



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2025

Date Filmed 6/2/86 Camera No. --- 2

Cameraman AS

86040590002

FEDERAL ELECTION COMMISSION

Internal communications, routing slips, 12 day
reports, counsel sheets, circulation matters, RAD
referral criteria

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☒ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☐ (8) Banking information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Charles W. Smith

date

May 15, 1986

REC 9-21-77

[Handwritten signature]
5/28/86

86040390003

Gcc# 354

(201) 892-4188

Box 1
Mantoloking, N.J. 08738

16 APR 28 P 1: 27

April 20

Office of the General Counsel
999 E St N.W.

Att Mr. Gross

Re; MUR 2025

Dear Mr. Gross

Herewith is the second \$500
on the conciliation agreement from
the Morris For Senate Campaign
Committee.

Robert Morris
Robert Morris Treasurer

02:01A 28 APR 91

RECEIVED
GENERAL COUNSEL
APR 28 1991

86040590004

36 APR 29 410:16

600-430

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER 463

April 20 19 86

PAY TO THE ORDER OF

Treasurer of the U.S.

Five Hundred & ⁰⁰/₁₀₀

\$ 500.00

DOLLARS



Ocean County National Bank
Member of The Summit Bancorporation
First Branch, New Jersey 08001

Phyllis M. Reed

MEMO

00312043090

1690004 90 0463

CC#356

MEMORANDUM

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 463 (a copy of which is attached) RELATING TO MUR 2025 AND NAME Morris For Senate Committee WAS RECEIVED ON 4/29/86. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT (#95F3875.1)
- / ✓ / CIVIL PENALTIES ACCOUNT (#95-1099.160)
- / / OTHER

SIGNATURE Debra A. Reed

DATE April 29 1986

36 APR 29 410:16

600-430

PERSONAL MONEY ORDER

28124

66-331/212

March 20 19 86

PAY
TO THE
ORDER OF

TREASURER OF THE UNITED STATES

\$ 1,000.00

THE NEWTON TRUST CO. 1000000's 00 Cts



THE NEWTON TRUST COMPANY
NEWTON, NEW JERSEY

Signature of Treasurer
Eastern States Political Action
Committee
Andover, N.J.

0212033101 999997

QCC#64

MEMORANDUM

TO: Debra A. Reed
RETHA DIXON

FROM: JOAN HARRIS

CHECK NO. 28124 (a copy of which is attached) RELATING
TO MUR 2025 AND NAME Eastern States Political Action
(Committee)
WAS RECEIVED ON 3/25/86. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT (#95F3875.16)
- / ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)
- / / OTHER _____

SIGNATURE Debra A. Reed DATE 3/27/86

GCC# 69

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. BYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS
CHARLES M. WATKINS
PETER J. CINQUEGRANI

March 24, 1986

BY HAND

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Sixth Floor
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2025

Dear Mr. Gross:

I am in receipt of your letter of March 5, 1986 and its enclosures. Pursuant to Paragraph VI of each Conciliation Agreement, enclosed are two(2) money orders payable to the Treasurer of the United States, each in the amount of one thousand dollars (\$1,000.00).

Pursuant to Paragraph X of each Conciliation Agreement, notice is hereby given to the Commission that respondents have complied with the terms of each Conciliation Agreement.

Very truly yours,

C. Michael Deese

C. Michael Deese

CMD:aj

36 MAR 28 AM 10
RECEIVED
GENERAL COUNSEL

86040390007

MS **NEWTON SAVINGS AND LOAN ASSOCIATION** **0018583**
 27 HIGH STREET
 NEWTON, NEW JERSEY 07860
 0543-000-08 Date Not Valid Over \$1,000.00
 March 19, 1986
 55-639
 212

MONEY ORDER

Pay to the
 Order of **TREASURER OF THE UNITED STATES**

NEWTON SAVINGS AND LOAN ASSOCIATION
\$1,000 AND 00 CTS

Drawn on
 Federal Home Loan
 Bank of New York

SENDER **NATIONAL CONSERVATIVE COALITION**
 (please print) **Andover, N.J.**
 ADDRESS

Newton Savings
DRAWER

0018583 51 02120639 1:702054300008 71

MEMORANDUM

TO: **Debra A. Reed**
RETHA DIXON

FROM: **JOAN HARRIS**

CHECK NO. **0018583** (a copy of which is attached) RELATING TO MUR **2025** AND NAME **National Conservative Coalition**

WAS RECEIVED ON **3/25/86**. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)
 / ☒ CIVIL PENALTIES ACCOUNT (#95-1099.160)
 / / OTHER

SIGNATURE **Debra A. Reed** DATE **3/27/86**

QCC# 63

RECEIVED
 MAR 25 1986
 ALBANY
 16

QCC#63

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS
CHARLES M. WATKINS
PETER J. CINQUEGRANI

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

March 24, 1986

BY HAND

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Sixth Floor
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2025

Dear Mr. Gross:

I am in receipt of your letter of March 5, 1986 and its enclosures. Pursuant to Paragraph VI of each Conciliation Agreement, enclosed are two(2) money orders payable to the Treasurer of the United States, each in the amount of one thousand dollars (\$1,000.00).

Pursuant to Paragraph X of each Conciliation Agreement, notice is hereby given to the Commission that respondents have complied with the terms of each Conciliation Agreement.

Very truly yours,

C. Michael Deese

C. Michael Deese

CMD:aj

36 MAR 25 11:16

RECEIVED
GENERAL COUNSEL

96040590009

LAW OFFICES

WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

BY
C
THE
GENERAL COUNSEL

26 MAR 24 P 2: 50

BY HAND

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
Sixth Floor
999 E Street, N.W.
Washington, D.C. 20463

6040590010

CC#93

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER
460

MARCH 21 1986

FE-430
512

PAY TO THE
ORDER OF

Treasurer of the United States

\$ 500.00

Five Hundred & no/100

DOLLARS



Ocean County National
Bank
Member of The Sunbelt Bancorporation
First National, New Jersey 08000

RT Morris, Revere

MEMO

0312043091

1690004 90 0460

UNION BANK BUILDING

MEMORANDUM

CC#93

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 460 (a copy of which is attached) RELATING

TO MUR 2025 AND NAME

WAS RECEIVED ON 3/28/86. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT (#95F3875-9)

/ / CIVIL PENALTIES ACCOUNT (#95-1099-160)

/ / OTHER

SIGNATURE Debra A. Reed

DATE

36 MAR 28 2:55

GENERAL LABEL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 5, 1986

Michael Deese, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2025
Eastern States Political
Action Committee
National Conservative
Coalition

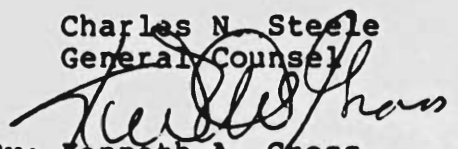
Dear Mr. Deese:

On February 27, 1986, the Commission accepted the conciliation agreements signed by you on behalf of your clients in settlement of a violation of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file will be closed in this matter upon payment of the civil penalty and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

86040590012



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael Deese, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2025
Eastern States Political
Action Committee
National Conservative
Coalition

Dear Mr. Deese:

On , 198 , the Commission accepted the conciliation agreements signed by you on behalf of your clients in settlement of a violation of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file will be closed in this matter upon payment of the civil penalty and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

86040590013



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1986

Robert Morris, Treasurer
Morris for Senate Committee
Box 1
Mantoloking, New Jersey 08738

RE: MUR 2025
Morris for Senate Committee
and Robert Morris, as
treasurer

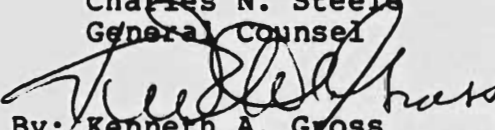
Dear Mr. Morris:

On February 27, 1986, the Commission accepted the conciliation agreements signed by you on behalf of your committee and yourself as treasurer, in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file will be closed in this matter upon payment of the civil penalty and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

86040590014



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert Morris, Treasurer
Morris for Senate Committee
Box 1
Mantoloking, New Jersey 08738

RE: MUR 2025
Morris for Senate Committee
and Robert Morris, as
treasurer

Dear Mr. Morris:

On , 198 , the Commission accepted the conciliation agreements signed by you on behalf of your committee and yourself as treasurer, in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file will be closed in this matter upon payment of the civil penalty and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

Handwritten signature/initials

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2025
National Conservative Coalition, Inc.)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the National Conservative Coalition, Inc. ("Respondent") violated 2 U.S.C. §441a by making contributions to an authorized political committee of a candidate for federal office in an amount in excess of \$1,000.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent the National Conservative Coalition, Inc. is a committee that is not registered with the Commission and does not qualify as a multicandidate political committee under 2 U.S.C. §441a.

2. Respondent contributed a total of Three Thousand Five Hundred Dollars (\$3,500) to the Morris for Senate Committee, the authorized political committee of a candidate for Federal office.

3. Respondent contends that, upon receipt of notification from the Commission that the contribution in excess of One Thousand Dollars (\$1,000) was impermissible, Respondent obtained a refund of Three Thousand Five Hundred Dollars (\$3,500) from the Morris for Senate Committee.

V. Respondent's \$3,500 contribution to a Federal candidate exceeded the \$1,000 limit on such contributions, and therefore constituted a violation of 2 U.S.C. §441a(a)(1)(A). Respondent contends that said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

86040390017

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

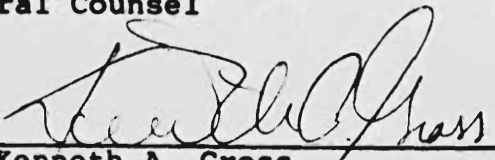
X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

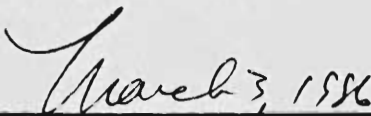
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

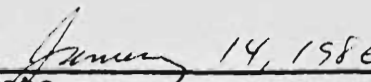
BY:


Kenneth A. Gross
Associate General Counsel


Date March 3, 1986

FOR THE RESPONDENT:


C. Michael Deese
Counsel


Date January 14, 1986

96040590013

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Eastern States Political Action) MUR 2025
Committee, Inc.)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Eastern States Political Action Committee, Inc. ("Respondent") violated 2 U.S.C. §441a by making contributions to an authorized political committee of a candidate for federal office in an amount in excess of \$1,000.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

86040590019

IV. The pertinent facts in this matter are as follows:

1. Respondent, the Eastern States Political Action Committee, Inc., is a committee that is not registered with the Commission and did not qualify as a multicandidate political committee under 2 U.S.C. §441a.

2. Respondent contributed a total of Four Thousand Five Hundred Dollars (\$4,500) to the Morris for Senate Committee, the authorized political committee of a candidate for Federal office.

3. Respondent contends that, upon receipt of notification from the Commission that the contribution in excess of One Thousand Dollars (\$1,000) was impermissible, Respondent obtained a refund of Three Thousand Five Hundred Dollars (\$3,500) from the Morris for Senate Committee.

V. Respondent's \$4,500 contribution to a Federal candidate exceeded the \$1,000 limit on such contributions, and therefore constituted a violation of 2 U.S.C. §441a(a)(1)(A). Respondent contends that said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

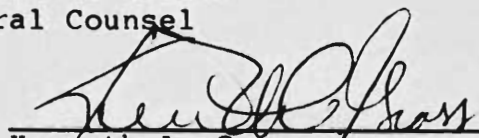
X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

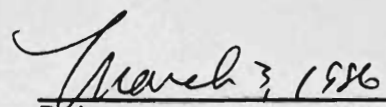
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

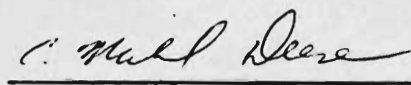
Charles N. Steele
General Counsel

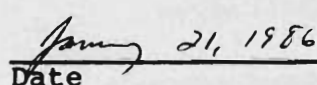
BY:


Kenneth A. Gross
Associate General Counsel


Date

FOR THE RESPONDENT:


C. Michael Deese
Counsel


Date

86040590021

BEFORE THE FEDERAL ELECTION COMMISSION

86 FEB 11 P 1:14

In the Matter of)
)
Morris for Senate Committee and) MUR 2025
Robert Morris, as treasurer)
)

86 FEB 11 P 37

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Morris for Senate Committee and Robert Morris, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(f) by knowingly accepting excessive campaign contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Morris for Senate Committee is the authorized political committee of a candidate for Federal office and Respondent Robert Morris is the treasurer of that committee.

86040590022

2. Respondents accepted \$8,000 in campaign contributions from the Eastern States Political Action Committee, Inc., and the National Conservative Coalition, Inc.

3. The Eastern States Political Action Committee, Inc. and the National Conservative Coalition, Inc. are committees that do not qualify for multicandidate political committee status, and thus are subject to the \$1,000 limit on contributions to Federal candidates established by 2 U.S.C. § 441a(a).

V. Respondents' knowing acceptance of \$8,000 in contributions from the aforesaid committees constitutes a violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A), payable in two installments of Five Hundred Dollars (\$500) each, the first of which is due upon the Commission's approval of the agreement, and the second thirty days thereafter.

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

86040790023

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XIII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

March 3, 1986
Date

FOR THE RESPONDENTS:

Paul Morris, Treasurer

Feb 3, 1986

CS/5

86040790024

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Conservative Coalition , Inc.
Eastern States Political Action
Committee, Inc.
Morris for Senate Committee and
Robert Morris, as treasurer

MUR 2025

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on February 27,
1986, the Commission decided by a vote of 5-0 to take
the following actions in MUR 2025:

1. Approve the conciliation agreements
attached to the General Counsel's
Report signed February 21, 1986.
2. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald and
McGarry voted affirmatively for this decision; Commissioner
Harris did not cast a vote.

