

Steven R. Newmark, Esq.
C/O Steven Fulop for Congress, Inc.
1 Greene Street - Suite 208
Jersey City, New Jersey 07302
(917) 226-7130
snewmark@gmail.com
snewmark@stevenfulop.com

Alva Smith
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2006 JUL 13 P 2:50

July 6, 2004

Re: In re Steven Fulop, Candidate for the
Office of Representative for the 13th
Congressional District of New Jersey
MUR No. 5462

Dear Ms. Smith:

Please be advised that I am counsel for Steven Fulop for Congress, Inc. See attached form to attest to said fact.

Enclosed please find our answer along with exhibits verifying that Steven Fulop for Congress, Inc. is not guilty of the alleged charges.

Please feel free to contact me any time at the contact information provided above

Thank you for your attention to this matter.

Very truly yours,

Steven Newmark, Esq.

Encl.

-----X
In re Steven Fulop,
Candidate for the Office of
Representative for the 13th Congressional
District of New Jersey.

BEFORE THE
FEDERAL ELECTION
COMMISSION

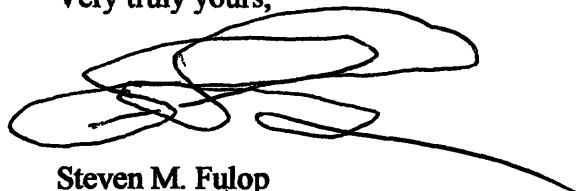
STATEMENT OF
REPRESENTATION

MUR No.: 5462

-----X
I, Steven M. Fulop, am the candidate in the above entitled action. I hereby certify
that Steven R. Newmark is the attorney handling this matter. Please direct all queries to
him at 1 Greene Street, Jersey City, NJ 07302.

Thank you for your attention to this matter.

Very truly yours,



Steven M. Fulop
Former Candidate for Congress,
13th Congressional Dist. of New Jersey

In re Steven Fulop,
Candidate for the Office of
Representative for the 13th Congressional
District of New Jersey.

BEFORE THE FEDERAL
ELECTION COMMISSION

ANSWER

MUR No.: 5462

RESPONDENT

The Respondent, STEVEN FULOP FOR CONGRESS, INC., by its attorney, Steven R. Newmark, as and for its Answer, responds to the allegations in the above entitled action as follows:

- 1) Denies knowledge or information sufficient to form a belief as to the allegations contained in paragraphs 1 and 7 of the complaint.
- 2) Denies the allegations contained in paragraphs 2, 8, 9, 10, 11, and 12.
- 3) Denies each and every allegation contained in paragraphs 3 and 4 of the complaint, except admits that Mr. Fulop was present at two press conferences in Jersey City, NJ.
- 4) Denies each and every allegation contained in paragraph 6 of the complaint, except admits that Steven Fulop for Congress, Inc. does maintain a website with the domain site <http://www.stevenfulop.com>.
- 5) Denies each and every allegation contained in paragraph 5 of the complaint, except admits that signs in support of Mr. Fulop's candidacy were placed throughout the district. Only signs that were paid for by Steven Fulop for Congress, Inc. were put up

with the aid of Steven Fulop and volunteers for his campaign. Signs that did not say “paid for by Steven Fulop for Congress, Inc.” were not paid for by Steven Fulop for Congress, Inc

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

- 6) The Federal Election Commission (“FEC”) failed to give timely notice of the complaint to respondent. Under 2 U.S.C. § 437g(a)(1), “within 5 days after receipt of a complaint, the Commission shall notify, in writing, any person alleged in the complaint to have committed such a violation.” The FEC received the complaint on June 7th. See Exhibit A. The letter accompanying the complaint to respondent was dated June 15th, eight days later. See Exhibit B. Respondent did not receive the letter until June 22, 2004. As such, the complaint should be dismissed under 2 U.S.C. § 437g(a)(1).

