600.00</p>	<p>Date (month, day, year) 9/30/92</p>	<p>Amount of Each Receipt this Period 100.00</p>
<p>C. Full Name, Mailing Address and ZIP Code RAY R. RAHNE 2615 SOUTH NEWTON STREET DENVER, CO 80219</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer DENVER FIRE DEPARTMENT</p> <p>Occupation FIREFIGHTER</p> <p>Aggregate Year-to-Date &gt; \$ 300.00</p>	<p>Date (month, day, year) 8/31/92</p>	<p>Amount of Each Receipt this Period 300.00</p>
<p>D. Full Name, Mailing Address and ZIP Code ROBERT D. BOLANDER 845 COOK STREET DENVER, CO 80206</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation RETIRED</p> <p>Aggregate Year-to-Date &gt; \$ 720.00</p>	<p>Date (month, day, year) 8/31/92 8/28/92</p>	<p>Amount of Each Receipt this Period 100.00 200.00</p>
<p>E. Full Name, Mailing Address and ZIP Code ROBERT D. BOLANDER 845 COOK STREET DENVER, CO 80206</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation RETIRED</p> <p>Aggregate Year-to-Date &gt; \$ 720.00</p>	<p>Date (month, day, year) 9/25/92</p>	<p>Amount of Each Receipt this Period 400.00 IN-KIND</p>
<p>F. Full Name, Mailing Address and ZIP Code DAVID ROSENBERG 1 EAST UWCHLAN AVENUE, #300 EXTON, PA 19341</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer ENVIRONMENTAL COMPLIANCE SERVICE</p> <p>Occupation EXECUTIVE VP</p> <p>Aggregate Year-to-Date &gt; \$ 1,000.00</p>	<p>Date (month, day, year) 9/29/92</p>	<p>Amount of Each Receipt this Period 1,000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code ROBERT A. RUSSELL 6 VILLAGE ROAD ENGLEWOOD, CO 80110</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer SELF</p> <p>Occupation ATTORNEY</p> <p>Aggregate Year-to-Date &gt; \$ 1,000.00</p>	<p>Date (month, day, year) 8/28/92</p>	<p>Amount of Each Receipt this Period 1,000.00</p>

SUBTOTAL of Receipts This Page (optional)

3,350.00

TOTAL This Period (last page this line number only)

**SCHEDULE A - ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page	Page	of
	8	8
For Line Number		114(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 collect contributions for such committee.

**NAME OF COMMITTEE (in Full)**

Friends for Harry Reid

Full Name, Mailing Address and Zip Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
David H Rosenberg 89 Sedgmore Drive Devon, PA 19333	Environmental Compliance Services	08/05/02	1000.00 ✓
Receipt for: <input checked="" type="checkbox"/> Primary   <input type="checkbox"/> General   <input type="checkbox"/> Other (specify)	Occupation Executive Vice President Aggregate Year To Date \$ 1000.00		
Peppin Sullivan 2695 Solar Drive Reno, NV 89509	N/A	07/20/02	500.00
Receipt for: <input checked="" type="checkbox"/> Primary   <input type="checkbox"/> General   <input type="checkbox"/> Other (specify)	Occupation Businessman Aggregate Year To Date \$ 500.00		

74  
9001

Total of Receipts This Page (optional) ..... 1500.00  
 Total Period (last page this line number only) ..... 24150.00

SCHEDULE A - ITEMIZED RECEIPTS



Contributions from Individuals/Persons

LINE NUMBER 11A

Name of Committee: NEW MEXICANS FOR BILL RICHARDSON

Name and Address	Employer	Date	Amount
Mike Rengel 5900 Canyon Ridge NE Albuquerque, NM 87111	Employer: Advanced Sciences, Inc.	08/18/92	250.00
Receipt for General 1992	Occupation: Vice President		
	YTD amount: 250.00		
Miguel Rios, Jr. 10067 Los Consados Raod NW Albuquerque, NM 87114	Employer: Orion International	08/18/92	250.00
Receipt for General 1992	Occupation: President		
	YTD amount: 250.00		
Michael H. Rivera P.O. Box 4555 Taos, NM 87571	Employer: Health Centers of Northern New Mexico	08/03/92	250.00
Receipt for General 1992	Occupation: Dental Director		
	YTD amount: 250.00		
E. Steven Romero 3801 Lowell Place, N. E. Albuquerque, NM 87122	Employer: Advanced Sciences, Inc.	08/18/92	250.00
Receipt for General 1992	Occupation: Vice President		
	YTD amount: 250.00		
David M. Rosenberg 209 Hedgemere Drive Devon, PA 19333	Employer: Environmental Compliance Services, Inc.	08/03/92	1000.00
Receipt for General 1992	Occupation: Executive Vice President		
	YTD amount: 1000.00		
Carolyn Sanders HC 68, Box 141 Portales, NM 88130	Employer: Portales National Bank	08/15/92	250.00
Receipt for General 1992	Occupation: Teller		
	YTD amount: 250.00		
Sub-total receipts this pg:			2250.00

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 2214102512

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 112  
FOR LINE 11200  
11a

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) **Engel For Congress**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Marshall A. Brachman P.O. Box 2200 Fort Worth, Texas 76113	self employed	7/6/92	\$ 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Invest/Export Business</b> Aggregate Year-to-Date > \$ 500		
David D. Rosenberg 709 Hedgenere Drive Devon PA 19333	Environmental Compliance Service	7/1/92	\$ 1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Executive Vice President</b> Aggregate Year-to-Date > \$ 1000		
David A. Alpert 179 Central Pkwy Mt Vernon NY 10548	Chap. Riverside Funeral	7/6/92	\$ 1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Vice President</b> Aggregate Year-to-Date > \$ 1000		
Robert G. Gammis 284 E. 190th St Brooklyn NY 10457	Givens on Theater	7/17/92	\$ 575.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>owner</b> Aggregate Year-to-Date > \$ 500		
Elias Eshaghian 5221 Utis Ave Torrance CA 90506	Self-employed	8/7/92	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Self-employed</b> Aggregate Year-to-Date > \$ 250		
Elias Ghodsi 8431 Santa Monica Blvd Los Angeles CA 90064	Self-employed	7/23/92	\$ 360.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Sales</b> Aggregate Year-to-Date > \$ 360		
David Eshaghian 237 W 35th St NY NY 10001	Real Estate	8/21/92	\$ 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: <b>Self Employed</b> Aggregate Year-to-Date > \$ 250		

SUBTOTAL of Receipts This Page (optional) ..... **\$3860.00**

TOTAL This Period (last page this line number only) .....