Attest:

2-27-86

Date

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

Received in Office of Commission Secretary:	Mon.,	2-24-86,	2:29
Circulated on 48 hour tally basis:	Tues.	2-25-86,	11:00
Deadline for vote:	Thurs.,	2-27-86,	11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rd*
DATE: February 24, 1986
SUBJECT: MUR 2025 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [XX]
Sensitive [XX]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [XX]
Audit Matters []

Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

2600091040026

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

National Conservative Coalition, Inc.)

Eastern States Political Action)

Committee, Inc.)

Morris for Senate Committee and)

Robert Morris, as treasurer)

- MUR 2025 P 2 : 29

GENERAL COUNSEL'S REPORT

BACKGROUND

Attached are two conciliation agreements which have been signed by Michael Deese, attorney for the National Conservative Coalition, Inc. and the Eastern States Political Action Committee, Inc., and a third conciliation agreement, signed by Robert Morris on behalf of himself and the Morris for Senate Committee.

86040390027

36040590028

RECOMMENDATIONS

1. Approve the attached conciliation agreements.
2. Close the file.

Charles N. Steele
Associate General Counsel

February 21, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Conciliation Agreements (3)
2. Letters to respondents
3. Letter from Robert Morris

cs/8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Eastern States Political Action) MUR 2025
Committee, Inc.)

CONCILIATION AGREEMENT

3604059002
This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Eastern States Political Action Committee, Inc. ("Respondent") violated 2 U.S.C. §441a by making contributions to an authorized political committee of a candidate for federal office in an amount in excess of \$1,000.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, the Eastern States Political Action Committee, Inc., is a committee that is not registered with the Commission and did not qualify as a multicandidate political committee under 2 U.S.C. §441a.

2. Respondent contributed a total of Four Thousand Five Hundred Dollars (\$4,500) to the Morris for Senate Committee, the authorized political committee of a candidate for Federal office.

3. Respondent contends that, upon receipt of notification from the Commission that the contribution in excess of One Thousand Dollars (\$1,000) was impermissible, Respondent obtained a refund of Three Thousand Five Hundred Dollars (\$3,500) from the Morris for Senate Committee.

V. Respondent's \$4,500 contribution to a Federal candidate exceeded the \$1,000 limit on such contributions, and therefore constituted a violation of 2 U.S.C. §441a(a)(1)(A). Respondent contends that said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:

C. Michael Deese
C. Michael Deese
Counsel

January 21, 1986
Date

86040390031

4

)

)

MUR 2025

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the National Conservative Coalition, Inc. ("Respondent") violated 2 U.S.C. §441a by making contributions to an authorized political committee of a candidate for federal office in an amount in excess of \$1,000.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

36040590032

IV. The pertinent facts in this matter are as follows:

1. Respondent the National Conservative Coalition, Inc. is a committee that is not registered with the Commission and does not qualify as a multicandidate political committee under 2 U.S.C. §441a.

2. Respondent contributed a total of Three Thousand Five Hundred Dollars (\$3,500) to the Morris for Senate Committee, the authorized political committee of a candidate for Federal office.

3. Respondent contends that, upon receipt of notification from the Commission that the contribution in excess of One Thousand Dollars (\$1,000) was impermissible, Respondent obtained a refund of Three Thousand Five Hundred Dollars (\$3,500) from the Morris for Senate Committee.

V. Respondent's \$3,500 contribution to a Federal candidate exceeded the \$1,000 limit on such contributions, and therefore constituted a violation of 2 U.S.C. §441a(a)(1)(A). Respondent contends that said violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:

C. Michael Deese
C. Michael Deese
Counsel

January 14, 1986
Date

BEFORE THE FEDERAL ELECTION COMMISSION

16 FEB 11 1961 14

In the Matter of)

Morris for Senate Committee and)
Robert Morris, as treasurer)

MUR 2025

16 FEB 11 1961 37

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Morris for Senate Committee and Robert Morris, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(f) by knowingly accepting excessive campaign contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent Morris for Senate Committee is the authorized political committee of a candidate for Federal office and Respondent Robert Morris is the treasurer of that committee.

8604050035

2. Respondents accepted \$8,000 in campaign contributions from the Eastern States Political Action Committee, Inc., and the National Conservative Coalition, Inc.

3. The Eastern States Political Action Committee, Inc. and the National Conservative Coalition, Inc. are committees that do not qualify for multicandidate political committee status, and thus are subject to the \$1,000 limit on contributions to Federal candidates established by 2 U.S.C. § 441a(a).

V. Respondents' knowing acceptance of \$8,000 in contributions from the aforesaid committees constitutes a violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A), payable in two installments of Five Hundred Dollars (\$500) each, the first of which is due upon the Commission's approval of the agreement, and the second thirty days thereafter.

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date all parties hereto have executed the same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XIII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

Robert Morris, Treasurer

Feb 3, 1986

CS/5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 3, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: CHARLES SNYDER

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2025: MORRIS FOR SENATE COMMITTEE

Please review the attached Request for Additional Information which is to be sent to the Morris for Senate Committee for the 1985 Mid-Year report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 4:00 p.m. on Thursday, December 6, 1985. Thank you.

COMMENTS:

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert Morris, Treasurer
Morris for Senate Committee
Box 1, 1237 Ocean Avenue
Mantocoking, NJ 08738

Identification Number: C00172528

Reference: Mid-Year Report (1/31/85-6/30/85)

Dear Mr. Morris:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your beginning cash-on-hand (\$274), plus your total receipts (\$3,800), minus your total disbursements (\$6,712), should equal a negative ending cash-on-hand balance of \$2,638. Your report discloses an ending cash-on-hand balance of \$198. Please amend your report to correct this discrepancy. Please note that if you amend your report to disclose a negative ending cash-on-hand figure, you should provide an explanation, and/or a Schedule D if the negative balance represents an overdraft on your bank account.

-Line 22, Column A of the Detailed Summary Page does not equal the sum of Lines 17, 18, 19(c), 20(d), and 21. Please amend your report(s) to clarify this discrepancy.

-Please provide a Schedule C and/or Schedule D to support the amount of outstanding loans/debts included in your total for Line 10 of the Summary Page. Please note that you must continue to disclose all terms with respect to the outstanding loans, including the date incurred, the due date and interest rate.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance,

please feel free to contact me on our toll-free number, (800)
424-9530. My local number is (202) 523-4048.

Sincerely,

Linda Tangney
Linda Tangney
Reports Analyst
Reports Analysis Division

86040390040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Morris for Senate Committee and)
Robert Morris, as treasurer)

MUR 2025

National Conservative Coalition, Inc.)
Eastern States Political Action)
Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on November 29,
1985, the Commission decided by a vote of 4-0 to take
the following actions in MUR 2025:

1. Enter into conciliation with the National
Conservative Coalition, the Eastern States
Political Action Committee, and Morris for
Senate Committee and Robert Morris, as
treasurer, prior to a finding of probable
cause to believe.
2. Approve the proposed conciliation agreements
attached to the General Counsel's Report
signed November 21, 1985.
3. Approve and send the letters attached to
the General Counsel's Report signed
November 21, 1985.

Commissioners Aikens, Harris, Josefiak and McGarry voted
affirmatively for this decision; Commissioners Elliott and
McDonald did not cast a vote.

Attest:

12-2-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040590041



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *RMB*

DATE: November 22, 1985

SUBJECT: MUR 2025 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒

Audit Matters ☐

Litigation ☐

Closed MUR Letters ☐

Status Sheets ☐

Advisory Opinions ☐

Other (see distribution
below) ☐

86040590042

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of)
)
Morris for Senate Committee and)
Robert Morris, as treasurer)
)
National Conservative Coalition, Inc.)
Eastern States Political Action)
Committee, Inc.)

MUR 2025 NOV 25 P 3:08

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission found reason to believe on June 5, 1985 that the Morris for Senate Committee ("MFS") and Robert Morris, as treasurer, violated 2 U.S.C. § 441a(f) and that the National Conserative Coalition, Inc., ("NCC") and the Eastern States Political Action Committee, Inc., ("ESPAC") violated 2 U.S.C. § 441a. The basis for this finding was a referral from the Reports Analysis Division stating that NCC had contributed \$3,500, and ESPAC \$4,500, to MFS, the authorized political committee of a candidate for Federal office. The referral also showed that neither ESPAC nor NCC is a multicandidate political committee and also suggested that those two committees might be affiliated.

II. LEGAL ANALYSIS

The Act establishes a \$1,000 limitation on contributions to Federal candidates. 2 U.S.C. § 441a. While multicandidate political committees may contribute up to \$5,000, NCC and ESPAC do not qualify for that status, as neither is registered with the Commission and neither has received contributions from more than 50 persons. Consequently, it appears that NCC and ESPAC violated

86040590043

2 U.S.C. § 441a by making \$8,000 worth of contributions to MFS¹/
and that the latter violated 2 U.S.C. § 441a(f) by knowingly
accepting those contributions. The Respondents have requested
pre-probable cause conciliation in this matter.²/ (See
Attachments 1 and 2).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

8 5 0 4 0 5 9 0 0 4 4

IV. RECOMMENDATIONS

1. Enter into conciliation with the National Conserative Coalition, the Eastern States Politital Action Committee, and the Morris for Senate Committee and Robert Morris, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreements.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

November 21, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from C. Michael Deese
2. Letter from Robert Morris
3. Proposed Conciliation Agreements
4. Proposed letters to Respondents
5. Letter from C. Michael Deese

CS #5

86040590045

Attachment 1

500 # 8025
Snyder

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

July 17, 1985

BY HAND

JUL 17 1985
P 3:46

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 2025

Dear Mr. Snyder:

Pursuant to our telephone conversation of earlier this week, I am enclosing statements designating the undersigned and Alan P. Dye as counsel for respondents Eastern States Political Action Committee and National Conservative Coalition in the above-referenced MUR.

As I indicated to you, both respondents plan to respond to the Commission's interrogatories by the end of the week. Additionally, this will serve as formal notification of the fact that respondents desire to enter into pre-probable cause conciliation.

Very truly yours,

C. Michael Deese
C. Michael Deese

CMD:ob

Enclosure

86040590046

attachment 2

400 = 273

RECEIVED (2015) 5524186

Box 1
Mantoloking, N.J. 08728

85 OCT 15

A10: 08

October 10

Charles Snyder
Office of the General Counsel
Federal Elections Commission
Washington D.C.

Dear Mr. Snyder;

After our conversation of today
I write to ask for an offer of conciliation.

Sincerely

Robert Morris
Robert Morris

36040590047

PS : OIA 91100

GENERAL

10

● *attachment 4*
part 1 ●



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Morris
Box 1
Mantoloking, New Jersey 08738

RE: MUR 2025
Morris for Senate Committee
and Robert Morris, as
treasurer

Dear Mr. Morris:

On June 4, 1985, the Commission found reason to believe that the Morris for Senate Committee and you, as treasurer, violated 2 U.S.C. § 441a. At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note the 30 day time period in this matter expires on , 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

86040570048

attachment 4
part 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

C. Michael Deese, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2025
National Conservative
Coalition, Inc.
Eastern States Political
Action Committee, Inc.

Dear Mr. Deese:

On June 4, 1985, the Commission found reason to believe that National Conservative Coalition and Eastern States Political Action Committee, Inc. violated 2 U.S.C. § 441a. At your request, the Commission determined on _____, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on _____, 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

86040590049

attachment 5

Q00-8722

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

October 15, 1985

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

OCT 15 1985
FEB 3: 59
RECEIVED
FEB 11 1986

Re: MUR 2025

Dear Mr. Snyder:

During our October 11 telephone conversation regarding the above-referenced matter, you requested respondents to supply answers to the following questions.

1. Are the committees' receipts listed on the documents provided to you on September 20, 1985 the total receipts for both committees?
2. Since respondent ESPAC originally contributed a total of \$4,500 to the Morris for Senate Committee, why are receipts totalling only \$3,500 listed on the document provided to you on September 20?

I am advised that the answers to your questions are as follows:

1. Over the years both NCC and ESPAC have received individual contributions in small amounts. These funds have been used for administrative expenses and, in the single instance mentioned below, for an ESPAC political contribution. The names of the contributors have not been maintained.

/(cont'd.)

86040:90050

WEBSTER, CHAMBERLAIN & BEAN

Charles Snyder, Esq.
October 15, 1985
Page Two

Further, neither committee has a record of the total amount of those contributions. ESPAC estimates this amount to have been a maximum of \$1,200.00, including the \$1,000.00 referenced below. NCC estimates this amount to have been approximately \$600.00.

2. As indicated in my letter of September 20, 1985, ESPAC's initial \$1,000 contribution to the Morris for Senate Committee on March 30, 1984, was made from funds gathered in small amounts (\$10 to \$20 each) from a number of persons, the names of whom are not maintained in ESPAC files.

I trust that this information will be sufficient to permit you to terminate your investigation and to begin pre-probable cause conciliation.

Very truly yours,



C. Michael Deese

CMD/hms

86040590051

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

October 15, 1985

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OCT 15 1985
3:59
GENERAL COUNSEL

Re: MUR 2025

Dear Mr. Snyder:

During our October 11 telephone conversation regarding the above-referenced matter, you requested respondents to supply answers to the following questions.

1. Are the committees' receipts listed on the documents provided to you on September 20, 1985 the total receipts for both committees?
2. Since respondent ESPAC originally contributed a total of \$4,500 to the Morris for Senate Committee, why are receipts totalling only \$3,500 listed on the document provided to you on September 20?

I am advised that the answers to your questions are as follows:

1. Over the years both NCC and ESPAC have received individual contributions in small amounts. These funds have been used for administrative expenses and, in the single instance mentioned below, for an ESPAC political contribution. The names of the contributors have not been maintained.

