



FEDERAL ELECTION COMMISSION

125 K STREET NW
WASHINGTON, DC 20463

THIS IS THE END OF TUE # 1041

Date Filmed 2/26/80 Camera No. --- 2

Cameraman G.P.C.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ruth M. Buehrer, President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041 (79)

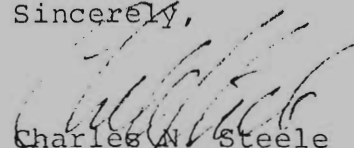
Dear Mrs. Buehrer:

The Federal Election Commission, on November 1, 1979, found reason to believe that the Essex County Education Association ("Association") may have violated 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended ("Act"). On February 5, 1980, the Commission decided to take no further action against the Association in connection with such violation.

In so deciding, the Commission reminds you that it is nevertheless illegal for a labor organization to make contributions in connection with any federal election; and that civil penalties may be imposed in such situations.

Accordingly, the Commission has decided to close the file in this matter. If you have any questions, please contact Daniel J. Blessington, the attorney handling this matter, at (202) 523-4039.

Sincerely,


Charles W. Steele
General Counsel

REGISTERED MAIL
RETURN RECEIPT REQUESTED

Math L. Bachrer, President
Essex County Education Association
733 Northfield Avenue
West Orange, New Jersey 07052

2/18/80

Re: MUR 1041 (79)

Dear Mrs. Bachrer:

The Federal Election Commission, on November 1, 1979, found reason to believe that the Essex County Education Association ("Association") may have violated 2 U.S.C. 3051 of the Federal Election Campaign Act of 1971, as amended ("Act"). On , 1980, the Commission decided to take no further action against the Association in connection with such violation.

As Secretary, the Commission reminds you that it is nevertheless illegal for a labor organization to make contributions in connection with any federal election; and that civil penalties may be imposed in such situations.

Accordingly, the Commission has decided to close the file in this matter. If you have any questions, please contact Daniel J. Massington, the attorney handling this matter, at (202) 525-1030.

Sincerely,

Charles E. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary W. Spruel, Treasurer
N.J.E.A. PAC-Members for Minish
Committee
9 Gray Street
Montclair, New Jersey 07042

Re: MUR 1041(79)

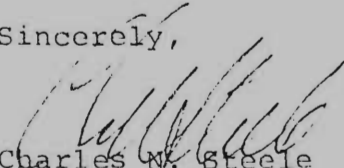
Dear Ms. Spruel:

On November 1, 1979, the Federal Election Commission found reason to believe that the N.J.E.A. PAC-Members for Minish Committee ("Committee") may have violated 2 U.S.C. §§ 441b, 433 and 434(b) of the Federal Election Campaign Act of 1971, as amended ("Act"). The Commission, on February 5, 1980, decided to take no further action against the Committee with respect to such violations.

The Commission, in so deciding, reminds you that it is nevertheless illegal for a political committee to accept contributions from labor organizations in connection with any federal election; and that the Act requires timely compliance with registration and reporting requirements. It should also be noted that civil penalties may be imposed in such situations.

Accordingly, the Commission has decided to close the file in this matter. If you have any questions, please contact Daniel Blessington, the attorney handling this matter, at (202) 523-1000.

Sincerely,


Charles W. Steele
General Counsel

REGISTERED MAIL
RETURN RECEIPT REQUESTED

2/8/80

Harry W. Spruvel, Treasurer
N.J.W.A. PAC- Leaders for Minish
Committee
9 Gray Street
Bordentown, New Jersey 07042

Re: MUR 1041(79)

Dear Mr. Spruvel:

On November 1, 1979, the Federal Election Commission found reason to believe that the N.J.W.A. PAC-Leaders for Minish Committee ("Committee") may have violated 2 U.S.C. §§ 4311, 4313 and 4314(b) of the Federal Election Campaign Act of 1971, as amended ("Act"). The Commission, on November 1, 1980, decided to take no further action against the Committee with respect to such violations.

The Commission, in so deciding, reminds you that it is nonetheless illegal for a political committee to accept contributions from labor organizations in connection with any Federal election; and that the Act requires timely compliance with registration and reporting requirements. It should also be noted that civil penalties may be imposed in such situations.

Accordingly, the Commission has decided to close the file in this matter. If you have any questions, please contact Daniel Blessington, the Attorney handling this matter, at (202) 513-1030.

Sincerely,

15/

Charles L. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
N.J.E.A. PAC - Members for)
Minish Committee)
Essex County Education)
Association, N. J.)

MUR 1041 (79)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session of February 5, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1041 (79):

1. Take no further action against NJEA PAC - Members for Minish Committee and Essex County Education Association in connection with violations of 2 U.S.C. §441b, §433 and §434(b).
2. Close the file
3. Approve and send the two letters attached to the General Counsel's report signed January 25, 1980.

Attest:

2/12
Date

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

MEMORANDUM TO: CHARLES STEFLE *mud*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: JANUARY 29, 1980
SUBJECT: OBJECTION - MUR 1041 - General Counsel's
Report dated 1-16-80: Signed 1-25-80;
Received in OCS 1-25-80, 3:06

The above-named report was circulated on a 48
hour vote basis at 11:00, January 28, 1980.

Commissioner Aikens submitted an objection at
5:24, January 28, 1980. MUR 1041 will be placed on
the agenda for the next Executive Session, the date
to be set at the Open Session on January 31, 1980.

January 25, 1980

MEMORANDUM TO: Marjorie W. Lemmons
FROM: Elissa T. Garr
SUBJECT: MUR 1041

Please have the attached General Counsel's Report on
MUR 1041 distributed to the Commission on a 48 hour tally
basis.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION
January 16, 1980

80 JAN 20 P 3: 08

In the Matter of)
)
N.J.E.A. PAC - Members for) MUR 1041 (79)
Minish Committee)
Essex County Education)
Association, N.J.)

GENERAL COUNSEL'S REPORT

BACKGROUND AND SUMMARY OF COMMISSION ACTION

The New Jersey Education Association PAC - Members for Minish Committee ("Committee"), an ad-hoc group organized for the general election of November of 1978, accepted a loan from the Essex County Education Association of New Jersey ("Association") and failed to comply with registration and reporting requirements in a timely manner. The matter was referred to the Office of General Counsel by the Reports Analysis Division.

On November 1, 1979, the Commission found reason to believe that the Committee and Association may have violated 2 U.S.C. §441b, and that, in addition, the Committee may have violated 2 U.S.C. §§433 and 434(b).

The Committee responded to the notification in a letter dated November 15, 1979. After the notification to the Association was returned to this office unclaimed, another notification was sent by regular first class mail (See Interim Investigative Report, December 6, 1979). The Association responded to this second notification in a letter dated December 10, 1979.

EVIDENCE

1. NJEA PAC - Members for Minish Committee

In her response, the treasurer confirmed that the Committee had accepted the loan and had violated registration and reporting requirements. She added that she was aware that union contributions were illegal, but was unaware that a loan is a contribution under the Act. Attached to her response were a copy of the check for \$552.90 used to repay the Association, and a letter which was intended to demonstrate the Committee's intention to comply with the law. (Attachment A)

2. Essex County Education Association of New Jersey

The President of the Association responded by detailing the circumstances of the loan and acknowledging her understanding that union contributions were illegal. Like the Committee Treasurer, she indicated that the Association was not aware that a loan is a contribution. She attached copies of the Association's ledger pages dealing with the loan which indicated that the loan was outstanding from October 25 to November 13, 1978, and was for the amount in question. Also attached were the two checks, constituting the loan, written by the Association in the Committee's behalf. (Attachment B)

ANALYSIS

Both the Committee and Association responded fully to the notifications. The responses indicate that the loan of \$552.90 was outstanding for approximately three weeks, and was repaid without interest.

While the responses confirm the violations of section 441b, it is noted that the amount of the illegal contribution is relatively small. For these reasons we think it is appropriate that the Commission take no further action.

The response of the Committee also confirms that it violated the registration and reporting requirements of 2 U.S.C. §§433 and 434(b). While the Committee did not register within ten (10) days of receiving in excess of \$1,000, it registered approximately three weeks later without having first been contacted by this office. In its termination report, submitted with its registration statement, the Committee failed to detail receipt of the subject loan. After receiving a request for additional information, however, it submitted an amended report which provided the necessary information. As we stated in our First General Counsel's Report, these violations should be viewed in connection with the §441b violation. Since there is a basis not to pursue the respondents any further for the §441b violation, and in view of the relatively minor nature of these §433 and §434(b) violations standing alone, we also propose that no further action be taken in regard to these violations.

RECOMMENDATIONS

1. Take no further action against NJEA PAC - Members for Minish Committee and Essex County Education Association in connection with violations of 2 U.S.C. §441b, §433 and §434(b).

2. Close the file.
3. Approve and send attached letters (2).

25 January 1980
Date

Charles N. Steele
General Counsel

ATTACHMENTS

Responses from Committee
Association
Proposed letters (2)

RECEIVED
FEDERAL ELECTION
COMMISSION

att A167
P1 of 4
scall

Mary W. Spruel
9 Gray Street
Montclair, New Jersey 07042

November 15, 1979

Lester Scall, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

005000

RE: MUR 1041 (79)

Dear Mr. Scall:

I am in receipt of a letter which is dated November 6, 1979 and which I received via certified mail on November 8, 1979 from the Federal Election Commission. Information is requested from me with regard to the NJEA PAC Members for Minish Committee, an ad hoc committee established in behalf of Congressman Joseph Minish for the 1978 general election.

The FEC believes that the NJEA PAC Members for Minish Committee may have violated sections 433(a), 441b(a) and 434(b) of the Federal Election Campaign Act.

With regard to 433(a) the NJEA PAC Members for Minish Committee filed its Statement of Organization Report on November 17, 1978. Our committee received \$990 from NJEA PAC on October 13, 1978 and, at that time, did not anticipate receiving or expending more than that amount in behalf of the candidate Joseph Minish. In accordance with the law, our committee was not under any obligation to file with the FEC and, consequently, did not do so.

As the campaign progressed, our committee incurred additional expenses which, in total, exceeded \$1,000. The specifics of the 10-day requirement of Section 433(a) were unknown to me resulting in delayed filing of a Statement of Organization Report. Upon discovery of the 10-day requirement, I immediately filed with the FEC. I respectfully ask you to consider in your deliberation of this case that, while our committee's Statement of Organization report was not filed within 10 days of expending funds in excess of \$1,000, the tardiness of the filing was not extreme. The Statement of Organization was filed as soon as I discovered that such was a requirement.

With reference to your question on a possible violation of 441b(a) of the Act, I must emphasize, as I did in my previous correspondence with Mr. Wade McArthur of your staff, that, at no time, did our committee ever regard the interim funds provided for the NJEA PAC Members for Minish Committee by the Essex County Education Association as a political contribution. There was never any intention that reimbursement would be made to the Essex County Association from NJEA PAC funds. I was well aware of

RECEIVED

Lester Scall, Esquire

Page 1

November 15, 1979

A
214

the fact that no contributions could be made by unions to a candidate or political committee. However, I did think that with proper notation in our records and those of the Essex County Education Association, that the funds used for campaign expenditures were in order. For further clarification, the \$552.90 reimbursement for expenditures incurred by the NJEA PAC Members for Minish Committee was made directly to the Essex County Education Association by NJEA PAC. Furthermore, the \$552.90 provided by the Essex County Education Association was done so via payment of two expenditures incurred by the NJEA PAC Members for Minish Committee. Those expenditures are listed in our report. They are \$102.90 to Rutan's Printers, 211 Glenridge Avenue, Montclair, N.J. 07042; and \$450 to Postmaster, West Orange, N.J. 07052. The Essex County Education Association was reimbursed by NJEA PAC within a short time of providing temporary funds for our committee.

Enclosed are copies of the front and back of the check sent by NJEA PAC to reimburse the Essex County Education Association. Also, is the copy of a note from Dolores T. Corona, NJEA PAC staff member, emphasizing the need for proper record-keeping for the Federal Election Commission. This should indicate that there was intention to comply with the law.

The technicalities of the law dealing with timely reporting of debt were unknown to me. The action taken with the Essex County Education Association appeared to be a simple one, i.e., to use the interim funds provided by the Essex County Education Association to pay two bills and, then, reimburse the Association for same. Moreover, no loan agreements were made with the Association in connection with this transaction. Discussions with Mr. Wade McArthur revealed that the transaction with the Essex County Education Association should be delineated as a "loan." As a result, I forwarded amended forms to the FEC complying with his advice.

I have provided you with an explanation of the questions raised by the FEC on the finances of the NJEA PAC Members for Minish Committee. As treasurer of the NJEA PAC Members for Minish Committee, I assure you that there was every intention to respect the law. Additionally, our records and previous correspondence forwarded to the FEC will show our serious attempts to clarify the matter. If any additional information is necessary, please contact me at the above address.

Sincerely yours,

Mary W. Spruel

Mary W. Spruel, Treasurer
NJEA PAC Members for Minish Committee

enclosures: 2



New Jersey Education Association • 180 W. State St. • Trenton, N.J. 08601

November 15, 1978

Essex County Education Association
730 Northfield Avenue
West Orange, New Jersey 07052

Dear Gentilepersons:

This is an additional transfer of money from
NJEA PAC to the NJEA PAC Educators for Minish
Campaign.

Please make sure that your records indicate such.
It is important to the whole area of record-
keeping for the Federal Election Commission.
May I suggest that you attach this note to your
records, also.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Dolores T. Corona", is written over the typed name.

