



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

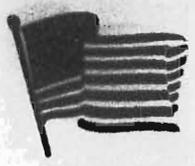
THIS IS THE BEGINNING OF MUR # 3978

DATE FILMED 7/27/95 CAMERA NO. 1

CAMERAMAN SES

95043661779

06 CH 1433



CAPE MAY COUNTY REGULAR REPUBLICAN ORGANIZATION

Gerard A. Desiderio
Chairman



May 23, 1994

MUR 3978

MAY 24 11 01 AM '94
RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

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

RE: Federal Election Law Violation Occurring In the 2nd
Congressional District of New Jersey.

Dear Commissioner:

As the Chairman of the Cape May County Regular Republican Organization, I wish to submit the following complaint concerning possible violations of the Federal Election Commission's contribution and filing requirements.

Primary Election campaigns for the Republican Nomination for the Second Congressional District of New Jersey are currently being pursued by New Jersey State Senator Bill Gormley, New Jersey State Assemblyman Frank LoBiondo, and Pro-Life candidate Bob Green. The campaign has already been the subject of litigation brought on by Assemblyman LoBiondo and his supporters which was decided in favor of Senator Gormley and the Cape May County Regular Republican Organization. The LoBiondo Campaign is continuing its efforts toward nomination and it is my concern that Federal Election Law is being violated.

As Chairman of the Cape May County Regular Republican Organization, I ask that the Federal Election Commission accept the following complaint outlining possible Federal Election contribution violations and political organization registration violations.

C O U N T O N E

Enclosed is a copy of an article from The Press of Atlantic City of May 13, 1994 (Exhibit A) which reports that an organization named the "Cape May County Real Republican Organization" raised \$3,300 at an April 23, 1994 fundraiser. The organization is headed by David Von Savage. The solicitation for this fundraiser (Exhibit B) states, "Come meet congressional candidate Frank LoBiondo and Freeholder Gary Jessel." According

95043661700

In a separate letter signed by Mr. Von Savage (Exhibit D) on stationary with the heading, "Real Republicans for LoBiondo, for Jessel & for Reform," Mr. Von Savage writes:

"On June 7th, Republican voters will choose between the Real Republicans for LoBiondo ticket, representing reform inside the government as well as inside our party, and the county organization under the Gormley column, representing power politics as usual - control by the elite, benefiting only a few."

Mr. Von Savage writes that one of the strategies to be pursued,

"Identifying and advancing Frank LoBiondo's campaign issues will also be key to our success."

Mr. Von Savage goes on to write that Von Savage backed candidates should "talk up" Jessel's vote against the 1994 county budget increases as well as the fact that LoBiondo supported Governor Christie Whitman in her 1993 campaign.

You will also find enclosed (Exhibit E) an invitation to a \$50.00 per person fundraiser being held at the home of Carlo Melini and Helen Thomason for "Republican United States House of Representatives Candidate Frank A. LoBiondo and Republican Cape May County Freeholder and Candidate Gary Jessel." This invitation asks that checks be made payable to Cape May County Real Republicans.

You should note that along with the invitation is a letter signed by Mr. Melini that states, "we are in the midst of a Republican battle between the party bosses of the Bill Gormley campaign and the grass roots reform group of the Real Republicans for Frank LoBiondo and Gary Jessel."

The Press of Atlantic City article reports that a "review of Federal Election Commission files turns up no hint that the Cape May County Real Republican Organization is politically active. The organization has not filed as a political committee."

Additionally, the Press of Atlantic City report reveals that Von Savage admitted having communication with the treasurer of the "LoBiondo Committee to Change Congress" -- candidate Frank LoBiondo's congressional campaign committee.

The above actions clearly are intended to influence a Federal Election. In this case, New Jersey's 2nd Congressional District Republican Primary.

The Cape May County Real Republican Organization must comply with election law that requires each organization that finances activity in connection with both Federal and non-Federal elections and which qualifies as a political committee shall either establish a separate federal account or establish a political committee which shall receive only contributions subject to the prohibitions and limitations of the Federal Election Commission.

95043661781

Additionally, the Cape May County Real Republican Organization must comply with Federal Election law which states that any committee solicitation that makes reference to a federal candidate or a federal election shall be presumed to be for the purpose of influencing a federal election and contributions resulting from that solicitation shall be subject to the prohibitions and limitations of the Federal Election Commission.

I am also alarmed that there seems to be an appearance of cooperation between the Cape May County Real Republican Organization and the LoBiondo Committee to Change Congress. It is my understanding that committees that make independent expenditures are required to sign an oath that such expenditures are made entirely independent of the campaign committee and are not coordinated with the campaign committee.

C O U N T T W O

In a letter to its members dated March 18, 1994 (Exhibit F), the Union League of Cape May County reported that a previous meeting had been held in February 1994 and that the Union League contributed the amount of \$1,000 to the LoBiondo for Congress Committee.

The Union League of Cape May County is not registered with the Federal Election Commission and designates itself as a "Republican Organization" on its letterhead.

The Union League of Cape May County (P.O. Box 24, Sea Isle City, New Jersey 08243) appears to be in violation of Federal Election law requiring political committees, clubs and associations to establish either a separate Federal account for contributions or a political committee that shall receive contributions subject to the prohibitions and limitations of the Federal Election Commission requirements.

Federal Election law also defines a political committee as any committee, club, association, or other group of persons which attempts to influence a federal election, and receives contributions aggregating in excess of \$1,000 or which makes expenditures aggregating in excess of \$1,000 during a calendar year.

The \$1,000 contribution and the cost of the mailer notifying Union League members of the contribution exceeds the \$1,000 limit and clearly places the Union League under the legal definition of a political committee.

The Federal Election Commission report of receipts and disbursements submitted by the LoBiondo Committee to Change Congress covering the period between January 1, 1994 and March 31, 1994 includes no entry for the contribution.

However, the Federal Election Commission report of receipts and disbursements submitted by the LoBiondo Committee to Change Congress during the 1992 Congressional campaign shows entries indicating receipt for two \$1,000 contributions. The first contribution is dated June 6, 1992 and the second contribution is dated October 20, 1992 (Exhibit G).

95043661782

It appears that the LoBiondo Committee to Change Congress may have accepted a contribution which they were barred from accepting. However, there is neither an entry nor a notation on their latest report regarding the contribution.

The 1992 campaign reports show that contributions at that time were in fact accepted by the campaign committee. However, it is not clearly demonstrated that the LoBiondo Committee to Change Congress is lawfully permitted to accept such contributions from this organization since the Union League is not registered with the Federal Election Commission.

In light of the serious nature of this matter, I am asking the Commission to commence an investigation to determine the level of non-compliance with Federal Election law and regulation by the congressional campaign of Frank LoBiondo and the activities of David Von Savage and the Cape May County Real Republican Organization.

Since time is of the essence, I am asking that this matter be looked into immediately.

Sincerely,

Gerard A. Desiderio
Gerard A. Desiderio
Chairman, Cape May County Regular
Republican Organization

Sworn and subscribed to before me
this 23rd day of MAY

A.D. 1994

William Kahner
Notary Public of New Jersey
MY COMMISSION EXPIRES 5-5-98

95043661783

EXHIBIT A

95043661784

Cape LoBiondo supporters shun PAC law

■ Materials put out by the Cape May County Real Republican Organization push LoBiondo's candidacy in the 2nd District congressional primary and attack his opponent. But the group insists there's no need to inform federal regulators.

By JOHN FROONJIAN
Statehouse Bureau

A committee headed by Cape May Republican David Von Savage is promoting Frank LoBiondo's congressional candidacy, at-

tacking his opponent and using LoBiondo's name to raise money.

However, a review of Federal Election Commission files turns up no hint that the Cape May County Real Republican Organi-

zation is politically active. The organization has not filed as a political committee.

FEC rules state that any group attempting to influence a federal election and which raises or spends more than \$1,000 must file as a political committee within 10 days, and then disclose its finances.

The Real Republicans for LoBiondo, for (Freeholder Gary) Jessel and for Reform, as the

organization calls itself, raised \$3,300 in a fund-raiser at Club Cheers in Wildwood on April 23, group chairman Von Savage said.

It spent about \$2,400 of that money on expenses, he said.

Von Savage's fund-raising materials for the event, billed in part as a chance to meet LoBiondo, urged participants to work on behalf of the state assembly

□ See Promote, Page A4

Promote: Group backing LoBiondo not led a 'AC

(Continued from Page A1)

LoBiondo's 2nd District congressional campaign.

The materials also criticized LoBiondo's GOP primary opponent, state Sen. William Gormley, R-Atlantic.

LoBiondo's slogan on the June 7 ballot is the same as the name of Von Savage's group — "Real Republicans for LoBiondo" — and LoBiondo is running with a slate of Von Savage-backed county candidates.

But Von Savage, who was involved in a 1991 effort to oust Gormley in a Senate primary, said his group does not have to file as a political committee with federal regulators.

The committee is not funding or advancing LoBiondo's campaign and mention of his name is only incidental to the group's main cause of reforming government, he said.

Von Savage said he confirmed his interpretation of the FEC code with a reputable source, Drew McCrosson, treasurer of the LoBiondo campaign.

McCrosson faxed him a copy of parts of the code and advised him, Von Savage said.

"It's his opinion we don't have to file," Von Savage said.

"Mention of federal candidates is incidental to their activities, which is reform of the Cape May County political arena," McCrosson said in a phone interview.

The FEC does not comment on specific situations, and no complaint has been lodged with the regulators about Von Savage's activities.

Requiring disclosure

FEC spokesman Ian Sturton said, in general a group is considered a political committee that must file if it raises or spends more than \$1,000 and tries to influence the outcome of a federal election.

If the group is backing more than one candidate, the money raised or spent is divided by the number of candidates to see if the pro-rated amount exceeds the \$1,000 threshold, Sturton said.

The purpose of requiring disclosure is to prevent shadowy campaign spending to occur away from public view.

In 1991, tens of thousands of dollars were funneled to a little-known state Senate primary opponent of Gormley's through two Cape May County political action committees.

Because the PACs failed to disclose their activities on deadline, the spending that helped Dominic Cappella almost beat Gormley wasn't evident until just before

ORGANIZATION'S STATEMENTS

■ The following are examples of political statements excerpted from a fund-raising letter and campaign flier from the Real Republicans for LoBiondo, for Jessel and for Reform, a group chaired by David Von Savage of Cape May.

■ On June 7, Republican voters will choose between the Real Republicans for LoBiondo ticket, representing reform inside the government as well as our party, and the county organization under the Gormley column. Reforming power politics as usual — control by the elite, benefiting only a few — platform will change that.

■ I know that we can count on the untiring support of Sen. James Caffero to promote our platform and campaign for our local candidates. Identifying and advancing Frank LoBiondo's campaign issues will also be key to our success.

■ County committee candidates should "talk up" (Cape May County Freeholder) Gary Jessel's vote against the 1994 county budget increases. Voters must also know that it was Jimmy Caffero, Frank LoBiondo and Garry Jessel (who worked hard for Gov. Whitman).

■ Italian Night, All You Can Eat! With Al Alberts and his world-famous orchestra on Saturday, April 23, at Club Cheers, Holly Beach Mall, Wildwood. Come meet congressional candidate Frank LoBiondo and Freeholder Gary Jessel.

■ Bill Gormley has voted to raise our taxes. Now Gormley wants us to believe he's some kind of fiscal conservative Republican!

the primary date.

Von Savage was paid \$1,400 by one of the PACs for advising Cappella.