/(cont'd.)

86040590052

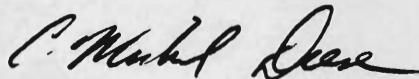
Charles Snyder, Esq.
October 15, 1985
Page Two

Further, neither committee has a record of the total amount of those contributions. ESPAC estimates this amount to have been a maximum of \$1,200.00, including the \$1,000.00 referenced below. NCC estimates this amount to have been approximately \$600.00.

2. As indicated in my letter of September 20, 1985, ESPAC's initial \$1,000 contribution to the Morris for Senate Committee on March 30, 1984, was made from funds gathered in small amounts (\$10 to \$20 each) from a number of persons, the names of whom are not maintained in ESPAC files.

I trust that this information will be sufficient to permit you to terminate your investigation and to begin pre-probable cause conciliation.

Very truly yours,



C. Michael Deese

CMD/hms

86040590053

LAW OFFICES

EBSTER, CHAMBERLAIN & BEAN

1717 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

OCT 15 2 3: 59

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

36040590055

6004 8731

RECEIVED AT (2015) 24186

Box 1
Mantoloking, N.J.

85 OCT 15 A10: 08

October 10

Mar 2025

Charles Snyder
Office of the General Counsel
Federal Elections Commission
Washington D.C.

Dear Mr. Snyder;

After our conversation of today
I write to ask for an offer of conciliation.

Sincerely

Robert Morris
Robert Morris

8 OCT 16 A10: 54

RECEIVED
GENERAL COUNSEL

Box 1 Mantoloking, N.J. 08738



85 OCT 13



Charles Snyder
Officer of the General Counsel
Federal Election Commission
1325 K ST NW
WASH. D.C.
205467

86040390056

GCC# 8596

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

September 20, 1985

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
GENERAL COUNSEL
SEP 20 P 3: 38

Re: MUR 2025

Dear Mr. Snyder:

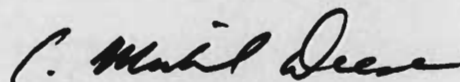
I apologize for the delay in getting to you the enclosed contribution information which you requested some time ago.

As you can see, the National Conservative Coalition (NCC) received contributions totalling \$3,500 from four (4) individuals between May 27, 1984 and June 1, 1984. These funds were contributed to the Morris for Senate Committee on June 3, 1984, and then refunded to NCC in December, 1984.

The Eastern States Political Action Committee (ESPAC) received contributions totalling \$3,500 from four (4) individuals between May 28, 1984 and June 2, 1984. These funds were contributed to the Morris for Senate Committee on June 3, 1984, and then refunded to ESPAC in December, 1984. The March 30, 1984, \$1,000 ESPAC contribution to the Morris for Senate Committee was made from funds gathered in small amounts (\$10 to \$20 each) from a number of persons, the names of whom are not maintained in ESPAC files.

I trust that this information is responsive to your request. Please give me a call if you have any questions.

Very truly yours,



C. Michael Deese

CMD/hms

Enc.

86040590057

EASTERN STATES POLITICAL ACTION COMMITTEE

ITEMIZED RECEIPTS

Receipt for: **Bob MORRIS FOR SENATE CAMPAIGN COMMITTEE**

Name and address of Contributor	Employer	Occupation	Date received	Amount of receipt
JOSEPH CORCORAN Box M KONKLETON, PENNA	Retired	—	May 28, 1984	\$1,000 ⁰⁰
8 5 0 0 5 0 ARTHUR ROLLER 139 CHURCH ST. HACKETTSTOWN, NJ	Retired	JUDGE	MAY 28, 1984	\$1,000 ⁰⁰
0 5 0 MARION CORCORAN Box 14 KONKLETON, PENNA	MANAGER COMMUNITY BANK RT 206 NEWTON, N.J.	NATIONAL	MAY 28, 1984	\$500 ⁰⁰
0 4 0 5 8 NICHOLAS KISS PO Box 342 ANDOVER, N.J.	Jersey, ANALYTICAL SERVICE 3 MAPLE ST. ANDOVER, NJ	CHEMIST	JUNE 2, 1984	\$1,000 ⁰⁰

NATIONAL CONSERVATIVE COALITION

ITEMIZED RECEIPTS

Receipt for: **R. MORRIS COMMITTEE**

86040590059

Name and Address of Contributor	Employer	Occupation	Date received	Amount of Receipt
JOSEPH BARANDY 37 SYLVAN WAY N. CALDWELL, NJ	TAS 3 MAPLE STR. ANDOVER, NJ	CHEMIST	5-27-1984	1,000.00
LLOYD LEE RD 1, BOX 67 HACKETTSTOWN, NJ	MAGNESIUM ELECT. FLEMINGTON, NJ	ENGINEER	5-27-1984	1,000.00
OLGA GOLASCHOW PO BOX 628 ANDOVER, NJ	RETIRED		5-28-1984	1,000.00
NICHOLAS KINS PO BOX 342	TEXAS ANALYT. SERVICE 3 MAPLE AVE ANDOVER, NJ	CHEMIST	6-1-1984	500.00

LAW OFFICES
ROSTER, CHAMBERLAIN & BEAN
1717 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006

SEP 20 3:38 PM

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

5 August 1985

C. Michael Deese, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

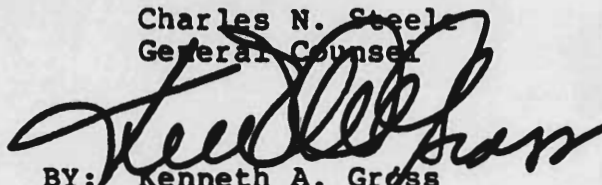
Re: MUR 2025

Dear Mr. Deese:

In confirmation of your conversation on July 25th with Charles Snyder of this office, please send us complete records of the receipts of the National Conservative Coalition, Inc. and the Eastern States Political Action Committee, Inc. These records should state the names and addresses of all persons and/or entities who have contributed to the two committees, in any form of money as well as in-kind, including loans.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

85040590061



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

5 August 1985

C. Michael Deese, Esquire
Webster, Chamberlain & Bean
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

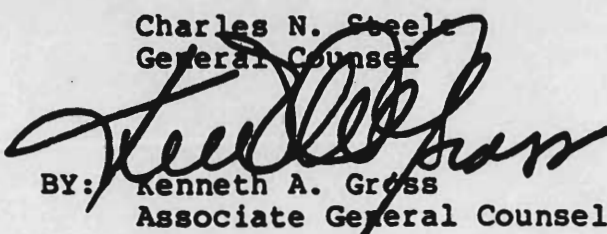
Re: MUR 2025

Dear Mr. Deese:

In confirmation of your conversation on July 25th with Charles Snyder of this office, please send us complete records of the receipts of the National Conservative Coalition, Inc. and the Eastern States Political Action Committee, Inc. These records should state the names and addresses of all persons and/or entities who have contributed to the two committees, in any form of money as well as in-kind, including loans.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

86040590062



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 31, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: CHARLES SNYDER

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: 2025: EASTERN STATES POLITICAL ACTION COMMITTEE

Please review the attached Request for Additional Information which is to be sent to the Eastern States Political Action Committee for the Statement of Organization. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 1:00 p.m. on Friday, August 2, 1985. Thank you.

COMMENTS:

Attachment

85040590063



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

Daniel P. Hlavac, Treasurer
Eastern States Political Action
Committee
3 Maple Avenue
Andover, NJ 07821

Identification Number: C00196477

Reference: Statement of Organization (7/15/85)

Dear Mr. Hlavac:

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Item 5(e) indicates that your committee is a separate segregated fund. A separate segregated fund is a political committee established, financed, maintained or controlled by a corporation, labor organization, membership organization, cooperative or trade association.

If your committee is a separate segregated fund, then an amended Statement of Organization should be submitted which identifies the connected organization. (11 CFR 102.2(a)(1)(ii)). In addition, please provide the type of connected organization.

If your committee is not a separate segregated fund, then an amended Statement of Organization should be submitted, which indicates the appropriate type of committee. 11 CFR 102.2(a)(1)(i).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Christopher L. Nuland
Reports Analyst
Reports Analysis Division

86040590064

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of:

MUR 2025

RESPONDENT EASTERN STATES POLITICAL
ACTION COMMITTEE'S ANSWERS TO
INTERROGATORIES

Respondent Eastern States Political Action Committee, Inc.
(hereinafter "ESPAC") hereby answers the Commission's
interrogatories as follows:

Interrogatory 1

ESPAC was incorporated on May 17, 1983 in the State of New
Jersey. The following persons are the officers and/or directors
of ESPAC:

Joseph Greco
451 Pearl Street
Woodbridge, New Jersey
(self-employed)

Judy Wolfesberger
5 Spring Street
Toms River, New Jersey

Nicholas Kins
P.O. Box 342
Andover, New Jersey
(employed by Jersey Analytical Services, Inc.)

86040590065

Daniel P. Hlavac
Third Street
Paterson, New Jersey
(unemployed)
(Treasurer, ESPAC)

Lloyd Lee
R.D. #1, Box 67
Hackettstown, New Jersey
(employed by Magnesium Electronics, Inc.)

Interrogatory 2

No committees, groups or organizations have been established, financed or controlled by ESPAC. One committee, the National Conservative Coalition, Inc., has on its five member board of directors two (2) individuals who also serve on the five-member board of directors of ESPAC. Those two (2) individuals are Lloyd Lee and Nicholas Kins.

Interrogatory 3

On March 30, 1984 ESPAC made a contribution of \$1000.00 to the Morris for Senate Committee (Robert Morris, candidate for U.S. Senate from New Jersey).

On June 3, 1984, ESPAC made a contribution in the amount of \$3,500.00 to the Morris for Senate Committee, bringing the total contributions to \$4,500.00. No other candidates have received any contributions from ESPAC.

ESPAC filed a Form 1 with the Federal Election Commission on or about April 6, 1983. A copy of the Form 1 is attached hereto. I believed at the time of the contribution to the Morris for Senate committee that ESPAC was registered with the FEC.

Following receipt of the Commission's letter of December 6, 1984, ESPAC obtained from the Morris for Senate Committee a refund of \$3,500 of the \$4,500 contribution. A photocopy of the refund check is attached hereto.

WITNESS my hand this 19 day of July, 1985.

Nicholas Kins
Nicholas Kins

STATE OF New Jersey)
CITY OF Quakertown) ss:

Before me, the undersigned Notary Public, on this 19 day of July, 1985, personally appeared NICHOLAS KINS, who being duly sworn, upon his oath stated that the above answers to written interrogatories submitted by the Federal Election Commission on July 1, 1985 are true and correct.

GIVEN under my hand and seal of office this 19 day of July, 1985.

My commission expires: _____

JOAN F. NARDONE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 1, 1989

Joan F. Nardone
Notary Public

86040590067

GCC# 2074

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of:

MUR 2025

JUL 22 1982 P12:26

RESPONDENT NATIONAL CONSERVATIVE
COALITION'S ANSWERS TO INTERROGATORIES

Respondent National Conservative Coalition, Inc.
(hereinafter "NCC") hereby answers the Commission's inter-
rogatories as follows:

Interrogatory 1

NCC was incorporated on September 13, 1982 in the State
of New Jersey. The following persons are the officers and/or
directors of NCC:

Lloyd Lee
R.D. # 1, Box 67
Hackettstown, New Jersey
(employed by Magnesium Electronic, Inc.)

Nicholas Kins
P.O. Box 342
Andover, New Jersey
(employed by Jersey Analytical Service, Inc.)

Adam Habuda
Kilray Road
Andover, New Jersey
(employed by Progressive Equipment, Inc.
(former treasurer, NCC)

86040590068

Arthur C. Roller
307 Church Street
Hackettstown, New Jersey
(retired)

Joseph A. Corcoran, Jr.
R.D. # 1, Box 14
Kunkletown, Pennsylvania
(employed by Energy Reduction Systems)
(present treasurer, NCC, voted in June 20, 1985)

Interrogatory 2

No committee, groups or organizations have been established, financed or controlled by NCC. One committee, the Eastern States Political Action Committee, Inc. has on its five-member board of directors two (2) individuals who also serve on the five-member board of directors of NCC. Those two individuals are Lloyd Lee and Nicholas Kins.

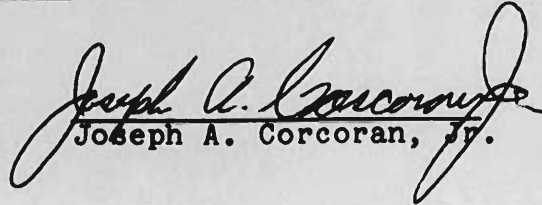
Interrogatory 3

On June 3, 1984, NCC made a contribution in the amount of \$3,500 to the Morris for Senate Committee (Robert Morris, candidate for U.S. Senate from New Jersey). No other candidate has received any contribution from NCC.

Following receipt of the Commission's letter of December 3, 1984, NCC obtained from the Morris for Senate Committee a refund of the \$3,500 contribution. A photocopy of the refund check is attached hereto.

86040590069

WITNESS my hand this 19 day of July, 1985.


Joseph A. Corcoran, Jr.

STATE OF New Jersey)
CITY OF Anaheim) ss:

Before me, the undersigned Notary Public, on this 19 day of July, 1985, personally appeared JOSEPH A. CORCORAN, JR., who being duly sworn, upon his oath stated that the above answers to written interrogatories submitted by the Federal Election Commission on July 1, 1985, are true and correct.

GIVEN under my hand and seal of office this 19 day of July, 1985.

