

October 24, 2003

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COMMISSION
SECRETARIAT

2003 NOV 25 P 12:41

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TO: Federal Elections Commission
999 E Street, NW
Washington, DC 20463

MUR # 5397

FR: Jim Logue
6 Tennessee Trail
Medford, NJ 08055

RE: Federal Election Commission Complaint

SENSITIVE

2003 NOV 25
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

I would like the Federal Election Commission to look into the Campaign Finance report filed by the Charlie Dent for Congress Committee on July 15, 2003. This is a candidate committee of Charles W. Dent, a Republican candidate for Congress in Pennsylvania's 15 Congressional District.

Specifically, under disbursements, the July 15, 2003 Report lists just seven paid disbursements:

1	U.S. Postmaster (Allentown, PA)	\$ 185.00	Stamps
2	Alphagraphics (Allentown, PA)	\$ 560.98	Stationary
2	Aristotle Intl. Inc. (Atlanta, GA)	\$5,400.00	Software
3	Laurel Group (Allentown, PA)	\$1,400.00	Retainer
4	U.S. Postmaster (Allentown, PA)	\$ 148.00	Stamps
5	Alphagraphics (Allentown, PA)	\$ 155.82	Copying
6	Alphagraphics (Allentown, PA)	\$ 74.73	Check
	Endorsement Stampers		

During the period covered by this report (through June 30, 2003), the Charlie Dent for Congress Committee made several expenditures not listed in this report.

1. On June 2, 2003 the Committee sent out a mass produced, bulk-mailed, solicitation letter to voters in the 15th District. The following expenditures would have been incurred in this mailing:

- 7 The purchase of a mailing list (whether direct or in-kind).
- 8 Printing the personalized two-page letter, reply card, reply envelope, and outer envelope.
- 9 A live, pre-sorted stamp was used on the outer envelope. This indicates that the services of a mail house were used in both preparing the mailing and in the use of a bulk rate permit.
- 10 A post office box was used as the return address on the outer envelope (P.O. Box 442, Allentown, PA 18105-0442). The United States Post Office requires post office box rental fees upfront. No payment is listed. This post office box is also used as the Committee's FEC filing address.

86TH ST. 24

2. The Committee doesn't list any expenses for telephones or for telephone calls. This report indicates that the Committee raised in excess of \$250,000. It is customary for candidates to call high dollar donors and this Committee has many high dollar donors. Yet there are no expenses for either a hard line or cell phone usage. On the Committee's June 2, 2003 fundraising letter, it lists telephone number 610-751-3116 and encourages people to call. When this number is called, the answer machine identifies the number as belonging to "Dent for Congress." Telephone companies are usually extremely strict with political campaigns and require a deposit prior to installing each telephone line. Again, no payment of any kind is listed.

3. The Committee doesn't list any expenses for communications, computer, or office machinery of any kind. Despite the listed purchase of computer software it doesn't list a space from which the Committee (an organization that raised a quarter of a million dollars) operated. How and from where did it communicate, organize itself, and operate?

4. According to the April 25, 2003 edition of the "Campaign Insider" newsletter, Candidate Dent hired the "Bellweather Consulting Group" to do PAC fundraising for his campaign. No payment is listed on his FEC report for expenses or services for Bellweather.

5. At 8:00 AM, on April 28, 2003 the Committee held a catered finance committee event in Allentown, Pennsylvania. In excess of 50 individuals attended. No payment is listed.

6. According to the April 9, 2003 edition of *Roll Call*, Candidate Dent travelled to Washington, D.C. to attend two events held on his behalf. The July 15, 2003 Report includes an in-kind contribution of \$1,800 on this date, but fails to list travel expenses incurred by Candidate Dent and any staff that may have travelled with him.

All expenditures made on behalf of a candidate for Congress must be reported as either an expenditure, an in-kind, or a debt. Candidate Dent's ability to raise in excess of a \$250,000 without the apparent use of any reportable means of communication is perplexing, as is his failure to report expenditures that the evidence suggests he must have made.

Congressional candidate Charles W. Dent is a member of the Pennsylvania State Senate. As a legislator, Dent controls a fully equipped, taxpayer-funded office at the state capitol in Harrisburg, and a district office in Allentown. Dent also controls a legislative campaign committee operated under state campaign finance laws.

The unaccounted for expenses I've detailed, coupled with these non-reportable resources available to Candidate Dent, is a matter for concern. Accordingly, I

would appreciate the Commission's assistance in obtaining full compliance from the Charlie Dent for Congress Committee.

On 11/4 2003, Jim Logue of 6 Tennessee Trail, Medford, NJ 08055, personally appeared before me.

Jim Logue
Jim Logue

11/4/03
Date

"Subscribed and sworn to before me on this 4 day of NOV, 2003."

Cheri J. Haines

CHERIL HAINES
Notary Public of New Jersey

My commission expires: My Commission Expires June 13, 2006

24.19.025.4200