9201453321

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)	EMPLOYER IN CURRENT EMPLOY	FEC ID NUMBER - 97215	
Full Name, Mailing Address and Zip Code	Name of Employer/Occupation	Date (MM/YY)	Amount Election
Mr. Marvin Ralph 212 Kramer Sikeston, Missouri 63801	Bob Ralph Dist. Co.  Wholesaler	07/02/92	200.00 Primary
	Aggregate Year-to-Date >	\$ 200.00	
Mr. Gary D. Bunney 640 Sunbridge Chesterfield, Missouri 63017	Edward D. Jones  Partner	07/02/92	200.00 Primary
	Aggregate Year-to-Date >	\$ 200.00	
Mr. Hans A. Reynolds 22 Hubster Oaks Drive Hubster Groves, Missouri 63119	Hubster-Groves Co.  Executive	07/05/92	200.00 Primary
	Aggregate Year-to-Date >	\$ 200.00	
Mr. Richard H. Nieman 64 Overhill Drive St. Louis, Missouri 63124	Nieman & Bitts, P.C.  Attorney	07/12/92	1,000.00 Primary
	Aggregate Year-to-Date >	\$ 1,000.00	
Mr. David H. Benschberg 209 Hodgman Drive Brynar, Pennsylvania 19333	ECS Incorporated  Executive Vice President	07/07/92	1,000.00 Primary ✓
	Aggregate Year-to-Date >	\$ 1,000.00	
Mr. James G. Bessenthal 100 Bayless Place Richmond, Virginia 23229	Standard Drug Stores  President	07/07/92	200.00 Primary
	Aggregate Year-to-Date >	\$ 200.00	
Mr. H.E. Daniel 1682 Oceanview Drive Tierra Verde, Florida 33715	Daniel Companies  President & C.E.O.	07/12/92	200.00 Primary
	Aggregate Year-to-Date >	\$ 200.00	
SUBTOTAL of Receipts This Page (optional)			\$ 3,500.00
TOTAL This Period (last page this line number only)			

**SCHEDULE A-P ITEMIZED RECEIPTS**  
**Contributions from Individuals/Persons**

**PAGE 8 OF 18**  
**FOR LINE NUMBER 17(a)(1)**

**NAME OF COMMITTEE (in Full)**  
**KERRY FOR PRESIDENT, INC. C00254250**

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

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Eric Selberg US West Communications 1801 California Street Denver, CO 80202-	US West Information Requested	06/23/92	\$250.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$500.00
Herb L. Kennamer Route 2 Box 1201 Van Vleck, TX 77482-	Information Requested Information Requested	06/10/92	\$1000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$1000.00
H. Lee Godfrey 2224 Rice Blvd. Houston, TX 77005-	Information Requested Information Requested	06/12/92	\$2000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$2000.00
David M. Rosenberg 209 Hodgman Drive Devon, PA 19333-	Information Requested Information Requested	06/12/92	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$500.00
Ed Bullock PO Box 2243 Austin, TX 78768-	Information Requested Information Requested	06/12/92	\$1000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$1000.00
Diane Smith 109 Schooner Austin, TX 78734-	Information Requested Information Requested	06/12/92	\$250.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$250.00
Leonard B. Selin 231 E 62nd Street New York, NY 10021-	Information Requested Information Requested	06/16/92	\$250.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$250.00
SUBTOTAL of Receipts This Page..... >			\$5250.00
TOTAL This Period..... >			

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R

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): Kostmayer Campaign Committee  
C 00214567

06/30/91

NAME AND ADDRESS	EMPLOYER/OCCUPATION	DATE	AMOUNT
Max Sher 135 S. Main Street Doylestown, PA 18901 [X] PRIMARY [ ] General	Cheap Mac Furniture Warehouse Businessman	06/27/91	250
		Aggregate Year-to-Date:	250
Peter L. Bittenweiser 8325 St. Martins Lane Philadelphia, PA 19118 [X] PRIMARY [ ] General	Self employed Consultant	06/27/91	250
		Aggregate Year-to-Date:	250
Ronald W. Greller 545 Taylor Avenue Newtown, PA 18940 [X] PRIMARY [ ] General	Morris Iron and Steel President	06/27/91	250
		Aggregate Year-to-Date:	250
Sylvan H. Cohen, Esq. 12 South 12th Street Philadelphia, PA 19107 [X] PRIMARY [ ] General	Cohen, Shapiro, Polisher etc. Attorney	06/27/91	250
		Aggregate Year-to-Date:	250
Barbara S. Jacobson 264 Windy Bush Rd. New Hope, PA 18938 [X] PRIMARY [ ] General	Homemaker	06/27/91	100
		Aggregate Year-to-Date:	300
Joseph C. Kohn, Esq. 2400 Reading Center Philadelphia, PA 19107 [X] PRIMARY [ ] General	Kohn, Savett, Klein & Graf Attorney	06/28/91	500
		Aggregate Year-to-Date:	500
Harold E. Kohn, Esq. 2400 One Reading Center Philadelphia, PA 19107 [X] PRIMARY [ ] General	Kohn, Savitt, Marion, etc. Attorney	06/28/91	500
		Aggregate Year-to-Date:	500
David M. Rosenberg 209 Hedgenere Drive Devon, PA 19333 [X] PRIMARY [ ] General	EC3 Inc. Attorney	06/28/91	250
		Aggregate year-to-Date:	250

SUBTOTAL of Receipts this Page \$ 2,350  
TOTAL This Period \$



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 28, 1994

Ellen S. Miller, Executive Director  
Center for Responsive Politics  
1320 19th Street, N.W.  
Washington, D.C. 20036

RE: MUR 3900

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by David M. Rosenberg. The respondent 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 3900. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar, Attorney  
Central Enforcement Docket

Enclosure  
Procedures

24043600842



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 28, 1994

David M. Rosenberg  
One East Uwchlan Avenue  
Suite 300  
Exton, PA 19341

RE: MUR 3900

Dear Mr. Rosenberg:

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 3900. 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.

24043600843

David M. Rosenberg  
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Mary L. Taksar, Attorney  
Central Enforcement Docket

**Enclosures**

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

24043600844



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

FEB 15 1994

Hugh Westbrook, Treasurer  
Kerrey for President, Inc.  
1511 K Street, N.W. #518  
Washington, D.C. 20005

RE: MUR 3900

Dear Mr. Westbrook:

The Federal Election Commission received a complaint which indicates that Kerrey for President, Inc. ("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 3900. 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.