Von Savage, who is running to replace Cape May County GOP Chairman Gerard Desiderio, said his group will spend money on Jessel and his county party reform, but not LoBiondo.

On Wednesday, Von Savage said his group had earlier filed as a PAC with state election regulators because of spending for Jessel.

An Election Law Enforcement Commission official said documents were received Wednesday.

"We're primarily a vehicle for change within Cape May County. The fact that Frank is gratuitously mentioned, in our opinion, does not require us to file with the FEC," Von Savage said.

"We're not doing anything for LoBiondo. Funds are being used for Gary Jessel and Cape May County Real Republicans," Von Savage said.

Requiring compliance

But the FEC does not require a committee to make donations to a candidate before it has to file and disclose finances. If a group tries to influence the outcome of a federal election and raises more than \$1,000, it must comply, a spokesman said.

Activities on behalf of a candidate also have a value, under the FEC regulations. If an independent committee were found to be working directly with a candidate, the group's spending could be attributed to the candidate.

In an April 22 letter sent by Von Savage to supporters of his Club Cheers event, the following politicking occurred:

■ The stationery had the letterhead "Real Republicans for LoBiondo, for Jessel and for Reform" in bold across the top.

■ Von Savage said in the June 7 primary, voters will pick between the LoBiondo "ticket" and "the county organization under the Gormley column, representing power politics as usual — control by the elite, benefiting only a few."

■ Among strategies to be pursued, "Identifying and advancing Frank LoBiondo's campaign issues will also be key to our success," the letter said.

■ Von Savage-backed candidates should "talk up" Jessel's vote against 1994 county budget increases as well as the fact that LoBiondo supported Gov. Christie Whitman in her 1993 campaign.

Criticizing opposition

In addition, a two-sided flier mailed by Von Savage's group criticized Gormley individually for his past positions on tax issues.

Gormley declined comment on Von Savage's activities.

Von Savage and McCrosson said the statements of support for LoBiondo and criticism of his opponent do not constitute attempts to influence the congressional primary vote.

"Nothing prohibits any organization from criticizing a candidate," McCrosson said.

"Frank is mentioned on the letterhead and mentioned in the letter, but the thrust is for reform in the party and county government," Von Savage said.

LoBiondo said he was assured by McCrosson's interpretation of the FEC code that there is no problem with the group's activities.

"I stand on what my treasurer says," LoBiondo said.

"David (Von Savage) is one of many, many supporters. I've asked support from many, many Republicans in Cape May County and he's one of them," he said.

In responding to questions about his group, Von Savage said his group did the same thing the Cape May County Republican Committee did in October 1992, when LoBiondo first ran for Congress. The county GOP didn't file with the FEC, he said.

However, Desiderio noted different rules apply to county political parties that are essentially a branch of the state party and independently formed committees.

95043661786

EXHIBIT B

95043661787

9 5 0 4 3 6 6 1 7 8 8

☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆
★
★ The Cape May County
★ **REAL** Republican Organization
★ *Cordially Invites you to Attend*

Italian Night
with Special Guest
Al Alberts
and His World
Famous Orchestra!

Sat., April 23, 1994

5:30 to 9:30 pm

All You Can Eat!

Tickets \$10 per person

CLUB GIBERS

Cedar Ave. & Holly Beach Mall

Wildwood, New Jersey

Beer \$1.50 & Drinks \$2.00

Ordered and Paid for by the Cape May County
REAL Republican Organization

☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆☆

Italian Night
All You Can Eat!
with Al Alberts
and His World Famous
Orchestra!
on Saturday, April 23rd
at Club Cheers
Holly Beach Mall
Wildwood

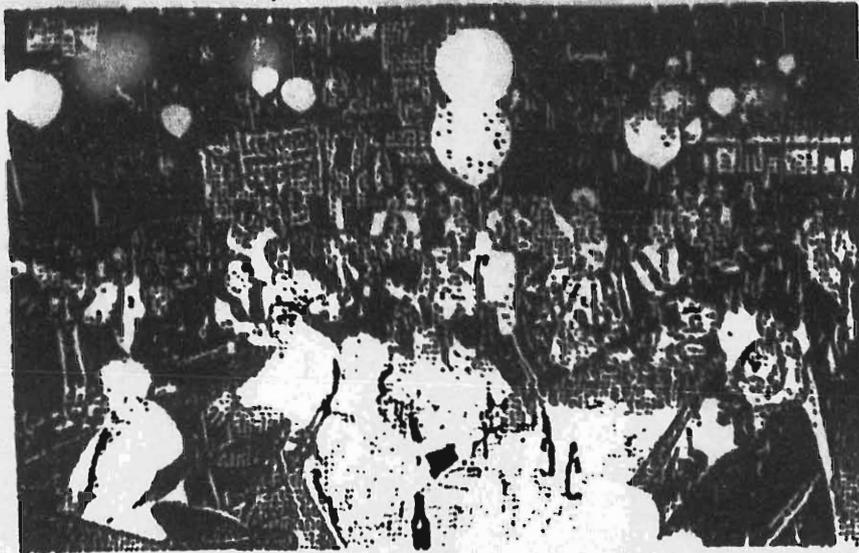
1ST CLASS
CS POSTAGE
PAID
No. 67
Wildwood, NJ
08360

★ Come meet Congressional Candidate ★
Frank Lo Biondo & Freeholder Gary Jessel

9 5 0 4 3 6 6 1 7 8 9

EXHIBIT C

95043661790



"Real Republican" Fund-raiser For LoBiondo & Jessel At "Cheers" A Huge Success

By Diane L. Fahey

Wildwood - The "Real Republican" fund-raiser held Cheers in Wildwood for Assemblyman Frank LoBiondo Preholder Gary Jessel, was a huge success.

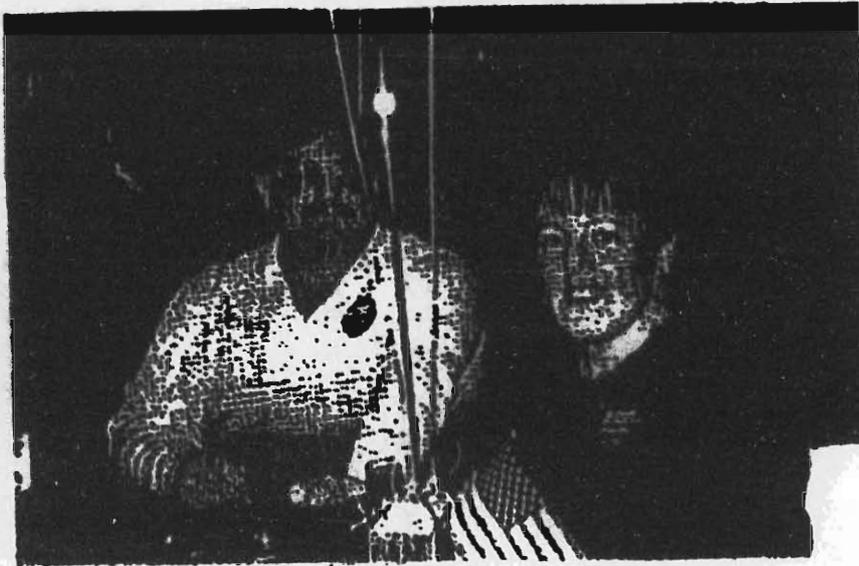
Led by Conservative David Von Savage, the "Real Republicans" organized this fund-raiser event in just weeks - if you persevere, you will prevail, as evidenced by the amount of supporters in attendance - some 300.

They refer to these events as "grassroots." Since LoBiondo was ousted from the "Regular Republican Organization column," chaired by Gerard DeSiderio, in the July Primary, LoBiondo will not get any money from the Regular Republican Organization to defray campaign costs, even though this is his district. Cape May County Preholder publicly endorsed Atlantic County Senator Bill Gornley over LoBiondo. Thus, Gornley's campaign will be funded from the Cape May County "Regular Republican Organization."

Knowing this, LoBiondo, along with his supporters, have been raising needed dollars by organizing many grassroots fund-raising events, involving many people, such as the latest one at Cheers.

Photos by Diane L. Fahey

Center picture are: Dennis Township Municipal Committee Members Barbara and Keith Collins



LoBiondo Against Any Tax To Finance Health Care

(Continued from front page) Cape May County - people who do not have access to health care," LoBiondo said. "A proposal to raise taxes and strangle small businesses with expensive government mandates is unconscionable. The skyrocketing unemployment economic disaster that this course will only worsen the health care situation."

LoBiondo was commenting on a speech given by Democrat Congressman from Illinois to the Harvard School of Public Health, in which Rostenkowski called for massive tax increases and expensive new mandates that will cost businesses jobs.

"Dan Rostenkowski has defined the issue - it does not matter to him which tax is raised as long as it is raised," LoBiondo said. "In his words, it is time for Democrats to belly up to the bar."

"I think Rostenkowski and the Democrats should look at the clock - because it is well past closing time," LoBiondo said. "They've been bellying up to the bar for a long time and we have been paying the tab."

LoBiondo also challenged his opponent to reject Rostenkowski's tax increases by signing the American Tax Reform "Taxpayer Protection Pledge."

LoBiondo also said that Rostenkowski's proposal for tax increases AND job killing mandates...



95043661791

8.7

EXHIBIT D

95043661792

Real Republicans
For Lo Biondo, For Jessel & For Reform

April 22, 1994

Dear Friends:

On June 7th, Republican voters will choose between the Real Republicans for LoBiondo ticket, representing reform inside the government as well as inside our party, and the county organization under the Gormley column, representing "power politics as usual" - control by the elite, benefiting only a few.

Our reform platform will change that. We are for tax cuts. We are for the elimination of wasteful spending. We are for property rights. And we are for the end of political arrogance.

Reform in the system will encourage more citizen participation and raise public confidence. Austerity on the pocketbook issues is the number one campaign issue across the country. Voters will support our reform platform but it's up to each one of us to communicate our message to all Republicans, within our own municipalities and throughout the county.

I know that we can count on the untiring support of Senator James Cafiero to promote our platform and campaign for our local candidates. Identifying and advancing Frank LoBiondo's campaign issues will also be key to our success -- we know he has strong grassroots appeal throughout the county. County committee candidates should "talk up" Gary Jessel's vote against the 1994 county budget increases. Voters must also know that it was Jimmy Cafiero, Frank LoBiondo and Gary Jessel worked hard for Governor Whitman, who is now being touted as a possible vice-presidential candidate for the '96 election for making good on her tax cut promises.

In addition to these strong assets for our side, the other side is irrefutably bogged down with a considerable number of "negatives" in their corner. First and foremost is Bill Sturm. I don't think there is a voter in the county who hasn't had some exposure -- either directly, secondhand, or via the newspapers -- to his arrogance and bossism. Remember, this is the man who barely won his last re-election battle by three hundred votes -- after twenty years in office. Bill Sturm is the epitome of the career politician who is now being thrown out of office because the voters simply won't put up with the cronyism anymore.

(next page, please)

95043661193

Real Republican

For Lo Biondo, For Jessel & For Reform

Page 170

The other side has two other "weighty" negatives in Maurice Catarasio and Phyllis Genevese. The fact that these two "chugs" have been allowed to represent the interests of the county organization speaks volumes of the character of their side. We all know of how these two have threatened just about everyone who tries to stand up to them.