Dolores T. Corona
Associate Director
Government Relations

DTC-gab

enclosure: check/\$552.90

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NEW JERSEY EDUCATION ASSOCIATION
PAC ACCOUNT
150 WEST STATE STREET
TRENTON, N. J. 08608

1215

PAY
TO THE
ORDER OF

Essex County Education Association

Received 10 25 55-73 312 01

\$ 352.90

Five hundred fifty two and 90/100

DOLLARS



NEW JERSEY NATIONAL BANK
MAIN OFFICE
TRENTON, N. J. 08603

Rosal De Pange

[Redacted signature line]

5973

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FEB 23 1973
FEB 23 1973
FEB 23 1973

DEC-5-73

1-55

1-55

1-55

DE 73 05
PAY ANY BANK ORDER
55-1



ESSEX COUNTY EDUCATION ASSOCIATION • 780 Northfield Avenue • West Orange, N. J. 07052 • (201) 738-5650

RUTH M. BUEHRER
President

KAY WEIDEMANN
Vice President

LORENA TYSON
Secretary

GEORGE STIEFBOLD
Treasurer

MAX KLETTER
Executive Director

73 DEC 11 AM 1:17

December 10, 1979

Charles N. Steele, Esquire
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR 1041 (79)

Dear Mr. Steele,

Your letter of December 3, 1979, with an enclosure of a previous letter from the Federal Election Commission dated November 6, 1979, arrived at my office by regular mail on December 6, 1979.

The Federal Election Commission is requesting information from me regarding funds totaling \$552.90 provided to the NJEA PAC Members for Minish Committee by the Essex County Education Association.

The NJEA PAC Members for Minish Committee was an ad hoc campaign committee established for the sole purpose of working in behalf of Joseph Minish for re-election to the U.S. House of Representatives. The Committee initially received \$990 from NJEA PAC to carry on activities in behalf of the candidate, but in the course of its operation incurred expenses totaling more than \$990. Mary Spruel, Treasurer of the NJEA PAC Members for Minish Committee, requested additional funds from NJEA PAC and received approval for same. However, processing of the check by NJEA PAC for transmittal to the NJEA PAC Members for Minish Committee would have meant some delay. With the understanding that a refund of the \$552.90 would be forthcoming from the NJEA PAC, the Essex County Education Association provided the total of \$552.90 to the Committee by forwarding payment of \$102.90 to Rutan's Printers, 211 Glenridge Ave., Montclair, N.J. 07042, and \$450 to Postmaster, West Orange, N.J. 07052. Enclosed are the copies of the front and back of the checks. Also, enclosed are copies of the ledger pages of the Essex County Education Association books which clearly indicate the payment to Rutan's Printers and Postmaster as PAC expenditures, and the receipt of \$552.90 as an NJEA PAC transfer for the NJEA PAC Members for Minish Committee.

The check for reimbursement from NJEA PAC for the amount in question (\$552.90) was sent to the Essex County Education Association on or about November 13, 1978 and was deposited on the Essex County Education Association account on November 30, 1978. Accompanying the check from NJEA PAC was a letter from Dolores T. Corona, Associate Director of NJEA Government Relations, clearly noting that the funds

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If further information is needed, please contact me at the above address.

John W. Bullock

cc: Lester Seale, Esquire, FEC

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ESSEX COUNTY EDUCATION ASSOCIATION
GEORGE W. STIEFBOLD, TREASURER
110 FOREST AVENUE
VERONA, N.J. 07044

1338

Oct 25 1978 55-1
212

PAY TO THE ORDER OF *Postmaster - West Orange* \$ *450.00*
Four hundred and no 100 DOLLARS

MIDLANTIC
Midlantic National Bank
West Orange Office, West Orange, N.J. 07067

MEMO *461*

Katherine J. Widenmann
George W. Stiefbold

"0000045000"

15998100

ESSEX COUNTY EDUCATION ASSOCIATION
GEORGE W. STIEFBOLD, TREASURER
110 FOREST AVENUE
VERONA, N.J. 07044

1340

Oct 28 1978 55-1
212

PAY TO THE ORDER OF *Rutari's Print Shop* \$ *102.90*
One hundred and two and 90/100 DOLLARS

MIDLANTIC
Midlantic National Bank
West Orange Office, West Orange, N.J. 07067

MEMO *461*

Katherine J. Widenmann
George W. Stiefbold

"0000010290"

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PAY ANY BANK
INDIANAPOLIS, IN.
NEWARK, NEW JERSEY

RECEIVED
OCT 31 1973
NEWARK, NJ
ACCOUNT NO. 55-1
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NO '73' 01
PAY ANY BANK P.E.S.
INDIANAPOLIS, IN.
NEWARK, NEW JERSEY

NOV - 1 78

1741

NO '73' 01
RECEIVED
OCT 31 1973
NEWARK, NJ
ACCOUNT NO. 55-1
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FOR POSTAL SERVICE
77-4-0178-400
RUTAN'S PRINT SHOP

9160810000

B549

	DUES	WOEA	NTEA	DINNER & LUNCH	ADS	TRANSFER	MISC	
	311	320	330	340	350	360	390	
SEPT 19	1100 40				3-			1103
	1100 40				3-			1103
Oct 7			75-		25-	2000-		2100
Oct 20			50-			2000-		2050-
Oct 28	1164 10	647 61	50-					1861
Oct 18	902 40						50 - refrigerator	952 40
Nov 7						3000-		3000-
	2066 50	647 61	175 -		25-	4000 -	50 -	6424 1
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Transfer NTEA PAC to NTEA PAC Education for Rm. Conf. Carpa

WORKSHEET 11/4/78

returned check # 1376

B699

ECCA

460

Legislative Comm. Finance

1938

Date	Paid To	CK Comm Exp	Misc	TOTAL
		# 461	469	
1 Sept 12	Virginia Klumb	1799	34 -	
2			34 -	34 -
3 Oct 13	Holiday Inn - Longoton	1326	121.54	
4 25	Postmaster W. Orange	1338	450 -	
5 28	Rutan's Print Shop	1340	102.90	
6			694.44	694.44
7 Dec 12	Virginia Klumb	1404	30 -	
8 12	Bryce Little	1408	146.57	
9			176.57	176.57
10 Jan 6	NJEA	1422	60 -	
11			60 -	60 -
12 Feb 13	Bart & Henry			
13 Mar 13	Wagner's	1457	50 -	
14 29	Patricia Caterers	492	5610 -	
15			5660 -	5660 -
16 Apr 4	Midland Press	1505	55 -	
17 10	Crest Flower	1511		
18 10	Midland Press	1512	175 -	
19 10	Freitag's Flowers	1513	89 -	
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27				



New Jersey Education Association • 100 W. State St. • Trenton, N.J. 08648

November 15, 1977

Essex County Education Association
175 North Avenue
Essex, N.J. 08827

Dear Gentlemen:

This is an additional transfer of money from
NJEA PAC to the NJEA PAC Educators for Minish
Campaign.

Please make sure that your records indicate such.
It is important to the whole area of record-
keeping for the Federal Election Commission.
May I suggest that you attach this note to your
records, also.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Dolores T. Corona". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dolores T. Corona
Associate Director
Government Relations

DTC-gab

enclosure: check/\$552.90

B 849



New Jersey Education Association • 180 W. State St. • Trenton, N.J. 08608 • Tel: (609) 599-4561 • twx 510-681-8400

B 949

9 Gray St.

Montclair, N.J. 07042

Nov 7, 1978

THE ASSOCIATION of Teachers
Trenton, N.J.
Dear Sir:

The N.J.E.A.-PAC Educators for Minish
Received materials (names) requiring five thousand
(5,000) mailings. This proved to be (3,000) three
thousand mailings short of the required votes
for Congressional District Eleven (11)

In order to complete the project before the
Election Date as required, it was necessary for
monies for the additional mailings be borrowed
from the Essex County Education Association, which was
done with the understanding that a refund of the
same would be forthcoming from N.J.E.A.-PAC.

The cost was

3000 stamps -	\$450
3000 letters -	102.90
Total cost of additional mailings -	\$552.90

A check for the amount of \$552.90 is requested.

Yours truly, Virginia Kleinknecht, Chm.
Mary H. Spruel, - Treas.

Mary Spruel

180 West State Street, 2nd Floor, Trenton, NJ 08608

Phone Tel: (609) 599-4561

9 Gray St. Montclair, N.J. 07042



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary W. Spruel, Treasurer
N.J.E.A. PAC-Members for Minish
Committee
9 Gray Street
Montclair, New Jersey 07042

Re: MUR 1041(79)

Dear Ms. Spruel:

On November 1, 1979, the Federal Election Commission found reason to believe that the N.J.E.A. PAC-Members for Minish Committee ("Committee") may have violated 2 U.S.C. §§ 441b, 433 and 434(b) of the Federal Election Campaign Act of 1971, as amended ("Act"). The Commission, on , 1980, decided to take no further action against the Committee with respect to such violations.

The Commission, in so deciding, reminds you that it is nevertheless illegal for a political committee to accept contributions from labor organizations in connection with any federal election; and that the Act requires timely compliance with registration and reporting requirements. It should also be noted that civil penalties may be imposed in such situations.

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Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ruth M. Buchrer, President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041 (79)

Dear Mrs. Buehrer:

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Accordingly, the Commission has decided to close the file in this matter. If you have any questions, please contact Daniel J. Blessington, the attorney handling this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *g*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY, *ccc*
DATE: DECEMBER 14, 1979
SUBJECT: MUR 1041 - Interim Investigative Report
dated 12-13-79; Received in OCS
12-13-79, 11:19

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 4:00, December 13, 1979.

There were no objections to the Interim Investigative
Report at the time of the deadline.

December 13, 1979

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1041

Please have the attached Interim Invest Report on
MUR 1041 distributed to the Commission.

Thank you.

1189924

BEFORE THE FEDERAL ELECTION COMMISSION
December 6, 1979

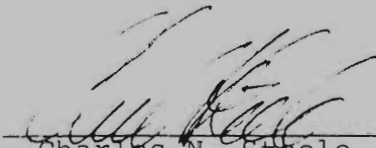
In the Matter of)
)
NJEA PAC-Members for) MUR 1041 (79)
Minish Committee)
Essex County Education)
Association, NJ)

INTERIM INVESTIGATIVE REPORT

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In a letter dated November 15, 1979, the NJEA PAC-Members for Minish Committee responded to our letter of November 6, 1979. The letter sent to the Essex County Education Association was returned to this office unclaimed. After confirming that the address was correct, we sent the letter again by regular first class mail. As of this date, there has been no response.

Pending a reply from Essex County, or in the absence of a response within ten days, a full report will be made to the Commission.

13 December 1979
Date



Charles N. Steele
General Counsel



ESSEX COUNTY EDUCATION ASSOCIATION • 780 Northfield Avenue • West Orange, N.J. 07052 • (201) 736-5650

RUTH M. BUEHNER
President

KAY WEIDEMANN
Vice President

LORENA TYSON
Secretary

GEORGE STIEFBOLD
Treasurer

MAX KLETTER
Executive Director

December 10, 1979

Charles N. Steele, Esquire
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: MUR 1041 (79)

Dear Mr. Steele,

Your letter of December 3, 1979, with an enclosure of a previous letter from the Federal Election Commission dated November 6, 1979, arrived at my office by regular mail on December 6, 1979.

The Federal Election Commission is requesting information from me regarding funds totaling \$552.90 provided to the NJEA PAC Members for Minish Committee by the Essex County Education Association.

The NJEA PAC Members for Minish Committee was an ad hoc campaign committee established for the sole purpose of working in behalf of Joseph Minish for re-election to the U.S. House of Representatives. The Committee initially received \$990 from NJEA PAC to carry on activities in behalf of the candidate, but in the course of its operation incurred expenses totaling more than \$990. Maru Spruel, Treasurer of the NJEA PAC Members for Minish Committee, requested additional funds from NJEA PAC and received approval for same. However, processing of the check by NJEA PAC for transmittal to the NJEA PAC Members for Minish Committee would have meant some delay. With the understanding that a refund of the \$552.90 would be forthcoming from the NJEA PAC, the Essex County Education Association provided the total of \$552.90 to the Committee by forwarding payment of \$102.90 to Rutan's Printers, 211 Glenridge Ave., Montclair, N.J. 07042, and \$450 to Postmaster, West Orange, N.J. 07052. Enclosed are the copies of the front and back of the checks. Also, enclosed are copies of the ledger pages of the Essex County Education Association books which clearly indicate the payment to Rutan's Printers and Postmaster as PAC expenditures, and the receipt of \$552.90 as an NJEA PAC transfer for the NJEA PAC Members for Minish Committee.