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

- 7) Petitioner’s complaint fails to state a cause of action upon which relief may be granted. Petitioner cites as the cause of action two sections from federal law: 2 U.S.C. § 437(g)(1) and 2 U.S.C. § 431. 2 U.S.C. § 437(g)(1) does not exist in the federal code. 2 U.S.C. § 431 is merely definitions. As such, petitioner has failed to state a cause of action upon which relief may be granted.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

- 8) Under the mandates of the Federal Election Commission ("FEC") a Congressional candidate is not required to file with the FEC until fifteen days after a candidate's receiving or expending \$5,000 in connection with his or her campaign for federal office.
- 9) Steven Fulop for Congress, Inc. did not meet the filing threshold until after May 20, 2004.
- 10) Respondent filed a timely statement of candidacy on June 3, 2004, which was well within the fifteen day filing period. Said statement of candidacy was sent to the Federal Election Commission, 999 E Street, NW, Washington, D.C. 20463 via certified mail. See Exhibits C and D.
- 11) The following is a breakdown of all expenditures by Steven Fulop for Congress, Inc. prior to May 21, 2004:

Website: set up and designed by Steven Fulop, along with volunteer Jeffrey Lipson. Neither Mr. Fulop, nor Mr. Lipson are professional Web designers. Steven Fulop for Congress purchased the domain site, and email rights to stevenfulop.com from digiHOST, Inc. The total costs of the website was: \$157.09. See Exhibit E.

T-Shirts: Steven Fulop for Congress, Inc. purchased 40 t-shirts from

On-Demand Printing. The total cost was \$325.88. See Exhibit F.

Flyers/Posters: Steven Fulop for Congress, Inc. purchased 2000 flyers, 2 banners, and 1000 posters from PIP Printing and Document Services for a total of \$2,898.04. See Exhibit G.

GRAND TOTAL: of all expenditures prior to May 21, 2004: \$3381.01

- 12) As of May 20, 2004, Steven Fulop for Congress, Inc. had yet to open a bank account. As such, Steven Fulop for Congress, Inc. technically had no monies received. Exhibit H shows proof that Steven Fulop for Congress, Inc. first opened a bank account on May 21, 2004.
- 13) Steven Fulop for Congress, Inc. did have five donation checks within its possession. Although Steven Fulop for Congress, Inc. had no way of depositing said checks, the following is a breakdown of all checks received by Steven Fulop for Congress, Inc. prior to May 21, 2004:

1. Brian Block	\$200.00
2. Carmen Fulop and Arthur Fulop	\$180.00
3. Frank J. Esposito and Valerie T. Esposito	\$750.00
4. Michael J. Poller and Meghan J. Kreger	\$100.00
5. Daniel S. Nathan	\$200.00
Grand Total of donations prior to May 21, 2004.....	\$1430.00

See Exhibit I.

14) Even if the Commission rules that checks received, but unable to be deposited or cashed, are to be counted towards the \$5,000 filing threshold, Steven Fulop for Congress, Inc. still did not meet this threshold as of May 20, 2004.

Total of Expenditures. \$3382.01

Total of Donations. \$1430.00

Note: no donations could have been deposited until after May 20, 2004 because the bank account was delayed until opening until May 21, 2004 due to administrative problems.

GRAND TOTAL of Expenditures and Donations as of May 20, 2004: \$4812.01

AS AND FOR A COUNTERCLAIM

15) Petitioner, Nicholas Chiaravalloti of 65 West 34th Street, Bayonne, New Jersey 07002, did knowingly violate 2 U.S.C. § 437(g)(12)(A) by making public these allegations.

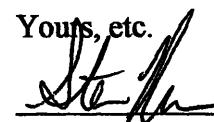
See Exhibit J.

16) Mr. Chiaravalloti was the campaign manager for Steven Fulop's former opponent in the congressional primary. As such he is fully aware of violating the spirit of confidentiality of 2 U.S.C. § 437(g)(12)(A). Steven Fulop for Congress, Inc. demands swift and appropriate action against Mr. Chiaravalloti.

