



National Republican Congressional Committee

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FEC MAIL ROOM

2000 SEP -5 P 4: 25

Donald F. McGahn II
General Counsel

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SEP 6 9 00 AM '00

FEDERAL ELECTION
COMMISSION

September 5, 2000

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Complaint Against Terry Van Horne, Van Horne for Congress,
John J. Palochik as Treasurer

Dear Mr. Noble:

The National Republican Congressional Committee, by and through its General Counsel, hereby brings this complaint pursuant to 2 U.S.C. § 437g(a)(1) against Terry Van Horn, Van Horne for Congress Committee and John J. Palochik as treasurer. The National Republican Congressional Committee is located at 320 First Street, S.E., Washington, D.C. 20003.

I. FACTUAL BACKGROUND

Terry Van Horne is a Democrat candidate for United States Congress for the 4th district of Pennsylvania. His campaign committee is Terry Van Horne for Congress. Van Horne's primary election was held on April 4, 2000. Since the primary election, Van Horne has collected at least \$37,000 in contributions for "primary debt retirement," including \$20,000 during the last few days before the June 30 reporting period.

320 First Street, S.E.
Washington, D.C. 20003
(202)479-7069
www.nrcc.org

21.19.025.1511

Interestingly, Van Horne reported only \$3,100 in debt on his pre-primary report and only \$11,700 on his April quarterly ending March 31. This \$11,700 was a loan from his personal funds; however, despite raising \$37,000 for "primary debt retirement" this loan has not been repaid.

Moreover, on his July quarterly report, Van Horne reported an additional \$24,340 in debts and obligations. Remarkably, Van Horne provided no information as to when these additional \$24,340 debts were incurred, nor do they appear on his 2000 April quarterly, pre-primary or 1999 year-end reports. Yet, Van Horne accepted at least \$37,000 in contributions designated for "debt retirement" with at least \$20,000 received within the final days of the June 30 reporting period.

Most troubling is a \$1,980 in-kind contribution from AFSCME for computer consulting services received on 5/12/00, 34 days after the primary. Van Horne shows on Schedule D a payment of \$1,980 for computer consulting services to PRS Data Systems. However, Van Horne does not provide any information as to the date these computer services took place. On May 12, 2000, Van Horne received from AFSCME \$3,020 for "primary debt retirement," \$1,980 in-kind contribution for "primary debt retirement" and an additional \$5,000 for the general election, matching AFSCME's total contribution limitation of \$10,000.

Additionally, Van Horne failed to attribute contributions to either the primary or general election for many of his reported receipts. For example, Van Horne lists a contribution for both "primary debt" and the general election from Delahunt for Congress in the amount of \$2000. However, he failed to itemize and attribute the proper amounts contributed for each election.

Van Horne's acceptance of \$37,000 of contributions for "primary debt retirement," while the only recognizable primary debt in the amount of \$11,700, is questionable in and of itself. This, coupled with the timing of these contributions, including the in-kind contribution for "debt retirement," can only mean Van Horne has completely disregarded the contribution limitations required by the Act in an attempt to inflate his war chest.

II. VIOLATIONS

A. Primary Debt Retirement

A campaign may accept contributions to retire debts after the election is over subject to three general rules: First, the contributions are subject to the limits and prohibitions under the Act. Second, the contributions must be specifically designated as

debt retirement. Finally, the contributions designated for debt retirement must not exceed the campaign's net debts outstanding. 11 C.F.R. § 110.1(b)(3)(i).

A campaign's net debts outstanding includes all outstanding debts and obligations minus cash on hand.¹ This is calculated as of the date of the election, in this case April 4, 2000, the date of Van Horne's primary election. Additionally, not only must the campaign calculate net debts outstanding as of the day of the election, but the campaign must continually recalculate its net debt as additional funds are received or spent on the election for which the debt is calculated. 11 C.F.R. § 110.1(b)(3)(ii) and (iii).