Its equally important that the voters realize just how good politics has been to them. For instance, Maurice pulls in over a quarter of a million of our county tax dollars annually for himself and family in salaries and benefits:

Maurice -- \$48,000, Bridge Commission salary, \$5000 for his county car and \$15,300 for his park security salary; his wife, Roxanne has a \$42,000 package; Roxanne's sister, Darlene Rigazio -- a \$24,000 package to work in the Personnel Office; Roxanne's brother, Clinton Clement works for Great Haven to the tune of about \$20,000; Roxanne's other sister, Linda -- about \$25,000 in salary plus \$5000 benefits as an employee for Maurice's Bridge Commission; Roxanne's niece -- about \$18,000 including benefits for working in the Computer office; Maurice's sister-in-law, Mary Lee Robinson -- a cool \$25,800 in compensation and benefits; and Maurice's brother-in-law, Beech Fox is sitting pretty on the MUA with about \$12,000 in compensation.

Please make every effort to be at this Saturday's Breakfast Club meeting (9 AM, Avalon Country Club). We will be focusing on our campaign strategy for the June 7th county committee election - I value your input on this all-important matter.

I am enclosing a ticket for our Saturday "All You Can Eat Italian Night" at Club Cheers. It's a great value at \$20, so please make a commitment to bring at least two other guests with you. This is our alternative fundraiser to the county's annual dinner taking place at Convention Hall that night, so it is imperative we have a great crowd!

Lastly, on a personal note, I would like to give a special thanks to Peg and Tony for the wonderful surprise birthday party given for me at the Virginia Hotel this past Monday night. I had a great time being "roasted" by the "likes" of Desiderio, Gornley and their crew. Most of all, I do so much appreciate everyone who came out to celebrate with me and for your generosity -- your support means a lot to our "cause." But as usual the distortions about me continue... I AM ONLY 39! REALLY!

Hope to see you Saturday morning and evening!

Tom

95043661794

EXHIBIT E

95043661795

Carlo Melini
11 Hummingbird Avenue
Petersburg, New Jersey 08270

May 11, 1994

Dear

As you are probably aware, we are in the midst of a Republican battle between the party bosses of the Bill Corney campaign and the grass roots reform group of the Real Republicans for Frank LoBiondo and Gary Jessel.

It is most critical that we are able to get our message to the people that we are for lower taxes, less government and putting an end to party bosses and cronyism.

Unfortunately, it is quite costly to produce the newspaper, television and radio spots necessary for an effective campaign.

On Saturday, May 22, 1994, from 5:30 to 7:30PM, I will be hosting a "Meet the Candidates" affair at my home at 11 Hummingbird Avenue, Petersburg, located off Rt. 610 in the Southwoods development. I am hoping to raise some money for our campaign.

I have enclosed some tickets. It would be a tremendous help for the candidates and the cause if you could purchase what you can and perhaps pass some on to a friend who might be interested. Your contributions are most needed and greatly appreciated.

Besides an opportunity to raise money, I think you'll enjoy the affair. I promise there will be no long speeches, just an informal gathering with some good homemade Italian specialties.

Thank you for whatever help you can offer. Please make your check payable to the Real Republicans and mail it to me at my home address.

Thank you,

Carlo

Carlo Melini

95043661796

95043661797

The
pleasure of your company
is requested
at the home of
Carlo Melini

&

Helen Thomason

for a

Homemade Italianfest

Sunday, May 22, 1994

5:30 to 7:30 PM

at

11 Hummingbird Avenue

Petersburg, New Jersey

For

Republican United States

House of Representatives

Candidate

Frank A. LoBiondo

and

Republican Cape May

County Freeholder

and Candidate

Gary Jessel

\$50.00 per person

Checks should be made payable to
Cape May County Real Republicans

R.S.V.P. By May 16, 1994 628-3373

EXHIBIT F

95043661798

Dear Dr. Costino:

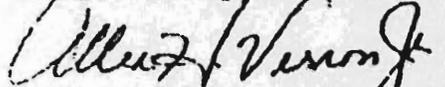
I am happy to report to the general membership the following: there was a unanimous agreement by the individual 28 members present at our February meeting that we should all support Frank in his race for the Congressional seat. It was pointed out that Frank has been our Assemblyman since 1988 and has done an excellent job. In addition, Frank is a member of the Union League and the only announced candidate who is a member.

While the Union League as an organization does not endorse candidates in a primary, the individual members voted to give LoBiondo For Congress Committee, a \$1,000.00 contribution. The vote was unanimous.

The complete minutes will be presented at the March 25, 1994 meeting.

Also submitted herewith is the Treasurer's Report as of March 1, 1994.

Respectfully Submitted,



Allen H. Vernon, Jr. Secretary
Cape May County Union League

95043661799



**Union
League**

of Cape May County, P.O. Box 24, Sea Isle City, N.J. 08243

March 18, 1994

Dear Union League Member:

Our next meeting of the Cape May County Union League will be held at the Tuckahoe Inn on March 25, 1994 with cocktails at 6:30 P.M. and dinner at 7:00 P.M.

As you are all aware, there are important events occurring in our county which demands our attention and participation. Our last meeting was very fruitful, and future meetings of the Union League should be both informative, interesting and cogent with respect to the future of South Jersey.

Please make every effort to attend this meeting and bring a friend with you who you would consider to become a member of our Union League.

Very Truly Yours,

DOC COSTINO

A REPUBLICAN ORGANIZATION

95043661300

UNION LEAGUE OF CAPE MAY COUNTY

TREASURER'S REPORT:

Report date: January 1, 1994 to March 23, 1994:

Beginning Balance January 1, 1994: \$ 8,287.52

Receipts: January	W. Robert Hontges (dues)	100.00	
	Tom Adams (dues)	100.00	
	50/50	50.00	
	Pin fines	10.00	
	Jan. Balance		<u>\$ 8,547.52</u>

Receipts: February	50/50	74.00	
	Pin Fines	10.00	
	Mort Nappen (new member)	100.00	
	Steve Cillian (new member)	100.00	
			<u>\$ 8,831.52</u>

Expenditure: February	Wild. Golf & Country Club (deposit for Christmas Party)	- 500.00	
	LoBiondo Campaign (donation)	<u>-1,000.00</u>	
	Balance Checking Account:		\$ 7,331.52
	Certificate of Deposit:	<u>\$10,000.00</u>	
	Balance on Hand 3/23/94		<u>\$17,331.52</u>

95043661801

EXHIBIT G

95043661802

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)

LOBIONDO COMMITTEE TO CHANGE CONGRESS

95043661803

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ATLANTIC CITY ELECTRIC CO FED PAC PO BOX 1264 PLEASANTVILLE, NJ 08132		10-19-92	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	700.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
SALEM COUNTY REPUBLICAN CAMPAIGN FUND MAIN STREET SALEM, NJ 08079		10-19-92	1084.50
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): (In-kind)	Occupation		
	Aggregate Year-to-Date > \$	1084.50	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
UNION LEAGUE OF CAPE MAY COUNTY P.O. BOX 24 SEA ISLE CITY, NJ 08243		10-20-92	1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	2000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
CMC CHIROPRACTIC SOCIETY 1403 TEXAS AVE CAPE MAY, NJ 08204		10-20-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
3M PAC 3M CENTER ST. PAUL, MN 55144		10-21-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MOBIL OIL CORP PAC 3225 GALLOWAY ROAD FRIEDRICH, VA 22037		10-23-92	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	500.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AVALON REPUBLICAN COMMITTEE 441 7TH STREET AVALON, NJ 08202		10-26-92	1700.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$	1700.00	

SUBTOTAL of Receipts This Page (optional)	5384.50
TOTAL This Period (last page this line number only)	

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

NAME OF COMMITTEE (in Full)

LOBIONDO COMMITTEE TO CHANGE CONGRESS

C00269340

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt this P.
GOPAC 440 FIRST ST NJ WASHINGTON, DC	N/A	7-1-92	6.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 11.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt this P.
UNION LEAGUE OF CAPE MAY COUNTY P.O. Box 24 SEA ISLE CITY, NJ 08243	N/A	7-6-92	1000.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt this
REPUBLICAN LEADERS FUND P.O. Box 65290 WASHINGTON, DC 20035-5290	N/A	7-13-92	1000
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt this
AMERICAN TRUCKING ASSOC. PAC 430 FIRST ST SE WASHINGTON, DC 20003-1875	N/A	7-15-92	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 20.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt th
CAPE MAY COUNTY MENS RETIRED CLUB 18 DEL DOMINO TRAILER PARK ERMA, NJ 08204	N/A	7-20-92	2
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 25.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount Receipt: T
CFANJ - FEDERAL 10 CORPORATE PLACE SO. PISCATAWAY, NJ 08854	N/A	8-7-92	1500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1500.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount Receipt: T
PITTSBURGH TOWNSHIP REPUB. ORG. PITTSBURGH TOWNSHIP, NJ	N/A	8-1-92	5
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

461

5043661304



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

JUNE 1, 1994

Gerard A. Desiderio, Chairman
Cape May County Regular Republican
Organization
6400 Landis Avenue
Sea Isle City, NJ 08243

RE: MUR 3978

Dear Mr. Desiderio:

This letter acknowledges receipt on May 24, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 3978. 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

95043661805



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

JUNE 1, 1994

Executive Director
Cape May County Real Republican
Organization
605 St. James Place
Cape May, NJ 08204

RE: MUR 3978

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that the Cape May County Real Republican Organization and you, as Executive Director, 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 3978. 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 Cape May County Real Republican Organization 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.

95043661806

**Executive Director
Cape May County Real Republican Organization
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**

95043661807



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUNE 1, 1994

**Executive Director
Union League of Cape May County
P.O. Box 24
Sea Isle City, NJ 08243**

RE: MUR 3978

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that the Union League of Cape May County and you, as Executive Director, 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 3978. 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 Union League of Cape May County 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.

95043661808

**Executive Director
Union League of Cape May County
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**

95043661809



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUNE 1, 1994

**Andrew J. McCrosson, Jr., Treasurer
LoBiondo Committee to Change Congress
P.O. Box 775
Marmora, NJ 08223**

RE: MUR 3978

Dear Mr. McCrosson:

The Federal Election Commission received a complaint which indicates that LoBiondo Committee to Change Congress ("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 3978. 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.

95043661810

Andrew J. McCrosson, Jr., Treasurer
Lobiondo Committee to Change Congress
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

95043661811

OGC#1478
RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
May 27 8 49 AM '94

LAW OFFICES
VINCENT L. LAMANNA, JR.
4400 LANDES AVENUE
P. O. BOX 106
SEA ISLE CITY, NEW JERSEY 08243
(800) 263-1118
FAX: 263-2286

VINCENT L. LAMANNA, JR.
PATRICK P. MARTIN
MARK P. DeLORENZO
*ALSO MEMBER PA BAR

AVALON OFFICE
2123 DUNE DRIVE
SUITE 22
AVALON, NEW JERSEY 08202

May 24, 1994

REPLY TO SEA ISLE CITY OFFICE

Federal Election Commission
Reports and Analyst Division
999 E Street
Washington, DC 20463

MUR 3978

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
May 27 3 42 PM '94

Re: Cape May County Real Republican Organization

Gentlemen:

Please be advised that this office represents the Cape May County Real Republican Organization (CMCRRO).

In an effort to determine whether the organization qualifies for filing with your Agency, one of its officers spoke with one of your representative and advised them of the nature of the activity and funds expended to date and contributions to date and were advised preliminarily that the organization did not qualify for filing under the appropriate regulations. That individual suggested that a package of campaign material and other information relating to the organization be forwarded to the FEC with a request for a determination as to whether the organization is a candidate for filing at this time.