24043600845

Hugh Westbrook, Treasurer  
Kerrey for President, Inc.  
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar, Attorney  
Central Enforcement Docket

**Enclosures**

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

24043600846

**Ifshin & Friedman**  
ATTORNEYS AT LAW

888 16th Street, N.W.  
Washington, D.C. 20006  
(202) 293-4175 Fax (202) 296-8791

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

FEB 14 10 14 AM '94

February 9, 1994

Ms. Joan McEnery  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

94 FEB 14 PM 3:50

RECEIVED  
FEDERAL ELECTION COMMISSION

Re: MUR 3900

Dear Ms. McEnery:

We have been retained by Mr. David Rosenberg to represent him in the above referenced matter. Enclosed please find an executed Designation of Counsel form.

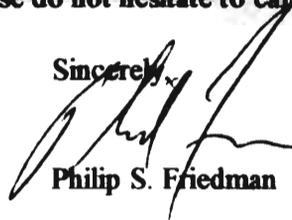
The purpose of this letter is to request an extension of time to file a responsive brief. As the allegations concern contributions made several months ago, Mr. Rosenberg needs additional time to collect his records to adequately respond to the complaint.

Accordingly, Mr. Rosenberg requests an additional 20 days over the 15 days in which he is required to file a responsive brief. We respectfully request an extension of time to March 7, 1994.

When this matter has been assigned to a staff attorney, please have that person contact me so that I may discuss this matter prior to filing a responsive brief.

Thank you for your cooperation and understanding in granting this extension. If you have any questions or concerns, please do not hesitate to call.

Sincerely,



Philip S. Friedman

Enclosure  
cc: David Rosenberg

24043600847

ID: \_\_\_\_\_

FEB 08 '94 16:57 No.008 P.03

MUR 3900

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

NAME OF COUNSEL: Philip Friedman, Esq.

FEB 14 10 14 AM '94

ADDRESS: Ifshin & Friedman

888 16th Street, NW

Suite 300

Washington, D.C. 20006

TELEPHONE: ( 202 ) 293-4175

94 FEB 14 PM 3:50

RECEIVED

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.

2-8-94  
Date

[Signature]  
Signature

RESPONDENT'S NAME: David M. Rosenberg

ADDRESS: 209 Hedgemarc Drive

Devon, PA 19333

TELEPHONE: HOME( 610 ) 688-2545

BUSINESS( 610 ) 458-0570

24043600348



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEB 18 1994

Philip S. Friedman, Esquire  
Ifshin & Friedman  
888 16th Street, N.W.  
Suite 300  
Washington, DC 20006

RE: MUR 3900  
David M. Rosenberg

Dear Mr. Friedman:

This is in response to your letter dated February 9, 1994, which we received on February 14, 1994, requesting an extension until March 7, 1994, to respond to the complaint in this matter. 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 March 7, 1994.

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

Sincerely,

*Karen White*  
for  
Joan McEnery  
Paralegal

24043600349

02-28-94 07:24PM

FROM SENATOR KERREY

TO 20193880

FOOI/002

06c 302

J. ROBERT KERREY  
MEMBER

3/1/94 9:45  
Manny

# United States Senate

WASHINGTON, DC 20510

94 FEB 29 AM 9:54

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## FAX MACHINE COVER FORM

DATE: 2/28  
Number of Pages  
(Including Cover): 2

FACSIMILE MESSAGE TO: Tuan McEnergy / General Counsel's  
ORGANIZATION: FEC Office

FACSIMILE NUMBER OF RECEIVER: 219 3880

FACSIMILE MESSAGE FROM: Shelb NY

MESSAGE: Please see attached and call  
me at 224-6551 tomorrow  
Thanks!

24043600850

If there is a problem with this transmission, please call:  
202/224-6551.

RECEIVED  
FEDERAL ELECTION COMMISSION

94 MAR -2 11 23 34

March 2, 1994

VIA FACSIMILE

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

Re: MUR 3900

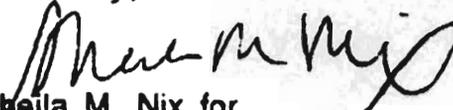
Dear Ms. McEnery:

I am writing to request a fifteen day extension to respond to MUR 3900. I did not receive a copy of the complaint until Friday February 25, 1994, and I was unable to talk to you about the complaint to receive clarification until Tuesday, March 1, 1994. Since I was just designated as counsel, I will need at least fifteen days to research and respond to the MUR. Furthermore, I am acting on a volunteer basis and I must complete my other job duties before I can concentrate on responding to the MUR.

Since the Kerrey for President office received the complaint on February 15, a fifteen day extension would require our response to be filed on Thursday, March 17, 1994.

Thank you for your consideration of this request.

Sincerely,



Sheila M. Nix for  
Kerrey for President, Inc.

24043600851

**STATEMENT OF DESIGNATION OF COUNSEL**

NUR 3960

NAME OF COUNSEL: Sheva Nik

ADDRESS: 245 2nd St NE #  
Washington DC 20002

TELEPHONE: ( 202 ) 544-5450  
462-3907

24 FEB 29 AM 9:54

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.

2/25/94  
Date

[Signature]  
Signature

RESPONDENT'S NAME: Kerry for President

ADDRESS: 1511 K Street NW #  
Washington DC  
20005

TELEPHONE: HOME ( \_\_\_\_\_ ) \_\_\_\_\_

BUSINESS ( 202 ) 224-6551

24043600852

OLC 406

**Ifshin & Friedman**  
ATTORNEYS AT LAW

888 16th Street, N.W.  
Washington, D.C. 20006  
(202) 293-4175 Fax (202) 296-8791

94 MAR -7 PM 2:35

RECEIVED  
FEDERAL ELECTION COMMISSION

March 7, 1994

Ms. Joan McEnery  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

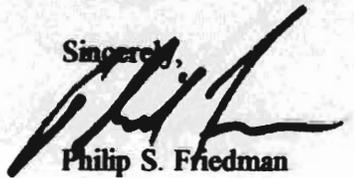
Re: MUR 3900

Dear Ms. McEnery:

Enclosed please find an original and one copy of Mr. Rosenberg's response to the complaint filed in the above referenced action.