The check for reimbursement from NJEA PAC for the amount in question (\$552.90) was sent to the Essex County Education Association on or about November 13, 1978 and was deposited in the Essex County Education Association account on November 30, 1978. Accompanying the check from NJEA PAC was a letter from Dolores T. Corona, Associate Director of NJEA Government Relations, clearly noting that the funds

6261811001

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MIDLAND NAT. B.
NEWARK, NEW JERSEY

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MIDLAND NAT. B.
NEWARK, NEW JERSEY

NOV - 1 73



FOR POSTAGE ONLY
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B 7 of 9

NEW JERSEY EDUCATION ASSOCIATION
PAC ACCOUNT
180 WEST STATE STREET
TRENTON, N. J. 08608

1215

November 13 1978 55-73 01
312

PAY
TO THE
ORDER OF

County of Mercer Association

\$ 500.00

DOLLARS



NEW JERSEY NATIONAL BANK

Handwritten signature

[Redacted line]

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NEW JERSEY NATIONAL BANK

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ECCA

460

Legislative Comm + Revenue

1978-19

Date	Paid To	CK Comm Exp	Here	TOTAL
Sept 12	Virginia Klumb	1799 34 -	469	
		34 -		34 -
Oct 13	Holiday Inn - Langston	1326 121 54		
20	Footmaster W. Orange	1338 450 -	PAC	
25	Kilmer's Print Shop	1340 102 90	PAC	
		694 44		694 44
Dec 12	Virginia Klumb	1404 30 -		
12	Bryce Little	1408 146 57		
		176 57		176 57
Jan 6	NFER	1422 60 -		
		60 -		60 -
Feb 13	Banc + Harry			
Mar 13	Wagner's	1487	50 -	
29	Patrian Caterers	492	5610 -	
			5660 -	5660 -
Apr 4	Midland Press	1505	55 -	
12	Midland Press	1511		
10	Midland Press	1512	195 -	
10	Freitag's Flowers	1513	89 -	
			339 -	339 -
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Essex County Education Association
GEORGE W. STIEFBOLD, TREASURER
110 FOREST AVENUE
VERONA, N.J. 07044

1338

PAY TO THE
ORDER OF

Postmaster - West Orange
Four hundred and 00/100

Oct 25 1978 55-1
212

\$450.00

DOLLARS

MIDLANTIC

Midlantic National Bank
West Orange Office, West Orange, N.J. 07052

MEMO

461

Katherine J. Wiedemann
George W. Stiefbold

Essex County Education Association
GEORGE W. STIEFBOLD, TREASURER
110 FOREST AVENUE
VERONA, N.J. 07044

1340

PAY TO THE
ORDER OF

Ripter's Print Shop
One hundred and two 00/100

Oct 28 1978 55-1
212

\$102.00

DOLLARS

MIDLANTIC

Midlantic National Bank
West Orange Office, West Orange, N.J. 07052

MEMO

461

Katherine J. Wiedemann
George W. Stiefbold

001180932

NEW JERSEY EDUCATION ASSOCIATION
PAC ACCOUNT
150 WEST STATE STREET
TRENTON, N. J. 08608

1215

November 3 1978 $\frac{55-73}{312}$ 01.

PAY
TO THE
ORDER OF

East County Education Association

\$ 552.90

Five hundred fifty-two and 90/100

DOLLARS



NEW JERSEY NATIONAL BANK

MAIN OFFICE
TRENTON, N.J. 08603

Rose DeLongis

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PAY ANY BANK DEPOSIT
MIDLAND TRUST CO
NEW YORK



New Jersey Education Association • 100 W. State St. • Trenton, N.J. 08608

November 15, 1978

Essex County Education Association
730 Northfield Avenue
West Orange, New Jersey 07052

Dear Gentilepersons:

This is an additional transfer of money from
NJEA PAC to the NJEA PAC Educators for Minish
Campaign.

Please make sure that your records indicate such.
It is important to the whole area of record-
keeping for the Federal Election Commission.
May I suggest that you attach this note to your
records, also.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Dolores T. Corona", with a long, sweeping horizontal line extending to the right.

Dolores T. Corona
Associate Director
Government Relations

DTC-gab

enclosure: check/\$552.90

439980



New Jersey Education Association • 180 W. State St. • Trenton, N.J. 08608 • Tel: (609) 599-4581 • twx 510-681-8400

9 Gray St.
Montclair, N.J. 07042
Nov. 7, 1978

N.J.E.A.-PAC Bd of Trustees
Trenton, N.J.
To Whom It May Concern:

Dear Sir:

The N.J.E.A.-PAC Educators for Minish
Received materials (names) requiring five thousand
(5,000) mailings. This proved to be (3,000) three
thousand mailings short of the required voters
for Congressional District Eleven (II)

In order to complete the project before the
Election Date as required, it was necessary for
monies for the additional mailings be borrowed
from the Essex County Education Association, which was
done with the understanding that a refund of the
same would be forthcoming from N.J.E.A.-PAC.

The cost was

3000 stamps -	\$450
3000 letters -	102.90
Total cost	\$552.90
of additional mailings	

A check for the amount of \$552.90 is requested.

Yours truly, Virginia Klumck - Chm.
Mary H. Spruel - Treas.

Mary Spruel

180 W. State St., 2nd Fl., Trenton, N.J. 08608

Home Tel: (201) 746-1043

9 Gray St. Montclair, N.J. 07042

ecpa

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

750 Northwood Avenue
West Orange, N.J. 07052

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ecpa

National Education Association

Charles N. Steele, Esquire
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20132

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ECED

780 Northfield Avenue
West Orange, NJ 07052

011117 P3:34

ECED

Lester Scalf, Esquire
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

Mary W. Spruel
9 Gray Street, Apt. 12-45
Montclair, New Jersey 07042

November 15, 1979

Lester Scall, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CR 506

RE: MUR 1041 (79)

Dear Mr. Scall:

I am in receipt of a letter which is dated November 6, 1979 and which I received via certified mail on November 8, 1979 from the Federal Election Commission. Information is requested from me with regard to the NJEA PAC Members for Minish Committee, an ad hoc committee established in behalf of Congressman Joseph Minish for the 1978 general election.

The FEC believes that the NJEA PAC Members for Minish Committee may have violated sections 433(a), 441b(a) and 434(b) of the Federal Election Campaign Act.

With regard to 433(a) the NJEA PAC Members for Minish Committee filed its Statement of Organization Report on November 17, 1978. Our committee received \$990 from NJEA PAC on October 13, 1978 and, at that time, did not anticipate receiving or expending more than that amount in behalf of the candidate Joseph Minish. In accordance with the law, our committee was not under any obligation to file with the FEC and, consequently, did not do so.

As the campaign progressed, our committee incurred additional expenses which, in total, exceeded \$1,000. The specifics of the 10-day requirement of Section 433(a) were unknown to me resulting in delayed filing of a Statement of Organization Report. Upon discovery of the 10-day requirement, I immediately filed with the FEC. I respectfully ask you to consider in your deliberation of this case that, while our committee's Statement of Organization report was not filed within 10 days of expending funds in excess of \$1,000, the tardiness of the filing was not extreme. The Statement of Organization was filed as soon as I discovered that such was a requirement.

With reference to your question on a possible violation of 441b(a) of the Act, I must emphasize, as I did in my previous correspondence with Mr. Wade McArthur of your staff, that, at no time, did our committee ever regard the interim funds provided for the NJEA PAC Members for Minish Committee by the Essex County Education Association as a political contribution. There was never any doubt that reimbursement would be made to the Essex County Association from NJEA PAC funds. I was well aware of

Lester Scall, Esquire

Page 2

November 15, 1979

the fact that no contributions could be made by unions to a candidate or political committee. However, I did think that with proper notation in our records and those of the Essex County Education Association, that the funds used for campaign expenditures were in order. For further clarification, the \$552.90 reimbursement for expenditures incurred by the NJEA PAC Members for Minish Committee was made directly to the Essex County Education Association by NJEA PAC. Furthermore, the \$552.90 provided by the Essex County Education Association was done so via payment of two expenditures incurred by the NJEA PAC Members for Minish Committee. Those expenditures are listed in our report. They are \$102.90 to Rutan's Printers, 211 Glenridge Avenue, Montclair, N.J. 07042; and \$450 to Postmaster, West Orange, N.J. 07052. The Essex County Education Association was reimbursed by NJEA PAC within a short time of providing temporary funds for our committee.

Enclosed are copies of the front and back of the check sent by NJEA PAC to reimburse the Essex County Education Association. Also, is the copy of a note from Dolores T. Corona, NJEA PAC staff member, emphasizing the need for proper record-keeping for the Federal Election Commission. This should indicate that there was intention to comply with the law.

The technicalities of the law dealing with timely reporting of debt were unknown to me. The action taken with the Essex County Education Association appeared to be a simple one, i.e., to use the interim funds provided by the Essex County Education Association to pay two bills and, then, reimburse the Association for same. Moreover, no loan agreements were made with the Association in connection with this transaction. Discussions with Mr. Wade McArthur revealed that the transaction with the Essex County Education Association should be delineated as a "loan." As a result, I forwarded amended forms to the FEC complying with his advice.

I have provided you with an explanation of the questions raised by the FEC on the finances of the NJEA PAC Members for Minish Committee. As treasurer of the NJEA PAC Members for Minish Committee, I assure you that there was every intention to respect the law. Additionally, our records and previous correspondence forwarded to the FEC will show our serious attempts to clarify the matter. If any additional information is necessary, please contact me at the above address.

Sincerely yours,

Mary W. Spruel, Treasurer
NJEA PAC Members for Minish Committee

enclosures: 2



New Jersey Education Association • 180 W. State St. • Trenton, N.J. 08608

November 15, 1978

Essex County Education Association
730 Northfield Avenue
West Orange, New Jersey 07052

Dear Gentilepersons:

This is an additional transfer of money from
NJEA PAC to the NJEA PAC Educators for Minish
Campaign.

Please make sure that your records indicate such.
It is important to the whole area of record-
keeping for the Federal Election Commission.
May I suggest that you attach this note to your
records, also.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Dolores T. Corona", is written over the typed name.

Dolores T. Corona
Associate Director
Government Relations

DTC-gab

enclosure: check/\$552.90

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NEW JERSEY EDUCATION ASSOCIATION

PAC ACCOUNT

180 WEST STATE STREET
TRENTON, N. J. 08608

1215

November 3 1978 $\frac{55-73}{312}$ 01.

PAY
TO THE
ORDER OF

Essex County Education Association

\$ 552.90

Five hundred fifty-two and 90/100

DOLLARS



NEW JERSEY NATIONAL BANK

MAIN OFFICE
TRENTON, N.J. 08603

Rosa DiStasio

[Redacted signature area]

[Redacted signature area]

[Redacted signature area]

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NEW JERSEY
DEC 1978

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PAY ANY BANK OR BRANCH
MIDDLEBURY COLLEGE
NEW JERSEY

H. W. Spruel
9 Gray St.
Montclair, NJ 07042

FIRST CLASS

Lester Scall, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION

1100 K STREET NW
WASHINGTON, DC 20463

December 3, 1979

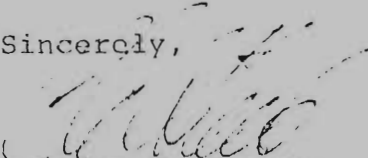
Ruth Buehrer, President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041 (79)

Dear Ms. Buehrer:

The enclosed letter, sent to your office by certified mail, was returned to the Commission unclaimed. Having confirmed that the above address is correct, this Office has decided the enclosed notification will reach you by regular mail.

Sincerely,


Charles N. Steele
Acting General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

November 6, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041(79)

Dear Sir or Madam:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act make it unlawful for unions to make contributions in connection with federal elections. Specifically it appears that on or about October 23, 1978, your association loaned funds to the NJEA PAC-Members for Minish Committee. Under the Act, a loan is a contribution. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1041(79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your association. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. [Additionally, please submit copies of the front and back of the check(s) by which the loan was made to the NJEA PAC-Members for Minish Committee and provide copies of any loan agreements in connection with this loan]. Where appropriate, statements should be submitted under oath.

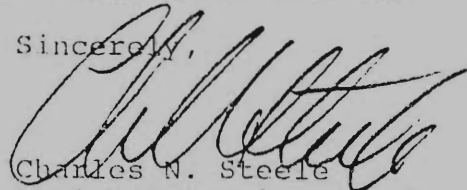
The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Scall, the attorney assigned to this matter, at 202-523-4166.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



Charles N. Steele
Acting General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

WRITER
[Signature]

REASON CHECKED

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☐ Moved, not forwardable

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President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

POSTAGE AND FEES PAID



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11-8-79
[Signature]

NOV 8 1979
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CE-IFIED

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

1 The following service is requested: check one Show to whom and date delivered ☐ C Show to whom date and address of delivery ☐ C RESTRICTED DELIVERY Show to whom and date delivered ☐ C RESTRICTED DELIVERY Show to whom date and address of delivery ☐ S CONSULT POSTMASTER FOR FEES		2 ARTICLE ADDRESSED TO President 780 Broadway, Apt. West Orange, N.J. 07052	
3 ARTICLE DESCRIPTION REGISTERED NO. CERTIFIED NO. INSURED NO.		(Always obtain signature of addressee or agent)	
4 I have received the article described above SIGNATURE _____ AUTHORIZED AGENT _____ DATE OF DELIVERY _____		5 ADDRESS Complete only if requested by addressee No such street No such number Moved, not forwardable POSTMARK	
6 UNABLE TO DELIVER BECAUSE _____		CLERK'S INITIALS _____	

SC 11 DUE 1041



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Essex County Education Association
730 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041(79)

Dear Sir or Madam:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for unions to make contributions in connection with federal elections. Specifically it appears that on or about October 23, 1978, your association loaned funds to the NJEA PAC-Members for Minish Committee. Under the Act, a loan is a contribution. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1041(79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your association. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. [Additionally, please submit copies of the front and back of the check(s) by which the loan was made to the NJEA PAC-Members for Minish Committee and provide copies of any loan agreements in connection with this loan]. Where appropriate, statements should be submitted under oath.

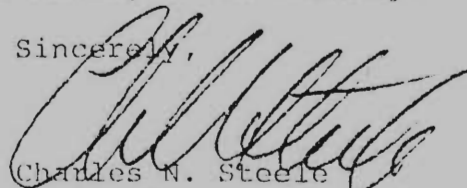
The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Scall, the attorney assigned to this matter, at 202-523-4166.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



Charles N. Steele
Acting General Counsel

11 5 0 3 1 1 1

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Essex County Education Association
780 Northfield Avenue
East Orange, New Jersey 07052

Re: MUE 1041(79)

Dear Sir or Madam:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended (the Act). This section of the Act made it unlawful for unions to make contributions in connection with federal elections. Specifically it appears that on or about October 23, 1978, your association loaned funds to the NJEA PAC-Members for Minish Committee. Under the Act, a loan is a contribution. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUE 1041(79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your association. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. [Additionally, please submit copies of the front and back of the check(s) by which the loan was made to the NJEA PAC-Members for Minish Committee and provide copies of any loan agreements in connection with this loan]. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Seall, the attorney assigned to this matter. 26 202 523-4006.