My Commission expires: **JOAN F. NARDONE**
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 1, 1989


Notary Public

86040590070

LAW OFFICES

LESTER, CHAMBERLAIN & BEAN

1717 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D. C. 20006

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Committee
Seventh Floor
1325 E Street, NW
Washington, DC 20044

BCC# 8035
Snyder

LAW OFFICES

WEBSTER, CHAMBERLAIN & BEAN

1747 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 785-9500

July 17, 1985

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
ARTHUR L. HEROLD
ALAN P. DYE
BURKETT VAN KIRK
FRANK M. NORTHAM
C. MICHAEL DEESE
GERARD P. PANARO
JOHN W. HAZARD, JR.
BRAD D. WEISS

BY HAND

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 2025

Dear Mr. Snyder:

Pursuant to our telephone conversation of earlier this week, I am enclosing statements designating the undersigned and Alan P. Dye as counsel for respondents Eastern States Political Action Committee and National Conservative Coalition in the above-referenced MUR.

As I indicated to you, both respondents plan to respond to the Commission's interrogatories by the end of the week. Additionally, this will serve as formal notification of the fact that respondents desire to enter into pre-probable cause conciliation.

Very truly yours,

C. Michael Deese
C. Michael Deese

CMD:ob

Enclosure

JUL 17 1985
P 3:46

86040590072

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2025

NAME OF COUNSEL: Mr. Alan Dye ; Mr. Michael Deese

ADDRESS:

Webster, Chamberlain + Bean
1747 Pennsylvania Ave, N.W.
Washington, DC 20006

TELEPHONE:

202-785-9500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/10/85
Date

Nicholas Kinis
Signature

RESPONDENT'S NAME:

Nicholas Kinis

ADDRESS:

Eastern States Political Action Committee
3 Maple Ave
Andover, N.J. 07821
INC.

HOME PHONE:

201-786-6191

BUSINESS PHONE:

201-786-6591

86040590073

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2025

NAME OF COUNSEL: Mr. Alan Dye; Mr. Michel Deese

ADDRESS: Webster, Chamberlain + Bean
1747 Pennsylvania Ave N.W.
Washington, DC 20006

TELEPHONE: 202-785-9500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/10/85
Date

Joseph A. Corcoran Jr.
Signature

RESPONDENT'S NAME: Joseph A. Corcoran, Jr.

ADDRESS: RD 1, Box 14,
Kunkletown, Penna
18058

HOME PHONE: 215-681-6437

BUSINESS PHONE: 201-786-6700

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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LAW OFFICES

WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006

TO:

Charles Snyder, Esq.
Office of the General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1985

Mr. Nicholas Kins, Director
Eastern States Political Action
Committee, Inc.
3 Maple Avenue
Andover, New Jersey 07821

RE: MUR 2025
Eastern States Political
Action Committee

Dear Mr. Kins:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the Eastern States Political Action Committee, Inc. violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Letter to Nicholas Kins
Page 2

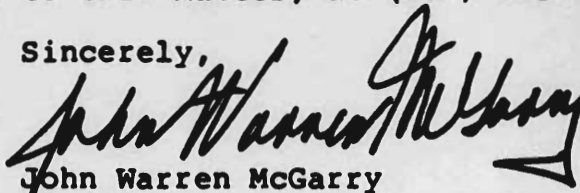
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

86040590077

**FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR 2025
STAFF MEMBER & TEL. NO.
Charles Snyder
(202)523-4000

RESPONDENT: Eastern States Political Action Committee, Inc.

SUMMARY OF ALLEGATIONS

8 6 0 4 0 5 9 0 0 7 8
This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS"), the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission, and that share an address. The foregoing facts suggest that NCC and ESPAC made contributions in excess of the \$1000 limit established by 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

The Act permits multicandidate political committees, as defined in 2 U.S.C. § 441a(4), to contribute as much as \$5000 to the authorized committee of a candidate for Federal office. 2 U.S.C. § 441a(a)(2). Among the criteria for the status of multicandidate political committee is the requirement that the

committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his authorized political committees with respect to any election for Federal office" is \$1000. Id. Therefore, ESPAC's contribution exceeded the statutory limitation by \$3500 and NCC's contribution did likewise by \$2500.

It appears, furthermore, that ESPAC and NCC may be affiliated, as defined by 11 C.F.R. § 100.5(g). The two committees have the same address, and their responses to RAD inquiries were mailed in the same envelope. Mr. Nicholas Kins, moreover, is an officer of both committees. If the unregistered committees are, in fact, affiliated, the excessive contribution would amount to \$7,000.

86040590079

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

86040590080

DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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If, during the period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

As used in the following questions, the terms listed below are defined as follows:

a. The term "identify" or "list" with respect to individuals shall mean to give the full name, last known residence address of such individual, and the last known place of business where such individual is or was employed. "Identify" or "list" with respect to other entities shall mean to give the full legal name, last known address of such entity, the entity's principal employees, if any, and the nature of the relationship between that entity and the Eastern States Political Action Committee, Inc., and the dates of such relationship.

b. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any information which may be otherwise construed to be out of its scope.

1. Identify all persons, organizations, or groups that have participated or are participating in the establishment, financing, or control of the Eastern States Political Action Committee, Inc.

Identify the treasurer of the Eastern States Political Action Committee, Inc.

2. Identify all committees, groups, or organizations that are or have been established, financed or controlled by the same person(s), organizations, or groups that have established, financed, or controlled the Eastern States Political Action Committee, Inc.

3. List all candidates for Federal office who have received contributions, whether in the form of money, services, or anything else of value, from the Eastern States Political Action Committee, Inc., and specify the dates of those contributions.

State the amount or value of each such contribution.

86040590083



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1985

Mr. Nicholas Kins, Director
National Conservative Coalition
3 Maple Avenue
Andover, New Jersey 07821

RE: MUR 2025
National Conservative
Coalition

Dear Mr. Kins:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the National Conservative Coalition violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

86040590084

Letter to Nicholas Kins
Page 2

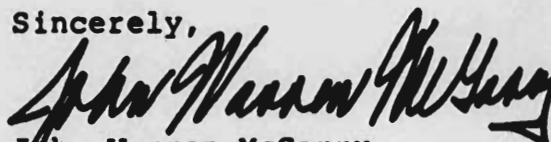
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

86040370085

**FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR 2025
STAFF MEMBER & TEL. NO.
Charles Snyder
(202) 523-4000

RESPONDENT: The National Conservative Coalition

SUMMARY OF ALLEGATIONS

86040390086
This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS"), the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission, and that share an address. The foregoing facts suggest that NCC and ESPAC made contributions in excess of the \$1000 limit established by 2 U.S.C. § 441a.

FACTUAL AND LEGAL ANALYSIS

The Act permits multicandidate political committees, as defined in 2 U.S.C. § 441a(4), to contribute as much as \$5000 to the authorized committee of a candidate for Federal office. 2 U.S.C. § 441a(a)(2). Among the criteria for the status of multicandidate political committee is the requirement that the

committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his authorized political committees with respect to any election for Federal office" is \$1000. Id. Therefore, ESPAC's contribution exceeded the statutory limitation by \$3500 and NCC's contribution did likewise by \$2500.

It appears, furthermore, that ESPAC and NCC may be affiliated, as defined by 11 C.F.R. § 100.5(g). The two committees have the same address, and their responses to RAD inquiries were mailed in the same envelope. Mr. Nicholas Kins, moreover, is an officer of both committees. If the unregistered committees are, in fact, affiliated, the excessive contribution would amount to \$7,000.

86040590087

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

86040590088

DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

-2-

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

Questions to: Nicholas Kins

As used in the following questions, the terms listed below are defined as follows:

a. The term "identify" or "list" with respect to individuals shall mean to give the full name, last known residence address of such individual, and the last known place of business where such individual is or was employed. "Identify" or "list" with respect to other entities shall mean to give the full legal name, last known address of such entity, the entity's principal employees, if any, and the nature of the relationship between that entity and the National Conservative Coalition, and the dates of such relationship.

b. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any information which may be otherwise construed to be out of its scope.

1. Identify all persons, organizations, or groups that have participated or are participating in the establishment, financing, or control of the National Conservative Coalition.

Identify the treasurer of the National Conservative Coalition.

2. Identify all committees, groups, or organizations that are or have been established, financed or controlled by the same person(s), organizations, or groups that have established, financed, or controlled the National Conservative Coalition.

3. List all candidates for Federal office who have received contributions, whether in the form of money, services, or anything else of value, from the National Conservative Coalition, and specify the dates of those contributions.

State the amount or value of each such contribution.

86040590091



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1985

Mr. Nicholas Kins, Director
National Conservative Coalition
3 Maple Avenue
Andover, New Jersey 07821

RE: MUR 2025
National Conservative
Coalition

Dear Mr. Kins:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the National Conservative Coalition violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Letter to Nicholas Kins
Page 2

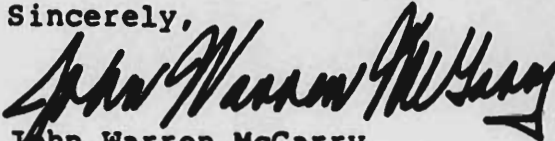
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

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86040590093

**FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR 2025
STAFF MEMBER & TEL. NO.
Charles Snyder
(202)523-4000

RESPONDENT: The National Conservative Coalition

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FACTUAL AND LEGAL ANALYSIS

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It appears, furthermore, that ESPAC and NCC may be affiliated, as defined by 11 C.F.R. § 100.5(g). The two committees have the same address, and their responses to RAD inquiries were mailed in the same envelope. Mr. Nicholas Kins, moreover, is an officer of both committees. If the unregistered committees are, in fact, affiliated, the excessive contribution would amount to \$7,000.

86040590095

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

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November 1980

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Identify the treasurer of the National Conservative Coalition.

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3. List all candidates for Federal office who have received contributions, whether in the form of money, services, or anything else of value, from the National Conservative Coalition, and specify the dates of those contributions.

State the amount or value of each such contribution.

85040590099



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1985

Mr. Nicholas Kins, Director
Eastern States Political Action
Committee, Inc.
3 Maple Avenue
Andover, New Jersey 07821

RE: MUR 2025
Eastern States Political
Action Committee

Dear Mr. Kins:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the Eastern States Political Action Committee, Inc. violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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Letter to Nicholas Kins
Page 2

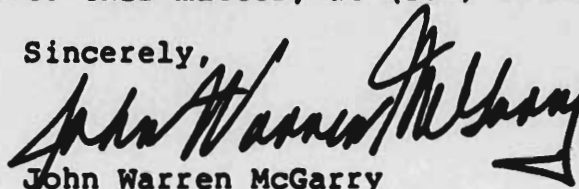
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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

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85040590101

**FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR 2025
STAFF MEMBER & TEL. NO.
Charles Snyder
(202) 523-4000

RESPONDENT: Eastern States Political Action Committee, Inc.

SUMMARY OF ALLEGATIONS

85040590102
This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS"), the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission, and that share an address. The foregoing facts suggest that NCC and ESPAC made contributions in excess of the \$1000 limit established by 2 U.S.C. § 441a.

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committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his authorized political committees with respect to any election for Federal office" is \$1000. Id. Therefore, ESPAC's contribution exceeded the statutory limitation by \$3500 and NCC's contribution did likewise by \$2500.

It appears, furthermore, that ESPAC and NCC may be affiliated, as defined by 11 C.F.R. § 100.5(g). The two committees have the same address, and their responses to RAD inquiries were mailed in the same envelope. Mr. Nicholas Kins, moreover, is an officer of both committees. If the unregistered committees are, in fact, affiliated, the excessive contribution would amount to \$7,000.

36040570103

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

86040590104

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85040590106

If, during the period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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Identify the treasurer of the Eastern States Political Action Committee, Inc.

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3. List all candidates for Federal office who have received contributions, whether in the form of money, services, or anything else of value, from the Eastern States Political Action Committee, Inc., and specify the dates of those contributions.

State the amount or value of each such contribution.

86040590107



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Nicholas Kins, Director
Eastern States Political Action
Committee, Inc.
3 Maple Avenue
Andover, New Jersey 07821

RE: MUR 2025
Eastern States Political
Action Committee

Dear Mr. Kins:

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85040790108

Letter to Nicholas Kins
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John Warren McGarry
Chairman

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CWJ

86040590109



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Dear Mr. Kins:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the National Conservative Coalition violated 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

86040590110

Letter to Nicholas Kins
Page 2

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement
Questions

CSJ

8604059011

86040590112

P 619 433 846

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

★ U.S.G.P.O. 1983-403-517

(See Reverse)	
Sent to <i>Office of Men Counsel</i>	
Street and No. <i>1325 K St NW</i>	
P.O., State and ZIP Code <i>W/ Cash, DC 20004</i>	
Postage	\$ <i>56</i>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	<i>75</i>
Return receipt showing to whom, Date, and Address of delivery	<i>70</i>
TOTAL Postage and Fees	\$ <i>2.01</i>
Postmark Date <i>APR 10 1982</i>	

PS Form 3800, Feb. 1982

BOX 1
MANTOLOKING, N.J. 08738



Office of the General Counsel
Attention Charles Snyder
Federal Elections Commission
1325 K Street NW
Washington, DC ~~20006~~ *off*

Certified



00:00:16
02:54

Robert Morris

RECORDED AT THE FEC

GCC# 7984

June 25, 1984 12:55

MUR 2025

Charles Snyder
Office of the General Counsel
Federal Elections Commission

Dear Mr. Snyder,

I am enclosing herewith my affidavit together with those of Nicholas Kins and officer of both PACS involved in Mr. McGarry's Letter to me of June 14.

I offer this evidence to demonstrate that no action should be taken against me or the Committee. Mr. McGarry's letter mentions answers to enclosed questions. However I do not find any questions among his enclosures.