If you have any questions or concerns, please do not hesitate to give me a call.

Sincerely,



Philip S. Friedman

Enclosure  
cc: David Rosenberg

24043600853

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:  
DAVID ROSENBERG

MUR 3900

RECEIVED  
FEDERAL ELECTION COMMISSION  
94 HAR - 7 PM 2:35

RESPONSE OF  
DAVID ROSENBERG

On January 21, 1994, the Center for Responsive Politics filed a complaint with the Federal Election Commission ("FEC" or "Commission") alleging that David M. Rosenberg violated the contribution limitations of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"), as well as corresponding Commission regulations. See e.g., 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

Pursuant to 11 CFR § 111.6, this memorandum sets forth the factual and legal basis upon which the Commission should find no reason to believe that the Respondent knowingly and willfully violated the Act or Commission regulations.

Mr. Rosenberg is the Executive Vice President of Environmental Compliance Services, Inc. Although Mr. Rosenberg and his wife Marjorie, have made contributions to federal candidates for a number of years, it was not until the 1992 election cycle that the Rosenbergs decided to significantly increase their federal contributions. This increase triggered the Rosenbergs' calendar year contribution limits for the first time in their history of making political contributions.

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In recognition of their mutual desire to make contributions to federal candidates, the Rosenbergs decided to make all contributions to candidates on their joint checking account. The checks from this joint account had both David and Marjorie Rosenberg's names printed on the face of the check, leaving Mr. Rosenberg (as well as his wife), who generally signed the checks alone, under the mistaken belief that the contributions would be automatically attributed to both he and his wife equally. Accordingly, the Rosenbergs were scrupulous in being sure to remain under their combined individual contribution limit of \$50,000 per calendar year.<sup>1</sup> See generally affidavits of David and Marjorie Rosenberg (attached hereto as Exhibit B).

In the final two months of the 1992 election cycle the Rosenberg's made the preponderance of their 1992 contributions.<sup>2</sup> Two checks, in particular, accounted for the bulk of these contributions: a \$20,000 check to the Democratic Senatorial Campaign Committee<sup>3</sup> and a \$10,000 check to the National Republican Senatorial Committee. Again, the Rosenbergs believed that the contributions would be attributed to each of them in equal amounts.

<sup>1</sup> Indeed, on November 2, 1992 Mr. Rosenberg notified the Executive Director of the Democratic Senatorial Campaign Committee that his 1992 contributions were in excess of his contribution limits. See Exhibit A (attached hereto). Mr. Rosenberg requested a partial refund (within 60 days of making the contribution) to assure that the total contributions made by Mr. Rosenberg and his wife were under \$50,000. Although Mrs. Rosenberg's signature was missing from the joint account check delivered to the DSCC, Mr. Rosenberg's November 2 letter demonstrates Mr. Rosenberg's good faith efforts to comply with the individual contribution limits of the Act.

<sup>2</sup> Supporting documentation for the contributions made is attached hereto as Exhibit C. Mr. and Mrs. Rosenberg have been unable to locate the check(s) to support the contribution(s) to Bill Clinton. On information and belief, however, Mr. Rosenberg believes that only one check for \$1,000 was contributed to Clinton, after which he and his wife complied with the instructions of a campaign letter requesting an equal reattribution of the contribution between David and Marjorie Rosenberg.

<sup>3</sup> As set forth in footnote one, the Rosenbergs requested and received a refund of \$3,250 from the DSCC. Thus, the Rosenbergs' 1992 contributions to the DSCC were \$21,750, rather than \$25,000.

On the face of the complaint, it is clear that the recipient political committees incorrectly reported Mr. and Mrs. Rosenbergs' 1992 contributions to federal candidates. What is equally clear is that such errors made by the recipient political committees, resulted in Mr. Rosenberg being identified as someone in technical violation of the FECA for having inadvertently exceeded the \$25,000 per calendar year individual contribution limit under the Act and Commission regulations.

To be sure, the Commission has long-held that for a check written on a joint-checking account to be equally attributed to both husband and wife, both persons must sign the check or accompany the check with a writing indicating the proper attribution between the parties on the joint checking account. See Advisory Opinion 1980-67.

Nevertheless, Part 110 of the Commission's regulations recognize that the more sophisticated party in the nuances of federal election law and contribution limits, namely the recipient committee, must also bear some of the burden of assuring that individuals and committees comply with the Act.<sup>4</sup> Indeed, 11 CFR 110.1(k)(3)(i) states that

[i]f a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitations on contributions set forth in 11 CFR 110.1(b), (c) or (d), as appropriate, the treasurer of the recipient political committee may ask the contributor whether the contribution was intended to be a joint contribution by more than one person. (emphasis added).

Moreover, 11 CFR 110.1(c) (3) informs recipient political committees established by the national parties, such as the DSCC and the NRSC, that while they may accept up to

<sup>4</sup> Several of the recipient political committees fulfilled their obligations under the Act by requesting reattributions from the Rosenbergs and/or making the equal split that was originally intended at the outset. For instance, contributions to Clinton for President and Kostmayer for Congress were split between the Rosenbergs where, on the face of the check, a manifestation of David and Marjorie Rosenberg's intent to make an individual contribution was evident.

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\$20,000 per calendar year from individuals, such contributions must also abide by the aggregate \$25,000 per calendar year contribution limit imposed on individuals.

Accordingly, when the DSCC and the NRSC, respectively, received a large contribution from the Rosenbergs' joint checking account in mid-September of 1992, both national party committees had an affirmative obligation to verify the permissibility of the contribution, and as was the case here, to request a reattribution of that portion of the contribution which was excessive. Unfortunately, neither committee ever verified with the Rosenbergs the permissibility of their contributor attributions, despite the fact that the check itself contained the names (although not the signatures) of both David and Marjorie Rosenberg.<sup>5</sup>

Not until October, 1993 did the Rosenbergs become aware that Mr. Rosenberg had technically exceeded his individual contribution limits. To rectify the problem, the Rosenbergs immediately contacted the DSCC to notify it that it may have improperly allocated their 1992 contribution, and requested a reattribution of their 1992 contribution to Marjorie, rather than David Rosenberg. See Exhibit D (attached hereto); see also supporting affidavits at Exhibit B. To this date, the DSCC has not responded to the Rosenberg's request.