This letter will remain confidential in accordance with E.O. 12812, Section 407c(2)(D) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William B. Seall
General Counsel

Charles A. Seale
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 6, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary W. Spruel, Treasurer
NJEA PAC Members for Minish
Committee
9 Gray Street
Montclair, New Jersey 07042

Re: MUR 1041 (79)

Dear Ms. Spruel:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated sections 433(a), 441b(a) and 434(b) of the Federal Election Campaign Act of 1971, as amended ("the Act").

Section 433(a) of the Act requires a Committee to register with the Commission within ten days after its organization or, if later, ten days after the date on which it has information which causes it to anticipate it will receive contributions or make expenditures in excess of \$1,000. It appears that your Committee's registration did not occur within this period.

Section 441b(a) of the Act prohibits the acceptance by Committees such as yours of contributions from unions. The loan to your Committee from the Essex County Education Association appears to be such a contribution.

Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

Section 434(b) of the Act requires the timely reporting of debts. Your Committee's apparent failure to timely report the Association's loan was a violation of this section.

We have numbered this matter MUR 1041 (79). Please refer to this number in all future correspondence.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary W. Spruel, Treasurer
NJRA PAC Members for Minish
Committee
9 Gray Street
Montclair, New Jersey 07042

Re: MUR 1041 (79)

Dear Ms. Spruel:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated sections 433(a), 441b(a) and 434(i) of the Federal Election Campaign Act of 1971, as amended (the Act).

Section 433(a) of the Act requires a Committee to register with the Commission within ten days after its organization or, if later, ten days after the date on which it has information which causes it to anticipate it will receive contributions or make expenditures in excess of \$1,000. It appears that your Committee's registration did not occur within this period.

Section 441b(a) of the Act prohibits the acceptance by committees such as yours of contributions from unions. The loan to your Committee from the Essex County Education Association appears to be such a contribution.

Although the contribution in question was reported in return, the Act was violated when the contribution was first accepted.

Section 434(i) of the Act requires the timely reporting of debts. Your Committee's apparent failure to timely report the contribution loan was a violation of this section.

We have numbered this letter MUR 1041 (79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Additionally, please provide copies of the front and back of the check(s) by which you repay the Essex County Education Association for its loan and provide copies of any loan agreements in connection with the loan. Where appropriate, statements should be submitted under oath. In this connection, we have already considered your Committee's reports and your letters of May 9 and 21, and June 25, 1979, to the Commission.

The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Scall, the attorney assigned to this matter, at 291-2234.

This matter will remain confidential in accordance with 21 C.F.R. Section 172.16(a)(3)(i) unless you notify the Commission in writing that you wish the information to be made public.

If you intend to be represented by counsel in this matter, please have such counsel advise you in writing.

Sincerely,

William A. Walker
Special Counsel

cc: Mr. John J. Steele
Executive General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1041
NJEA PAC-Members for Minish Committee)
Essex County Education Association, NJ)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 1, 1979, the Commission decided by a vote of 5-0 to take the following actions regarding the above-captioned matter:

1. Find REASON TO BELIEVE that the NJEA PAC-Members for Minish Committee may have violated 2 U.S.C. §433, §441b and §434(b)
2. Find REASON TO BELIEVE that the Essex County Education Association may have violated 2 U.S.C. §441b.
3. Approve the letters attached to the First General Counsel's Report dated October 29, 1979.

Voting for this determination were Commissioners Tiernan, Friedersdorf, Harris, McGarry, and Reiche.

Attest:

11/1/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 10-29-79, 4:57
Circulated on 48 hour vote basis: 10-30-79, 11:00

October 29, 1979

MEMORANDUM TO: Marge Enmohas
FROM: Jane Colgrove
SUBJECT: MUR 1041

Please have the attached First General Counsel's Report on MUR 1041 distributed to the Commission on a 48 hour tally basis.

Thank you.

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL

BY OGC TO COMMISSION OCT 22 1979

MUR NO 80-1041 (79)

STAFF MEMBER(S) 57

Moss/Scall

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: NJEA PAC-Members for Minish Committee
Essex County Education Association, NJ

RELEVANT STATUTE: 2 U.S.C. §§433, 441b, 434(b)
11 C.F.R. §104.2(b)

INTERNAL REPORTS CHECKED: NJEA PAC-Members for Minish Committee

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

The NJEA PAC-Members for Minish Committee was referred to the Office of General Counsel on October 4, 1979, by the Reports Analysis Division (RAD), for failing to register within ten (10) days, in violation of 2 U.S.C. §433(a); and, for accepting a loan from a labor organization, in violation of 2 U.S.C. §441b(a).

EVIDENCE

The NJEA PAC-Members for Minish Committee (the Committee) was an "... ad hoc committee established solely for the November 1978 general election." Its statement of organization, which was dated November 17, 1978, was accompanied by a termination report showing that all of its receipts and expenditures occurred in the period from October 30 through November 15, 1978. All the receipts, which totalled \$1,542.90, were reported as being from the NJEA PAC (PAC), the Committee's affiliated organization. The listed dates of the transaction were as follows: \$990 was received on October 13, 1978 and \$552.90 was received on November 15, 1978. The Committee's expenditures, which also equalled \$1,542.90, were made between October 20 and October 30, 1978.

During a May 5, 1979 phone conversation between RAD staff and a representative of the PAC, RAD inquired as to the Committee's receipts and expenditures prior to registration and as to how the Committee was able to make all of its expenditures when it showed only \$990 in its treasury. The PAC representative explained that the Committee had obtained a loan of \$552.90 from the Essex County Education Association (Association), a union, to tide it over until the PAC transferred this amount to the Committee. On May 9, 1979, the Committee Treasurer explained this in a letter to RAD.

Other correspondence between RAD, the PAC and the Committee ensued in an effort to get the Committee to amend its report to show the loan from the Association. On May 22, 1979, the Committee submitted an amendment showing that the loan from the Association was made on October 23, 1978, was interest free, and was repaid on November 15, 1978.

PRELIMINARY ANALYSIS

Section 433(a) of the Act requires a committee to register within ten days after its organization or, if later, ten days after the date on which it has information which causes it to anticipate it will receive contributions or make expenditures in excess of \$1,000. The Committee received a total of \$1,542.90 by October 23, 1978 yet did not register until November 17, 1978. Therefore it is in violation of §433(a).

Section 441b(a) prohibits the making and receipt of contributions by unions to federal committees. The Association's loan of \$552.90 to the Committee was a contribution in violation of §441b(a).

While the loan was outstanding for only 23 days, it was made during the period immediately prior to the election and it permitted the Committee to make expenditures it would not otherwise have been able to make. Furthermore the Committee reported the loan only after Commission staff had questioned it about its activities. In view of these circumstances we think the Commission should find reason to believe that both the Committee and the Association violated §441b(a).

While the §433(a) violation, by itself, may not be serious, it is connected with the circumstances surrounding the §441b violation. In this context, the Commission should find reason to believe that the Committee violated §433(a).

Finally, the late reporting by the Committee of the Association's loan under the circumstances described above is an issue closely related to the issues referred to this office by RAD. Pursuant to §434(b) of the Act and 104.2(b) of the Regulations, a Committee is required to include in its report for the appropriate period the debts and obligations it incurred within that period. The Committee's ultimate amendment of its report to include the Association loan does not cure its failure to timely report, and the Commission should find reason to believe that the Committee violated §434(b).

RECOMMENDATION

1. Find reason to believe that the NJEA PAC-Members for Minish Committee may have violated 2 U.S.C. §433, §441b and §434(b).
2. Find reason to believe that the Essex County Education Association may have violated 2 U.S.C. §441b.
3. Approve the attached letters.

ATTACHMENTS

- I. Rad Referral
- II. Proposed letters to Respondents(2)

ATTACHMENT I

D
RAD

488
XXX 96-159

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

MUR 1041

DATE OCTOBER 4, 1979

ANALYST Maude McArthur wsv

TO: William C. Oldaker

TEAM CHIEF Steve Mims

THROUGH: STAFF DIRECTOR CBP.

COMPLIANCE REVIEW Carroll Bowen CB/PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS PH

CANDIDATE/COMMITTEE: NJEA PAC MEMBERS FOR MINISH

TREASURER: Mary M. Spruel

ADDRESS: 9 Gray Street
Montclair, New Jersey 07042

AFFILIATE(S): NJEA PAC

ALLEGATION(S):

CITE:

ATTACHMENT(S):

The committee failed to register within
10 days of expending in excess of \$1,000
to influence federal elections.

2 U.S.C. 433(a)

II, III, X

The committee accepted a prohibited
loan from a labor organization.

2 U.S.C. 441b(a)

V, VI, VIII

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review. AND DATE.

Normal review - RFAI sent 4-26-79

ATTACHMENT

IV

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-30-78 TO 11-17-78

TOTAL RECEIPTS \$ 2,095.80 TOTAL EXPENDITURES \$ 2,095.80

CASH ON HAND \$ 0.00 DEBTS \$ 0.00

4. HISTORY:

5. RESULTS OF REVIEW:

ATTACHMENT

RTAI (Termination) sent 4-26-79

IV

6. Inadequate response received 5-16-79

VI

Response with adequate disclosure received 5-24-79

VIII

Response with further clarification received 7-5-79

X

7. COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 5- 3-79

V

Telecon 5-16-79

VII

Telecon 6-12-79

IX

8. REASON(S) FOR REFERRAL:

ATTACHMENT

See above allegations

Receipt of prohibited contribution in excess of \$100 threshold

9. OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

10. OTHER RELEVANT INFORMATION:

None

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 12JUL79
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NSEA PAC MEMO TO THE FINISH CONNECTION ORGANIZATION: EDUCATION ASS'N NEW JERSEY 1978 STATEMENT OF ORGANIZATION								ID# C00106088
	TERMINATION REPORT	1,542		1,542		20NOV78		3 78HSE/155/3070
	REQUEST FOR ADDITIONAL INFORMATION					30OCT78 -17NOV78		4 78HSE/155/3080
	TERMINATION REPORT - AMENDMENT	1,542		1,542		30OCT78 -17NOV78		2 79FEC/126/1670
	TERMINATION REPORT - AMENDMENT					30OCT78 -17NOV78		8 79FEC/127/2771
	TERMINATION REPORT - AMENDMENT					30OCT78 -17NOV78		7 79FEC/128/0675
	TERMINATION REPORT - AMENDMENT					30OCT78 -17NOV78		2 79FEC/130/1414
	TOTAL	1,542	0	1,542	0			26 TOTAL PAGES
TERMINATED								

ALL THE ABOVE REPORTS HAVE BEEN REVIEWED

FEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REGULAR MAIL
NOV 14 1976

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contribu-
tions or expenditures in excess of \$1,000 in any calendar year in support
of such candidate(s).

(See Reverse Side For Instructions.)

RECEIVED
FEDERAL ELECTION COMMISSION
13 NOV 20 AM 2-03

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with his campaign must maintain and record with respect to each election.

200106088

1(a) Name of Committee (in full) ☐ Check if name or address is changed

N.J.E.A. PAC - MEMBERS FOR MINISH

2. File

084673

(b) Address (number and street)

9 Gray Street

3. Date

November 17, 1976

(c) City, State and ZIP code

Montclair, New Jersey 07042

4. Is this an amended statement? Yes ☐ No ☒
If YES, fill in ONLY THOSE LINES ON
WHICH THERE HAS BEEN A CHANGE

5. Check one

☒ (a) This committee has been designated as the principal campaign committee for

JOSEPH G. MINISH

(Name of Candidate)

a candidate for U.S. HOUSE OF REPRESENTATIVES

1978

Election

(Federal office sought)

(Year of election)

to be held in the State of NEW JERSEY

(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate and is authorized by

(Name of Candidate)

to receive contributions and make expenditures with respect to the

Election(s)

(General, Primary, Runoff, etc.)

held in

(Year of election in State)

and will file all reports and statements with the candidate's principal campaign

committee.

(Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

☐ (c) This committee supports only one candidate

JOSEPH G. MINISH

but is not an authorized committee.

(Name of Candidate)

☐ (d) This committee supports more than one federal candidate and is not a party committee.

☐ (e) This committee is a

committee of the

Party.

(National, State, county, city)

(Democratic, Republican, etc.)

6. Name of affiliated and/or connected organizations

Mailing address and ZIP code

Relationship

N.J.E.A. POLITICAL
ACTION COMMITTEE

180 W. State Street
P. O. Box 1211
Trenton, New Jersey 08607

Affiliate

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation

☐ Labor organization

☐ Membership organization

☐ Trade association

☐ Cooperative

☐ Corporation without capital stock

☐ Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate line above when information is continued on separate page(s).

Statement of Organization For a Committee

(Page 2)

Name of Committee

N.J.E.A. PAC - MEMBERS FOR MINISH

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? ☐ Yes ☒ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ Yes ☐ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
JOSEPH G. MINISH	9 Gray Street Montclair, N.J. 07042	U.S. House of Representatives	Democratic

(b) List by name, address, office sought, and party affiliation, any candidate for any other public office that this committee is supporting, unless the committee is supporting the entire ticket of a party as indicated in line 9.

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party.