To add to my concern and even distress about this matter I now realize that the Morris for Senate Committee refunded \$1000 in excess of what was required to the National Conservative Coalition. Since the excessive amounts were 4500 and 3500 respectively, when each could have contributed \$1000.

I hope you can be helpful in this matter.

Robert Morris

P.S. I also enclose the certification of Joseph P. Greco, counsel for the Morris for Senate Committee.

Robert Morris

June 28, 1985

To the Federal Election Commission

Robert Morris, being duly sworn, deposes and says that he is the treasurer of the Morris for Senate Committee and that he has received a letter from John Warren McGarry of the FEC that the aforesaid Committee knowingly received contributions in excess of \$1000 from two unregistered political action committees.

That he denies that the aforesaid Committee knowingly received contributions from unregistered political action committees.

That he believed at all times that the political action committees aforesaid were indeed registered.

That Nicholas Kins, the President of the Eastern States Political Action Committee informed your deponent that he had registered the ESPAC and submits with this affidavit, his copy of the FEC Form I that was the basis of his belief that he had registered.

That Joseph P. Greco, the lawyer who prepared the FEC Form I for the ESPAC and who subsequently became counsel for the Morris for Senate Committee, informed your deponent that he had been advised by Mr. Kins that the PAC was registered.

That when Mr. Kins demonstrated this evidence of registration of the ESPAC and treated both PACs (National Conservative Coalition and the ESPAC) equally, your deponent believed on the basis of this that they were registered.

That the Morris for Senate Committee made timely refunds of \$3500 each to the aforesaid PAC when the FEC made its contention known.

That your deponent realizes now that the Morris for Senate Committee was required only to return \$3500 to the ESPAC and \$2500 to the NCC.

Sworn and Subscribed to before me

this 28th day of June 1985

Barbara J. Schoemer

BARBARA J. SCHOEMER
Notary Public of New Jersey
My Commission Expires Nov. 19, 1988

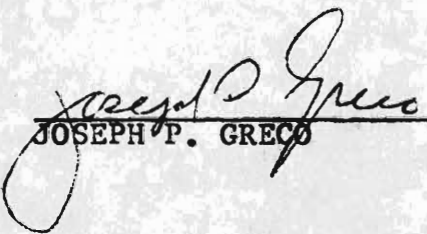
Robert Morris

CERTIFICATION

85 JUL 11

JOSEPH P. GRECO, certifies as follows:

1. I am an attorney-at-law of the State of New Jersey.
2. I was the attorney for the Morris For Senate Committee.
3. Prior to being appointed as attorney for the aforesaid committee, I had occasion to be consulted by one, Nicholas Kins of Andover, New Jersey, who requested me to prepare formation papers for the Eastern States Political Action Committee.
4. I prepared said documents and attended to having the same executed .
5. I personally delivered the completed and executed documents to Nicholas Kins, who advised me he would personally attend to having the Political Action Committee registered.
6. Subsequent to the delivery of the completed documents to Nicholas Kins, I was so advised by Nicholas Kins that he had forwarded the documents for registration and I thereafter notified Robert Morris that I had been advised by Mr. Kins the pack was duly registered.
7. I certify that the foregoing statements made by me are true. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.


JOSEPH P. GRECO

Dated: June 26, 1985

86040590116



NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE, ANDOVER, N.J. 07821 PHONE 201/786-6591

RECEIVED AT THE FEC

85 JUL 11 PM 2: 54

June 26, 1985

Federal Election Commission
Washington, D.C. 20463

I, Nicholas Kins, certify as follows:

1. I am the president of the Eastern States Political Action Committee and the Vice-President of the National Conservative Coalition. Both are the corporations of the State of New Jersey.
2. In April 1983 I have sent by mail a completed FEC Form 1 (3/80) to the Federal Election Commission in Washington D.C. for the purpose of registration of the Eastern States Political Action Committee.
3. When the Eastern States Political Action Committee made contribution to Mr. Robert Morris for Senate Committee I firmly believed that the Eastern States Political Action Committee was registered with the Federal Election Commission.
4. When Mr. Robert Morris asked me if the Eastern States Political Action Committee is registered with the FEC I advised him that it was registered per Item 2 above.
5. The National Conservative Coalition was organized in September 1982 and I thought that it was registered with the FEC.
6. When the FEC alerted the National Conservative Coalition and the Eastern States Political Action Committee that the FEC had no record of registration of these two organizations with it, Morris for Senate Committee promptly refunded all the donated money back to the National Conservative Coalition and the Eastern States PAC, \$3,500.00 to each.
7. I make these statements as to the best of my knowledge and that I can be punished for any willfully false statements.
8. I am enclosing a copy of the FEC Form 1 original of which was sent to the FEC in Washington in April 1983 (Exhibit A).
9. Enclosed are the copies of our responses to the FEC in December 1984. National Conservative Coalition response- Exhibit B, and Eastern States PAC response- Exhibit C.
10. Enclosed are the copies of the FEC letters to the National Conservative Coalition and the Eastern States PAC indicating that a full refund of the contribution from the Morris for Senate Committee will satisfy compliance with the FEC Act. (Exhibit D for NCC and Exhibit E for Eastern States PAC)

Gloria Conti GLORIA CONTI
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires December 15, 1988

Nicholas Kins
Nicholas Kins

35040590117

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed. Eastern States Political Action Committee, Inc.		2. Date April 6, 1983
(b) Address (Number and Street) 3 Maple Avenue		3. FEC Identification Number
(c) City, State and ZIP Code Andover, New Jersey 07821		4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☒ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

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

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

- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

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

Full Name	Mailing Address and ZIP Code	Title or Position
Nicholas Kins	3 Maple Avenue, Andover New Jersey 07821	Bookkeeper

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

Full Name	Mailing Address and ZIP Code	Title or Position
Daniel P. Hlavac	3 Maple Ave., Andover N.J.	Treasurer
Alfred Angelo	3 Maple Ave., Andover, N.J. 07821	Asst. Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
American National Bank & Trust Co.	Route #206, Byram, New Jersey 07874

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

Daniel P. Hlavac

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

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.

For further information contact:

Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

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FEC FORM 1 (3/80)

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed. Eastern States Political Action Committee, Inc.	2. Date April 6, 1983
(b) Address (Number and Street) 3 Maple Avenue	3. FEC Identification Number
(c) City, State and ZIP Code Andover, New Jersey 07821	4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☒ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

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

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

- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

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

Full Name	Mailing Address and ZIP Code	Title or Position
Nicholas Kins	3 Maple Avenue, Andover New Jersey 07821	Bookkeeper

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

Full Name	Mailing Address and ZIP Code	Title or Position
Daniel P. Hlavac	3 Maple Ave., Andover N.J.	Treasurer
Alfred Angelo	3 Maple Ave., Andover, N.J. 07821	Asst. Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
American National Bank & Trust Co.	Route #206, Byram, New Jersey 07874

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

Daniel P. Hlavac

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

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.

For further information contact:

Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)



NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE, ANDOVER, N.J. 07821

PHONE 201/786-6591

December 27, 1984

Mr. Mike Tanqney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tanqney:

In response to your letter of December 3, 1984 and our telephone conversation the National Conservative Coalition has decided to follow your second alternative in order to comply with the Federal Election Commission Act, i.e. to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the National Conservative Coalition from the Morris for Senate Campaign Committee (check No. 444 for the amount of \$3500.00).

As per your letter and our telephone conversations this should satisfy our compliance with the Act and close the matter. Please, confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Nicholas Kins
Director

Enclosure

Exhibit

'B''

86040590120



EASTERN STATES POLITICAL ACTION COMMITTEE, INC.

3 MAPLE AVENUE

ANDOVER, NJ 07821

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

As per our telephone conversation you agreed to forward this letter to the analyst who is handling the Eastern States Political Action Committee's case of its contribution to the Morris for Senate Committee.

In order to comply with the FEC Act as I discussed with you on the telephone we have decided to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the Eastern States Political Action Committee from the Morris for Senate Campaign Committee (check No. 443 for the amount of \$3500.00).

As per our telephone conversation this should satisfy our compliance with the Act and close the matter. Please, Confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Nicholas Kins
President

Enclose

Exhibit
"C"

86040590121

Exhibit



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 3 1984

Treasurer
National Conservative Coalition
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

In addition, the Act precludes a political committee from making a contribution to a candidate to Federal office in excess of \$1,000 per election, until it becomes a multicandidate committee. The term "multicandidate committee" means a political committee which has been registered with the Commission, Clerk of the House or Secretary of the Senate for at least six months; has received contributions for Federal elections from more than 50 persons; and (except for any State political party organization) has made contributions to five or more Federal candidates. 2 U.S.C. §441a(a)(4) and 11 CFR 100.5(e)(3).

A review of the receipts reported by the Morris for Senate Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC Form 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms enclosed; or

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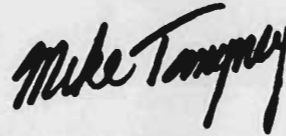
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

Enclosures

36040590123

Exhibit "E"



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 6 1984

Treasurer
Eastern States Political
Action League
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

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A review of the receipts reported by the Morris For Senate Campaign Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the 1984 Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

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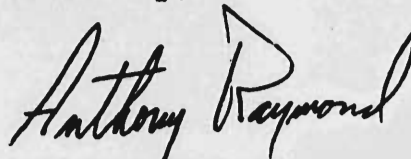
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

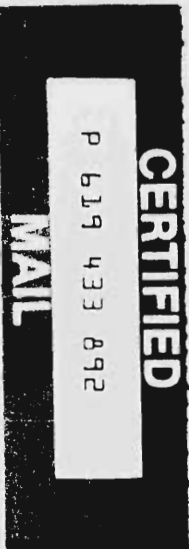


Anthony Raymond
Reports Analyst
Reports Analysis Division

Enclosures

86040590125

BOX 1
ANTIOLOKING, N.J. 08738



Mr. Charles Snyder
Office of the General Counsel
Federal Elections Commission
1325 K Street NW
Washington, DC 20463



65 JUL 11 8 00 PM '63

Robert Morris

July 8, 1985

Snyder

Charles Snyder
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

Dear Mr. Snyder,

After I spoke with you today, I decided to send a second copy of the affidavits and the other material to you because you had not received the original.

What you have here are photo copies of my carbons. I apologize for them.

Sincerely,

R. Morris

86040590127

June 28, 1985

Charles Snyder
Office of the General Counsel
Federal Elections Commission

Dear Mr. Snyder,

I am enclosing herewith my affidavit together with those of Nicholas Kins and officer of both PACS involved in Mr. McGarry's Letter to me of June 14.

I offer this evidence to demonstrate that no action should be taken against me or the Committee. Mr. McGarry's letter mentions answers to enclosed questions. However I do not find any questions among his enclosures.

To add to my concern and even distress about this matter I now realize that the Morris for Senate Committee refunded \$1000 in excess of what was required to the National Conservative Coalition. Since the excessive amounts were 4500 and 3500 respectively, when each could have contributed \$1000.

I hope you can be helpful in this matter.

P.S. I also enclose the certification of Joseph P. Greco, counsel for the Morris for Senate Committee.

86040590128

Robert Morris

June 28, 1985

To the Federal Election Commission

Robert Morris, being duly sworn, deposes and says that he is the treasurer of the Morris for Senate Committee and that he has received a letter from John Warren McGarry of the FEC that the aforesaid Committee knowingly received contributions in excess of \$1000 from two unregistered political action committees.

That he denies that the aforesaid Committee knowingly received contributions from unregistered political action committees.

That he believed at all times that the political action committees aforesaid were indeed registered.

That Nicholas Kins, the President of the Eastern States Political Action Committee informed your deponent that he had registered the ESPAC and submits with this affidavit, his copy of the FEC Form I that was the basis of his belief that he had registered.

That Joseph P. Greco, the lawyer who prepared the FEC Form I for the ESPAC and who subsequently became counsel for the Morris for Senate Committee, informed your deponent that he had been advised by Mr. Kins that the PAC was registered.

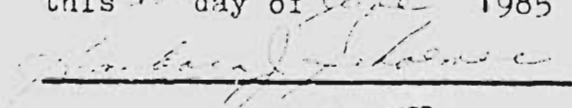
That when Mr. Kins demonstrated this evidence of registration of the ESPAC and treated both PACs (National Conservative Coalition and the ESPAC) equally, your deponent believed on the basis of this that they were registered.

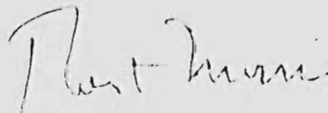
That the Morris for Senate Committee made timely refunds of \$3500 each to the aforesaid PAC when the FEC made its contention known.

That your deponent realizes now that the Morris for Senate Committee was required only to return \$3500 to the ESPAC and \$2500 to the NCC.

Sworn and Subscribed to before me

this 28th day of June 1985


BARBARA J. SCHOEMER
Notary Public of New Jersey
My Commission Expires Nov. 19, 1986

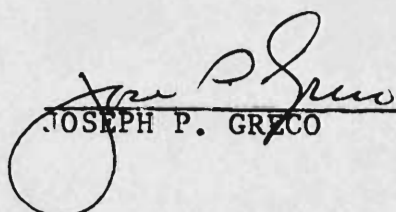


86040590129

CERTIFICATION

JOSEPH P. GRECO, certifies as follows:

1. I am an attorney-at-law of the State of New Jersey.
2. I was the attorney for the Morris For Senate Committee.
3. Prior to being appointed as attorney for the aforesaid committee, I had occasion to be consulted by one, Nicholas Kins of Andover, New Jersey, who requested me to prepare formation papers for the Eastern States Political Action Committee.
4. I prepared said documents and attended to having the same executed .
5. I personally delivered the completed and executed documents to Nicholas Kins, who advised me he would personally attend to having the Political Action Committee registered.
6. Subsequent to the delivery of the completed documents to Nicholas Kins, I was so advised by Nicholas Kins that he had forwarded the documents for registration and I thereafter notified Robert Morris that I had been advised by Mr. Kins the pack was duly registered.
7. I certify that the foregoing statements made by me are true. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.