Accordingly, I am enclosing herewith the following:

- (a) Copy of letter from David Von Savage, Chairman to me dated May 23, 1994 with enclosures including list of expenditures as well as a list of receipts and a specimen campaign advertisement.
- (b) Miscellaneous fund raising activities including tickets and invitations, etc.

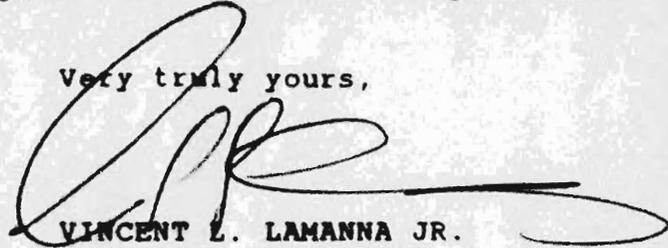
95043661812

Federal Election Commission
May 24, 1994
Page Two

The organization wishes to be in compliance with the appropriate regulations, however, if it does not qualify for filing as indicated preliminarily by one of your representatives, it does not wish to file unnecessarily.

Any assistance from your office in this regard would be greatly appreciated.

Very truly yours,



VINCENT L. LAMANNA JR.

VLL:ljj
Enclosures
cc: Mr. David Von Savage
Mrs. Peg Emberger

95043661813

**Real Republicans
For Lo Biondo, For Jessel & For Reform**

May 23, 1994

Mr. Vincent L. Lamanna, Jr.
Attorney at Law
4400 Landis Avenue
Sea Isle City, New Jersey 08243

Dear Vince:

On May 6, 1994, the Cape May County Real Republican Organization (CMCRRO) filed with the New Jersey Election Law Enforcement Commission as an on-going political committee (see attached).

The CMCRRO was organized to help elect some 155 county committee candidates and to support Gary Jessel, an incumbent Republican Freeholder, who is seeking his party's renomination in the June 7, 1994 primary election.

All 155 county committee candidates and Mr. Jessel are running for elected office under the slogan Real Republicans for LoBiondo in column three on the ballot. Assemblyman Frank LoBiondo is seeking the Republican Party nomination on June 7th for the U.S. House of Representatives.

Since April 14, 1994, the final date of petition filing for the county committee, freeholder and congressional candidates, the CMCRRO has expended a total of \$5,595.90.

The exact nature of these expenditures are identified on the attached statement of account titled Disbursements Paid by David Von Savage for Club Cheers Benefit.

In addition, I have attached a copy of each corresponding promotional expenditure for your review. I have tried to cross reference each ad with each expenditure.

The newsletter represents the largest single expenditure of the CMCRRO - \$2,952.00 and \$336.00 for postage and \$700.00 for printing (included within the \$1,018.18 payment on 5/16/94 to Printing Express).

(next page, please)

95043661814

Mr. Vincent L. Lamanna, Jr.
May 23, 1994

For your information, the weekly letters dated April 22, 1994 through May 20, 1994 are mailed exclusively to some two hundred members of the CMCRRRO and not to the general public (postage paid by Tony DiSimone \$232 as an in-kind contribution).

It is my opinion that the CMCRRRO does not have to file any documentation with the FEC as a PAC or as any other type of on-going political committee because we have not expended in excess of \$1,000 on behalf of congressional candidate Frank LoBiondo.

The CMCRRRO will not be making a contribution to Mr. LoBiondo's congressional campaign.

Based on our total expenditure of \$5,595.90 and the fact that we have approximately 155 county committee candidates, a freeholder candidate and a congressional candidate, the pro-rata allocation which thus far has been expended on behalf of Mr. LoBiondo is only \$35.64 (\$5,595.90 divided by 157 candidates = \$35.64).

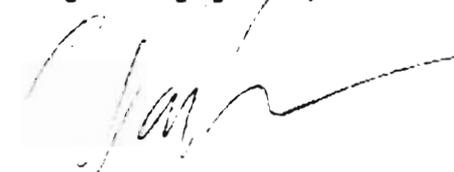
Should the CMCRRRO ever meet the \$1,000 threshold FEC reporting requirement on behalf of Mr. LoBiondo, our organization will immediately file any and all of the necessary documentation with the FEC to satisfy their regulations.

On Friday, May 20, 1994, Peg Emberger, Vice-Chair of the CMCRRRO, was in phone communication with Mr. Steve Penske from the FEC to obtain a written opinion from him concerning our position, that based on the foregoing information, we do not have to file.

Although Mr. Penske agreed verbally that we did not have to file, he was unwilling to reduce his opinion to writing until such time as he had the opportunity to review all of our written campaign material. We fully understand his position in this regard.

I appreciate your cooperation in forwarding to Mr. Penske a copy of my letter along with all of the previously referenced material so that we may hopefully obtain his written opinion in a timely manner. Again, thank you very much for your help.

Very truly yours,



David I. Von Savage
Chairman

VS/
file: FEC

95043661815

NICKELS MIDWAY PIER 100.00
3500 BOARDWALK
WILDWOOD, NJ 08260

DISBURSEMENTS PAID BY DAVID VON SAVAGE FOR CLUB CHEERS BENEFIT

4/14/94 LABELS COUNTY CLERK 128.27
4/15/94 POSTAGE WILDWOOD POSTMASTER 866.97
4/16/94 POSTAGE WILDWOOD POSTMASTER 659.68
4/18/94 POSTAGE WILDWOOD POSTMASTER 422.00
4/23/94 VILLAGE BAKERY 91.30
CAPE MAY, NJ
4/23/94 TONY'S PARTY & PAPER 92.00
132 E. SPICKER AVE
WILDWOOD, NJ 08260 \$2260.22

CASH FROM CLUB CHEERS BENEFIT PAID FOR:

4/23 COMMUNITY NEWS 100.00
P.O. BOX 557
WOODBINE, NJ 08260
4/23/94 CARMEN DEE ORCHESTRA 1600.00
C/O 42ND STREET PRODUCTS
4218 PARK BLVD.
WILDWOOD, NJ 08260
4/23/94 ANGELSEA FIRE COMPANY 250.00
1ST AND NEW JERSEY AVE
NORTH WILDWOOD, NJ 08260
\$1950.00

OTHER DISBURSEMENTS

5/5/94 LABELS COUNTY CLERK 118.52
5/6/94 WARNER CABLE 20.00
2751 DUNE DRIVE
AVALON, NJ 08202
5/10/94 PRINTING EXPRESS 600.00
821 SHUNPIKE ROAD
NORTH CAPE MAY, NJ 08204
5/12/94 WILDWOOD, POST MASTER 2952.20
5/16/94 PRINTING EXPRESS 1018.18

95043661316

821 SHUMPIKE ROAD
NORTH CAPE MAY, NJ 08204

5/16/94 **HERALD** **306.00**
1508 STATE HWY 47
RIO GRANDE, NJ 08242

5/18/94 **WILDWOOD POST OFFICE** **336.00**

5/19/94 **TKR** **70.00**
4315 NEW JERSEY AVE
WILDWOOD, NJ 08260

5/21/94 **COMMUNITY NEWS** **175.00**
PO BOX 557
WOODBINE, NJ 08270

TOTAL DISBURSEMENTS FROM CHECKING ACCOUNT **\$5595.90**

95043661817

RECEIPTS**IN KIND**

4/26, 5/3 5/11, 5/17/94	TONY DISIMONE 142 W. RIO GRANDE AVE WILDWOOD, NJ 08260 WEEKLY MAILINGS CMC REAL REPUBLICANS	292.00
5/20/94	TONY DISIMONE OR SOUTH JERSEY ADJUST 142 W. RIO GRANDE AVE WILDWOOD, NJ 08260 CAPT. MAC'S & BAR SET UP	\$1021.00
5/21/94	PARAMOUNT AIR SERVICE CAPE MAY COUNTY AIRPORT P.O. BOX 155 RIO GRANDE, NJ 08242 VOTE REAL REPUBLICANS FOR LOBIONDO	\$438.00
5/22/94	PARAMOUNT AIR SERVICE CAPE MAY COUNTY AIRPORT P.O. BOX 155 RIO GRANDE, NJ 08242 VOTE REAL REPUBLICANS FOR LOBIONDO	\$438.00

LOANS RECEIVED

4/15/94	DAVID VON SAVAGE 605 SAINT JAMES PLACE CAPE MAY, NJ 08204 (SEE DISBURSEMENTS FOR CHEERS BENEFIT)	\$2260.22
5/12/94	MARY LICATA 606 RT 9 NORTH CAPE MAY COURT HOUSE, NJ 08210	\$5000.00

CASH RECEIVED FOR CHEERS BENEFIT	\$1950.00
----------------------------------	-----------

CHECKS RECEIVED FROM CLUB CHEERS BENEFIT

4/23/94	LINDA KISSLING 24 STOCKTON PLACE CAPE MAY, NJ 08204	40.00
	SALLY SACHS P.O. DRAWER 1 CAPE MAY POINT, NJ 08212	20.00
	JERSEY CAPE MEDICAL ASSOC. 212 N MAIN ST. CAPE MAY COURT HOUSE, NJ 08210	10.00

95043661818

5043661819

Re-Elect Jessel for Freeholder
Send 'em a Message Banquet

No 000174

May 20th Friday - 6:45 pm - Cocktails

Captain Mac's Banquet Hall

(at 2nd Avenue, North Wildwood)

Senator James Castero - Master of Ceremonies

\$25 per couple

Full Course Dinner

Ordered and Paid For By:

CAPE MAY COUNTY REAL REPUBLICAN ORGANIZATION

Make Checks Payable To:

95043661820

JUNE 7 VOTE FOR... REAL REPUBLICAN GARY JESSEL ★



VOTE COLUMN 3 BOTTOM UP FOR... JESSEL.. LEADERSHIP & EXPERIENCE

JESSEL

In the summer of 1991, Freeholder candidate *Mark Videtto* announced that he was stepping down as the Ocean City Fitness Center Chairman, citing the center's growth beyond his ability to oversee it.

Then it was discovered that the county GRAND JURY INDICTED the center director and bookkeeper on charges of theft by deception of amounts totaling more than **\$57,000.00.**

"One must ask for much more common sense and caution of those who serve their community."

Southern Ledger 12/1991

"Our sincere hope is that in the future, if [Mark Videtto] wishes to remain in positions of public trust, that he be forthright and open."

Southern Ledger 6/28/91

CAN CAPE MAY COUNTY VOTERS AFFORD TO "JUST ASSUME" THAT MARK VIDETTO HAS WHAT IT TAKES TO OVER-SEE THE COUNTY'S BUDGET OF 22 MILLION DOLLARS?

IF \$57,000 IN MISAPPROPRIATIONS CAN SLIP BY *Mark Videtto* UNDER HIS WATCH AS OCEAN CITY FITNESS CHAIRMAN, HOW MUCH ELSE WILL SLIP BY HIM AS COUNTY FREEHOLDER?