10 Identify by name, address and position, the person in possession of committee books and records.

Full name	Mailing address and ZIP code	Title or position
MARY W. SPRUELL	9 Gray Street Montclair, N.J. 07042	Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

Statement of Organization For a Committee

(Page 3)

FEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Name of Committee

N.J.E.A. PAC - MEMBERS FOR MINISH

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
VIRGINIA M. KLUMB	103 Hillside Avenue W. Caldwell, N.J. 07006	Chairman

12 Does this committee plan to stay in existence beyond the current calendar year? ☐ Yes ☒ No
If "Yes" for how long?

13 In the event of dissolution, what disposition will be made of residual funds? Return funds to NJEA PAC

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
MONTCLAIR SAVINGS BANK	VALLEY ROAD, UPPER MONTCLAIR, N. J. 07043

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)).

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

Mary K. Spaul
(Signature of Treasurer)

November 17, 1976
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further
information,
contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

000105085

NOV 16 1978

FEC FORM 3
REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

REGULAR MAIL

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
NOV 20 AM 3:05

Note: Committees authorized by a candidate to receive contributions and make expenditures in support of the candidate must maintain separate records with respect to each election.

1. N.J.E.A. PAC - Members for Minish

Name of Candidate or Committee (in full)

9 Gray Street

Address (number and street)

Montclair, N. J. 07043

City, State and ZIP Code

☐ Check if address is different than previously reported

Year of Election 1979

2. C 34573

Candidate Committee

3. U.S. House of Representatives

Office Sought State District (if applicable)

4. Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

☐ Tenth day report preceding election
(primary, general or conventional)

☐ Termination Report

☐ July 10 Quarterly Report

on (date) in the State of

☐ Amendment for

☐ October 10 Quarterly Report

☐ Thirtieth day report following election
(primary, general or conventional)

(which report)

☐ January 31 Annual Report

☐ Monthly Report

on (month) (date) in the State of

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar)

5. Covering Period	Column A This Period	Column B Calendar Year To Date
10/30/78 Through 11/17/78		
6. Cash on hand January 1, 19		\$
7. Cash on hand at beginning of reporting period	\$ 1.00	
8. Total receipts (from line 19)	\$ 1,542.90	\$
(a) Subtotal: Add lines 7 and 8 for Column A and lines 6 and 8 for Column B	\$ 1,542.90	\$
9. Total expenditures (from line 25)	\$ 1,542.90	\$
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$.00	\$
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ ---	
12. Debts and obligations owed to the Committee, Candidate (itemize all on Schedule C)	\$.00	
13. Debts and obligations owed by the Committee, Candidate (itemize all on Schedule C)	\$.00	

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

11/17/78
(Date)

X Mary W. Samuel
(Typed Name of Treasurer or Candidate)

Mary W. Samuel
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form)

For further
information,
Contact.

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO
B 187620 (105-06)
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FLC FORM 3)

NAME OF CANDIDATE OR COMMITTEE N.J.E.A. PAC - MEMBERS FOR MINISH		REPORT COVERING THE PERIOD FROM: 10/30/78 TO: 11/17/78	
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (S)			
(d) Subtotal of contributions from individuals		\$	\$
15. Transfers from Political Committees			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) N.J.E.A. PAC		\$ 1,542.90	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
18. Refunds, Rebates, Returns of Deposits			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts		\$ 1,542.90	\$
EXPENDITURES			
20. Operating Expenditures			
(a) Itemized (use Schedule D)		\$ 1,542.90	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule D)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$	
(b) To other committees (itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$	
(d) Subtotal of transfers out		\$	\$
23. Independent Expenditures (use Schedule E)		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)		\$	\$
25. Total Expenditures		\$ 1,542.90	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 1,542.90	
27. Transfers In (from line 15(a))		\$	
28. Net Receipts (Subtract line 27 from line 26)		\$ 1,542.90	
29. Total Expenditures (from line 25)		\$ 1,542.90	
30. Transfers Out (from line 22(a))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 1,542.90	

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 16a, 17a, and or 18a
of FLC FORM 3

Page 1 of 1 for

Line Number 19

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

N.J.E.A. PAC - MEMBERS FOR MINISH

Full Name, Mailing Address and ZIP Code

N.J.E.A. PAC

Principal Place of Business

180 W. State Street
P.O. Box 1211

Elizabeth, N.J. 08607

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

10/13/78

Amount of each Receipt
this Period

\$ 990.00

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

N.J.E.A. PAC

Principal Place of Business

180 W. State Street
P.O. Box 1211

Elizabeth, N.J. 08607

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

11/15/78

Amount of each Receipt
this Period

\$ 552.00

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

\$ 2,542.00

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 25

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

N.J.E.A. PAC - MEMBERS FOR MINISH

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rutan's Printers 211 Glenridge Avenue Montclair, N. J. 07042	Printing Expenditure for ☐ Primary ☐ General ☐ Other	10/20/78	\$ 170.53
Postmaster, West Orange, N. J. 07052	Postage Expenditure for ☐ Primary ☒ General ☐ Other	10/23/78	\$ 750.00
Virginia Klumb, Chairman 103 Hillside Avenue W. Caldwell, N.J. 07006	Refreshments for Committee Expenditure for ☐ Primary ☒ General ☐ Other	10/23/78	\$ 17.00
Mary W. Daniel 9 Gray Street Montclair, N. J. 07042	Miscellaneous expenses S.F. Publications, Inc. Expenditure for ☐ Primary ☒ General ☐ Other	10/30/78	\$ 52.37
Rutan's Printers 211 Glenridge Avenue Montclair, N. J. 07042	Printing Expenditure for ☐ Primary ☒ General ☐ Other	10/30/78	\$ 102.00
Postmaster, West Orange, N. J. 07052	Postage Expenditure for ☐ Primary ☒ General ☐ Other	10/30/78	\$ 450.00
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this page (first page this line number only)			\$ 1,542.90



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

26 APR 1979

Ms. Mary W. Spruel, Treasurer
NJFA PAC Members for Minish
9 Gray Street
Montclair, New Jersey 07042

Dear Ms. Spruel:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting form, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Wade McArthur in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

1325 K Street, N.W.
Washington, D.C. 20463TO: NJEA PAC MEMBERS FOR MINISHDATE: 26 APR 1979I.D. NO.: C00106088

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10-30-78 THROUGH 11-17-78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

 Coverage Dates: omitted or incorrect

XXX Summary Page Line(s): ALL Column(s): B Totals: XXX omitted or incorrect

XXX Detailed Summary (Page 2) Line(s): ALL Column(s): B Totals: xxx omitted or incorrect

 Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

 Date(s): omitted or inadequate for Schedule(s) Line(s)

 Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)

 Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)

 Election Designation: omitted or inadequate for Schedule(s) Line(s)

XXX Aggregate Year-to-Date Totals: XXX omitted or inadequate for Schedule(s) A Line(s) 15

 Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

 Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

 Inadequate Description of: proceeds dates events location of Schedule

 Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

XXX Other: Please be advised that in-kind contributions to other committees should be
itemized on a separate Schedule B for Line 22c of the Detailed Summary Page.
Please amend your report accordingly.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

MEMORANDUM: FOR FILES

ANALYST: Wade McArthur

RE: TELECON

FROM: Ms. Dee Corena (609) 599-4561 ext. 250

DATE: 5-3-79

NAME OF COMMITTEE: NJEA PAC MEMBERS FOR MINISH C00106098

Ms. Corena (from NJEA PAC) called this date regarding an REAT received by the above named committee. She stated that the treasurer of NJEA Pac Members for Minish called her seeking advise. She stated that the individuals working with the NJEA Minish PAC were inexperienced.

Analyst went over the REAT of 4-26-79 with her in great detail. The only real question appeared to be over the definition of "in-kind" contributions. Analyst explained that ~~expenditures~~ made for the purpose of influencing a federal election ~~in cooperation~~ with the candidate or his/her committee ~~were~~ considered in-kind contributions. Ms. Corena stated that she would amend the report accordingly.

Analyst then inquired as to the receipt and expenditure of funds prior to registration as a political committee. She stated that at the time of the initial contribution of \$990 from the parent PAC on 10-13-78 the committee did not anticipate ~~receiving~~ or expending in excess of \$1000.

Analyst then pointed out that the itemized expenditures clearly show in excess of \$1000 prior to registration. Analyst further inquired as to how the committee was able to expend funds prior to the receipt of funds to cover the expenditures. She stated again that the committee was not intended to spend more than the \$990 received initially from NJEA PAC, however they realized that they required additional funds. They received these funds from the local committee (UNION) with the assurance that it was to be a loan to be repaid with NJEA PAC funds. Analyst explained that regardless of the intention of the Minish committee that they had accepted prohibited contributions from a union and had failed to disclose ---receipt or repayment of these funds.

Analyst advised that the report should be amended to clearly disclose all activity and to provide a statement outlining exactly what happened and why. Ms. Corena stated that the amendment would be sent in shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION
MAY 16 AM 8:40

NJEA PAC - Members for Minish
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

May 9, 1979

Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1375 K Street Northwest
Washington, D.C. 20463

Dear Mr. McArthur:

Enclosed is an amended copy of the Termination Report of Receipts and Expenditures filed by the NJEA PAC Members for Minish Campaign Committee for the 1978 general election.

Dolores Corona, Associate Director of Government Relations, New Jersey Education Association, discussed the amendments with you via telephone on Thursday, May 3, 1979. The enclosed completed form reflects all those amendments.

A question arose in your discussion with Ms. Corona regarding a disparity of dates between the payment of expenditures detailed on the page entitled, "Itemized Expenditures" and receipts listed on the page entitled, "Itemized Receipts." The explanation for that difference is as follows.

The NJEA PAC Members for Minish Committee was an ad hoc committee established solely for the November 1978 general election. The NJEA Political Action Committee transferred \$990 on November 13, 1978 to the NJEA PAC Members for Minish Committee for campaign activities and operating expenses. Our campaign committee incurred expenses beyond \$990. We applied to NJEA PAC for additional funds to cover the remaining expenses. While these funds were forthcoming, our county affiliate, the Essex County Education Association, provided our committee with interim funds. We reimbursed the county association upon receipt of the transfer of \$552 from NJEA PAC to our committee.

It appears that the action we took in using funds from the Essex County Education Association may be in violation of the federal election laws. We were unaware that this could be so and thought at all times that we were acting in compliance with the law. We regret that any violation of the federal election laws might have occurred. Indeed, there was never any intention not to respect the law.

I hope that the above comments will serve to explain the disparity in the dates of the receipts and expenditures. If any additional information is necessary, please contact me at the above address.

Sincerely yours,

Mary W. Spruel

Mary W. Spruel, Treasurer
NJEA PAC - Members for Minish

enclosures: several
MWS:js

NJEAC- PAC Members for Minish

C00106083

(Full Name Of Committee)

(Identification Number)

Wade McArthur

(Name of Analyst)

Ms. Dee Corena

(Committee Contact)

DATE/TIME: May 16, 1979

IN REFERENCE TO: REAI of 4-26-78 and telecon of 5-3-78

PHONE NUMBER: (609) 599-4561

REMARKS:

Analyst called Ms. Corena to explain that the committee's response to the REAI of 4-26-78 was not an adequate response in light of my conversation with her on 5-3-78.

Analyst advised that the report should be amended to show "all activity" including the loan from and loan repayment to the local education association. Analyst advised that it should be itemized on Schedule A for Line 17a, and on Schedule B for Line 21a of the Detailed Summary Page and on Schedule C. Analyst further explained that Schedule C should disclose all the terms of the loan, and clarify why the loan was not returned within 10 days (if it was not). Analyst stressed the importance of disclosing all financial activity including the dates, amounts and any other pertinent information.

She stated that a corrected amendment would be forthcoming shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION

NJEA PAC - Members for Minish R. 10
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

May 21, 1979

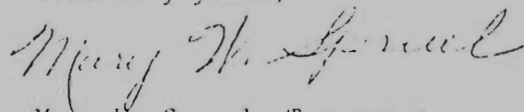
Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street Northwest
Washington, DC 20463

Dear Mr. McArthur:

Enclosed is a second amended form of the Termination Report of Receipts and Expenditures filed for the NJEA PAC - Members for Minish Committee for the 1978 general election. Dolores Corena, Associate Director of Government Relations of the New Jersey Education Association, discussed the amendments with you via telephone on Thursday, May 17. The enclosed completed form reflects all those amendments. I do hope that everything is now in compliance. If there is any further question, please contact me at the above address.

Thank you for your help in this situation.