JOSEPH P. GRECO

Dated: June 26, 1985

86040590130

NCC

NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE ANDOVER, N.J. 07821 PHONE 201/786-6591

June 26, 1985

Federal Election Commission
Washington, D.C. 20463

I, Nicholas Kins, certify as follows:

1. I am the president of the Eastern States Political Action Committee and the Vice-President of the National Conservative Coalition. Both are the corporations of the State of New Jersey.
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5. The National Conservative Coalition was organized in September 1982 and I thought that it was registered with the FEC.
6. When the FEC alerted the National Conservative Coalition and the Eastern States Political Action Committee that the FEC had no record of registration of these two organizations with it, Morris for Senate Committee promptly refunded all the donated money back to the National Conservative Coalition and the Eastern States PAC, \$3,500.00 to each.
7. I make these statements as to the best of my knowledge and that I can be punished for any willfully false statements.
8. I am enclosing a copy of the FEC Form 1 original of which was sent to the FEC in Washington in April 1983 (Exhibit A).
9. Enclosed are the copies of our responses to the FEC in December 1984, National Conservative Coalition response- Exhibit B, and Eastern States PAC response- Exhibit C.
10. Enclosed are the copies of the FEC letters to the National Conservative Coalition and the Eastern States PAC indicating that a full refund of the contribution from the Morris for Senate Committee will satisfy compliance with the FEC Act. (Exhibit D for NCC and Exhibit E for Eastern States PAC)

Gloria Conti
NOTARY PUBLIC - NEW JERSEY

Nicholas Kins

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

(a) Name of Committee (in Full) ☐ Check if name or address is changed.		2. Date
Eastern States Political Action Committee, Inc.		April 6, 1983
(b) Address (Number and Street)		3. FEC Identification Number
3 Maple Avenue		
(c) City, State and ZIP Code		4. Is this an amended Statement? ☐ YES ☒ NO
Andover, New Jersey 07821		

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
- ☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ Party.
- ☒ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

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

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

- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

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

Full Name	Mailing Address and ZIP Code	Title or Position
Nicholas Kins	3 Maple Avenue, Andover New Jersey 07821	Bookkeeper

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

Full Name	Mailing Address and ZIP Code	Title or Position
Daniel P. Hlavac	3 Maple Ave., Andover N.J.	Treasurer
Alfred Angelo	3 Maple Ave., Andover, N.J. 07821	Asst. Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
American National Bank & Trust Co.	Route #206, Byram, New Jersey 07874

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

Daniel P. Hlavac

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

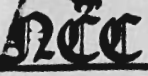
Date

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

For further information contact:

Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)



NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE, ANDOVER, N.J. 07821

PHONE 201/786-6591

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

In response to your letter of December 3, 1984 and our telephone conversation the National Conservative Coalition has decided to follow your second alternative in order to comply with the Federal Election Commission Act, i.e. to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the National Conservative Coalition from the Morris for Senate Campaign Committee (check No. 444 for the amount of \$3500.00).

As per your letter and our telephone conversations this should satisfy our compliance with the Act and close the matter. Please, confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Nicholas Kins
Director

Enclosure

Exhibit - B



EASTERN STATES POLITICAL ACTION COMMITTEE, INC.

3 MAPLE AVENUE

ANDOVER, NJ 07821

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

As per our telephone conversation you agreed to forward this letter to the analyst who is handling the Eastern States Political Action Committee's case of its contribution to the Morris for Senate Committee.

In order to comply with the FEC Act as I discussed with you on the telephone we have decided to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the Eastern States Political Action Committee from the Morris for Senate Campaign Committee (check No. 443 for the amount of \$3500.00).

As per our telephone conversation this should satisfy our compliance with the Act and close the matter. Please, Confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Nicholas Kins
President

Enclose

Exhibit
"C"

86040590134

Exhibit "D"



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 3 1984

Treasurer
National Conservative Coalition
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

In addition, the Act precludes a political committee from making a contribution to a candidate to Federal office in excess of \$1,000 per election, until it becomes a multicandidate committee. The term "multicandidate committee" means a political committee which has been registered with the Commission, Clerk of the House or Secretary of the Senate for at least six months; has received contributions for Federal elections from more than 50 persons; and (except for any State political party organization) has made contributions to five or more Federal candidates. 2 U.S.C. §441a(a)(4) and 11 CFR 100.5(e)(3).

A review of the receipts reported by the Morris for Senate Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC Form 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms enclosed; or

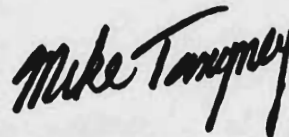
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

Enclosures

86040590136



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 6 1984

Treasurer
Eastern States Political
Action League
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

In addition, the Act precludes a political committee from making a contribution to a candidate to Federal office in excess of \$1,000 per election, until it becomes a multicandidate committee. The term "multicandidate committee" means a political committee which has been registered with the Commission, Clerk of the House or Secretary of the Senate for at least six months; has received contributions for Federal elections from more than 50 persons; and (except for any State political party organization) has made contributions to five or more Federal candidates. 2 U.S.C. §441a(a)(4) and 11 CFR 100.5(e)(3).

A review of the receipts reported by the Morris For Senate Campaign Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the 1984 Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC Form 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms enclosed; or

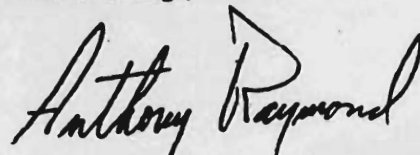
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Anthony Raymond
Reports Analyst
Reports Analysis Division

Enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1985

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Mantoloking, New Jersey 08738

RE: MUR 2025
Morris for Senate Committee,
and Robert Morris, as treasurer

Dear Mr. Morris:

On June 4, 1985, the Federal Election Commission determined that there is reason to believe the Morris for Senate Committee and and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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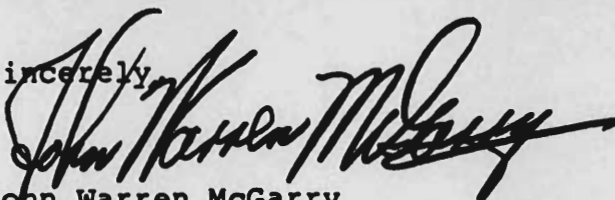
Letter to Robert Morris, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040590140

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2025
STAFF MEMBER & TEL. NO.
Charles Snyder
(202) 523-4000

RESPONDENTS: Morris for Senate Committee and
Robert Morris, as treasurer

SUMMARY OF ALLEGATIONS

36040590141
This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS") the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission.

RAD therefore advised MFS on November 30, 1984 that it had accepted excessive contributions from the two unregistered committees. MFS consequently refunded \$3500 to ESPAC and \$3500 to NCC, retaining \$1000 of the ESPAC contribution. MFS was advised by RAD that these refunds would be taken into account by way of mitigation, but that the Commission might take further legal steps concerning the acceptance of the excessive contributions.

The foregoing facts suggest that MFS violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act ("the Act") by accepting excessive contributions from ESPAC and NCC.

FACTUAL AND LEGAL ANALYSIS

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The Act permits multicandidate political committees, as defined in 2 U.S.C. § 441a(a)(4), to contribute as much as \$5000 to the authorized committee of a candidate for Federal office. 2 U.S.C. § 441a(a)(2). Among the criteria for the status of multicandidate political committee is the requirement that the committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his authorized political committees with respect to any election for Federal office" is \$1000. Id.

The Act further provides that: "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section." 2 U.S.C. § 441a(f). There is thus reason to believe that MFS's acceptance of contributions in excess of \$1000 from NCC and ESPAC constitutes a violation of 2 U.S.C. § 441a(f).

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

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DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Mantoloking, New Jersey 08738

RE: MUR
Morris for Senate Committee,
and Robert Morris, as treasurer

Dear Mr. Morris:

On , 1985, the Federal Election Commission determined that there is reason to believe the Morris for Senate Committee and and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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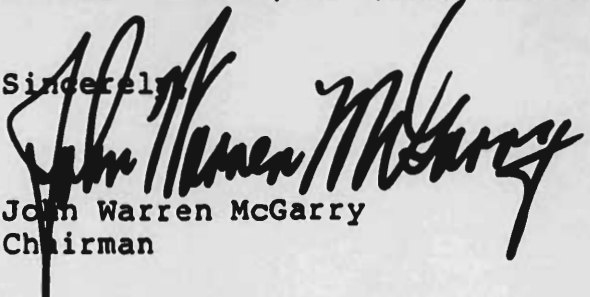
Letter to Robert Morris, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

ewf

86040590146

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Morris for Senate Committee)
and Robert Morris, as)
treasurer) RAD 85L-14
National Conservative Coalition)
Eastern States Political Action)
Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 4, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the Morris for Senate Committee, and Robert Morris, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that the National Conservative Coalition and the Eastern States Action Committee, Inc. violated 2 U.S.C. § 441a.
4. Direct the Office of General Counsel to send appropriate letters and Factual and Legal Analyses.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

6/5/85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040590147



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING^{en}

DATE: May 22, 1985

SUBJECT: Objection RAD 85L-14: First General Counsel's
Report, signed May 17, 1985.

The above-named document was circulated to the
Commission on MONDAY, May 20, 1985, 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____X_____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for

00040590148



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING
DATE: May 22, 1985
SUBJECT: Objection RAD 85L-14: First General Counsel's
Report, signed May 17, 1985.

The above-named document was circulated to the
Commission on MONDAY, May 20, 1985, 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____X_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for TUESDAY, June 4, 1985.

86040590149



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SECRETIVE

MAY 22 11:09

Date and Time Transmitted: MONDAY, May 20, 1985, 4:

COMMISSIONER: McGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, May 22, 1985 4:00

SUBJECT: RAD 85L-14: First General Counsel's Report
signed May 17m 1985.

- () I approve the recommendation
(✓) I object to the recommendation

COMMENTS: _____

Date: 5-22-85 Signature: Thomas E. Harris

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

86040390150



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: May 20, 1985
SUBJECT: RAD 85L-14: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	[X]
Sensitive	[X]
Non-Sensitive	[]
24 Hour No Objection	[]
Sensitive	[]
Non-Sensitive	[]
Information	[]
Sensitive	[]
Non-Sensitive	[]

Other []

DISTRIBUTION

Compliance	[X]
Audit Matters	[]
Litigation	[]
Closed MUR Letters	[]
Status Sheets	[]
Advisory Opinions	[]
Other (see distribution below)	[]

1510650403

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL RAD #85L-14
BY OGC TO THE COMMISSION 5/20/85/8:45 STAFF MEMBER: Snyder

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: Morris for Senate Committee and
Robert Morris, as treasurer
National Conservative Coalition
Eastern States Political Action
Committee, Inc.

RELEVANT STATUTES: 2 U.S.C. §§ 441a(a) and 441a(f)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS"), the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission.

RAD therefore advised MFS on November 30, 1984 that it had accepted excessive contributions from the two unregistered committees. MFS consequently refunded \$3500 to ESPAC and \$3500

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to NCC, retaining \$1000 of the ESPAC contribution.* / MFS was advised by RAD that these refunds would be taken into account by way of mitigation, but that the Commission might take further legal steps concerning the acceptance of the excessive contributions.

SUMMARY OF ALLEGATIONS

The foregoing facts suggest that MFS violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act ("the Act") by accepting excessive contributions from ESPAC and NCC.

FACTUAL AND LEGAL ANALYSIS

The Act permits multicandidate political committees, as defined in 2 U.S.C. § 441a(a)(4), to contribute as much as \$5000 to the authorized committee of a candidate for Federal office. 2 U.S.C. § 441a(a)(2). Among the criteria for the status of multicandidate political committee is the requirement that the committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his

26040590150

authorized political committees with respect to any election for Federal office" is \$1000. Id.

The Act further provides that: "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section."

2 U.S.C. § 441a(f). There is thus reason to believe that MFS's acceptance of contributions in excess of \$1000 from NCC and ESPAC constitutes a violation of 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Morris for Senate Committee, and Robert Morris, as treasurer, violated 2 U.S.C. § 441a(f).
3. Take no action against the National Conservative Coalition and the Eastern States Political Action Committee, Inc.
4. Approve and send the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

Date

By:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Referral
2. Proposed letter to Robert Morris
3. General Counsel's Factual and Legal Analysis

Attachment 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

3 April 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *151*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE MORRIS FOR SENATE COMMITTEE

This is a referral of the Morris for Senate Committee (the "Committee"). The Committee has accepted and refunded apparent excessive contributions totalling \$6,000 from two (2) unregistered committees.

For your information, New Jersey state law permits unlimited corporate and labor union contributions to political committees.

If you have any questions, please contact Gregory Swanson at 523-4048.

Attachment

86040590155

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 April 1985

ANALYST: Gregory Swanson

I. COMMITTEE: Morris for Senate Committee
(C00172528)
Robert Morris, Treasurer
(July 17, 1984 - present)
Edwin G. Fisher, Jr., Treasurer
(February 1, 1984-July 17, 1984)
Thomas H. Jordan, Treasurer
(November 16, 1983-January 31, 1984)
1237 Ocean Avenue
Mantoloking, NJ 08738¹/₁

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contributions from Two Unregistered Committees (2 U.S.C. §441a(f))

The Morris for Senate Committee (the "Committee") disclosed the receipt of contributions totalling \$8,000 from two (2) unregistered committees in 1984. The total amount was designated for the primary election, resulting in the receipt of apparent excessive contributions totalling \$6,000.²/₂

The Committee's 1984 April and July Quarterly Reports itemized the receipt of a \$1,000 contribution on March 30, 1984, and a \$3,500 contribution on June 3, 1984, from Eastern States PAC. The July Quarterly Report also disclosed the receipt of a \$3,500 contribution on June 3, 1984, from the National Conservative Coalition (Attachments 3 and 4).