WHEREFORE, Respondent demands that the complaint be dismissed in its entirety and that Petitioner should be sanctioned on the counterclaims together with any further relief as the Commission deems fit.

Dated: Jersey City, New Jersey
July 6, 2004

Yours, etc.


Steven R. Newmark, Esq.

Attorney for Respondent

VERIFICATION

STATE OF NEW JERSEY)
COUNTY OF HUDSON) ss.:

DAVID A. IANKELEVICH, being duly sworn deposes and says:

I am the treasurer of the respondent corporation in the within action; I have read the annexed Answer, know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true.

David A. Jankelevich

Sworn to before me this
6 day of July, 2004

Notary Public

ARTHUR FULOP
NOTARY PUBLIC OF NEW JERSEY
I.D. NO. 0025245
My Commission Expires June 26, 2007
936 Broad Street
Newark, N.J. 07102
973-623-0555

Exhibit A

RECEIVED
FEDERAL ELECTIONS
COMMISSION
SECRETARIAT

SENSITIVE

2001 JUN -8 A 10:13

In re Steven Fulop,
Candidate for the Office of
Representative for the 13th Congressional
District of New Jersey

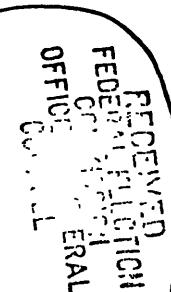
RESPONDENT

BEFORE THE FEDERAL
ELECTION COMMISSION

COPY

COMPLAINT

MUR No.: 5462



I, Nicholas Chiaravalloti, being of full age, residing at 65 West 34th Street, Bayonne, New Jersey 07002, files this complaint with the Federal Election Commission in accordance with the provisions of 2 U.S.C. §437(g)(1) in the belief that respondent violated provisions of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431, et seq., as follows:

1. Pursuant to federal law and Federal Election Commission ("FEC") regulations, within fifteen days of a candidate's receiving or expending \$5,000 in connection with his or her campaign for federal office, that candidate must designate a principal campaign committee by filing a statement of candidacy or letter with the same information with the FEC.
2. Upon information and belief, Steven Fulop ("Fulop"), Candidate for the Office of Representative for the 13th Congressional District of New Jersey, has violated this requirement.
3. Specifically, Folop conducted a press conference to announce his candidacy, which was reported in the Jersey Journal newspaper. See Exhibit A.

4. Additionally, Fulop organized and/or sponsored a protest against the incumbent Congressman, which was held in Jersey City, NJ. I have personal knowledge that this occurred, as I was present for the protest.
5. There are signs in support of Fulop's candidacy throughout the 13th Congressional District. I have personally seen these signs. See Exhibit B.
6. Fulop maintains a website in support of his candidacy. The web address is www.stevenfulop.com. The website is purportedly paid for by "Steven Fulop for Congress, Inc." See Exhibit C.
7. Fulop, through his organization, distributed T-Shirts in support of his candidacy, at a Martin Luther King event in Jersey City. I have personal knowledge of this fact as I was present at this event and observed the distribution of the T-shirts.
8. Upon information and belief, the cost of the foregoing items and activities in support of Fulop's candidacy cost more than \$5,000.
9. Fulop has admitted to raising nearly \$50,000 in support of his candidacy for Congress, as reported in the Newark Star-Ledger. See Exhibit D.
10. Fulop ignored the clear mandates of the federal election laws and FEC regulations by failing to file the necessary statement of candidacy or letter with the same information with the FEC within 15 days of such expenditures. In fact, even to date, according to FEC records, Fulop has failed to file any paperwork with the FEC, much less the required statement of candidacy or letter with the same information.