Sincerely yours,



Mary W. Spruel, Treasurer
NJEA PAC - Members for Minish

MWS:jjb

enclosures: 5

SCHEDULE A

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3Page 1 of 1 forLine Number 19(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code

NJEA PAC

Receipt for

☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Essex County Education Association

Receipt for

☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

NJEA PAC

Receipt for

☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Receipt for

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

180 W. State St.

PO Box 1211, Trenton, NJ 08607

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 990.00

Principal Place of Business

780 Northfield Ave.

West Orange, NJ 07052

Occupation

Teacher Association

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 1,542.90

Principal Place of Business

180 W. State St.

PO Box 1211, Trenton NJ 08607

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 2,095.80

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Date (month,
day, year)

10-13-78

Amount of each Receipt
this Period

\$990.00

Date (month,
day, year)

10-23-78

Amount of each Receipt
this Period

\$552.90

Date (month,
day, year)

11-13-78

Amount of each Receipt
this Period

\$552.90

Date (month,
day, year)Amount of each Receipt
this PeriodDate (month,
day, year)Amount of each Receipt
this PeriodDate (month,
day, year)Amount of each Receipt
this PeriodDate (month,
day, year)Amount of each Receipt
this Period

SUBTOTAL (if receipt, this page optional)

\$

TOTAL (this period last page this line number only)

\$ 2,095.80

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 25

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full NJEAC PAC - Members for Minish			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Printing Expenditure for ☐ Primary ☒ General ☐ Other	10-20-78	\$170.63
Postmaster West Orange, NJ 07052	Postage Expenditure for ☐ Primary ☒ General ☐ Other	10-23-78	\$750.00
Virginia Klumb, Chairperson 103 Hillside Ave. W. Caldwell, NJ 07006	Refreshments for Committee Expenditure for ☐ Primary ☒ General ☐ Other	10-23-78	\$17.00
Mary W. Spruel 9 Gray St. Montclair, NJ 07042	Miscellaneous expenses, e.g. telephone, transportation Expenditure for ☐ Primary ☒ General ☐ Other	10-30-78	\$51.37
Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Printing Expenditure for ☐ Primary ☒ General ☐ Other	10-30-78	\$102.90
Postmaster, West Orange, NJ 07052	Postage Expenditure for ☐ Primary ☒ General ☐ Other	10-30-78	\$450.00
Essex County Education Association 780 Northfield Ave. West Orange, NJ 07052	Repayment of loan Expenditure for ☐ Primary ☒ General ☐ Other	11-15-78	\$552.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 2,095.30

SCHEDULE C

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3Page 1 of 1 forLine Number 12 & 13(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Essex County Education Association
780 Northfield Ave.
West Orange, NJ 07052Date (month,
day, year)

10-23-78

Amount of Original
Debt, Contract,
Agreement or
Promise

\$ 552.90

Cumulative
Payment
To Date

\$ 552.90

Outstanding
Balance at
Close of
This Period

\$ 0

☐ Primary☒ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

No interest charged on loan. No cosigners were required by Essex County Education Association. The number of days between the date of the loan (10-23-78) and the date of the repayment of the loan (11-15-78) exceeded 10 days. This was due to the delay in receiving the reimbursement from NJEA PAC.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
Promise

\$

Cumulative
Payment
To Date

\$

Outstanding
Balance at
Close of
This Period

\$

☐ Primary☐ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
Promise

\$

Cumulative
Payment
To Date

\$

Outstanding
Balance at
Close of
This Period

\$

☐ Primary☐ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

SUBTOTAL (this period this page optional)

\$ 552.90

\$ 552.90

\$ 0

TOTAL this period (last page this line number only)

\$ 552.90

\$ 552.90

\$ 0

Carry over ending balance only to appropriate line of summary

NJEA PAC MEMBERS FOR MINISH

C00106083

(Full Name Of Committee)

(Identification Number)

Wade McArthur

(Name of Analyst)

Dee Corena

(Committee Contact)

DATE/TIME: 6-18-79

IN REFERENCE TO: RFAI of 4-26-79

PHONE NUMBER: (609) 599-4561

REMARKS:

Analyst called Ms. Corena to request further clarification.

specifically, analyst requested clarification on the aggregate year-to-date totals on Schedule A, and the in-kind contributions on Schedule B.

Ms. Corena stated that a response would be sent in shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION

178 JUL 5 AM 11:59
NJEAC-Members for Minish
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

June 28, 1979

Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street Northwest
Washington, DC 20463

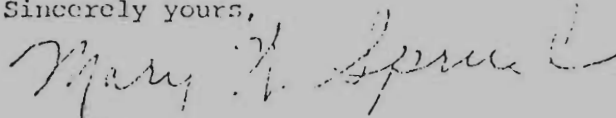
Dear Mr. McArthur:

The following amendments should be made on the Report of Receipts and Expenditures for the NJEA PAC Members for Minish Committee:

- On the Itemized Receipts page the aggregate sum made to the Committee from the Essex County Education Association should be \$552.90 -- not \$1,542.90. This, therefore, changes the aggregate from NJEA PAC to the Committee. It should read \$1,542.90 -- not \$2,095.80.
- On the Detailed Summary of Receipts and Expenditures page, lines 20a and 20c should be switched with 22c and 22d. In other words, 20a and 20c should read \$69.37 and lines 22c and 22d should read \$1,473.53.
- On the Itemized Expenditures page those expenditures made to Rutan's Printers and West Orange Postmaster were made in behalf of the candidate Joseph Minish.

Hoping that all is now in order, I remain,

Sincerely yours,



Mary W. Spruel, Treasurer
NJEAC - Members for Minish

MWS:gab



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Mary W. Spruel, Treasurer
NJEA PAC Members for Minish
Committee
9 Gray Street
Montclair, New Jersey 07042

Re: MUR 1041 (79)

Dear Ms. Spruel:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your Committee may have violated sections 433(a), 441b(a) and 434(b) of the Federal Election Campaign Act of 1971, as amended ("the Act").

Section 433(a) of the Act requires a Committee to register with the Commission within ten days after its organization or, if later, ten days after the date on which it has information which causes it to anticipate it will receive contributions or make expenditures in excess of \$1,000. It appears that your Committee's registration did not occur within this period.

Section 441b(a) of the Act prohibits the acceptance by Committees such as yours of contributions from unions. The loan to your Committee from the Essex County Education Association appears to be such a contribution.

Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

Section 434(b) of the Act requires the timely reporting of debts. Your Committee's apparent failure to timely report the Association's loan was a violation of this section.

We have numbered this matter MUR 1041 (79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Additionally, please provide copies of the front and back of the check(s) by which you repaid the Essex County Education Association for its loan and provide copies of any loan agreements in connection with the loan. Where appropriate, statements should be submitted under oath. In this connection, we have already considered your Committee's reports and your letters of May 9 and 21, and June 28, 1979, to the Commission.

The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Scall, the attorney assigned to this matter, at 202-523-4166.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

BY: Charles N. Steele
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Essex County Education Association
780 Northfield Avenue
West Orange, New Jersey 07052

Re: MUR 1041(79)

Dear Sir or Madam:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for unions to make contributions in connection with federal elections. Specifically it appears that on or about October 23, 1978, your association loaned funds to the NJEA PAC-Members for Minish Committee. Under the Act, a loan is a contribution. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1041(79). Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your association. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. [Additionally, please submit copies of the front and back of the check(s) by which the loan was made to the NJEA PAC-Members for Minish Committee and provide copies of any loan agreements in connection with this loan]. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Lester Scall, the attorney assigned to this matter, 26 202-523-4166.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

BY: Charles N. Steele
Associate General Counsel

D
RAD

488
XXX 96-159

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

MUR 1041

DATE OCTOBER 4, 1979

ANALYST Jade McArthur wzu

TO: William C. Oldaker

TEAM CHIEF Steve Mims

THROUGH: STAFF DIRECTOR ABP.

COMPLIANCE REVIEW Carroll Bowen PS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: NJEA PAC MEMBERS FOR MINISH

TREASURER: Mary W. Spruel

ADDRESS: 9 Gray Street
Montclair, New Jersey 07042

AFFILIATE(S): NJEA PAC

ALLEGATION(S):

CITE:

ATTACHMENT(S)

The committee failed to register within
10 days of expending in excess of \$1,000
to influence federal elections.

2 U.S.C. 433(a)

II, III, X

The committee accepted a prohibited
loan from a labor organization.

2 U.S.C. 441b(a)

V, VI, VIII

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

Normal review - RFAI sent 4-26-79

ATTACHMENT

IV

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-30-78 TO 11-17-78

TOTAL RECEIPTS \$ 2,095.80 TOTAL EXPENDITURES \$ 2,095.80

CASH ON HAND \$ 0.00 DEBTS \$ 0.00

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

RAI (Termination) sent 4-26-79

IV

Inadequate response received 5-16-79

VI

Response with adequate disclosure received 5-24-79

VIII

Response with further clarification received 7-5-79

X

COMMUNICATIONS WITH CANDIDATE COMMITTEE:

ATTACHMENT

Telecon 5- 3-79

V

Telecon 5-16-79

VII

Telecon 6-18-79

IX

REASON(S) FOR REFERRAL:

ATTACHMENT

See above allegations

Receipt of prohibited contribution in excess of \$100 threshold

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

None

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 12 JUL 79
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
ADSEA PAC MEMBERS FOR MINISH								ID# C00106088
CONNECTICUT ORGANIZATION: EDUCATION ASS'N: NEW JERSEY	1978 STATEMENT OF ORGANIZATION					20NOV78	3	78HSE/155/3070
	TERMINATION REPORT	1,542		1,542		30OCT78 -17NOV78	4	78HSE/155/3080
	REQUEST FOR ADDITIONAL INFORMATION					30OCT78 -17NOV78	2	79FEC/126/1670
	TERMINATION REPORT - AMENDMENT	1,542		1,542		30OCT78 -17NOV78	8	79FEC/127/2771
	TERMINATION REPORT - AMENDMENT					30OCT78 -17NOV78	7	79FEC/128/0675
	TERMINATION REPORT - AMENDMENT					30OCT78 -17NOV78	2	79FEC/130/1414
	TOTAL	1,542	0	1,542	0		26	TOTAL PAGES

TERMINATED

ALL THE ABOVE REPORTS HAVE BEEN REVIEWED

REGULAR MAIL

NOV 16 1978

Statement of Organization
For a Political Committee

FEC Form 1

July 1976

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463Supporting any candidate(s) for federal office and anticipating contribu-
tions or expenditures in excess of \$1,000 in any calendar year in support
of such candidate(s).

(See Reverse Side For Instructions.)

1378 NOV 20 1978

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with the campaign must maintain and keep records with respect to each election.

200106088

1 (a) Name of Committee (in full) ☐ Check if name or address is changed

N.J.E.A. PAC - MEMBERS FOR MINISH

2 File

084573

(b) Address (number and street)

9 Cray Street

3 Date

November 17, 1978

(c) City, State and ZIP code

Montclair, New Jersey 07042

4 Is this an amended statement? ☐ Yes ☒ No
If YES, fill in only those lines on
which there has been a change

5 Check one

☐ (a) This committee has been designated as the principal campaign committee for JOSEPH G. MINISH

(Name of Candidate)

a candidate for U.S. HOUSE OF REPRESENTATIVES

(Federal office sought)

1978

(Year of election)

to be held in the State of NEW JERSEY

(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate, and is authorized by _____

(Name of Candidate)

to receive contributions and make expenditures with respect to the _____

(General, Primary, Runoff, etc.)

held in _____

(Year of election in State)

and will file all reports and statements with the candidate's principal campaign

committee.

(Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

☒ (c) This committee supports only one candidate JOSEPH G. MINISH but is not an authorized committee.

(Name of Candidate)

☐ (d) This committee supports more than one Federal candidate and is not a party committee.☐ (e) This committee is a _____ committee of the _____ Party.

(National, State, county, city)

(Democratic, Republican, etc.)

6 Names of affiliated and or connected
organizations

Mailing address and ZIP code

Relationship

N.J.E.A. POLITICAL
ACTION COMMITTEE180 W. State Street
P. O. Box 1211
Trenton, New Jersey 08607

Affiliate

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate sheets.

780115737700

Statement of Organization For a Committee

(Page 2)

Name of Committee

N.J.E.A. PAC - MEMBERS FOR MINISH

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? ☐ Yes ☒ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ Yes ☐ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
JOSEPH G. MINISH	9 Gray Street Montclair, N.J. 07042	U.S. House of Representatives	Democratic

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting, unless the committee is supporting the entire ticket of a party as indicated in line 9:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party: ☐

10 Identify by name, address and position, the person in possession of committee books and records

Full name	Mailing address and ZIP code	Title or position
MARY W. SPRUEL	9 Gray Street Montclair, N.J. 07042	Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization For a Committee

(Page 3)

FEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Name of Committee

N.J.E.A. PAC - MEMBERS FOR MINISH

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee)

Full name	Mailing address and ZIP code	Title or position
VIRGINIA M. KLUMB	103 Hillside Avenue W. Caldwell, N.J. 07006	Chairman

12 Does this committee plan to stay in existence beyond the current calendar year? ☐ Yes ☒ No
If "Yes" for how long?

13 In the event of dissolution, what disposition will be made of residual funds? RETURN FUNDS TO NJEA PAC

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds

Name of bank, repository, etc.	Mailing address and ZIP code
MONTCLAIR SAVINGS BANK	VALLEY ROAD, UPPER MONTCLAIR, N. J. 07043

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)).

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

Mary K. Spradell
(Signature of Treasurer)

November 17, 1977
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further
information
contact:

Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

FEC FORM 3
REVISED

January, 1978

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REGULAR MAIL

NOV 16 1978

REPORT OF RECEIPTS AND EXPENDITURES

FOR A CANDIDATE OR COMMITTEE

SUPPORTING CANDIDATE(S) FOR

NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
NOV 20 AM 3:05

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with the campaign must maintain separate records with respect to each election.