VOTE TUESDAY JUNE 7TH FOR ★ LEADERSHIP & EXPERIENCE ★

Designed and paid for by: The Cape May County Real Republican Organization
Martin Pogliughi, Treasurer

Community Room
5/19 - 5/25/91

SENATOR CAFIERO TO SERVE AS FREEHOLDER JESSEL'S CAMPAIGN MANAGER

In addition to the full support of Senator Cafiero and congressional candidate and Assemblyman Frank LoBiondo, Jessel has the public support of the following elected officials, political organizations, and trade group: Mayor Marv Pagliughi of Avalon, Mayor Aldo Palombo of North Wildwood, Deputy Mayor Sarge O'Shea of Lower Township, Council President Ray Smith of Avalon, Council President Mike Gentile of Wildwood, Council President Anthony Saduk of Woodbine, Council Presi-

**SENATOR CAFIERO,
FREEHOLDER JESSEL
& REAL REPUBLICANS
STAND UP TO THE
REPUBLICAN ESTABLISHMENT**

dent Walt Larcombe of North Wildwood, Vice President of Council Chuck Covington of Avalon, Councilwoman Nancy Hudanich of Avalon, Commissioner Mike McHale of Sea Isle City, Councilman Dick Dean of Avalon, Councilman James Lemma of Wildwood, Councilman Pete Holcombe of Wildwood, Councilman Joe Fox of Cape May, Lower Township Real Republican Organization, Stone Harbor Republican Club, Cape May City Regular Republican Organization, and the Ocean City Board of Realtors.

Send 'em A Message . . .

**VOTE JESSEL
FOR FREEHOLDER**

June 7th, 1994

Republican Primary

... the Republican Party ...
... the Republican Party ...



Senator Jim Cafiero says . . .

Vote Real Republicans

Vote Gary Jessel for Freeholder

Vote Real Republicans County Committee



**Cape May County
Real Republican
Organisation**

1st Class
U.S. Postage
Paid
in C
Permit No. 4000



9 5 0 4 3 6 6 1 8 2 1

Cape May County **Real** Republican PRIMARY ELECTION NEWS

Nothing is More Powerful than Truth - Daniel Webster

THERE IS A DIFFERENCE

"REAL" VERSUS "REGULAR"
REPUBLICANS - COME JUNE 7TH YOU
HAVE A CHOICE

The Real Republicans ticket represents reform inside our government and party. The Regular Republican Organization under the Gormley column represents "power politics as usual" - control by the elite to benefit only a few.

There is a split in the county GOP party, but the split is disproportionately in favor of the Real Republicans in numbers, commitment, ideas and enthusiasm. Gormley's side is comprised of the Freeholders plus a number of county employees, many of them coerced for their support. The other side lead by the Real Republicans for LoBiondo which enjoys widespread grassroots support for real reform. One undeniable truth, the voters are tired of political arrogance.

GORMLEY VOTES 18 TIMES TO RAISE STATE TAXES!

Since being elected to serve in our state legislature, Bill Gormley has voted over 18 times to raise our taxes. He's voted to increase our income tax, gas tax, sales tax, alcohol tax, just to name a few. He also sponsored the legislation to do away with the home property tax deduction. Now Gormley wants us to believe he's some kind of fiscal conservative Republican!

Gormley's Tax Scorecard from 1979 to 1989

- 1-A1489 Gormley voted to raise Emergency Transportation Tax
- 1-A3482 Gormley voted to raise all food/drink vending machine sales tax
- 3-A1188 Gormley voted to increase alcoholic beverage tax
- 4-B1285 Gormley voted to eliminate property tax rebates
- 5-A1585 Gormley voted to increase cigarette tax
- 6-A1728 Gormley voted to increase A.C. luxury tax
- 7-A2382 Gormley voted to increase state sales tax from 6% to 6.5%
- 9-A2889 Gormley voted to increase state income tax
- 9-A 889 Gormley voted to increase cigarette tax
- 10-A2882 Gormley voted to tax for Homestead tax relief act
- 11-A2882 Gormley voted against only taxing certain insurance companies
- 12-A2889 Gormley voted to increase taxes on pets & non-pets
- 13-A2889 Gormley voted to create a corporate surtax
- 14-S1889 Gormley voted to tax fuel storage as real property
- 15-A4849 Gormley voted to increase motor fuels tax
- 16-A1135 Gormley voted to tax telephone sales for 911 service
- 17-S2785 Gormley voted to apply premium tax to health service corporations
- 18-S3844 Gormley voted to impose use tax on certain property

TIME TO CLEAN OUT THE COURT HOUSE CAREER POLITICIANS FORGET THE PEOPLE

JESSEL ALONE STAND US FOR
TAXPAYERS AND VOTES NO
AGAINST '94 BUDGET INCREASES

If there were a "Truth-in-Politics Act" as there is in lending, Freeholder Director Bill Sturm would be subject to some heavy fines. Under his leadership, our county budget has increased from \$36,699,290 in 1984 to \$82,713,866. If this trend continues unchecked, look for a \$164,000,000 budget in ten years!

On the other hand, the Real Republicans for LoBiondo are for tax cuts, we are for the elimination of wasteful spending, we are for property rights. Gary Jessel cast the lone vote against the \$3,206,169 spending increase for the 1994 county budget. Freeholder Jessel said "If Atlantic County can reduce it's budget by \$2.5 million this year alone, why is Cape May County raising its taxes?"

BILL STURM USES COUNTY DOLLARS TO PAY BACK POLITICAL CRONY

REPUBLICAN STATE
COMMITTEEMAN MAURICE
CATARCIO & FAMILY GET OVER
ONE-QUARTER MILLION IN
TAXPAYER DOLLARS ANNUALLY

True to his former Democrat roots, Bill Sturm has built his power base and control over party members by doling out jobs and padding the county payrolls with paybacks to all his political allies. Republican crony and political henchman Maurice Catarcio enjoys a fat paycheck each week from county taxpayers, plus he has a county car, plus he has a mobile car phone, plus great health benefits, plus a great pension system. In fact, Maurice and his family are paid over one-quarter of a million dollars annually from county taxpayers. Right now there are eight, count 'em, eight family members on the county payroll! Not bad. Government is good for Maurice. Is it good for you?

Send our a message - Vote Jessel

Printed by Cape May County Real Republican Organization

9 5 0 4 3 6 6 1 8 2 2



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

JUNE 15, 1994

Vincent L. Lamanna, Jr.
4400 Landis Avenue
P.O. Box 165
Sea Isle City, NJ 08243

RE: MUR 3978

Dear Mr. Lamanna:

This letter acknowledges receipt of the May 24, 1994, letter, addressed to the Reports Analysis Division of the Federal Election Commission ("Commission"), which you sent on behalf of your client, the Cape May County Real Republican Organization. Your letter was forwarded to the Enforcement Division.

Prior to the letter being forwarded to the Enforcement Division, on June 1, 1994, the Commission notified the Cape May Real Republican Organization of a complaint which had been filed in a matter designated MUR 3978.

Therefore, your May 24, 1994, letter will be considered along with any response which is submitted regarding the complaint. Additionally, one of the attachments to the May 24, 1994, letter makes reference to Mr. Steve Penske of the Federal Election Commission. No such employee works at the Commission and I do not know who Mr. Penske is.

If you have any questions regarding this matter, please contact Mary Taksar at (202) 219-3690.

Sincerely,

Lois G. Lerner
Associate General Counsel

95043661323

LAW OFFICES
VINCENT L. LAMANNA, JR.
4400 LANDES AVENUE
P. O. BOX 186
SEA ISLE CITY, NEW JERSEY 08243
(800) 263-1118
FAX: 263-2286

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

JUN 15 8 00 AM '94

VINCENT L. LAMANNA, JR.
PATRICK F. MARTIN*
MARK P. DELORENZO*
*ALSO MEMBER PA BAR

AVALON OFFICE:
2123 DUNE DRIVE
SUITE 22
AVALON, NEW JERSEY 08202

June 10, 1994

REPLY TO SEA ISLE CITY OFFICE

Federal Election Commission
Enforcement Division
Office of the General Counsel
999 E Street
Washington, DC 20463

Re: Cape May County Real Republican Organization
MUR 3978

JUN 15 9 28 AM '94
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

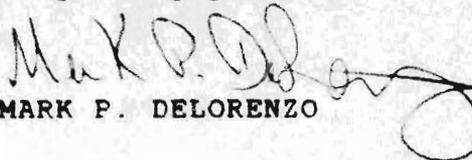
Dear Sir/Madam:

Please be advised that this office represents the respondent with respect to the above-referenced matter. Accordingly, enclosed herewith is the respondent's executed statement of designation of counsel.

On June 7, 1994, this office received your notice indicating that the complaint was received by the Federal Election Commission. It is my understanding that a response is due within fifteen (15) days of that date. A formal response will be forthcoming within that period of time.

Thank you for your attention to this matter.

Very truly yours,


MARK P. DELORENZO

MPD/bl
Enclosure
cc: David Von Savage

95043661824

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3978

NAME OF COUNSEL: VINCENT L. LAMANNA, JR.
ATTORNEYS AT LAW

ADDRESS: 4400 Landis Avenue
P.O. Box 165
Sea Isle City, NJ 08243

TELEPHONE: (609) 263-1118

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.

6/6/94
Date

[Signature]
Signature

RESPONDENT'S NAME: DAVIS VON SAVAGE

ADDRESS: 605 ST. JAMES PLACE
Cape May
NJ 08204

TELEPHONE: HOME (609) _____

BUSINESS (_____) same

95043661825

MOTT, VERNON AND MOTT

ATTORNEYS AT LAW
THE BOURSE BUILDING
8th STREET & ASBURY AVENUE
THIRD FLOOR
P. O. BOX 385

OCEAN CITY, NEW JERSEY 08226-0385
(609) 399-7577

JOEL A. MOTT, III
ALLEN H. VERNON, JR
JEFFERSON A. MOTT

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE
JUN 16 9 09 AM '94
JOEL A. MOTT, JR.
OF COUNSEL
FAX
(609) 391-9265

June 13, 1994

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

Attention: Joan McEnery

Re: MUR 3978

Dear Ms. McEnery:

In reference to the above, I am providing you with a Statement of Designation of Counsel.

I respectfully request an extension of time to demonstrate in writing that no action should be taken against the Union League of Cape May County in this matter. The reason for the request is that the correspondence date June 1, 1994 was sent to an executive director of the Union League at Post Office Box 24. The Union League has no such position and the box was not opened until approximately June 10, 1994. As such I am just recently receiving this information. An extension of fifteen days would be helpful.

It is my understanding this matter will remain confidential.

Thank you for your assistance in this regard.

Very truly yours,

MOTT, VERNON AND MOTT

Allen H. Vernon, Jr.
Allen H. Vernon, Jr.

AHV/1kj

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUN 16 9 51 AM '94

95043661026

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3978

NAME OF COUNSEL: MOTT, VERNON AND MOTT

ADDRESS: 8th & Asbury Avenue, The Bourse Bldg., Third Floor
P.O. Box 385
Ocean City, New Jersey 08226

TELEPHONE: (609) 399-7577

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.

6/10/94
Date


Signature
Allen H. Vernon, Jr., Secretary
for Union League of Cape May County

RESPONDENT'S NAME: Union League of Cape May County

ADDRESS: P.O. Box 24
Sea Isle City, NJ 08243

TELEPHONE: HOME (_____) No phone available

BUSINESS (_____) _____

95043661827



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUNE 16, 1994

Allen H. Vernon, Jr., Esq.
Mott, Vernon and Mott
8th Street & Asbury Avenue
The Bourse Building, Third Floor
P.O. Box 385
Ocean City, NJ 08226

RE: MUR 3978
Union League of Cape May
County

Dear Mr. Vernon:

This is in response to your letter dated June 13, 1994, requesting an extension of 10 days to respond to the complaint filed in the above-noted 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 July 5, 1994.