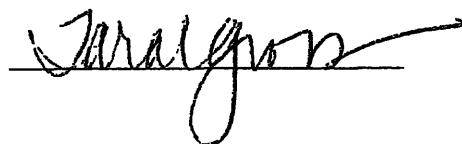
11. Fulop has received in-kind contributions from a non-federally registered political action committee, the "Reform Democratic Organization of Jersey City." ("RDOJC") Specifically, posters have been printed in support of Fulop's candidacy for Congress and paid for by the RDOJC. See Exhibit E.

12. Fulop's actions constitute a violation of numerous campaign finance laws and regulations and demand a swift response and strong remedy by the FEC.



Nicholas Chiaravalloti

Signed and sworn to before me
this 4 day of June 2004.



My Commission Expires
03/02/2009
State of New Jersey

Exhibit B



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

fax (202) 219 -

3923

JUN 15 2004

Dave Lankelvich, Treasurer
Steven Fulop for Congress, Inc.
1 Greene Street, Suite 208
Jersey City, NJ 07302

Re: MUR 5462

Dear Mr. Lankelvich:

The Federal Election Commission received a complaint that indicates that Steve Fulop for Congress, Inc. ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 5462. Please refer to this number in all future correspondence.

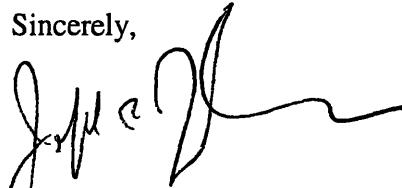
The Complaint was not sent to you earlier due to an administrative oversight. Under the Act you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials that you believe are 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.

Alia Smith

If you have any questions, please contact Elaine Devine at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan
Supervisory Attorney
Complaints Examination &
Legal Administration

Enclosures:

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

Exhibit C

FEC FORM 2

STATEMENT OF CANDIDACY

1. (a) Name of Candidate (in full)

Steven Michael Fulop

(b) Address (number and street) Check if address changed

1 Greene Street - Suite 208

2. Identification Number

(c) City, State, and ZIP Code

Jersey City, New Jersey 07302

3. Is This Statement New Amended

OR

(A)

4. Party Affiliation

Democrat

5. Office Sought

U.S. Congress

6. State & District of Candidate

New Jersey - 13th Congressional District

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2004 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full)

Steven Fulop for Congress, Inc.

(b) Address (number and street)

1 Greene Street - Suite 208

(c) City, State, and ZIP Code

Jersey City, New Jersey 07302

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)

(b) Address (number and street)

(c) City, State, and ZIP Code

DECLARATION OF INTENT TO EXPEND PERSONAL FUNDS (House or Senate Only)

9. I intend to expend personal funds exceeding the threshold amount (see 11 C.F.R. 400.9) by

9A 0.00

for the primary election, and

9B 0.00

for the general election.

If you do not intend to expend personal funds exceeding the threshold amount for either election, you must enter "0.00" for each.

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

Signature of Candidate

Date

5/24/04

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

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 0.60	UNIT ID: 0022
Certified Fee		
Return Receipt Fee (Endorsement Required)	2.30	Postmark Here
Restricted Delivery Fee (Endorsement Required)	1.75	
Total Postage & Fees	\$ 4.65	Clerk: KRZ2D6 06/03/04

Sent To
Federal Election Commission
 Street, Apt No.:
 or PO Box No. 999 E Street, NW
 City, State, ZIP+4 Washington DC 20463

PS Form 3800, June 2002

See Reverse for Instructions



***** WELCOME TO *****
 TOMPKINS SQUARE STA
 NEW YORK NY 10009-9991
 06/03/04 01:39PM

Store USPS Trans 25
 Wkstn sys5004 Cashier KRZ2D6
 Cashier's Name NYDIA
 Stock Unit Id SIANELE SION
 PG Phone Number 8002758777
 USPS # 3558250022

1. First Class
 Destination: 20463
 Weight: 1.300Z
 Postage Type: PVI
 Total Cost: 4.65
 Base Rate: 0.60
 SERVICES
 Certified Mail 2.30
 7003310000461686860 1.75
 Return Receipt
 Subtotal 4.65
 Total 4.65

Cash 5.65
 Change Due 1.00
 Cash

Number of Items Sold: 1

Thank You!
 Please come again!