1. N.J.E.A. PAC - Members for Binish

Name of Candidate or Committee (in full)

9 Gray Street

Address (number and street)

Montclair, N. J. 07042

City, State and ZIP Code

2. ID No. C34573

Candidate Committee

3. U.S. House of Representatives

(Office Sought, State, District or Municipality)

Year of Election 1978

4. Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

☐ July 10 Quarterly Report

☐ October 10 Quarterly Report

☐ January 31 Annual Report

☐ Monthly Report

☐ Tenth day report preceding _____ election
(primary, general or conventional)

on _____ in the State of _____
(date)

☐ Thirtieth day report following _____ election
(primary, general or conventional)

on _____ in the State of _____
(date)

☒ Termination Report

☐ Amendment for _____

(which report)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year To Date
11/30/78 Through 11/17/78		
6. Cash on hand January 1, 1978		\$
7. Cash on hand at beginning of reporting period	\$ 1.00	\$
8. Total receipts (from line 19)	\$ 1,542.90	\$
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 1,543.90	\$
9. Total expenditures (from line 25)	\$ 1,542.90	\$
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 1.00	\$
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$	\$
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1.00	\$
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 1.00	\$

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

11/17/78

(Date)

X Mary W. Spruel

(Typed Name of Treasurer or Candidate)

Mary W. Spruel
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further
information,
Contact

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO
B-187620 (10-7-06)
Expires 3/31/81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FLC FORM 3)

NAME OF CANDIDATE OR COMMITTEE		REPORT COVERING THE PERIOD	
N.J.E.A. PAC - MEMBERS FOR MINISH		FROM: 10/30/78	TO: 11/17/78
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (S			
(d) Subtotal of contributions from individuals		\$	\$
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) N.J.E.A. PAC		\$ 1,542.90	
(b) Funds from other committees (itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts		\$ 1,542.90	\$
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)		\$ 1,542.90	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$	\$
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)		\$	
(b) To other committees (itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)		\$	
(d) Subtotal of transfers out		\$	\$
23. Independent Expenditures (use Schedule E)		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)		\$	\$
25. Total Expenditures		\$ 1,542.90	\$
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 1,542.90	
27. Transfers In (from line 15(a))		\$	
28. Net Receipts (Subtract line 27 from line 26)		\$ 1,542.90	
29. Total Expenditures (from line 25)		\$ 1,542.90	
30. Transfers Out (from line 22(a))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$	

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and or 18a
of FLC FORM 3

Page 1 of 1 for

Line Number 79

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

N.J.E.A. PAC - MEMBERS FOR MINISH

Full Name, Mailing Address and ZIP Code

N.J.E.A. PAC

Principal Place of Business

180 W. State Street
P.O. Box 1211
Trenton, N.J. 08607

Date (month,
day, year)

10/13/78

Amount of each Receipt
this Period

\$ 990.00

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

N.J.E.A. PAC

Principal Place of Business

180 W. State Street
P.O. Box 1211
Trenton, N.J. 08607

Date (month,
day, year)

11/15/78

Amount of each Receipt
this Period

\$ 552.90

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,
day, year)

Amount of each Receipt
this Period

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

\$ 3,542.90

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 25

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

N.J.E.A. PAC - MEMBERS FOR MINISH

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rutan's Printers 211 Glenridge Avenue Montclair, N. J. 07042	Printing Expenditure for: ☐ Primary ☐ General ☐ Other	10/20/78	\$ 170.63
Postmaster, West Orange, N. J. 07052	Postage Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	\$ 750.00
Virginia Klumb, Chairman 193 Hillside Avenue W. Caldwell, N.J. 07005	Refreshments for Committee Expenditure for: ☐ Primary ☒ General ☐ Other	10/23/78	\$ 17.00
Mary W. Lipud 9 Gray Street Montclair, N. J. 07042	Miscellaneous expenses e.g. tel. phone, travel Expenditure for: ☐ Primary ☐ General ☐ Other	10/30/78	\$ 52.37
Rutan's Printers 211 Glenridge Avenue Montclair, N. J. 07042	Printing Expenditure for: ☐ Primary ☐ General ☐ Other	10/30/78	\$ 102.96
Postmaster, West Orange, N. J. 07052	Postage Expenditure for: ☐ Primary ☒ General ☐ Other	10/30/78	\$ 450.00
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 1,542.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

26 APR 1979

Ms. Mary W. Spruel, Treasurer
NJEA PAC Members for Minish
9 Gray Street
Montclair, New Jersey 07042

Dear Ms. Spruel:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Wade McArthur in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

TO: NJEA PAC MEMBERS FOR MINISII

DATE: 26 APR 1979

I.D. NO.: C00106088

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10-30-78 THROUGH 11-17-78,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

 Coverage Dates: omitted or incorrect

XXX Summary Page Line(s): ALL Column(s): B Totals: XXX omitted or incorrect

XXX Detailed Summary (Page 2) Line(s): ALL Column(s): B Totals: xxx omitted or incorrect

 Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

 Date(s): omitted or inadequate for Schedule(s) Line(s)

 Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)

 Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)

 Election Designation: omitted or inadequate for Schedule(s) Line(s)

XXX Aggregate Year-to-Date Totals: XXX omitted or inadequate for Schedule(s) 2 Line(s) 15a

 Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

 Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

 Inadequate Description of: proceeds dates events location of Schedule

 Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

XXX Other: Please be advised that in-kind contributions to other committees should be
itemized on a separate Schedule B for Line 22c of the Detailed Summary Page.

Please amend your report accordingly.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

MEMORANDUM: FOR FILES

ANALYST: Wade McArthur

RE: TELECON

FROM: Ms. Dee Corena (609) 599-4561 ext. 250

DATE: 5-3-79

NAME OF COMMITTEE: NJEA PAC MEMBERS FOR MINISH CO0106028

Ms. Corena (from NJEA PAC) called this date regarding an RFAI received by the above named committee. She stated that the treasurer of NJEA Pac Members for Minish called her seeking advise. She stated that the individuals working with the NJEA Minish PAC were inexperienced.

Analyst went over the RFAI of 4-26-79 with her in great detail. The only real question appeared to be over the definition of "in-kind" contributions. Analyst explained that ~~expenditures~~ made for the purpose of influencing a federal election ~~in cooperation~~ with the candidate or his/her committee were considered in-kind contributions. Ms. Corena stated that she would amend the report accordingly.

Analyst then inquired as to the receipt and expenditure of funds prior to registration as a political committee. She stated that at the time of the initial contribution of \$990 from the parent PAC on 10-13-76 the committee did not anticipate ~~receiving~~ or expending in excess of \$1000.

Analyst then pointed out that the itemized expenditures clearly show in excess of \$1000 prior to registration. Analyst further inquired as to how the committee was able to expend funds prior to the receipt of funds to cover the expenditures. She stated again that the committee was not intended to spend more than the \$990 received initially from NJEA PAC, however they realized that they required additional funds. They received these funds from the local committee (UNION) with the assurance that it was to be a loan to be repaid with NJEA PAC funds. Analyst explained that regardless of the intention of the Minish committee that they had accepted prohibited contributions from a union and had failed to disclose -- receipt or repayment of these funds.

Analyst advised that the report should be amended to clearly disclose all activity and to provide a statement outlining exactly what happened and why. Ms. Corena stated that the amendment would be sent in shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION
MAY 13 AM 8:40

NJEA PAC - Members for Minish
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

May 9, 1979

Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street Northwest
Washington, D.C. 20463

Dear Mr. McArthur:

Enclosed is an amended copy of the Termination Report of Receipts and Expenditures filed by the NJEA PAC Members for Minish Campaign Committee for the 1978 general election.

Dolores Corona, Associate Director of Government Relations, New Jersey Education Association, discussed the amendments with you via telephone on Thursday, May 3, 1979. The enclosed completed form reflects all those amendments.

A question arose in your discussion with Ms. Corona regarding a disparity of dates between the payment of expenditures detailed on the page entitled, "Itemized Expenditures" and receipts listed on the page entitled, "Itemized Receipts." The explanation for that difference is as follows.

The NJEA PAC Members for Minish Committee was an ad hoc committee established solely for the November 1978 general election. The NJEA Political Action Committee transferred \$990 on November 13, 1978 to the NJEA PAC Members for Minish Committee for campaign activities and operating expenses. Our campaign committee incurred expenses beyond \$990. We applied to NJEA PAC for additional funds to cover the remaining expenses. While these funds were forthcoming, our county affiliate, the Essex County Education Association, provided our committee with interim funds. We reimbursed the county association upon receipt of the transfer of \$552 from NJEA PAC to our committee.

It appears that the action we took in using funds from the Essex County Education Association may be in violation of the federal election laws. We were unaware that this could be so and thought at all times that we were acting in compliance with the law. We regret that any violation of the federal election laws might have occurred. Indeed, there was never any intention not to respect the law.

I hope that the above comments will serve to explain the disparity in the dates of the receipts and expenditures. If any additional information is necessary, please contact me at the above address.

Sincerely yours,

Mary W. Spruel

Mary W. Spruel, Treasurer
NJEA PAC - Members for Minish

enclosures: several
MWS:qab

79 JUN 1 2 28 7 19 1979



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON DC 20463

GOVERNMENT RECORDS
MAY - 3 1979

26 APR 1979

Ms. Mary W. Spruel, Treasurer
NJEA PAC Members for Minish
9 Gray Street
Montclair, New Jersey 07042

Dear Ms. Spruel:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Wade McArthur in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

777311272773

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463TO: NJEA PAC MEMBERS FOR MTNISHDATE: 5-9-79I.D. NO.: C00106088

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 10-30-78 THROUGH 11-17-78,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

 Coverage Dates: omitted or incorrect

XXX Summary Page Line(s): ALL Column(s): B Totals: XXX omitted or incorrect

XXX Detailed Summary (Page 2) Line(s): ALL Column(s): B Totals: XXX omitted or incorrect

 Schedule Totals: disagree with Detailed Summary (Page 2) or omitted

 Date(s): omitted or inadequate for Schedule(s) Line(s)

 Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)

 Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)

 Election Designation: omitted or inadequate for Schedule(s) Line(s)

XXX Aggregate Year-to-Date Totals: XXX omitted or inadequate for Schedule(s) A Line(s) 150

 Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)

 Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)

 Inadequate Description of: proceeds dates events location of Schedule

 Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

XXX Other: Please be advised that in-kind contributions to other committees should be
itemized on a separate Schedule B for Line 22c of the Detailed Summary Page.
Please amend your report accordingly.

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

FEC FORM 3
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
FEDERAL ELECTION
COMMISSION
Amended
79 MAY 16 AM 8:40

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 NJEA PAC Members for Minish
Name of Candidate or Committee (in full)
9 Gray Street
Address (number and street)
Montclair, NJ 07042
City, State and ZIP Code
2 I.D. No. _____
Candidate/Committee
3 U.S. House of Representatives
Office Sought, State/District (if applicable)
Year of Election 1978

4 Type of Report (check appropriate boxes)

- ☐ April 10 Quarterly Report
☐ July 10 Quarterly Report
☐ October 10 Quarterly Report
☐ January 31 Annual Report
☐ Monthly Report (month) _____ on _____ (date) _____ in the State of _____
☐ Tenth day report preceding _____ election (primary, general or convention)
☐ Thirtieth day report following _____ election (primary, general or convention)
☒ Termination Report
☐ Amendment for _____ (which report)
This is a report for ☐ Primary Election ☒ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Covering Period	Through	Column A This Period	Column B Calendar Year-To Date
10-30-78	11-17-78		
6 Cash on hand January 1, 19			\$
7 Cash on hand at beginning of reporting period		\$.00	
8 Total receipts (from line 19)		\$ 1,542.90	\$ 1,542.90
8a Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)		\$ 1,542.90	\$ 1,542.90
9 Total expenditures (from line 25)		\$ 1,542.90	\$ 1,542.90
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)		\$.00	\$.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)		\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)		\$.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)		\$.00	

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

5-9-79
(Date)

Mary W. Spruel
(Typed Name of Treasurer or Candidate)

Mary W. Spruel
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form)

For further
information,
Contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO
B 187620 (R0-00)
Expires 3/31/81

All previous versions of FEC FORM 3 are obsolete and should no longer be used

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE NJEA PAC - Members for Minish		REPORT COVERING THE PERIOD FROM: 10-30-78 TO: 11-17-78	
RECEIPTS		Column A This Period	Column B Calendar Year-To-Date
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$)		\$	\$
(d) Subtotal of contributions from individuals		\$	\$
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount) NJEA PAC		\$ 1,542.90	
(b) Funds from other committees (Itemize on Schedule A regardless of amount)		\$	
(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount)		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees		\$ 1,542.90	\$ 1,542.90
16. Other Income:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of other income		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns of deposits		\$	\$
19. Total Receipts		\$ 1,542.90	\$ 1,542.90
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule E)		\$ 1,473.53	
(b) Unitemized		\$	
(c) Subtotal of operating expenditures		\$ 1,473.53	\$ 1,473.53
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount)		\$	
(b) To other committees (Itemize on Schedule B regardless of amount)		\$	
(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount)		\$ 69.37	
(d) Subtotal of transfers out		\$ 69.37	\$ 69.37
23. Independent Expenditures (use Schedule E)		\$	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F)		\$	\$
25. Total Expenditures		\$ 1,542.90	\$ 1,542.90
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)		\$ 1,542.90	
27. Transfers In (from line 15(a))		\$ 1,542.90	
28. Net Receipts (Subtract line 27 from line 26)		\$	
29. Total Expenditures (from line 25)		\$ 1,542.90	
30. Transfers Out (from line 22(a))		\$	
31. Net Expenditures (Subtract line 30 from line 29)		\$ 1,542.90	

**SCHEDULE A
REVISED**

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

Line Number 19

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full
NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
NJEA PAC	180 W. State St. PO Box 1211, Trenton, NJ 08607 Occupation Political Action Committee	10-13-78	\$990.00
Receipt for ☐ Primary ☒ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$ 990.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
NJEA PAC	180 W. State St. PO Box 1211, Trenton, NJ 08607 Occupation Political Action Committee	11-15-78	\$552.00
Receipt for ☐ Primary ☒ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$ 1542.90		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 1,542.90

7007031202704

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 25

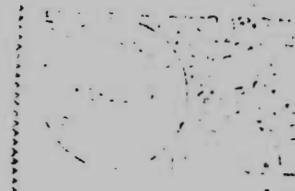
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Printing Expenditure for: ☐ Primary ☒ General ☐ Other	10-20-78	\$170.63
Postmaster, West Orange, NJ 07052	Postage Expenditure for: ☐ Primary ☒ General ☐ Other	10-23-78	\$750.00
Virginia Klumb, Chairperson 103 Hillside Ave. W. Caldwell NJ 07006	Refreshments for Committee Expenditure for: ☐ Primary ☒ General ☐ Other	10-23-78	\$17.00
Mary W. Spruel 9 Gray Street Montclair, NJ 07042	Miscellaneous expenses e.g. telephone, transp. Expenditure for: ☐ Primary ☒ General ☐ Other	10-30-78	\$52.37
Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Printing Expenditure for: ☐ Primary ☒ General ☐ Other	10-30-78	\$102.90
Postmaster, West Orange, NJ 07052	Postage Expenditure for: ☐ Primary ☒ General ☐ Other	10-30-78	\$450.00
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$1,542.90

7 2 0 3 1 2 8 2 6 0 3



1st Class

MR. WADE MCARTHUR
Reports Analysis Division
Federal Election Commission
1335 K. Street N.W.
Washington, DC 20463

19 MAY 1961

19 MAY 16 AM 8:40

NJEAC- PAC Members for Minish

C00106088

(Full Name Of Committee)

(Identification Number)

Wade McArthur

(Name of Analyst)

Ms. Dee Corena

(Committee Contact)

DATE/TIME: May 16, 1979

IN REFERENCE TO: REAI of 4-26-78 and telecon of 5-3-78

PHONE NUMBER: (609) 599-4561

REMARKS:

Analyst called Ms. Corena to explain that the committee's response to the REAI of 4-26-78 was not an adequate response in light of my conversation with her on 5-3-78.