In the 1992 election cycle, the Rosenbergs made good faith efforts to comply with individual contribution limitations imposed by the Act by limiting the contributions made under their joint checking account to less than \$50,000 in the calendar year. When the Rosenbergs discovered that recipient political committees, particularly the DSCC, had

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<sup>5</sup> The DSCC's failure to verify the propriety of Mr. Rosenberg's contribution was particularly egregious after the DSCC had been put on notice that Mr. Rosenberg had exceeded his calendar year contribution limit. See note 1, infra.

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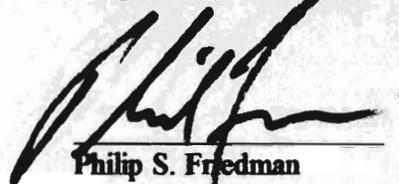
failed to properly allocate their contributions or to inquire whether the Rosenbergs were in compliance with their individual contribution limits as required under Commission regulations, the Rosenbergs immediately attempted to correct the technical error.

The Commission should acknowledge that the recipient political committees failed to meet their administrative obligations to themselves and the Rosenbergs in properly allocating the Rosenbergs' contributions. The Commission should also acknowledge that Mr. Rosenberg and his wife made good faith efforts to comply with the Act and Commission regulations. Accordingly, the Commission should take no further action against Mr. Rosenberg.

Should the Commission, however, find reason to believe that Mr. Rosenberg is in technical violation of the Act, and take further action on this matter, Mr. Rosenberg requests pre-probable cause conciliation in order to conclude this matter expeditiously.

Date: March 7, 1994

Respectfully submitted,



Philip S. Friedman  
Attorney for Respondent  
David M. Rosenberg

24043600858

November 2, 1992

Mr. Steve Richetti  
Executive Director  
Democratic Senatorial Campaign Committee  
430 South Capitol Street  
Washington, DC 20003

ECS

Dear Steve:

One East Uppala Avenue  
Suite 300  
Ebens, Pennsylvania 19741  
(215) 269-6734  
(800) ECS-1434  
Fossilair Photography  
Fax (215) 524-5354

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Best of luck on Tuesday! I'm certain the Democrats will increase their majority in the Senate. You and your entire staff should be proud of the role the DSCC played in this forthcoming victory.

I need to alert you to a problem I discovered. I was recently informed that my 1991 contributions to federal candidates were accounted against my 1992 allocations. Unfortunately, I only realized this aspect of federal election law after I already gave the maximum amount in 1992.

I am, therefore, technically in violation of federal election law unless I receive a partial refund of my 1992 contributions. As a result, I must request that the DSCC refund \$3250 of my 1992 membership. This refund will allow me to meet the federal limitations for 1992.

I would appreciate this refund check as soon as possible. I look forward to seeing you again at the November 7th victory party. Thanks for your cooperation.

Sincerely yours,

David M. Rosenberg, Esq.  
Executive Vice President

B

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:  
DAVID ROSENBERG

MUR 3900

AFFIDAVIT OF  
DAVID ROSENBERG

24043600860

1. I am an Executive Vice President of Environmental Compliance Services, Inc. and I submit this affidavit in support of my response to the complaint filed in the above referenced action.

2. In the 1992 election cycle my wife, Marjorie Rosenberg, and I decided to make several contributions to candidates for federal office, as well as contributions to both of the major national political parties. Both my wife and I decided together which political committee would be the recipient of our individual contributions.

3. Each contribution I made during the 1992 election cycle was drawn on a joint checking account I hold with my wife. Both of our names, David and Marjorie Rosenberg, are printed on the face of each check. Representative copies of the checks in question are being submitted in connection with my response to the complaint.

4. During the 1992 election cycle I was aware that both my wife and I could each make contributions in connection with federal elections up to the maximum of \$25,000 per calendar. Thus, to comply with our combined limit of \$50,000 per calendar year, both my wife and I decided to make all of our contributions from our joint checking account.

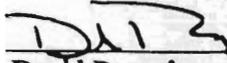
5. I did not know that each check also needed to be signed by my wife in order for each check to be attributed equally to David and Marjorie Rosenberg. I simply assumed that each recipient political committee would, as set forth on the face of the check, attribute each contribution equally between the persons identified as holders of the checking account. Indeed, some recipient political committees appear to have correctly reported my intent to make a contribution in equal amounts from my wife and me, even though my wife did not sign a single check.

6. It was not my intent to knowingly and willfully exceed my individual calendar year contribution limit. I believed that I was scrupulously following the contribution limits by making sure that the combined contributions made by my wife and I -- all of which were drawn on our joint checking account -- did not exceed our combined individual contribution limits for 1992.

7. When I became aware of a potential problem in October, 1993, my wife and I immediately notified the DSCC by letter of the need to properly attribute our 1992 contribution. To date, we have received no response from the DSCC.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: 3-2-94

By:   
David Rosenberg

24043600361

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:  
DAVID ROSENBERG

MUR 3900

AFFIDAVIT OF  
MARJORIE ROSENBERG

1. My name is Marjorie Rosenberg. I am the wife of David Rosenberg and I submit this affidavit in support of Mr. Rosenberg's response to the complaint filed in the above referenced action.

2. In the 1992 election cycle my husband, David Rosenberg, and I decided to make several contributions to candidates for federal office, as well as contributions to both of the major national political parties. Both my husband and I decided together which political committee would be the recipient of our individual contributions.

3. Each contribution I made during the 1992 election cycle was drawn on a joint checking account I hold with my husband. Both of our names, Marjorie and David Rosenberg, are printed on the face of each check. Representative copies of the checks in question are being submitted in connection with Mr. Rosenberg's response to the complaint.

4. During the 1992 election cycle I was aware that both my husband and I could each make contributions in connection with federal elections up to the maximum of \$25,000 per calendar. Thus, to comply with our combined limit of \$50,000 per calendar year, both my husband and I decided to make all of our contributions from our joint checking account.

5. I did not know that each check also needed to be signed by me in order for each check to be attributed equally to David and Marjorie Rosenberg. I simply assumed that each recipient political committee would, as set forth on the face of the check, attribute each contribution equally between the persons identified as holders of the checking account. Indeed, some recipient political committees appear to have correctly reported my intent to make a contribution in equal amounts from my husband and me, even though I did not personally sign a single check.