Van Horne's pre-primary report covering 1/1/00-3/15/00 lists his debts and obligations as \$3,100 and cash on hand as \$5,517.34, leaving him with a surplus of \$2,417.34. Van Horne's April quarterly report covering the period between 3/16/00 and 3/31/00 lists debts and obligations as \$11,700 and cash on hand \$1,739.62 with net debts outstanding \$9,960.38 as of March 31. There is no information on either of these reports or on his July quarterly report concerning his debts and obligations and cash on hand on the exact day of the primary, April 4. This is particularly disturbing because on his July quarterly report, which covers 4/1/00 through 6/30/00, Van Horne reports \$36,040 in debts and obligations and \$165,563.05 in cash on hand with no debts outstanding and \$129,523.05 cash on hand.

Consequently, there is no indication from any of Van Horne's financial disclosure reports that the additional \$24,340 in debt (in addition to the \$11,700 reported on his April quarterly) can be attributed to the primary election. Thus, Van Horne's acceptance of over \$37,000 in contributions designated for "primary debt retirement" can only be construed as an unashamed attempt by Van Horne to thwart the contribution limitations required by federal law.

B. In-kind Contribution Designated as "Debt Retirement"

As stated above, a campaign must calculate net debts outstanding as of the date of the election, in this case, April 4, 2000. 11 C.F.R. § 110.1(b)(3)(ii). An in-kind contribution occurs when a person pays for services on the committee's behalf. 11 C.F.R. § 100.7(a)(1)(iii). However, in this case, the \$1,980 payment for computer services was designated as "debt retirement" for the primary. Again, this was reported on Van Horne's 2000 July quarterly report only, and Van Horne has provided no information as to when the computer services occurred and when the debt was actually incurred.

¹ In calculating net debts outstanding for a primary election, cash on hand need not include contributions designated for the general election. 11 C.F.R. § 110.1(b)(3)(ii)(A) and (B)

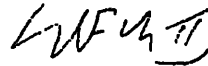
II. CONCLUSION

Upheld by the United States Supreme Court, contribution limits are one of the central tenets of our campaign finance system, and flagrant violations such as those being perpetrated by Van Horne must be stopped. For these reasons, and based upon the foregoing, the National Republican Congressional Committee respectfully requests that the Commission:

1. Find that there exists a reasons to believe that Federal law has been violated;
2. Promptly investigate the matter; and
3. Institute appropriate legal action to secure an appropriate fine for these violations.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,



Donald F. McGahn II

District of Columbia
Signed and sworn to before me this
5 day of September, 2000.



Notary Public
My Commission expires

M.D. ACTON
Notary Public, District of Columbia
My Commission Expires July 14, 2004

4151-520-61-12
21.19.25.1514

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

2000 FEB - P A 11: 51

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) VAN HORNE FOR CONGRESS		2. FEC IDENTIFICATION NUMBER C 00348482
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 444		
CITY, STATE and ZIP CODE NEW KENSINGTON, PA 15068	STATE/DISTRICT PA 04	3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> 12-Day Pre-Election Report for the _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> 90-Day Post-Election Report following the General Election
<input checked="" type="checkbox"/> January 31 Year End Report	on _____ in the State of _____
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

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

SUMMARY

6. Covering Period <u>9-1-99</u> through <u>12-31-99</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
7. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	44,755.00	44,755.00
(b) Total Contribution Refunds (from Line 20(d))	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 7(b) from 7(a))	44,755.00	44,755.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	27,894.39	27,894.39
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	27,894.39	27,894.39
8. Cash on Hand at Close of Reporting Period (from Line 27)	16,860.61	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9532
Local 202-694-1100

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

Type or Print Name of Treasurer ROBERT J. KLINE	Date 1-27-00
Signature of Treasurer <i>R.J. Kline</i>	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 8437g

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
VAN HORNE FOR CONGRESS

ADDRESS (number and street) Check if different than previously reported.
P.O. Box 444