Analyst advised that the report should be amended to show "all activity" including the loan from and loan repayment to the local education association. Analyst advised that it should be itemized on Schedule A for Line 17a, and on Schedule B for Line 21a of the Detailed Summary Page and on Schedule C. Analyst further explained that Schedule C should disclose all the terms of the loan, and clarify why the loan was not returned within 10 days (if it was not). Analyst stressed the importance of disclosing all financial activity including the dates, amounts and any other pertinent information.

She stated that a corrected amendment would be forthcoming shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION

217 MAY 24 1979
NJEA PAC - Members for Minish
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

May 21, 1979

Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street Northwest
Washington, DC 20463

Dear Mr. McArthur:

Enclosed is a second amended form of the Termination Report of Receipts and Expenditures filed for the NJEA PAC - Members for Minish Committee for the 1978 general election. Dolores Corona, Associate Director of Government Relations of the New Jersey Education Association, discussed the amendments with you via telephone on Thursday, May 17. The enclosed completed form reflects all those amendments. I do hope that everything is now in compliance. If there is any further question, please contact me at the above address.

Thank you for your help in this situation.

Sincerely yours,

Mary W. Spruel

Mary W. Spruel, Treasurer
NJEA PAC - Members for Minish

MWS:gab

enclosures: 5

100-12108-1003

FEC FORM 3
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES
FOR A CANDIDATE OR COMMITTEE
SUPPORTING CANDIDATE(S) FOR
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED
FEDERAL ELECTION COMMISSION
Amended

12:14

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1 NLEA PAC Members for Minish

Name of Candidate or Committee (in full)

9 Gray St.

Address (number and street)

Montclair, NJ 07042

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election 1978

2 I.D. No.

Candidate/Committee

3 U.S. House of Representatives

Office Sought, State/District (if applicable)

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

☐ Tenth day report preceding _____ election
(primary, general or convention)

☒ Termination Report

☐ July 10 Quarterly Report

on _____ in the State of _____
(date)

☐ Amendment for _____

☐ October 10 Quarterly Report

☐ Thirtieth day report following _____ election
(primary, general or convention)

(which report)

☐ January 31 Annual Report

☐ Monthly Report

on _____ in the State of _____
(month) (date)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
(Figures may be rounded to nearest dollar.)

5 Coverage Period	Through	Column A This Period	Column B Calendar Year-To Date
10-30-78	11-17-78		
6 Cash on hand January 1, 19			\$
7 Cash on hand at beginning of reporting period		\$.00	
8 Total receipts (from line 19)		\$ 2,095.80	\$ 2,095.80
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)		\$ 2,095.80	\$ 2,095.80
9 Total expenditures (from line 25)		\$ 2,095.80	\$ 2,095.80
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)		\$.00	\$.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)			
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)		\$.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)		\$.00	

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

5-22-79
(Date)

Mary W. Spruel

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441 (see reverse side of form).

For further
information,
contact.

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO
R 18/620 (10/78)
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE
NJEA PAC - Members for Minish

REPORT COVERING THE PERIOD
FROM: 10-30-78 TO: 11-17-78

RECEIPTS

Column A
This Period

Column B
Calendar Year-To Date

14. Contributions from Individuals (including contributions in-kind):

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Sales and collections included above

List by event on memo Schedule D (\$)

(d) Subtotal of contributions from individuals \$

15. Transfers from Political Committees:

(a) Funds from affiliated/authorized committee (Itemize on Schedule A regardless of amount). NJEA PAC \$ 1,542.90

(b) Funds from other committees (Itemize on Schedule A regardless of amount). \$

(c) Contributions in-kind from political committees (Itemize on Schedule A regardless of amount) \$

(d) Subtotal of transfers in and contributions in-kind from political committees \$ 1,542.90

\$ 1,542.90

16. Other Income:

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Subtotal of other income \$

\$

17. Loans and Loan Repayments Received:

(a) Itemized (use Schedule A) \$ 552.90

(b) Unitemized \$

(c) Subtotal of loans and loan repayments received \$ 552.90

\$ 552.90

18. Refunds, Rebates, Returns of Deposits:

(a) Itemized (use Schedule A) \$

(b) Unitemized \$

(c) Subtotal of refunds, rebates, returns of deposits \$

\$

19. Total Receipts:

\$ 2,095.80

\$ 2,095.80

EXPENDITURES

20. Operating Expenditures:

(a) Itemized (use Schedule B) \$ 1,473.53

(b) Unitemized \$

(c) Subtotal of operating expenditures \$ 1,473.53

\$ 1,473.53

21. Loans, Loan Repayments, and Contribution Refunds Made:

(a) Itemized (use Schedule B) \$ 552.90

(b) Unitemized \$

(c) Subtotal of loans and loan repayments made and contribution refunds \$ 552.90

\$ 552.90

22. Transfer Out to Political Committees:

(a) To affiliated/authorized committee (Itemize on Schedule B regardless of amount) \$

(b) To other committees (Itemize on Schedule B regardless of amount) \$

(c) Contributions in-kind to other committees (Itemize on Schedule B regardless of amount) \$ 69.37

(d) Subtotal of transfers out \$ 69.37

\$ 69.37

23. Independent Expenditures (use Schedule E)

24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (Itemize on Schedule F) \$

\$

25. Total Expenditures:

\$ 2,095.80

\$ 2,095.80

**RECEIPTS AND EXPENDITURES,
NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES**

26. Total Receipts (from line 19)

\$ 2,095.80

27. Transfers In (from line 15(a))

\$ 2,095.80

28. Net Receipts (Subtract line 27 from line 26)

\$

29. Total Expenditures (from line 25)

\$ 2,095.80

30. Transfers Out (from line 22(a))

\$

31. Net Expenditures (Subtract line 30 from line 29)

\$ 2,095.80

SCHEDULE A

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3Page 1 of 1 forLine Number 19(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code

NJEA PAC

Principal Place of Business

180 W. State St.

PO Box 1211, Trenton, NJ 08607

Date (month,
day, year)

10-13-78

Amount of each Receipt
this Period

\$990.00

Receipt for

☐ Primary☒ General☐ Other

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 990.00

Full Name, Mailing Address and ZIP Code

Essex County Education Associa-
tion

Principal Place of Business

780 Northfield Ave.

West Orange, NJ 07052

Date (month,
day, year)

10-23-78

Amount of each Receipt
this Period

\$552.90

Receipt for

☐ Primary☒ General☐ Other

Occupation

Teacher Association

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 1,542.90

Full Name, Mailing Address and ZIP Code

NJEA PAC

Principal Place of Business

180 W. State St.
PO Box 1211, Trenton NJ 08607Date (month,
day, year)

11-13-78

Amount of each Receipt
this Period

\$552.90

Receipt for

☐ Primary☒ General☐ Other

Occupation

Political Action Committee

☐ Check if Contributor is self-employed

Aggregate Year To Date \$ 2,095.80

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)Amount of each Receipt
this Period

Receipt for

☐ Primary☐ General☐ Other

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)Amount of each Receipt
this Period

Receipt for

☐ Primary☐ General☐ Other

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)Amount of each Receipt
this Period

Receipt for

☐ Primary☐ General☐ Other

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,
day, year)Amount of each Receipt
this Period

Receipt for

☐ Primary☐ General☐ Other

Occupation

☐ Check if Contributor is self-employed

Aggregate Year To Date \$

SUBTOTAL (of receipts this page (optional))

\$

TOTAL (this period (last page this line number only))

\$ 2,095.80

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 1 of 1 for
Line Number 25

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full NJEA PAC - Members for Minish			
Full Name, Mailing Address and ZIP Code Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Particulars of Expenditure Printing Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-20-78	Amount of each expendi- ture this period \$170.63
Full Name, Mailing Address and ZIP Code Postmaster West Orange, NJ 07052	Particulars of Expenditure Postage Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-23-78	Amount of each expendi- ture this period \$750.00
Full Name, Mailing Address and ZIP Code Virginia Klumb, Chairperson 103 Hillside Ave. W. Caldwell, NJ 07006	Particulars of Expenditure Refreshments for Committee Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-23-78	Amount of each expendi- ture this period \$17.00
Full Name, Mailing Address and ZIP Code Mary W. Spruel 9 Gray St. Montclair, NJ 07042	Particulars of Expenditure Miscellaneous expenses, e.g., telephone, transportation Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-30-78	Amount of each expendi- ture this period \$52.37
Full Name, Mailing Address and ZIP Code Rutan's Printers 211 Glenridge Ave. Montclair, NJ 07042	Particulars of Expenditure Printing Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-30-78	Amount of each expendi- ture this period \$102.90
Full Name, Mailing Address and ZIP Code Postmaster, West Orange, NJ 07052	Particulars of Expenditure Postage Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 10-30-78	Amount of each expendi- ture this period \$450.00
Full Name, Mailing Address and ZIP Code Essex County Education Association 780 Northfield Ave. West Orange, NJ 07052	Particulars of Expenditure Repayment of loan Expenditure for: ☐ Primary ☒ General ☐ Other	Date (month, day, year) 11-15-78	Amount of each expendi- ture this period \$552.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expendi- ture this period
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 2,095.80

SCHEDULE C

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3Page 1 of 1 forLine Number 12 & 13(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

NJEA PAC - Members for Minish

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Essex County Education Association
780 Northfield Ave.
West Orange, NJ 07052Date (month,
day, year)

10-23-78

Amount of Original
Debt, Contract,
Agreement or
Promise

\$ 552.90

Cumulative
Payment
To Date

\$ 552.90

Outstanding
Balance at
Close of
This Period

\$ 0

☐ Primary☒ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

No interest charged on loan. No cosigners were required by Essex County Education Association. The number of days between the date of the loan (10-23-78) and the date of the repayment of the loan (11-15-78) exceeded 10 days. This was due to the delay in receiving the reimbursement from NJEA PAC.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
Promise

\$

Cumulative
Payment
To Date

\$

Outstanding
Balance at
Close of
This Period

\$

☐ Primary☐ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
day, year)Amount of Original
Debt, Contract,
Agreement or
Promise

\$

Cumulative
Payment
To Date

\$

Outstanding
Balance at
Close of
This Period

\$

☐ Primary☐ General☐ Other

NATURE OF OBLIGATION (Details of Debt)

SUBTOTALS this period this page (optional)

\$ 552.90

\$ 552.90

\$ 0

TOTAL this period (last page this line number only)

\$ 552.90

\$ 552.90

\$ 0

Carry outstanding balance only to appropriate line of summary

72072110113861013

0 0 1 0 1 8 1 0 1 4

fuel, Treasurer
Members for Minish

NJ 07042

7 0 3 2 1 2 3 0 5 3 1
MAY 29 12 14



Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street NW
Washington, DC 20463

NJEA PAC MEMBERS FOR MINISH

C00106033

(Full Name Of Committee)

(Identification Number)

Wade McArthur

(Name of Analyst)

Dee Corena

(Committee Contact)

DATE/TIME: 6-18-79

IN REFERENCE TO: RFAI of 4-26-79

PHONE NUMBER: (609) 599-4561

REMARKS:

Analyst called Ms. Corena to request further clarification.

specifically, analyst requested clarification on the aggregate year-to-date totals on Schedule A, and the in-kind contributions on Schedule B.

Ms. Corena stated that a response would be sent in shortly.

RECEIVED
FEDERAL ELECTION
COMMISSION

178 JUL 5 AM 11:59
NJEA PAC - Members for Minish
Mary W. Spruel, Treasurer
9 Gray Street
Montclair, New Jersey 07042

June 28, 1979

Mr. Wade McArthur
Reports Analysis Division
Federal Election Commission
1325 K Street Northwest
Washington, DC 20463

Dear Mr. McArthur:

The following amendments should be made on the Report of Receipts and Expenditures for the NJEA PAC Members for Minish Committee:

- On the Itemized Receipts page the aggregate sum made to the Committee from the Essex County Education Association should be \$552.90 -- not \$1,542.90. This, therefore, changes the aggregate from NJEA PAC to the Committee. It should read \$1,542.90 -- not \$2,095.80.
- On the Detailed Summary of Receipts and Expenditures page, lines 20a and 20c should be switched with 22c and 22d. In other words, 20a and 20c should read \$69.37 and lines 22c and 22d should read \$1,473.53.
- On the Itemized Expenditures page those expenditures made to Rutan's Printers and West Orange Postmaster were made in behalf of the candidate Joseph Minish.

Hoping that all is now in order, I remain,

Sincerely yours,



Mary W. Spruel, Treasurer
NJEA PAC - Members for Minish

MWS:gab



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF OUR # 1041

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Captain C. P. A.