24043600862

6. When my husband became aware of a potential problem in October, 1993, we immediately notified the DSCC, by letter, of the need to properly attribute our 1992 contribution. To date, we have received no response from the DSCC.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: 3/2/94

By: Marjorie Rosenberg  
Marjorie Rosenberg

24043600863

<u>Payee</u>	<u>Amount</u>	<u>Date</u>	<u>Bank</u>	<u>Maker</u>
Kostmayer Campaign Committee	\$250.00	6 -27-91	Downingtown National Bank	David M. Rosenberg
Friends of Peter Kostmayer	\$1,000.00	12-19-91	Downingtown National Bank	David M. Rosenberg
Friends of Robert G. Torricelli	\$1,000.00	12-26-91	Downingtown National Bank	David M. Rosenberg
Karroy for President	\$1,000.00	6-3-92	Downingtown National Bank	David M. Rosenberg
Gephardt in Congress	\$1,000.00	6-3-92	Downingtown National Bank	David M. Rosenberg
Engal for Congress	\$1,000.00	7-1-92	Downingtown National Bank	David M. Rosenberg
Friends of Harry Reid	\$1,000.00	7-22-92	Downingtown National Bank	David M. Rosenberg
Richardson for Congress	\$1,000.00	7-28-92	Downingtown National Bank	David M. Rosenberg
Mendez for Congress	\$1,000.00	9-2-92	Premier Bank One, Columbus	David M. Rosenberg
DSCC	\$20,000.00	9-8-92	Premier Bank One, Columbus	David M. Rosenberg
Republican Senatorial Campaign	\$10,000.00	9-9-92	Premier Bank One, Columbus	David M. Rosenberg
Toricelli for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Erdeigh for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Burton for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Kennedy for Congress	\$500.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Schaeffer for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Swift for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Manton for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Shelby for Senate	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Ritter for Congress	\$1,000.00	9-22-92	Premier Bank One, Columbus	David M. Rosenberg
Weldon for Congress	\$1,000.00	10-28-92	Downingtown National Bank	David M. Rosenberg

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

3874

7-1 1952

90-907  
319

PAY TO THE ORDER OF Emilio For Casales \$ 100.00

One Hundred / 100 DOLLARS



Downingtown National Bank  
Downingtown, PA  
CE 05200854

MEMO

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

8899

7-23 1952

90-907  
319

PAY TO THE ORDER OF Friends of Mary Reid \$ 100.00

One Hundred / 100 DOLLARS



Downingtown National Bank  
Downingtown, PA  
04015781 CE-17722

MEMO

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

D-MK 3813

7-27 1952

90-907  
319

PAY TO THE ORDER OF Mary Reid \$ 125.00

One Hundred and Twenty Five / 100 DOLLARS



Downingtown National Bank  
Downingtown, PA

MEMO

0000100000

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

3594

12-20 1952

90-907  
319

PAY TO THE ORDER OF Friends of Robert G. Torres \$ 100.00

One Hundred / 100 DOLLARS



Downingtown National Bank  
Downingtown, PA

MEMO

24043600865

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

3301

90-817  
319

PAY TO THE  
ORDER OF

*Friends of Peter Kaszinger* \$ 200.00

JUL 2 1991

DOLLARS

Downingtown National Bank  
Downingtown, Pennsylvania

*DMR*

MEMO

MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

3568

90-817  
319

PAY TO THE  
ORDER OF

*Friends of Peter Kaszinger* \$ 100.00

12-19 1991

DOLLARS

Downingtown National Bank  
Downingtown, PA

*DMR*

MEMO

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

164

PAY TO THE  
ORDER OF

*ERDAK For Lovelock* \$ 100.00

DOLLARS

PREMIER  DO NOT RESUBMIT TAX DEDUCTIBLE

*DMR*

MEMO

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

163

PAY TO THE  
ORDER OF

*ERDAK For Lovelock* \$ 100.00

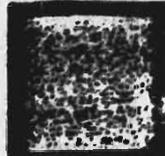
DOLLARS

PREMIER  DO NOT RESUBMIT TAX DEDUCTIBLE

*DMR*

MEMO

24043600866



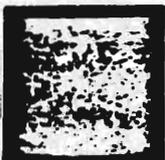
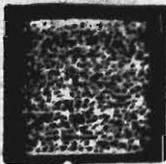
DAVID ROSENBERG 141  
 MARJORIE DAMESHEK ROSENBERG  
 [REDACTED]  
 PAY TO THE ORDER OF [REDACTED] \$ [REDACTED]  
 DO NOT RESUBMIT TAX DEDUCTIBLE   
 PREMIER [REDACTED] 03 25 27 52  
 [Signature]

MARJORIE D. ROSENBERG 3900  
 DAVID M. ROSENBERG  
 [REDACTED] 7-22 1952 90-97 318  
 PAY TO THE ORDER OF [REDACTED] 300901495 08-12-92 355 9009 0 15 \$ 1000.00  
 [REDACTED] 00/100 DOLLARS  
 Botwinington National Bank  
 Botwinington, PA  
 MEMO 424500888 08-12-92 4044241 9 04

701 DAVID ROSENBERG 162  
 MARJORIE DAMESHEK ROSENBERG  
 [REDACTED] 9-22 1952  
 PAY TO THE ORDER OF [REDACTED] \$ 500.00  
 Five hundred & no/100 DOLLARS  
 PREMIER [REDACTED] DO NOT RESUBMIT TAX DEDUCTIBLE   
 [REDACTED] 03 10 20 12 3  
 [Signature]

DAVID ROSENBERG 167  
 MARJORIE DAMESHEK ROSENBERG  
 [REDACTED] 9-22 1952  
 PAY TO THE ORDER OF [REDACTED] \$ 1000.00  
 One thousand & no/100 DOLLARS  
 DO NOT RESUBMIT TAX DEDUCTIBLE   
 PREMIER [REDACTED] 03 10 20 12 3  
 [Signature]

24043600867



24043600868

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

159

39 28 82

DO NOT RESUBMIT TAX DEDUCTIBLE

PREMIER

Handwritten: *DM*

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

157

39 28 82

DO NOT RESUBMIT TAX DEDUCTIBLE

PREMIER

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DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

153

7 22 1982

DO NOT RESUBMIT TAX DEDUCTIBLE

PREMIER

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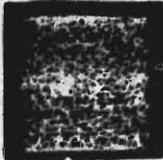
DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

155

DO NOT RESUBMIT TAX DEDUCTIBLE

PREMIER

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MARJORIE D. ROSENBERG  
DAVID M. ROSENBERG