If you have any questions, please contact Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

95043661628



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUNE 16, 1994

Mark P. DeLorenzo, Esq.
Law Offices of Vincent L. LaManna, Jr.
4400 Landis Avenue
P.O. Box 165
Sea Isle City, N.J. 08243

RE: MUR 3978
David Von Savage and
Andrew I. McCrosson

Dear Mr. DeLorenzo:

This is in response to your letter dated June 15, 1994, requesting a two week extension to respond to the complaint filed in the above-noted 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 July 5, 1994.

If you have any questions, please contact Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

95043661829

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

JUN 20 9 10 AM '94

LAW OFFICES
VINCENT L. LAMANNA, JR.
4400 LANDES AVENUE
P. O. BOX 185
SEA ISLE CITY, NEW JERSEY 08243
(609) 263-1118
FAX: 263-2286

VINCENT L. LAMANNA, JR.
PATRICK F. MARTIN*
MARK P. DELORENZO*
*ALSO MEMBER PA BAR

AVALON OFFICE:
2123 DUNE DRIVE
SUITE 22
AVALON, NEW JERSEY 08202

June 15, 1994

REPLY TO SEA ISLE CITY OFFICE

Federal Election Commission
Enforcement Division
Office of the General Counsel
999 E. Street
Washington, D. C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUN 20 2 49 PM '94

Attention: Mary L. Taksar, Esquire

Re: MUR 3978

Dear Mrs. Taksar:

Please be advised that this office represents respondents Mr. David Von Savage in his capacity as Executive Director of the Cape May County Real Republican Organization; and Mr. Andrew I. McCrosson, Jr., in his capacity as Treasurer of the LoBiondo Committee to Change Congress, with respect to the above referenced matter. Accordingly, enclosed herewith is Mr. McCrosson's executed designation of counsel. Mr. Von Savage's executed designation of counsel was provided previously under cover letter dated June 10, 1994.

On behalf of both respondents, I am requesting a two (2) week extension of time within which to respond to the complaint. The additional time is necessary to gather all of the necessary information and assemble all of the pertinent documents.

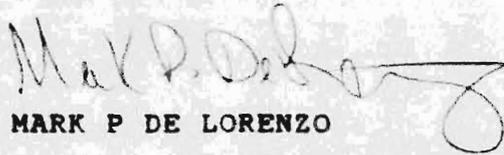
It is my understanding that I will be notified in writing if this request is granted and, if so, will be advised of the new date.

95043661830

Federal Election Commission
June 15, 1994
Page Two

Thank you for your cooperation and attention to this matter.

Very truly yours,



MARK P DE LORENZO

MPD:mkh
Enclosure
Transmitted by Fax and Regular Mail
cc: Mr. David Von Savage
Mr. Andrew McCrosson

95043661831

STATEMENT OF DESIGNATION OF COUNSEL

NUR 3978

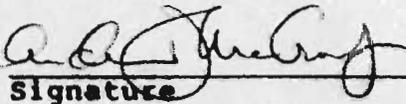
NAME OF COUNSEL: VINCENT L. LAMANNA JR.
ATTORNEYS AT LAW

ADDRESS: 4400 Landis Avenue
P. O. Box 165
Sea Isle City, N.J. 08243

TELEPHONE: (609) 263-1118

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.

6-8-94
Date


Signature

RESPONDENT'S NAME: Andrew J. McCrosson, Jr.

ADDRESS: LoBiondo Committee to Change Congress
P.O. Box 775
Marmora, New Jersey 08223

TELEPHONE: HOME (609) 390-3148

BUSINESS (609) 348-4231

95043661832

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
OFFICE OF GENERAL
COUNSEL

JUN 5 3 15 PM '94
JUN 10 5 56 AM '94

LAW OFFICES
VINCENT L. LAMANNA, JR.
4400 LANDIS AVENUE
P. O. BOX 188
SEA ISLE CITY, NEW JERSEY 08243
(800) 263-1118
FAX: 263-8286

VINCENT L. LAMANNA, JR.
PATRICK F. MARTIN
MARK P. DeLORENZO
*ALSO MEMBER PA BAR

AVALON OFFICE:
2123 DUNE DRIVE
SUITE 22
AVALON, NEW JERSEY 08202

June 30, 1994

REPLY TO SEA ISLE CITY OFFICE

Federal Election Commission
Enforcement Division
Office of the General Counsel
999 E. Street
Washington, D.C. 20463

Attention: Mary L. Taksar, Esquire

Re: MUR 3978

Dear Mrs. Taksar:

Please accept this response on behalf of the respondents, Mr. David Von Savage in his capacity as Executive Director of the Cape May County Real Republicans Organization (CMCRRO) and Mr. Andrew J. McCrosson, Jr. in his capacity as Treasurer of the LoBiondo Committee to Change Congress, to the Complaint filed in the above referenced matter. In addition, we have provided certifications from both respondents in support of this response. Also, we were advised that a previous submission in the form of a letter from this office with several attachments, dated May 24, 1994, would be considered along with this response.

Moreover, attached to this response is an original letter from the Complainant, Gerard A. Desiderio, requesting that the Complaint be withdrawn and that no further action be taken in this matter. It is my understanding that Mr. Desiderio, in addition to providing his letter to us to be attached to our response, he is sending a second original directly to the FEC for their review.

Upon review of the procedures for processing complaints filed with the Federal Election Commission, the Commission's initial task is to determine whether or not there is reason to believe that the Complaint sets forth a possible violation of the Federal Election Campaign Act of 1971. It is respectfully submitted that the Complaint does not set forth any credible facts that would allow the Commission to find reason to believe that there has been a violation of the Act. As stated in Mr. Desiderio's request to withdraw the Complaint, he based the majority of his allegations upon what turned out to be inaccurate newspaper articles.

95043661833

Federal Election Commission
Enforcement Division
Office of the General Counsel
June 30, 1994
Page 2

As alluded to in the second paragraph in page one of the Complaint filed by Gerard A. Desiderio, the Primary Election Campaigns for the Republican Nomination for the Second Congressional District of New Jersey was a hard fought political battle. This Primary Election created a severe rift in the Cape May County Republicans. The Complaint, at the time of filing, was designed as a political tool filed for the benefit of the media prior to the Primary Election.

The Complaint alleges possible violations of contribution and filing requirements. However, the Complaint does not cite to any specific statute or regulation that has been violated. This "shotgun" approach is unfair and inappropriate. The fact that Mr. Desiderio has provided a sworn complaint is of little value; he provides no facts that he must stand behind. In addition, his investigation since filing the Complaint, as indicated in his letter requesting the Complaint to be withdrawn, has revealed that there were in fact no irregularities.

It appears that Mr. Desiderio is alleging that the CMCRRRO is a political committee as defined in 2 U.S.C. sec. 431 and must therefore register with the FEC in accordance with 2 U.S.C. sec. 433. As such, it should be made clear that the CMCRRRO did in fact file a Statement of Organization with the FEC on May 16, 1994, in accordance with 2 U.S.C. sec. 433. Therefore, the allegation as to possible violations of filing requirements is baseless. The FEC Form-1 that was filed is attached as exhibit "B" to Mr. Von Savage's certification. The CMCRRRO filed from an abundance of caution because they were unsure if it was necessary to file. Enclosed with their Statement of Organization was a request for guidance from the FEC as to whether or not filing was in fact necessary and if so, did they file correctly. It was the opinion of Mr. Von Savage that filing with the FEC was not necessary because the CMCRRRO did not fall within the definition of a political committee as defined by the Act.

The CMCRRRO filed with the FEC even though the CMCRRRO has not expended in excess of \$1,000.00 on behalf of congressional candidate Frank LoBiondo nor has it made a contribution to Frank LoBiondo's campaign.

It is clear that the CMCRRRO's purpose was for the election of committee persons and County Freeholder and that all funds raised by the CMCRRRO would be used for this purpose. Mr. LoBiondo had his own campaign manager and own fund raising activities separate and apart from the CMCRRRO's activities.

95043661834

Federal Election Commission
Enforcement Division
Office of the General Counsel
June 30, 1994
Page 3

Mr. Desiderio's statement that "there seems to be an appearance of cooperation between the CMCRRRO and the LoBiondo Committee to Change Congress" is entirely unfounded. This statement is made based on a report in the newspaper that a phone conversation took place between Mr. Von Savage and Mr. McCrosson. Both respondents have indicated in their certifications that there was without any question no cooperation between the two organizations. Mr. Desiderio states that he has spoken to the appropriate officials from the Union League and from the LoBiondo Committee to Change Congress and is satisfied that proper filings and reporting has occurred.

Mr. Desiderio alleges in Count Two of the Complaint that there were possible violations with regard to a contribution made by the Union League to the LoBiondo for Congress Committee. Again, Mr. Desiderio's efforts post filing of the Complaint have revealed that there in fact were no violations.

Attached as Exhibit "A" to Mr. McCrosson's certification is a copy of an affidavit from Allen Vernon in his capacity as Secretary of the Cape May County Union League. The affidavit properly sets forth the circumstances for the contribution that was made and makes clear that the Union League is not required to register with the FEC.

As to the allegation that the contribution was improperly accepted, Mr. McCrosson in his certification states that the contribution in question was not accepted until the matter contained in Mr. Vernon's affidavit was addressed. The LoBiondo Committee to Change Congress did not accept a contribution which they were barred from accepting. Further, after the contribution was properly accepted, it was included on the LoBiondo Committee to Change Congress' report of receipts and disbursements covering the period of April 1, 1994, through May 18, 1994. This document is attached to Mr. McCrosson's certification as Exhibit "B".

There is no reason to believe that any violations have been committed. The Complaint filed by Mr. Desiderio was purely a political barb thrown at his opponents in an effort to divert the voter's attention from the real issues. Mr. Von Savage and Mr. McCrosson acting on behalf of their respective organizations have not violated any statute or regulation. Mr. Desiderio has not provided any credible facts to support the allegations, has acknowledged his lack of credible evidence and in good faith has requested that the Complaint be withdrawn. Finally, the respondents have demonstrated that there have been no violations of contribution or filing requirements.

95043661835

Federal Election Commission
Enforcement Division
Office of the General Counsel
June 30, 1994
Page 4

For all of the above stated reasons, it is respectfully submitted that there is no reason to believe that there have been any violations of the Federal Election Campaign Act of 1971.

Respectfully submitted,


Mark P. DeLorenzo

MPD/bl
Enclosures
cc: David VonSavage
Andrew McCrosson
Mary Annie Harper

95043661836



CAPE MAY COUNTY REGULAR REPUBLICAN ORGANIZATION



Gerard A. Desiderio
Chairman

June 30, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUN 5 3 16 PM '94

Office of the General Counsel
Federal Election Commission Enforcement Div.
999 East Street
Washington, D.C.

RE: Federal Election Commission Complaint
Identification No.: MUR 3978

Dear Commission:

Please be advised that I am the Complainant in the above identified Complaint. I hereby request that the Complaint be withdrawn and that no further action be taken with regard to the Complaint.

The primary basis that I am requesting that no action be taken is that I am convinced at this point in time that the participants acted in good faith and ultimately made all of the required filings. I have met extensively with the individuals involved, particularly those from the Frank LoBiondo Committee and am satisfied that all proper filings were ultimately made.

With regard to Count One of the Complaint, one can readily ascertain that the great majority of that complaint is based upon newspaper articles which ultimately turned out to be less accurate than their face value may have lead an individual to believe.

With regard to Count Two, that complaint was based upon a union league of Cape May County report to its members, which apparently contained errors as to what had been done and what had not been done.