Track & Confirm

Shipment Details

You entered 7003 3110 0004 6168 6860

Your item was delivered at 8:54 am on June 10, 2004 in WASHINGTON, DC 20463.

Here is what happened earlier

- ARRIVAL AT UNIT, June 10, 2004, 4:04 am, ZIP Code 20000
- ACCEPTANCE, June 03, 2004, 1:39 pm, NEW YORK, NY 10009

Notification Options

► **Track & Confirm by email** [What is this?](#) [Go >](#)

 **POSTAL INSPECTORS**
Preserving the Trust

[site map](#) [contact us](#) [government services](#)
Copyright © 1999-2002 USPS. All Rights Reserved. [Terms of Use](#) [Privacy Policy](#)

Track & Confirm

Enter label number

[Track & Confirm FAQs](#)

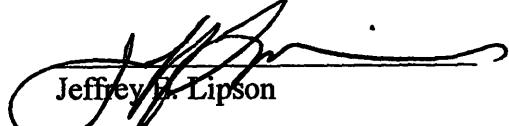
Exhibit E

AFFIDAVIT

STATE OF NEW JERSEY)
COUNTY OF HUDSON) ss.:

JEFFREY E. LIPSON, being duly sworn deposes and says:

I helped set up a website for Steven Fulop's campaign for Congress; said website had a domain name of <http://www.stevenfulop.com>; I did this work in a volunteer capacity; I received no compensation for said work, and that I am not a professional web designer.



Jeffrey E. Lipson

Sworn to before me this
6 day of July, 2004



Notary Public

ARTHUR FULOP
NOTARY PUBLIC OF NEW JERSEY
ID NO. 002-3245
My Commission Expires June 26, 2007
938 Broad Street
Newark, N.J. 07102
973-623-0555

Subj: **Fwd: STATEMENT: Customer # 5342: Steven Fulop for U.S. Congress, Inc's Web Hosting Statement**
Date: 7/1/2004 11:49:09 AM Eastern Daylight Time
From: jeff@sevensquared.com
To: Smr1977@aol.com

Here is the invoice from digiHOST, Inc.

— Forwarded message from digiHOST Automated Billing <billing@digihost.com>

Date: Thu, 01 Jul 2004 11:30:03 -0400
From: digiHOST Automated Billing <billing@digihost.com>
Reply-To: digiHOST Automated Billing <billing@digihost.com>
Subject: STATEMENT: Customer # 5342: Steven Fulop for U.S. Congress, Inc's Web Hosting Statement
To: steven@fulop.org, jeff@sevensquared.com, kat@digihost.com

Do not pay this statement, this is a record of your payment.

digiHOST, Inc.
10018 W. McNab Road Suite 111
Fort Lauderdale, Florida
Phone: (954) 252-9209
Fax: (954) 434-2887

Date: 4/11/4

Order# 90748

Bill To:
Steven Fulop for U.S. Congress, Inc
Steven Fulop
1 Greene Street Suite 208
Jersey City, NJ 07302
USA

Domain Name(s) PRODUCT NAME	QTY	PRICE	AMOUNT
stevenfulop.com	—	—	—
Startup Plan Setup [stevenfulop.com]	1	20.00	20.00
PRORATED CREDIT [stevenfulop.com]	7	-0.33	-2.31
Startup Plan Monthly [stevenfulop.com]	12	9.95	119.40
MySQL Setup [stevenfulop.com]	1	20.00	20.00
TOTAL		157.09	

This statement is for your records only, it is NOT a bill.