4020

90-807  
318

PAY TO THE  
ORDER OF

Wendy For [unclear] \$ 100.00

One hundred and 00/100 DOLLARS

 Downington National Bank  
Downington, PA

MEMO

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

156

PAY TO THE  
ORDER OF

Maura For [unclear] \$ 100.00

One hundred and 00/100 DOLLARS

**PREMIER** *Signature* **DO NOT RESUBMIT** TAX DEDUCTIBLE

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"DO NOT RESUBMIT"

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P.2

DAVID ROSENBERG  
MARJORIE DAMESHEK ROSENBERG

DO NOT RESUBMIT

140

PAY TO THE  
ORDER OF

DSEC \$ 20.00.00

**PREMIER** *Signature*

TAX DEDUCTIBLE

MEMO

24043600870

MARJORIE D. ROSENBERG  
 DAVID M. ROSENBERG

PAY TO THE ORDER OF BERNARD W. LOWERY

One Thousand 7 DOLLARS

Washington National Bank  
 Washington, PA

MEMO \_\_\_\_\_

3812

JUL 9 92

00-807

*[Signature]*

D

October 28, 1993

Ms. Kate Carr  
Finance Director  
Democratic Senatorial Campaign Committee  
430 South Capitol Street, SE  
Washington, DC 20003

Dear Kate:

We are writing this letter concerning the federal contributions that we made in the year 1992. Specifically, we are requesting a re-designation of our 1992 contribution to the Democratic Senatorial Campaign Committee which was credited to David Rosenberg.

It is our understanding that federal law limits the political contributions by a single individual to \$25,000 each year. In addition, it is our understanding that federal law limits the political contributions to a married couple for each year to \$50,000. In accordance with such laws, our contributions totaled below the \$50,000 maximum amount for the year 1992.

It has recently come to my attention, however, that federal law requires each individual in a joint account to specifically notify the relevant campaign committee, which married person is making the contribution. In making our 1992 contribution to the DSCC, there was a misunderstanding regarding the allocation of this contribution.

In light of this misunderstanding, we are requesting a re-designation of our \$20,000 contribution to the DSCC, and that the Committee officially allocate this check to the proper name - Marjorie Rosenberg. I would appreciate written confirmation of the proper allocation.

Thank you for your cooperation. Please do not hesitate to contact us with any questions.

Sincerely yours,

  
David M. Rosenberg

  
Marjorie D. Rosenberg

24043600871

March 17, 1994

VIA FACSIMILE

Joan McEnery  
Federal Election Commission  
Washington, DC 20463

Re: MUR 3900

RECEIVED  
FEDERAL ELECTION COMMISSION  
MARCH 17 10 26 AM '94

Dear Ms. McEnery:

On behalf of Kerrey for President, Inc. (the "Committee"), I am writing to demonstrate that no action should be taken against the Committee with respect to MUR 3900.

The complaint upon which MUR 3900 is based alleges that David Rosenberg violated 2 U.S.C. sec. 441(a)(3) and 11 C.F.R. sec. 110.5 by contributing in excess of \$25,000 to campaign committees in 1992.

The Committee did give a contribution from Mr. Rosenberg in the amount of \$500 on June 3, 1992. This contribution was reported to the Federal Election Commission ("FEC") on the Committee's monthly disclosure report.

We believe, however, that the Committee did not violate the Federal Election Campaign Act with regard to Mr. Rosenberg's contribution for the following reasons:

1. Mr. Rosenberg's contribution did not violate the \$1000 contribution limit for individuals set forth in 11 C.F.R. sec. 110.1(a)(1).
2. The Federal Election Campaign Act does not impose a duty on campaign committees to monitor a contributor's total campaign contributions in a given year. The statute states only that, "No candidate or political committee shall knowingly accept a contribution...in violation of the provisions of this section." 2 U.S.C. sec. 441(a). 11 C.F.R. sec. 110.9(a) (emphasis added). The Committee did not knowingly accept a contribution in violation of the Act.
3. In any event, at the time the contribution was made by Mr. Rosenberg, it was not in violation of the Act. The contribution was accepted in June, 1992. According to FEC records, Mr. Rosenberg had not reached the \$25,000 contribution limit for 1992 until September, 1992. Therefore, when the Committee accepted Mr. Rosenberg's contribution, the contribution did not violate 11 C.F.R. sec. 110.5.

For the reasons stated above, the Committee believes that it did not violate the Federal Election Campaign Act of 1971 with respect to Mr. Rosenberg's contribution and therefore, no further action should be taken against the Committee.

If you need additional information or documentation from the Committee, please call me at 202/224-6551 or 202/544-5450.

Sincerely,



Sheila M. Nix, for  
Kerrey for President, Inc.

24043600872

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
) Enforcement Priority  
)

GENERAL COUNSEL'S MONTHLY REPORT

**SENSITIVE**

I. INTRODUCTION

This report is the second Enforcement Priority System Monthly Report. The purpose of this September Monthly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 44 cases which do not warrant further pursuit

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relative to the other pending cases.<sup>1</sup> A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-44. For the Commission's convenience, the narratives for the externally-generated matters are immediately followed by the complaint and response(s) and the narrative for the internally-generated matter is immediately followed by the referral.

#### B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 2 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.<sup>2</sup> Since the recommendation not to pursue the identified cases is

1. These matters are: PM 299; MUR 3856; MUR 3859; MUR 3860; MUR 3861; MUR 3863; MUR 3864; MUR 3865; MUR 3868; MUR 3869; MUR 3870; MUR 3871; MUR 3872; MUR 3873; MUR 3874; MUR 3875; MUR 3877; MUR 3878; MUR 3880; MUR 3881; MUR 3882; MUR 3883; MUR 3884; MUR 3885; MUR 3887; MUR 3888; MUR 3889; MUR 3897; MUR 3900; MUR 3901; MUR 3906; MUR 3909; MUR 3910; MUR 3913; MUR 3914; MUR 3915; MUR 3916; MUR 4029; MUR 4030; MUR 4034; MUR 4035; MUR 4038; MUR 4039; and MUR 4040.

2. These matters are RAD 93L-66 and RAD 93L-69.

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based on staleness, this Office has not prepared separate narratives for these cases. However, the referrals for these internally-generated matters are attached. See Attachments 45-46.

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This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective November 14, 1994. By closing the cases effective November 14, 1994, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for this fairly large number of cases.