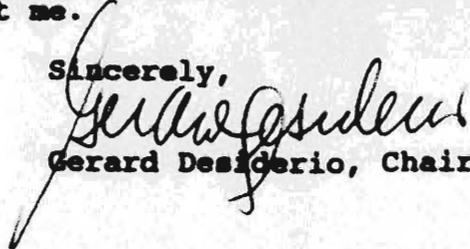
After speaking to the appropriate Union League Officials and the Frank LoBiondo individuals, I am satisfied that no irregularity occurred and that proper filings and reportings have occurred.

95043661837

Office of the General Counsel
June 30, 1994
Page 2

I trust that this is sufficient to have the Complaint withdrawn. However, should any additional information be needed, please do not hesitate to contact me.

Sincerely,


Gerard Desiderio, Chairman

GD/lp

95043661838

CERTIFICATION

DAVID I. VON SAVAGE, of full age, being duly sworn on his oath according to law, deposes and says:

1. I am the Executive Director of the Cape May County Real Republican Organization (CMCRRO).
2. The CMCRRO was formed for the purpose of helping to elect 155 Cape May County Executive Committee persons and to support Gary Jessel, an incumbent Republican Freeholder, all running for elected office under the Real Republican slogan.
3. On May 6, 1994, the CMCRRO filed with the New Jersey Election Law Enforcement Commission as an on-going political committee. Designation of Campaign Treasurer and Depository is attached hereto as Exhibit "A".
4. The candidates running for Executive Committee and for County Freeholder ran in the same column as Congressional candidate, Frank LoBiondo.
5. Because of this alignment, we advised the FEC of the CMCRRO's existence by filing a Statement of Organization which is attached hereto as Exhibit "B".
6. The CMCRRO has not raised nor expended more than \$1,000.00 on behalf of Congressional candidate, Frank LoBiondo.
7. The CMCRRO has not made a contribution to Mr. LoBiondo's Congressional campaign.
8. No funds received through solicitations and fundraisers sponsored by the CMCRRO were used for federal election purposes.
9. The Statement of Organization was filed from an abundance

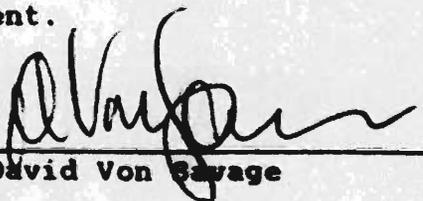
95043661839

of caution and was accompanied with a request as to whether or not filing with the FEC was necessary.

10. There was no cooperation between the CMCRRRO and the LoBiondo Committee to Change Congress.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 7-1-94


David Von Savage

95043661840

CONTINUING POLITICAL COMMITTEE DESIGNATION OF CAMPAIGN TREASURER AND DEPOSITORY

FORM D-3

NEW JERSEY ELECTION LAW ENFORCEMENT COMMISSION
CI-183 TRENTON, NEW JERSEY 08625-0185 (609) 292-8700

FOR STATE USE ONLY

PLEASE TYPE OR PRINT

Full Committee Name, Address (Number & Street, City, State, Zip Code)

Cape May County REAL Republican Organization
1111 Lafayette St. #605
Cape May, NJ 08204

(AREA) DAY TELEPHONE:
884-1577

(AREA) EVENING TELEPHONE:
884-1577

First Report Filed? Yes No

Identification Number

"X" if Address is Different From Address Previously Reported

"X" if committee name is different

Committee Type: (X one)

- Political Party Committee
- Ongoing Political Committee

Location:

- Municipality _____
- County Cape May

TYPE OF FILING: (X one)

- Political party committee Annual designation due July 1st
- Ongoing political committee Initial designation
- Deputy treasurer
- Additional depository
- Amendment

N.J.S.A. 19:44A-10 requires each State, county and municipal committee of a political party to designate a single treasurer and organizational depository on or before July 1st of each year. It also requires every continuing political committee to designate a single organizational treasurer and depository not later than the date on which it first receives any contribution or makes or incurs any expenditure in the furtherance or aid of the election or defeat of any candidate or to aid the passage or defeat of any public question. The committee is required to notify the Commission of the appointment and designation within 10 days by filing this form. The committee may appoint deputy treasurer(s) designate additional depositories, as required. The committee must notify the Commission not later than the tenth day after their appointment or designation, respectively.

TREASURER NAME

Martin L. Pagliughi

ADDRESS (NUMBER AND STREET, CITY, STATE, ZIP CODE)

441 7th St. Avalon, NJ 08202

(AREA) DAY TELEPHONE

967-8200

(AREA) EVENING TELEPHONE

967-5631

BANK NAME

Commerce Bank

ADDRESS (NUMBER AND STREET, CITY, STATE, ZIP CODE)

101 E. 9th St. Ocean City, NJ 08226

ACCOUNT NAME

Cape May County REAL Republican Organization

ACCOUNT NUMBER

4401246

CHAIRPERSON/PRESIDENT NAME

ADDRESS (NUMBER AND STREET, CITY, STATE, ZIP CODE)

EXHIBIT "A"

5/6/94

CHAIRPERSON/PRESIDENT SIGNATURE

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL (Check if name is changed) **Cape May County Real Republican Organization**

(b) Number and Street Address (Check if address is changed) **156 Asbury Ave. Ocean City, NJ 08226.**

DATE **5/16/94**

TEC IDENTIFICATION NUMBER

IS THIS STATEMENT AN AMENDMENT? YES NO

2. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee and is NOT a principal campaign committee. (Complete the candidate information below.)
- Name of Candidate: _____ Candidate Party Affiliation: **Clara Saugh** State/District: _____
- (c) This committee supports/opposes only one candidate **Frank LoBiondo** and is NOT an authorized committee. (Name of candidate)
- (d) This committee is a _____ committee of the _____ Party. (National, State or subordinate) (Democratic, Republican, etc.)
- (e) The committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

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

Type of Connected Organization: Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

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

Full Name	Mailing Address	Title or Position
Denise Jessel	156 Asbury Ave.	Secretary

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

Full Name	Mailing Address	Title or Position
Martin L. Pagliughi	441 7th Street Avalon, NJ 08202	Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Commerce Bank	101 E. 9th St. Ocean City, NJ 08226

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

TYPE OR PRINT NAME OF TREASURER: **Martin L. Pagliughi** EXHIBIT "B" DATE: **5/16/94**

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

95043661842

CERTIFICATION

ANDREW J. McCROSSON, JR., of full age, being duly sworn on his oath according to law, deposes and says:

1. I am the Treasurer of the LoBiondo Committee to Change Congress.

2. On February 25, 1994, the Cape May County Union League made a contribution of \$1,000.00 to the LoBiondo Committee to Change Congress.

3. The \$1,000.00 contribution was not accepted by the LoBiondo Committee to Change Congress until the Union League supplied an affidavit indicating the source of the funds and the status of the Union League. A true and accurate copy of the Affidavit supplied by Allen Vernon in his capacity as Secretary of the Cape May County Union League is attached hereto as Exhibit "A".

4. This contribution was reflected on the Report of Receipts and Disbursements that was filed by the LoBiondo Committee to Change Congress for the period of April 1, 1994, through May 18, 1994. A true and accurate copy of the Report of Receipts and Disbursements that was filed by the LoBiondo Committee to Change Congress for the period of April 1, 1994, through May 18, 1994 is attached hereto as Exhibit "B".

5. No funds have been received by the LoBiondo Committee to Change Congress from the Cape May County Real Republican Organization.

6. There was no cooperation between the LoBiondo Committee to Change Congress and the Cape May County Real Republican

95043661843

FOR STAMPED
SOUTH WORTH CO. USA

Organization.

I certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made by me are
willfully false, I am subject to punishment.

Dated: 7-1-94

Andrew J. McCrosson, Jr.
Andrew J. McCrosson, Jr.

95043661844

AFFIDAVIT

I, Allen H. Verano, as ^{Secretary} ~~Treasurer~~ of the Capo May Ce Unio League (referred hereinafter as the "Committee") located at RD 24 Sea Isle Ct NJ, do hereby state the following:

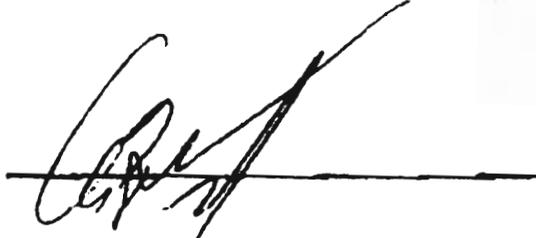
1. That on Feb. 25 94, the Committee, as a non-federal committee, made a contribution of \$ 1000⁰⁰ to the LoBiondo Committee to Change Congress 1994 primary election campaign.

2. That during the calendar year 1994, the Committee did not receive contributions aggregating in excess of \$1,000 nor did the Committee make expenditures in excess of \$1,000 for the purpose of influencing federal elections.

3. That sufficient funds permissible under the Federal Election Law were available in the account at the time of the contribution. Specifically, funds from prohibited sources such as corporations, labor unions, foreign nationals, federally chartered banks or federal contractors were not used to make the contribution to the LoBiondo Committee to Change Congress primary election campaign.

4. This contribution is permissible under New Jersey state law.

Dated: 4/12/94



TREASURER
Secretary

95043661845

SCHEDULE A

ITEMIZED RECEIPTS

OTHER POLITICAL COMMITTEES

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)
LOBIONDO COMMITTEE TO CHANGE CONGRESS

95043661847

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
THE A&N-HOBBY INDUSTRY PAC 1250 I ST. N.W., SUITE 500 WASHINGTON, D.C. 20005	N/A	4-12-94	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
COMMITTEE TO RE-ELECT MARION CASCO 15 PARSONS CT. BLOOMFIELD, NJ 07003-2017	N/A	4-19-94	50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	50.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
FRIENDS OF ERNIE DROS 42 MURDOCK ST. FORDS, NJ 08863	N/A	4-22-94	100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	100.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AMERICAN OPTOMETRIC ASSOCIATION PAC 1505 PRINCE ST, SUITE 300 ALEXANDRIA, VA 22314	N/A	4-22-94	1500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	1500.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
UNION LEAGUE OF CAPE MAY COUNTY P.O. BOX 24 SEA ISLE CITY, NJ 08243	N/A	4-25-94	1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	1000.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
DWIGHT-ILLINOIS INC EMPLOYEES GOOD WIT. FUND ONE SENGATE TOLEDO, OH 43666	N/A	4-25-94	200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	200.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
FISHERIES PAC 1525 WILSON BLVD, SUITE 500 ARLINGTON, VA 22209	N/A	4-25-94	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	500.00

SUBTOTAL of Receipts This Page (optional) 3850.00

TOTAL This Period (last page this line number only)

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

Name of Committee (In full) LOBIONDO COMMITTEE TO CHANGE CONGRESS	Report Covering the Period:	
	From: 04/01/94	To: 05/18/94
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(A) Itemized (use Schedule A)	91,352.00	
(B) Unitemized	42,127.94	
(B) Total of contributions from individuals	133,479.94	212,982.94
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	16,673.40	16,673.40
(d) The Candidate		
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(B), (b), (c) and (d))	150,153.34	229,656.34
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.		
13. LOANS:		
(a) Made or Guaranteed by the Candidate		
(b) All Other Loans		
(c) TOTAL LOANS (add 13(a) and (b))		
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
15. OTHER RECEIPTS (Dividends, Interest, etc.)		
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	150,153.34	229,656.34
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	73,324.48	94,067.01
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.		
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate		
(b) Of All Other Loans		
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))		
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	1,000.00	1,000.00
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	1,000.00	1,000.00
21. OTHER DISBURSEMENTS		
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	74,324.48	95,067.01

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 62,148.47	
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 150,153.34	
25. SUBTOTAL (add Line 23 and Line 24)	\$ 212,301.81	
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 74,324.48	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 137,977.33	

95043661848

MOTT, VERNON AND MOTT

ATTORNEYS AT LAW
THE BOURSE BUILDING
8th STREET & ASBURY AVENUE
THIRD FLOOR
P O. BOX 385

OCEAN CITY, NEW JERSEY 08226-0385
(609) 399-7577

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE

JUL 7 11 10 AM '94

JOEL A. MOTT, III
ALLEN H. VERNON, JR.
JEFFERSON A. MOTT

JOEL A. MOTT, JR.
OF COUNSEL

July 5, 1994

FAX
(609) 891-9265

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUL 7 3 30 PM '94

Federal Election Commission
Washington, D.C. 20463
Attn: Joan McEnery

Re: Cape May County Union League
MUR 3978

Dear Ms. McEnery:

In reference to the above, I am providing you with an explanation in response to a Complaint filed under correspondence dated May 23, 1994, by Gerard A. Desiderio, Chairman of the Cape May County Regular Republican Organization and a member of the Cape May County Union League.