¹/ The Committee informed the Commission of its new mailing address on its 1984 Year End Report.

²/ The two unregistered committees have the same address. Their responses were received in the same envelope. In addition, according to the cover letters to their responses, Mr. Nicholas Kins is an officer of both committees (Attachment 2). If the unregistered committees are affiliated, the apparent excessive amount contributed would equal \$7,000.

86040590156

MORRIS FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

A Request for Additional Information ("RFAI") was sent regarding the 1984 July Quarterly Report on November 30, 1984 (Attachment 5). The RFAI requested that the Committee refund the amounts in excess of \$1,000 per election and/or provide the Commission with any additional clarifying information concerning the contributors or the reporting of the receipts.

The candidate, Mr. Robert Morris, serving as the Committee's treasurer, responded in a letter received December 17, 1984 (Attachment 6). Mr. Morris stated that the two political committees had been given two options by the FEC, one calling for his campaign to return \$7,000 and the other his returning \$5,000.^{3/} He further explained that, as of the date of his letter, the two political committees had not told him which option they were taking; however, he was prepared to comply. Finally, he requested an extension of time until the committees made their decision.

On December 19, 1984, Mr. Morris telephoned the Reports Analysis Division ("RAD") analyst to ask if his response had been received by the Commission (Attachment 7). He also indicated that he had disbursed \$7,000 of the Committee's funds to refund the excessive amounts from the two political committees. The analyst told Mr. Morris that he should inform the Commission of the refunds in writing.

On December 20, 1984, a Second Notice was sent to the Committee, acknowledging the candidate's letter (Attachment 8). This notice informed the Committee that a written statement regarding the refunds was still required.

Mr. Morris responded in another letter, received December 24, 1984. This letter stated that the Morris for Senate Committee had refunded \$3,500 to the Eastern States PAC and \$3,500 to the National Conservative Coalition (Attachment 9). The Committee's 1984 Year End Report showed refunds totalling \$7,000 on Line 20 of the Detailed Summary Page (Attachment 10). In addition, responses received from the unregistered committees included photocopies of the refund checks from the Morris for Senate Committee dated December 17, 1984 (Attachment 2).

^{3/} The Committee's calculations did not include the \$1,000 contribution received by Morris for Senate from Eastern States PAC on March 30, 1984.

MORRIS FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

IV. OTHER PENDING MATTERS INITIATED BY RAD:

The Committee has received an apparent excessive contribution from an individual. The individual, who is an officer of both of the unregistered committees discussed in this referral, contributed \$500 on March 30, 1984. The Committee's 1984 Year End Report disclosed the receipt of a \$1,000 contribution from this individual on January 4, 1985. Both of these contributions were designated for the primary election, resulting in the receipt of an apparent excessive contribution of \$500. The Committee was sent an Informational Notice regarding this matter on April 2, 1985.

86040390158

8 6 0 4 0 5 9 0 1 5 9

FEDERAL ELECTION COMMISSION

1983-1984

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 1APR85

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
MORRIS, ROBERT	SENATE	REPUBLICAN PARTY					1984 ELECTION	ID# S2NJ00072	
1. STATEMENT OF CANDIDATE									
1983 STATEMENT OF CANDIDATE							16NOV83	2	83SEN/007/0420
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
MORRIS FOR SENATE COMMITTEE							ID# C00172528	SENATE	
1983 STATEMENT OF ORGANIZATION							16NOV83	3	83SEN/007/0422
YEAR-END			10,510		8,323		29AUG83 -31DEC83	10	84SEN/007/0414
1984 STATEMENT OF ORGANIZATION - AMENDMENT							17JUL84	3	84SEN/011/0489
APRIL QUARTERLY			13,710		13,297		1JAN84 -31MAR84	11	84SEN/008/2487
PRE-PRIMARY			12,847		13,640		1APR84 -16MAY84	12	84SEN/011/1583
JULY QUARTERLY			59,596		59,061		17MAY84 -30JUN84	14	84SEN/015/2635
JULY QUARTERLY - AMENDMENT			-		-		17MAY84 -30JUN84	6	84SEN/030/0639
JULY QUARTERLY - AMENDMENT			-		-		17MAY84 -30JUN84	3	84SEN/030/1755
REQUEST FOR ADDITIONAL INFORMATION							17MAY84 -30JUN84	3	84FEC/350/0289
REQUEST FOR ADDITIONAL INFORMATION 2ND							17MAY84 -30JUN84	2	84FEC/357/1958
OCTOBER QUARTERLY			3,461		5,162		30JUN84 -15OCT84	8	84SEN/023/2654
YEAR-END			11,675		12,040		15OCT84 -31JAN85	7	85SEN/003/0992
TOTAL			111,799	0	111,523	0		82	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All reports have been reviewed.

Cash on hand as of January 31, 1985 - \$ 274.34

Debts owed to the Committee - \$ 0.00

Debts owed by the Committee - \$42,567.90*

* This figure was calculated by the RAD analyst. The figure reported by the Committee does not reflect a loan repayment of \$2,792.66 disclosed on the 1984 July Quarterly Report.

ATTACHMENT 1

85 JAN 2 11:52

EASTERN STATES POLITICAL ACTION COMMITTEE, INC.

3 MAPLE AVENUE

ANDOVER, NJ 07821

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

As per our telephone conversation you agreed to forward this letter to the analyst who is handling the Eastern States Political Action Committee's case of its contribution to the Morris for Senate Committee.

In order to comply with the FEC Act as I discussed with you on the telephone we have decided to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 2X.

Attached to this letter is a copy of the refund check received by the Eastern States Political Action Committee from the Morris for Senate Campaign Committee (check No. 443 for the amount of \$3500.00).

As per our telephone conversation this should satisfy our compliance with the Act and close the matter. Please, Confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
President

Enclose

36040590160

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER
443

Dec 17 1984

85-430
812

PAY TO THE
ORDER OF

EASTERN STATES PAC.

\$ 3500.00

Three Five Hundred & 00/100

DOLLARS



ocean county national
bank

Member of The Summit Bancorporation
First Payment Air deposit card

First Union

4:03 12043091

169 004 91 0443

86040590161



ATTACHMENT
(page 3 of 5)

85 JAN 2 11:53

NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE, ANDOVER, NJ 07821 PHONE 201/786-6591

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

In response to your letter of December 3, 1984 and our telephone conversation the National Conservative Coalition has decided to follow your second alternative in order to comply with the Federal Election Commission Act, i.e. to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the National Conservative Coalition from the Morris for Senate Campaign Committee (check No. 444 for the amount of \$3500.00).

As per your letter and our telephone conversations this should satisfy our compliance with the Act and close the matter. Please, confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Director

Enclosure

05040590162

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER
444

Dec 17 1984

8-430
312

PAY TO THE
ORDER OF

National Conservative Coalition
Phyllis H. Hinkle + 1/2

\$

3500.00

DOLLARS



*ocean county national
bank*

Member of The Summit Bancorporation
First National Bank of New Jersey

Phyllis Hinkle

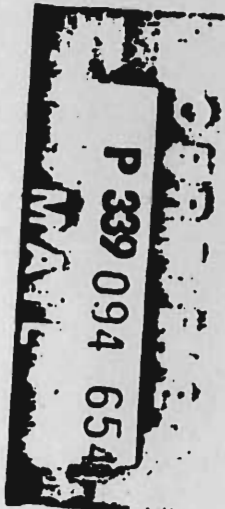
⑆031204309⑆

1690004 9 0444

86040590163



RECEIVED
FEB 1 1984



Mr. Mike Tanquey
Report Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

05 JAN 2 11:52

49106507098

ITEMIZED RECEIPTS

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

Mass. Bay E. 1855 Campaign Committee

A. Full Name, Mailing Address and ZIP Code <i>EAST SIDE CONSTRUCTION CORP of</i> <i>NEW YORK</i> <i>39 E. 65TH</i> <i>NEW YORK CITY, N.Y. 10001</i>	Name of Employer 	Date (month, day, year) <i>3-1-84</i>	Amount of Each Payment this Period <i>750.00</i>
Received For: ☒ Primary ☐ General ☐ Other (specify):	Occupation 		
Address as of Year-to-Date - 8			

B. Full Name, Mailing Address and ZIP Code THE CONSERVATIVE COUNCIL P.A.C. 501 CHURCH STREET VIENNA, VA. 22180	Name of Employer	Date (month, day, year) 3-28-84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Accrue Year 40-20-8		

C. Full Name, Mailing Address and ZIP Code EASTMAN STATES PAC 3 MAPLE AVENUE ANDOVER N.J 07801	Name of Employer Occupation	Date (month, day, year) 3-20-84	Amount of Each Recession This Period 1000.00 RPF
Receipt For: ☒ Primary ☐ General E Order (monthly):	Accumulation Year to Date - \$		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			

C. Other (Specify): _____		Aggregate Year-to-Date \$ _____	
E. Full Name, Mailing Address and ZIP Code _____ _____ _____		Name of Employer _____	Date (month, day, year) _____
		Occupation _____	
Receipt For:	☐ Primary ☐ General	Amount of Each Receipt This Period _____	

E Other (specify): F. Full Name, Mailing Address and ZIP Code		Age: <u> </u> Years to Date—B Name of Employer Date (month, day, year) Amount of Each Receipt This Period	
Receipt For: ☐ Primary ☐ General		Occupation	

☐ Other (specify): _____		Aggregate Year-to-Date - \$	
8. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)
		Occupation	
Payroll For:	☐ Primary ☐ Casual	Amount of Each Payroll: This Part	

Q Over capacity:	4. 1974 Tax 2. 200-8	
NET TOTAL of Previous Tills Paid (continued).....		V. 20. 00

TOTAL TAX PAID (SEE PAGE TWO AND NUMBER ONLY)

94020032192

SCHEDULE A

ITEMIZED RECEIPTS

ATTACHMENT 4

1984 JULY QUARTERLY REPORT

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

Name of Committee (on Full)

A. Full Name, Mailing Address and ZIP Code <i>EDMAN STATES PAC</i> <i>3 Maple Avenue</i> <i>Andover New Jersey</i> Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$ <i>4,500.00</i>	Date (month, day, year) <i>6 8 84</i>	Amount of Each Receipt This Period <i>3500.00</i>
B. Full Name, Mailing Address and ZIP Code <i>NOTRUM CAMPAIGN COALITION</i> <i>3 Maple Avenue</i> <i>Andover New Jersey</i> Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$ <i>3,500.00</i>	Date (month, day, year) <i>6 8 84</i>	Amount of Each Receipt This Period <i>3500.00</i>
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (continued)			<i>7000.00</i>
TOTAL This Period (See page 40 for number only)			<i>7000.00</i>

86040320166
 R4020152330



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543 NOV 30 1984

82-2

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Montclair, NJ 08737

Identification Number: C00172578

Reference: July Quarterly Report (5/17/84-6/30/84)

Dear Mr. Morris:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contribution(s) in question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), prompt action by you to refund the excessive amount will be taken into consideration.

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91033:00299

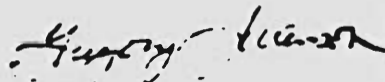
-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution, or any other source. If the candidate borrowed funds from a lending institution or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 CFR 110.10. (11 CFR 100.7(a)(1) and 104.3(d))

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include this information. (11 CFR 104.11)

In addition, your previous report disclosed an outstanding balance owed to R.C. Maxwell in the amount of \$646.00. Schedule B of this report shows no payments on this debt and no outstanding balance on Schedule D. Please clarify and amend accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Gregory Swanson
Reports Analyst
Reports Analysis Division

94033:00290

REC'D
NOV 17 1984
S3283
NJ REP C1464
5/17-6/30/84

MORRIS FOR SENATE COMMITTEE
P.O. BOX 1604
POINT PLEASANT BEACH, N.J. 08742

Gregory Swanson
Reports Analyst
Federal Election Commission
Washington, DC 20463

Dear Mr. Swanson,

I have your letter which was dated November 30 which came here the first week of December. With respect to the two \$3500 contributions from the Eastern States PAC and the National Conservative Coalition, those PACs, since the date of your letter have been given by the FEC two options, one calling for my campaign to return \$7000 and the other my returning \$5000. As of the date of this writing they have not told me which option they are taking and I am prepared to comply. I ask that you allow me an extension until the PACs make their decision.

With respect to my loans of \$40,000 to the campaign, I enclose the evidence of my taking a second lien equity mortgage in the amount of \$50,000 which netted me \$39,000. In addition when the bills came into Mr. Fisher, the former treasurer, the telephone bills and the travel bills (gasoline etc.) charged on my personal accounts could not be paid so I paid them and charged the amounts to campaign debts.

On schedule D - I have reconstructed the items as best I could. I do not understand why Mr. McKenna, the CPA who had been handling the account, did not fill them in. You will notice that I did not fill in Litho Services, the #1 item, the reason being that there is a dispute between Litho and ourselves as to the amounts owed. And we are endeavoring to work it out.

Will you advise me of your response to the above? Please address it to POBox One, Mantoloking, NJ 08738.

Sincerely,

Robert Morris

P.S. With respect to R.C. Maxwell item, Maxwell is a subdivision of Outdoor Advertising (Gannett) and has the same billing.

Will you send accurate figures for my bill - to the ...