CITY, STATE and ZIP CODE STATE/DISTRICT
NEW KENSINGTON, PA 15068 PA 04

2. FEC IDENTIFICATION NUMBER
C 00348482

3. IS THIS REPORT AN AMENDMENT?
 YES NO

4. TYPE OF REPORT

- April 15 Quarterly Report
- 12-Day Pre-Election Report for the PRIMARY (Type of Election)
election on 4-4-00 in the State of PENNSYLVANIA
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid-Year Report (Non-election Year Only)
- 30-Day Post-Election Report following the General Election
on _____ in the State of _____
- Termination Report

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

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>1-1-00</u> through <u>3-15-00</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	32,315.00	32,315.00
(b) Total Contribution Refunds (from Line 20(d))	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	32,315.00	32,315.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	46,758.27	46,758.27
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	46,758.27	46,758.27
8. Cash on Hand at Close of Reporting Period (from Line 27)	5,517.34	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	3,100.00	

For further information contact:
Federal Election Commission
935 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

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

Type or Print Name of Treasurer
ROBERT J. KLINE

Signature of Treasurer *[Signature]* Date **3-20-00**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §137g.

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FEC FORM 3
(revised 4/87)

21-19-025-1516

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

2004 APR 10 A 10:53

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) VAN HORNE FOR CONGRESS		2. FEC IDENTIFICATION NUMBER C 00348482
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 444		
CITY, STATE and ZIP CODE NEW KENSINGTON, PA 15068 PA 04	STATE/DISTRICT PA 04	3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

4. TYPE OF REPORT

- April 15 Quarterly Report 12-Day Pre-Election Report for the _____ (Type of Election) election on _____ in the State of _____
- July 15 Quarterly Report 30-Day Post-Election Report following the General Election on _____ in the State of _____
- October 15 Quarterly Report Termination Report
- January 31 Year End Report
- July 31 Mid-Year Report (Non-election Year Only)

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

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
3-16-00 through 3-31-00		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	16,580.00	48,895.00
(b) Total Contribution Refunds (from Line 20(b))	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	16,580.00	48,895.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	28,957.72	75,715.99
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	28,957.72	75,715.99
8. Cash on Hand at Close of Reporting Period (from Line 27)	1,739.62	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	11,700.00	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9580
Local 202-534-1100

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

Type or Print Name of Treasurer ROBERT J. KLINE	Date 4-14-00
Signature of Treasurer <i>R.J. Kline</i>	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5487g.

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FEC FORM 3
(revised 4/87)

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEC MAIL ROOM

2000 JUL 19 P 3:34

USE FEC MARKING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Van Horne for Congress		2. FEC IDENTIFICATION NUMBER C00348482
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 444		3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CITY, STATE and ZIP CODE New Kensington PA 15068	STATE/DISTRICT PA04	

4. TYPE OF REPORT

- April 15 Quarterly Report 12-Day Pre-Election Report for the _____ (Type of Election) election on _____ in the State of _____
- July 15 Quarterly Report 30-Day Post-Election Report following the General Election on _____ in the State of _____
- October 15 Quarterly Report Termination Report
- January 31 Year End Report
- July 31 Mid-Year Report (Non-election Year Only)
- This report contains activity for: Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
4-1-00 through 6-30-00		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	226,965.00	275,860.00
(b) Total Contribution Refunds (from Line 20(a))	1,250.00	1,250.00
(c) Net Contributions (other than loans) (subject Line 6(b) from 6(a))	225,715.00	274,610.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	61,891.57	137,607.56
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subject Line 7(b) from 7(a))	61,891.57	137,607.56
8. Cash on Hand at Close of Reporting Period (from Line 27)	165,563.05	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	36,040.00	

For further information contact:
Federal Election Commission
888 E Street, NW
Washington, DC 20463
Tel Free 800-424-9330
Local 202-693-1800

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

Type or Print Name of Treasurer JOHN J. PALOCKI, ASSISTANT TREASURER	Date 7-14-00
Signature of Treasurer 	

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

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FEC FORM 3
(revised 4/87)