I am a duly admitted attorney in the State of New Jersey and also the Secretary of the Cape May County Union League. I have personal knowledge of the facts which I will present in this correspondence. This Complaint arises out of an alleged Federal Election Law violation occurring in the Second Congressional District of New Jersey. The candidate for said Congressional Election in the Republican Primary was Frank LoBiondo.

In reviewing the correspondence, Count One of the correspondence does not apply to the Cape May County Union League. In response to Count Two of said correspondence, references made to correspondence dated March 18, 1994, Exhibit F. The correspondence presented by myself as Secretary for the Cape May County Union League simply presented general information directed to our President, Dr. Costino, as to the votes made by the individual twenty-eight (28) members present at our February 1994 meeting. By unanimous support the membership voted to support Frank LoBiondo with a \$1,000 contribution. Also included in said mailing to the general members was correspondence submitted by our President, Dr. Costino, which gave notice of the next meeting. Also included was a Treasurer's Report. This correspondence was merely a summary of our Union League's activities for the previous month. Our general practice is such that our President, Dr. Costino, prepares a notice of the next month's meeting location and

95043661349

95043661850

faxes it to my office. Thereafter, my office prepares the notice and includes with said notice the minutes and the Treasurer's Reports, if the same are available when Dr. Costino's correspondence arrives. If the minutes are not available, or the Treasurer's Report is not prepared at that time, the same is presented at the regular meeting. Count Two suggests that because the Union League made a \$1,000 contribution, and mailed out the previously discussed notice, that the contribution would exceed \$1,000 and place the Union League under legal definition of the political committee. Once again, it is simply stated that the Union League, through its regular course of business, sends a mailing out each month to each of its individual members regarding the Union League's activities.

I have no knowledge as to the contents of the Federal Election Commission report of receipts and disbursements submitted by the LoBiondo Committee To Change Congress, covering the period between January 1, 1994 and March 31, 1994.

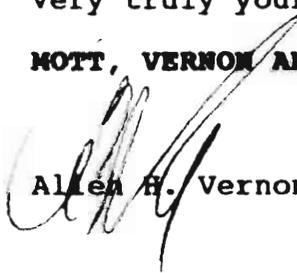
It is further suggested that Union League did not have a separate Federal account for contributions. It is submitted that the Union League was not required to comply with certain rules regarding accounting methods. The Union League can demonstrate, through the Treasurer's Report submitted, that it had sufficient funds permissible under Federal Law to cover the amount of disbursement made at the time the check was written. It is not necessary to make a separate account, due to the fact that the Union League is a local party organization that is an unregistered group.

It is correct that the Union League submitted a \$1,000 contribution to the LoBiondo campaign for the Primary, on or about June 6, 1992, and a second contribution to the general election made on or about October 20, 1992. All contributions made by the Union League were made in good faith without the advance benefit of an advisory opinion. For these reasons, the Union League is requesting that no action should be taken against the League in response to the Complaint.

If you have any questions or comments, please feel free to contact me at my office.

Very truly yours,

MOTT, VERNON AND MOTT


Allen H. Vernon, Jr., Esquire

AHV/tlm
enclosure
cc: Dr. Costino

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

JUN 13 3 40 PM '95

In the Matter of

)
) Enforcement Priority
)

SENSITIVE

GENERAL COUNSEL'S MONTHLY REPORT

I. INTRODUCTION

This report is the General Counsel's Report to recommend that the Commission no longer pursue the identified lower priority and stale cases under the Enforcement Priority System.

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 10 cases which do not warrant further pursuit relative to the other pending cases.¹ A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each

1. These matters are: MUR 4087; MUR 4092; MUR 4093; MUR 4096; MUR 4097; MUR 4098; MUR 4100; MUR 4103; MUR 4106; and MUR 4114.

95043661851

case is attached to this report. See Attachments 1-11. As the Commission requested, this Office has attached the responses to the complaints for the externally-generated matters and the referral for the internally-generated matter following the narrative. See Attachments 1-11.

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 34 cases that

do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. As the Commission requested, in matters in which the Commission has made no

2. These matters are: MUR 2582; MUR 3109; MUR 3241; MUR 3426; MUR 3857; MUR 3858; MUR 3862; MUR 3866; MUR 3876; MUR 3879; MUR 3890; MUR 3893; MUR 3895; MUR 3896; MUR 3898; MUR 3902; MUR 3903; MUR 3904; MUR 3905; MUR 3907; MUR 3908; MUR 3912; MUR 3933; MUR 3958; MUR 3962; MUR 3978; MUR 3984; RAD 93L-19; RAD 94L-05; RAD 94L-11; RAD 94L-15; RAD 94L-21; RAD 94L-23; and RAD 94L-26.

95043661852

findings, the responses to the complaints for the externally-generated matters and the referrals for the internally-generated matters are attached to the report. See Attachments 16-45. For cases in which the Commission has already made findings and for which each Commissioner's office has an existing file, this Office has attached the most recent General Counsel's Report. See Attachments 12-15.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective June 26, 1995. By closing the cases effective June 26, 1995, 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 these cases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective June 26, 1995 in the following matters:

- 1) RAD 93L-19
- 2) RAD 94L-05
- 3) RAD 94L-11
- 4) RAD 94L-15
- 5) RAD 94L-21
- 6) RAD 94L-23
- 7) RAD 94L-26

B. Take no action, close the file effective June 26, 1995, and approve the appropriate letter in the following matters:

- 1) MUR 3857
- 2) MUR 3858
- 3) MUR 3862

95043661853

- 4) MUR 3866
- 5) MUR 3876
- 6) MUR 3879
- 7) MUR 3890
- 8) MUR 3893
- 9) MUR 3895
- 10) MUR 3896
- 11) MUR 3898
- 12) MUR 3902
- 13) MUR 3903
- 14) MUR 3904
- 15) MUR 3905
- 16) MUR 3907
- 17) MUR 3908
- 18) MUR 3912
- 19) MUR 3933
- 20) MUR 3958
- 21) MUR 3962
- 22) MUR 3978
- 23) MUR 3984
- 24) MUR 4087
- 25) MUR 4092
- 26) MUR 4093
- 27) MUR 4096
- 28) MUR 4097
- 29) MUR 4098
- 30) MUR 4100
- 31) MUR 4103
- 32) MUR 4106
- 33) MUR 4114

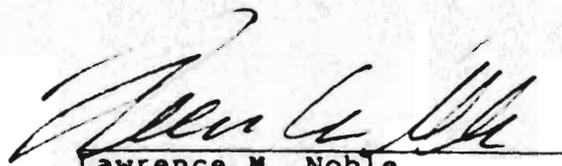
C. Take no further action, close the file effective June 26, 1995, and approve the appropriate letter in the following matters:

- 1) MUR 2582
- 2) MUR 3109
- 3) MUR 3241
- 4) MUR 3426

Date

June 17, 1995

Lawrence M. Noble
General Counsel



95043661854

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enforcement Priority) Agenda Document
#X95-52

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 27, 1995, do hereby certify that the Commission decided by a vote of 6-0 on each of the matters listed below to take the actions hereinafter described:

A. Decline to open a MUR and close the file effective July 5, 1995 in the following matters:

- 1) RAD 93L-19
- 2) RAD 94L-05
- 3) RAD 94L-11
- 4) RAD 94L-15
- 5) RAD 94L-21
- 6) RAD 94L-23
- 7) RAD 94L-26

B. Take no action, close the file effective July 5, 1995, and approve the appropriate letter in the following matters:

- 1) MUR 3857
- 2) MUR 3858
- 3) MUR 3862

(continued)

95043661855

Federal Election Commission
Certification: Enforcement Priority
June 27, 1995

Page 2

- 4) MUR 3866
- 5) MUR 3876
- 6) MUR 3879
- 7) MUR 3890
- 8) MUR 3893
- 9) MUR 3895
- 10) MUR 3896
- 11) MUR 3898
- 12) MUR 3902
- 13) MUR 3903
- 14) MUR 3904
- 15) MUR 3905
- 16) MUR 3907
- 17) MUR 3908
- 18) MUR 3912
- 19) MUR 3933
- 20) MUR 3958
- 21) MUR 3962
- 22) MUR 3978
- 23) MUR 3984
- 24) MUR 4087
- 25) MUR 4092
- 26) MUR 4093
- 27) MUR 4096
- 28) MUR 4097
- 29) MUR 4098
- 30) MUR 4100
- 31) MUR 4103
- 32) MUR 4106
- 33) MUR 4114

(continued)

95043661856

C. Take no further action, close the file effective July 5, 1995, and approve the appropriate letter in the following matters:

- 1) MUR 2582
- 2) MUR 3109
- 3) MUR 3241
- 4) MUR 3426

Commissioners Aikens, Elliott, McDonald, McGarry, Potter, and Thomas voted affirmatively for the decision with respect to each of these actions.

Attest:

6-30-95
Date

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

95043661857



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 6, 1995

Gerard A. Desiderio, Chairman
Cape May County Regular Republican Organization
6400 Landis Avenue
Sea Isle City, NJ 08243

RE: MUR 3978

Dear Mr. Desiderio:

On May 24, 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 exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on July 5, 1995. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

95043661858



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

July 6, 1995

Mark P. DeLorenzo, Esquire
Law Offices of Vincent L. LaManna Jr.
4400 Landis Avenue
P.O. Box 165
Sea Isle City, NJ 08243

RE: MUR 3978
Cape May County Real Republican Organization and David
Von Savage, as Executive Director; LoBiondo Committee
to Change Congress and Andrew I. McCrosson, as
treasurer

Dear Mr. DeLorenzo:

On June 1, 1994, the Federal Election Commission notified your clients 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 exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on July 5, 1995.

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 the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

95043661859



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 6, 1995

Allen H. Vernon Jr., Esquire
Mott, Vernon and Mott
8th Street & Asbury Avenue
The Bourse Building, Third Floor
P.O. Box 385
Ocean City, NJ 08226

RE: MUR 3978
Union League of Cape
May County

Dear Mr. Vernon:

On June 1, 1994, the Federal Election Commission notified your client 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 exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on July 5, 1995.

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 the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

95043661860

THIS IS THE END OF SUR : 3978

95043661861



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3973

DATE FILMED 7/27/95 CAMERA NO. 1

CAMERAMAN RES

95043661862