**III. RECOMMENDATIONS**

A. Decline to open a MUR and close the file effective November 14, 1994 in RAD 93L-66 and RAD 93L-69.

B. Decline to open a MUR, close the file effective November 14, 1994, and approve the appropriate letter in PM 299.

C. Take no action, close the file effective November 14, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3856
- 2) MUR 3859
- 3) MUR 3860
- 4) MUR 3861
- 5) MUR 3863
- 6) MUR 3864
- 7) MUR 3865
- 8) MUR 3868
- 9) MUR 3869
- 10) MUR 3870
- 11) MUR 3871
- 12) MUR 3872
- 13) MUR 3873
- 14) MUR 3874
- 15) MUR 3875
- 16) MUR 3877
- 17) MUR 3878
- 18) MUR 3880
- 19) MUR 3881
- 20) MUR 3882
- 21) MUR 3883
- 22) MUR 3884
- 23) MUR 3885
- 24) MUR 3887
- 25) MUR 3888
- 26) MUR 3889
- 27) MUR 3897
- 28) MUR 3900
- 29) MUR 3901
- 30) MUR 3906
- 31) MUR 3909
- 32) MUR 3910
- 33) MUR 3913
- 34) MUR 3914
- 35) MUR 3915

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- 36) MUR 3916
- 37) MUR 4029
- 38) MUR 4030
- 39) MUR 4034
- 40) MUR 4035
- 41) MUR 4038
- 42) MUR 4039
- 43) MUR 4040

10'26'94  
Date

*Lawrence M. Noble*  
Lawrence M. Noble  
General Counsel

Attachments

24043600877

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
David Rosenberg.

)  
)  
)

MUR 3900

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 2, 1994, the Commission decided by a vote of 6-0 to take no action, close the file in MUR 3900 effective November 14, 1994, and approve the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1994.

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

Attest:

11-9-94  
Date

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

Received in the Secretariat: Thurs., Oct. 27, 1994 3:16 p.m.  
Circulated to the Commission: Fri., Oct. 28, 1994 2:00 p.m.  
Deadline for vote: Wed., Nov. 02, 1994 4:00 p.m.

bjr

24043600878



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 21 1994

Ellen S. Miller, Executive Director  
Center for Responsive Politics  
1320 19th Street, N.W.  
Washington, D.C. 20036

RE: MUR 3900

Dear Ms. Miller:

On January 21, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994. 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).

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

24043600879

MUR 3900  
DAVID ROSENBERG

The Center for Responsive Politics filed a complaint alleging that David Rosenberg exceeded his 1992 \$25,000 annual limit by \$22,000 because his contributions attributable to 1992 total \$47,000. The contributions identified in the complaint raised the issue of whether Kerrey for President, Inc. accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Rosenberg indicates that the contributions at issue were written on a joint checking account belonging to him and his wife and that he believed that the contributions were being attributed equally to both individuals listed on the checks. Mr. Rosenberg states that prior to the filing of the complaint, on November 2, 1993, he requested a \$3,250 refund from the Democratic Senatorial Campaign Committee. Mr. Rosenberg indicates that on October 29, 1993, Mr. and Mrs. Rosenberg requested that the DSCC completely reattribute the \$20,000 contribution from David Rosenberg to Marjorie Rosenberg.

The Kerrey for President, Inc. responds that it received a \$500 contribution from Mr. Rosenberg on June 3, 1992 and that Mr. Rosenberg's contribution did not exceed the \$1,000 contribution limit. The Committee also states that the contribution was received prior to the point in time that Mr. Rosenberg exceeded the \$25,000 annual limit.

This matter involves less significant issues relative to other matters pending before the Commission and remedial action was taken.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 21 1994

Philip Friedman, Esq.  
Ifshin & Friedman  
888 16th Street, N.W.  
Suite 300  
Washington, D.C. 20006

RE: MUR 3900  
David M. Rosenberg

Dear Mr. Friedman:

On January 28, 1994, the Federal Election Commission notified your client, David M. Rosenberg, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

24043600881

**MUR 3900**  
**DAVID ROSENBERG**

The Center for Responsive Politics filed a complaint alleging that David Rosenberg exceeded his 1992 \$25,000 annual limit by \$22,000 because his contributions attributable to 1992 total \$47,000. The contributions identified in the complaint raised the issue of whether Kerrey for President, Inc. accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Rosenberg indicates that the contributions at issue were written on a joint checking account belonging to him and his wife and that he believed that the contributions were being attributed equally to both individuals listed on the checks. Mr. Rosenberg states that prior to the filing of the complaint, on November 2, 1993, he requested a \$3,250 refund from the Democratic Senatorial Campaign Committee. Mr. Rosenberg indicates that on October 29, 1993, Mr. and Mrs. Rosenberg requested that the DSCC completely reattribute the \$20,000 contribution from David Rosenberg to Marjorie Rosenberg.

The Kerrey for President, Inc. responds that it received a \$500 contribution from Mr. Rosenberg on June 3, 1992 and that Mr. Rosenberg's contribution did not exceed the \$1,000 contribution limit. The Committee also states that the contribution was received prior to the point in time that Mr. Rosenberg exceeded the \$25,000 annual limit.

This matter involves less significant issues relative to other matters pending before the Commission and remedial action was taken.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

NOV 21 1994

Sheila Nix, Esq.  
245 Second Avenue, S.E. # 300  
Washington, D.C. 20002

RE: MUR 3900  
Kerrey for President, Inc.  
Hugh Westbrook, Treasurer

Dear Ms. Nix:

On February 15, 1994, the Federal Election Commission notified your clients, Kerrey for President, Inc. ("Committee") and Hugh Westbrook, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See atta narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

24043600883

**MUR 3900**  
**DAVID ROSENBERG**

The Center for Responsive Politics filed a complaint alleging that David Rosenberg exceeded his 1992 \$25,000 annual limit by \$22,000 because his contributions attributable to 1992 total \$47,000. The contributions identified in the complaint raised the issue of whether Kerrey for President, Inc. accepted contributions which exceeded the \$1,000 limit.

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The Kerrey for President, Inc. responds that it received a \$500 contribution from Mr. Rosenberg on June 3, 1992 and that Mr. Rosenberg's contribution did not exceed the \$1,000 contribution limit. The Committee also states that the contribution was received prior to the point in time that Mr. Rosenberg exceeded the \$25,000 annual limit.

This matter involves less significant issues relative to other matters pending before the Commission and remedial action was taken.

24043600884



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3900

DATE FILMED 12-16-91 CAMERA NO. 2

CAMERAMAN JMN

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