Exhibit F

Invoice



tel 718.392.0500 fax 718.391.0022
46-09 11th street, Long Island City, NY 11101

Date	Invoice #
4/16/2004	4119

Bill To

Steven Fulop
Steven Fulop
208 Greene St, #208
Jersey City, NJ

Ship To

P O Number	Terms	Rep	Ship	Via	F O.B.	Project	submitted
			4/16/2004				
Quantity	Item Code	Description				Price Each	Amount
40	Silkscreening	40 RED TEE SHIRTS, WITH WHITE LETTERS, 5 MEDIUM, 5 X-LARGE, 30 LARGE Steven Fulop. Democrat for Congress An honest democrat for change front and back				6.75	270.00T
1	Design	1 screen Sales Tax				30.00 8.625%	30.00T 25.88
					Total \$325.88		
					Balance Due \$325.88		

E-mail	Web Site
jobs@ondemandprinting.com	www.ondemandprinting.com

Exhibit G



PRINTING and
DOCUMENT SERVICES

INVOICE

No. 66827

Date 4/28/04

Customer P.O. No.

SOLD TO
STEPHEN FULOP FOR CONGRESS
1 GREEN STREET, SUITE 208

JERSEY CITY NJ 07302

STEVEN NEWMARK / STEVEN FULOP
Phone: C 917-226-7130
Fax: 973-643-6950

Customer Contact _____

1180 Route 46 West • Parsippany, NJ 07054
Tel: (973) 331-1113 • Fax: (973) 331-1288
Celebrating over 25 Years in Parsippany

QUANTITY	DESCRIPTION	AMOUNT
2,000	Color digital HANDOUTS, 4 x 6 WHITE INDEX 105#, copied 2 up on 2 sides RIP PROCESSING	1,008.00
5	CUT CARD STOCK (250)	
2	BANNERS 33 X 66	396.00
1,000	POSTERS 11 X 17 FULL COLOR VARNISHED	1,330.00

Taken by:
Account Type: Charge

Ship Via:
Deposit 1: 2,000.00 (cr
card)

SUB	2,734.00
TAX	164.04
SHIPPING	
TOTAL	2,898.04

ESTIMATES are valid for 30 days and are based on information received. Estimates are subject to revision upon receipt of materials for actual job. Charges for corrections/customer alterations will be added to the estimated price

COMPUTER FILES PIP cannot guarantee compatibility of our capabilities with every program, so some manipulation of files may be necessary. Customer will be informed of these charges if they are needed as accurately as possible.

Balance Due: 898.04

PARTIAL DELIVERY

The following items taken

DATE _____	SIGNATURE _____
DATE _____	SIGNATURE _____
DATE _____	SIGNATURE _____

DATE _____
AMOUNT DUE _____
AMOUNT PAID _____
BAL. DUE _____
CHECK # _____
CASH <input type="checkbox"/> CR.CD. <input type="checkbox"/>

Authorized By _____ Date: _____

RECEIVED BY: _____ Date: _____
(OR SHIPPED VIA) _____

PLEASE PAY FROM THIS INVOICE
NO STATEMENT WILL BE SENT
Thank You!

Exhibit H

BRINQ A816771 BPZDF

Branch Inquiry

BABRI075 07/02/04

09:32

Org: 075 Serv: DDA Acct: 2000012992955

S: 200983553 D: 00000000000000

C/R/W: W

WEN FULOP FOR CONGRESS INC

Avail Bal : 9,257.50
Total Avail : 9,257.50
Curr Bal : 9,257.50
Aver Bal : 4,712.80

1 GREENE ST APT#208

Lt Stmt Date: 06/30/2004

Open Dt: 05/21/2004

JERSEY CITY NJ 07302

Comment: IN

Spec Grp: REGULAR CONFID-NONE Stmt Cyc: CYCLE-31

Prd Desc: NON-PROFIT CHECKING Status: ACTIVE

CTRDEP 5,500.00 06/28/04 CHECK 992

2,500.00 06/08/04

CTRDEP 7,500.00 06/01/04 CHECK 991

3,272.50 06/07/04

DEP 2,030.00 05/21/04

INQUIRY COMPLETED

Command:

F1=Help F3=Exit

SIGNATURE ENDORSEMENT GUARANTEED
WACHOVIA BANK, NATIONAL ASSOCIATION

BY

7/2/04

Exhibit I

<p style="text-align: center;">MICHAEL J. POLLER MEGHAN F. KREGER 1701 ASPEN DRIVE PLAINSBORO, NJ 08536</p>		<p>55-33/212 9442343415</p>	<p>250</p>
<p style="text-align: center;">PAY TO THE ORDER OF <u>Steven Fulop for Congress</u></p>		<p>DATE <u>4-26-04</u></p>	
<p><u>One hundred and 00/100</u></p>		<p>\$ <u>100.00</u></p>	<p>DOLLARS <input checked="" type="checkbox"/> <small>Security Features Details on Back.</small></p>
<p>Fleet  <small>www.fleet.com Merch Mail Office Lawrenceville, New Jersey 08548</small></p>			
<p><i>Michael Poller</i></p>			

SAFETY PAPER

249

MICHAEL J. POLLER
MEGHAN F. KREGER
1701 ASPEN DRIVE
PLAINSBORO, NJ 08536

55-33/212
9442343415

DATE 4-26-04

PAY TO THE ORDER OF Steven Fulop for Congress \$ 100.00
One hundred and 00/100 DOLLARS Security Features
 Details on Back

Fleet
 93312 www.fleet.com
 Mercer Mall Office
 Lawrenceville, New Jersey 08648

MEMO _____

Meghan F. Kregis

40212003390 94423 43415# 0249

FRANK J. ESPOSITO
VALERIE T. ESPOSITO
4738 AUSTIN TRACE
ZIONSVILLE, IN 46077-9867

2-7080/2740
0906330720

Date 4/24/04 890

Pay to the order of Steven Fulop for Congress \$ 750.00
Seven hundred fifty + 00/100 Dollars Security Features
 Details on Back

citibank

CITIBANK, P.O. B.
 222 WEST ADAMS
 CHICAGO, IL 60606

Memo _____

Family

42710708040906331070# 1890

CARMEN FULOP
ABIGAIL FULOP

55-33/212
9442343415

DATE 4-26-04 580

PAY TO THE ORDER OF Steven Fulop for Congress \$ 180.00
One hundred and eighty DOLLARS Security Features
 Details on Back

Independence

409212003390 94423 43415# 1890

Exhibit J



Menendez files complaint against foe

Saturday, June 05, 2004

The campaign of Rep. Robert Menendez yesterday filed a complaint with the Federal Election Commission accusing his challenger in Tuesday's primary, Steven Fulop, of violating federal election law by not filing campaign-finance reports.

"It is impossible to become a lawmaker when one starts off as a lawbreaker," Nicholas Chiaravalloti, Menendez's campaign manager, said in a statement accompanying the complaint.

Menendez and Fulop are facing off in the race for the Democratic nomination in the 13th Congressional District.

Fulop yesterday said the complaint is "typical Menendez ... We are not in violation of any law. We have dotted every i and crossed every t."

Congressional candidates must begin filing reports once they raise or spend \$5,000. In two interviews with The Star-Ledger in recent weeks, Fulop said he had raised close to \$50,000. The Menendez camp cited those interviews in its complaint.

Steven Newmark, an attorney working with Fulop's campaign, said Fulop was mistaken when he used the \$50,000 figure in comments to the newspaper.

"I don't know why he would have said that," Newmark said. "I think what he was referring to is what we hoped we would raise."

Newmark said Fulop's campaign hit the \$5,000 mark only this week, and as soon as that happened, the finance records were completed and mailed to Washington, D.C.

An FEC complaint can take months or years to resolve. And even if a candidate is found in violation, the penalties are civil and would not affect ability to hold federal elected office.

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