FEGAN0799D

21 19 00 15 18

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each as to type of the District Quarterly Page

PAGE 16 OF 16

FOR LINE NUMBER 1125

Contributions from 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) Van Home for Congress CC0348482

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
National Committee for an Effective Government 122 E Street NW Suite 650 Washington DC 20001 Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation Aggregate Year-to-Date <u>\$ 2500.00</u>	4-18-00	2,500.00 in-kind, electoral targeting
B. Full Name, Mailing Address and ZIP Code AFSCME 1025 L Street N.W. Washington DC 20036 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): <u>debt</u>	Name of Employer Occupation Aggregate Year-to-Date <u>\$ 10,000.00</u>	Date (month, day, year) 5-12-00	Amount of Each Receipt This Period 1,980.00 in-kind, computer consulting services
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date <u>\$</u>	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date <u>\$</u>	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date <u>\$</u>	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date <u>\$</u>	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date <u>\$</u>	Date (month, day, year)	Amount of Each Receipt This Period

SUBTOTAL of Receipts This Page (optional)	4480.00
TOTAL This Period (last page this line number only)	169,650.00

SCHEDULE C
(Revised 5/80)

Page 1 of 1 for
LINE NUMBER 15(a)
(Use separate schedules
for each numbered line)

LOANS

Loans made or guaranteed by candidate

Name of Committee (in Full)		Committee Payment To Date		Balance Outstanding at Close of This Period
Van Horne for Congress		0		1,700.00
A. Full Name, Mailing Address and ZIP Code of Loan Source Terry E. Van Horne 658 Vance Dr. Lower Burrell PA 15068		Original Amount of Loan 1,700.00 (personal funds)	0	1,700.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Term: Date Incurred <u>3-27-00</u> Date Due <u>7-31-00</u> Interest Rate <u>0</u> % (per) <input type="checkbox"/> Secured				
List All Endorsements or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source Terry E. Van Horne 658 Vance Drive Lower Burrell PA 15068		Original Amount of Loan 10,000.00 (personal funds)	0	10,000.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Term: Date Incurred <u>3-27-00</u> Date Due <u>7-31-00</u> Interest Rate <u>0</u> % (per) <input type="checkbox"/> Secured				
List All Endorsements or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer	/	/	/
	Occupation			
	Amount Guaranteed Outstanding \$			
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (non page in this line only)				11,700.00
Carry outstanding balance only to LINE 1, Schedule C, for this line. If on Schedule D, carry forward to appropriate line of Summary.				

SCHEDULE D
(Revised 3/90)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Corporation (In Full)	Outstanding Balance Reporting This Period	Amount Incurred This Period	Payment This Period	Overriding Balance at Close of This Period
Van Horne for Congress				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Buhl Brothers Printing, Inc. 400 Edwards Rd. New Kensington PA 15068	2,829.00	0	0	2,829.00
Nature of Debt (Purpose): Printing				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Bob Kline 37 Fellowship Drive Halifax PA 17032	10,000.00	0	0	10,000.00
Nature of Debt (Purpose): Contract Services				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Ron Brown 9301 Almar Place Pittsburgh PA 15237	5,834.35	0	0	5834.35
Nature of Debt (Purpose): Consulting fees				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Joe Nauchnik 124 Mohawk Dr. Arnold PA 15068	3,875.00	0	0	3,875.00
Nature of Debt (Purpose): Contract Services				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Grogan Graftam McGinley 3 Gateway Ctr. 22nd Floor Pittsburgh PA 15222	1,801.65	0	0	1,801.65
Nature of Debt (Purpose): legal fees				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor PRS Data Systems 205 main street Pittsburgh PA 15215	1,980.00	0	1,980.00	0
Nature of Debt (Purpose): computer consulting fees				
1) SUBTOTALS This Period This Page (optional)				
2) TOTALS This Period (last page in this line only)				24,340
3) TOTAL OUTSTANDING LOANS from Schedule G (last page only)				11,700
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				36,040

FEARLEVER

21.19.025.1521