MEMORANDUM FOR THE FILES: Telecon

SUBJECT: Response to RFAI sent December 20, 1984 concerning apparent
441a violation and source of candidate loan.
DATE: December 19, 1984
FROM: Mr. Robert Morris (candidate/treasurer)
TO: Gregory Swanson (Analyst)
NAME OF COMMITTEE: Morris for Senate Committee - C00172528/NJ

Mr. Robert Morris telephoned to ask if his written response had been received by the Commission. He also indicated that he disbursed \$7,000 of the Committee's funds to refund the excessive amounts from the two PAC's. I said that the response had been received, however, that another written response was necessary to indicate that the Committee had refunded the excessive amounts. In addition, I explained that the transactions should be included in the Committee's next report.

I explained that his response, concerning the source of the \$40,311 candidate loan, raised a new question as the loan was secured by means of a second lien equity mortgage on his and his wife's home, evidenced by the signed loan agreement attached. I explained that the Commission would require a statement disclosing the value of the property in an amount that is at least double the value of the loan. He said he had just sold the house this last weekend for \$500,000 and would be able to provide a statement to that effect.

86040590170



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

80-3

December 20, 1984

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Montoloking, NJ 08037

Identification Number: C00172526

Reference: July Quarterly Report (5/17/84-6/30/84)

Dear Mr. Morris:

On November 30, 1984 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 17, 1984 response is incomplete because you have not provided all the requested information. The Commission notes your letter indicating that you are seeking to determine the amounts of the contribution refunds. For this response to be considered adequate, the following information is still required.

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

86040371958
R403371958

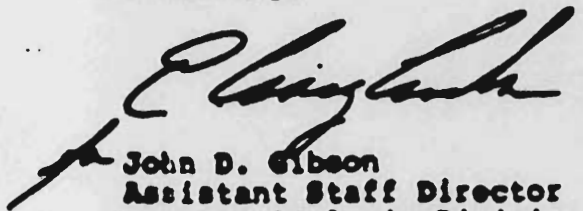
If the contribution(s) in question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), prompt action by you to refund the excessive amount will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Gregory Swanson on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

86040590172
94033371059

Robert Morris

110
110024 All: 30

LM

December 19, 1984

H

Gregory Swanson
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Mr. Swanson,

I write to confirm our telephone conversation of today, and report:

1. With respect to the loan taken out as a second lien on our residence, 1201 Ocean Ave., Mantoloking, NJ on December 12 we sold that home for \$525,000 thereby showing my equity.

2. The Morris for Senate Committee has sent \$3500 checks to the Eastern States Political Action Committee and the National Conservative Coalition thus complying with the settlement made by those two PACs with the FEC.

Must I further report this to the Senate or will my reporting to you fulfill my responsibility?

Thank you for your helpfulness in this transaction. I will report the \$3500 returns in the January 15 report.

Sincerely,

Robert Morris

1984 YEAR-END
REPORTDETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)

Month (covering the Period)

From

To

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Name Every Unincorporated S. 675)

(b) Political Party Committees

(c) Other Political Committees

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (Add 11a, 11b, 11c and 11d)

12 TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

13 LOANS

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (Add 13a and 13b)

14 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15 OTHER RECEIPTS (Dividends, Interest, etc.)

16 TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)

II. DISBURSEMENTS

17 OPERATING EXPENDITURES

18 TRANSFERS TO OTHER AUTHORIZED COMMITTEES

19 LOAN REPAYMENTS

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (Add 19a and 19b)

20 REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 20a, 20b and 20c)

21 OTHER DISBURSEMENTS

22 TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)

III. CASH SUMMARY

23 CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD

24 TOTAL RECEIPTS THIS PERIOD (From Line 16)

25 SUBTOTAL (Add Line 23 and Line 24)

26 TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)

27 CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)

4675

53,827.25

4675

7000

47,311.05

7000

11,675

113,238.30

840.13

84,209.19

4200

43,111.05

4200

7000

7000

12000.13

100,409.19

639.47

11,675

12,314.42

12000.13

274.34



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Mantoloking, New Jersey 08738

RE: MUR
Morris for Senate Committee,
and Robert Morris, as treasurer

Dear Mr. Morris:

On , 1985, the Federal Election Commission determined that there is reason to believe the Morris for Senate Committee and and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, along with your answers to the enclosed questions, within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

06040590175

Letter to Robert Morris, Treasurer
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040390178

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
STAFF MEMBER & TEL. NO.
Charles Snyder
(202) 523-4000

RESPONDENTS: Morris for Senate Committee and
Robert Morris, as treasurer

SUMMARY OF ALLEGATIONS

This inquiry was generated by a referral from the Reports Analysis Division ("RAD"). According to RAD, the April and July 1984 Quarterly reports of the Morris For Senate Committee ("MFS") the principal campaign committee authorized by Robert Morris in connection with his candidacy for the Republican nomination for the office of U.S. Senator from New Jersey in 1984, showed receipt of a \$3500 contribution from the National Conservative Coalition ("NCC") and a \$4500 contribution from Eastern States Political Action Committee, Inc. ("ESPAC"). NCC and ESPAC are both committees that have not registered with the Commission.

RAD therefore advised MFS on November 30, 1984 that it had accepted excessive contributions from the two unregistered committees. MFS consequently refunded \$3500 to ESPAC and \$3500 to NCC, retaining \$1000 of the ESPAC contribution. MFS was advised by RAD that these refunds would be taken into account by way of mitigation, but that the Commission might take further legal steps concerning the acceptance of the excessive contributions.

The foregoing facts suggest that MFS violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act ("the Act") by accepting excessive contributions from ESPAC and NCC.

7710610403

FACTUAL AND LEGAL ANALYSIS

86040590178

The Act permits multicandidate political committees, as defined in 2 U.S.C. § 441a(a)(4), to contribute as much as \$5000 to the authorized committee of a candidate for Federal office. 2 U.S.C. § 441a(a)(2). Among the criteria for the status of multicandidate political committee is the requirement that the committee have been registered with the Commission for at least six months. 2 U.S.C. § 441a(a)(4). Since neither NCC nor ESPAC has registered, these committees are necessarily subject to the contribution limits set forth in 2 U.S.C. § 441a(a)(1). The applicable limitation on contributions to a candidate "and his authorized political committees with respect to any election for Federal office" is \$1000. Id.

The Act further provides that: "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section." 2 U.S.C. § 441a(f). There is thus reason to believe that MFS's acceptance of contribution in excess of \$1000 from NCC and ESPAC constitutes a violation of 2 U.S.C. § 441a(f).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

3 April 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE MORRIS FOR SENATE COMMITTEE

This is a referral of the Morris for Senate Committee (the "Committee"). The Committee has accepted and refunded apparent excessive contributions totalling \$6,000 from two (2) unregistered committees.

For your information, New Jersey state law permits unlimited corporate and labor union contributions to political committees.

If you have any questions, please contact Gregory Swanson at 523-4048.

Attachment

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 April 1985

ANALYST: Gregory Swanson

I. COMMITTEE: Morris for Senate Committee
(C00172528)
Robert Morris, Treasurer
(July 17, 1984 - present)
Edwin G. Fisher, Jr., Treasurer
(February 1, 1984-July 17, 1984)
Thomas H. Jordan, Treasurer
(November 16, 1983-January 31, 1984)
1237 Ocean Avenue
Mantoloking, NJ 08738^{1/}

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contributions from Two Unregistered Committees (2 U.S.C. §441a(f))

The Morris for Senate Committee (the "Committee") disclosed the receipt of contributions totalling \$8,000 from two (2) unregistered committees in 1984. The total amount was designated for the primary election, resulting in the receipt of apparent excessive contributions totalling \$6,000.^{2/}

The Committee's 1984 April and July Quarterly Reports itemized the receipt of a \$1,000 contribution on March 30, 1984, and a \$3,500 contribution on June 3, 1984, from Eastern States PAC. The July Quarterly Report also disclosed the receipt of a \$3,500 contribution on June 3, 1984, from the National Conservative Coalition (Attachments 3 and 4).

^{1/} The Committee informed the Commission of its new mailing address on its 1984 Year End Report.

^{2/} The two unregistered committees have the same address. Their responses were received in the same envelope. In addition, according to the cover letters to their responses, Mr. Nicholas Kins is an officer of both committees (Attachment 2). If the unregistered committees are affiliated, the apparent excessive amount contributed would equal \$7,000.

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MORRIS FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

A Request for Additional Information ("RFAI") was sent regarding the 1984 July Quarterly Report on November 30, 1984 (Attachment 5). The RFAI requested that the Committee refund the amounts in excess of \$1,000 per election and/or provide the Commission with any additional clarifying information concerning the contributors or the reporting of the receipts.

The candidate, Mr. Robert Morris, serving as the Committee's treasurer, responded in a letter received December 17, 1984 (Attachment 6). Mr. Morris stated that the two political committees had been given two options by the FEC, one calling for his campaign to return \$7,000 and the other his returning \$5,000.^{3/} He further explained that, as of the date of his letter, the two political committees had not told him which option they were taking; however, he was prepared to comply. Finally, he requested an extension of time until the committees made their decision.

On December 19, 1984, Mr. Morris telephoned the Reports Analysis Division ("RAD") analyst to ask if his response had been received by the Commission (Attachment 7). He also indicated that he had disbursed \$7,000 of the Committee's funds to refund the excessive amounts from the two political committees. The analyst told Mr. Morris that he should inform the Commission of the refunds in writing.

On December 20, 1984, a Second Notice was sent to the Committee, acknowledging the candidate's letter (Attachment 8). This notice informed the Committee that a written statement regarding the refunds was still required.

Mr. Morris responded in another letter, received December 24, 1984. This letter stated that the Morris for Senate Committee had refunded \$3,500 to the Eastern States PAC and \$3,500 to the National Conservative Coalition (Attachment 9). The Committee's 1984 Year End Report showed refunds totalling \$7,000 on Line 20 of the Detailed Summary Page (Attachment 10). In addition, responses received from the unregistered committees included photocopies of the refund checks from the Morris for Senate Committee dated December 17, 1984 (Attachment 2).

^{3/} The Committee's calculations did not include the \$1,000 contribution received by Morris for Senate from Eastern States PAC on March 30, 1984.

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MORRIS FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

IV. OTHER PENDING MATTERS INITIATED BY RAD:

The Committee has received an apparent excessive contribution from an individual. The individual, who is an officer of both of the unregistered committees discussed in this referral, contributed \$500 on March 30, 1984. The Committee's 1984 Year End Report disclosed the receipt of a \$1,000 contribution from this individual on January 4, 1985. Both of these contributions were designated for the primary election, resulting in the receipt of an apparent excessive contribution of \$500. The Committee was sent an Informational Notice regarding this matter on April 2, 1985.

35040590182

8 6 0 4 0 5 9 0 1 8 3

FEDERAL ELECTION COMMISSION
1983-1984

DATE 1APR85

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
MORRIS, ROBERT	SENATE	REPUBLICAN PARTY					1984 ELECTION	ID# S2NJ00072	
1. STATEMENT OF CANDIDATE									
1983 STATEMENT OF CANDIDATE							16NOV83	2 83SEN/007/0420	
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
MORRIS FOR SENATE COMMITTEE							ID# C00172528 SENATE		
1983 STATEMENT OF ORGANIZATION							16NOV83	3 83SEN/007/0422	
YEAR-END			10,510		8,323		29AUG83 -31DEC83	10 84SEN/004/0114	
1984 STATEMENT OF ORGANIZATION - AMENDMENT							17JUL84	3 84SEN/015/0089	
APRIL QUARTERLY			13,710		13,297		1JAN84 -31MAR84	11 84SEN/008/2487	
PRE-PRIMARY			12,847		13,640		1APR84 -16MAY84	12 84SEN/011/1582	
JULY QUARTERLY			59,596		59,061		17MAY84 -30JUN84	14 84SEN/015/2635	
JULY QUARTERLY - AMENDMENT			-		-		17MAY84 -30JUN84	6 84SEN/030/0629	
JULY QUARTERLY - AMENDMENT			-		-		17MAY84 -30JUN84	3 84SEN/030/1755	
REQUEST FOR ADDITIONAL INFORMATION							17MAY84 -30JUN84	3 84FEC/350/0289	
REQUEST FOR ADDITIONAL INFORMATION 2ND							17MAY84 -30JUN84	2 84FEC/357/1958	
OCTOBER QUARTERLY			3,461		5,162		30JUN84 -15OCT84	8 84SEN/022/2654	
YEAR-END			11,675		12,040		15OCT84 -31JAN85	7 85SEN/003/0997	
TOTAL			111,799	0	111,523	0		82 TOTAL PAGES	
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All reports have been reviewed.

Cash on hand as of January 31, 1985 - \$ 274.34

Debts owed to the Committee - \$ 0.00

Debts owed by the Committee - \$42,567.90*

* This figure was calculated by the RAD analyst. The figure reported by the Committee does not reflect a loan repayment of \$2,792.66 disclosed on the 1984 July Quarterly Report.

ATTACHMENT 1



ATTACHMENT
(page 1 of 2)

85 JAN 2 11:52

EASTERN STATES POLITICAL ACTION COMMITTEE, INC.

3 MAPLE AVENUE

ANDOVER, NJ 07821

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

As per our telephone conversation you agreed to forward this letter to the analyst who is handling the Eastern States Political Action Committee's case of its contribution to the Morris for Senate Committee.

In order to comply with the FEC Act as I discussed with you on the telephone we have decided to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the Eastern States Political Action Committee from the Morris for Senate Campaign Committee (check No. 443 for the amount of \$3500.00).

As per our telephone conversation this should satisfy our compliance with the Act and close the matter. Please, Confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
President

Enclose

86040590184

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER
443

Dec 17 1984

BB-430
812

PAY TO THE
ORDER OF

EASTERN STATES PAC.

\$ 3500.00

Three Five Hundred & 00/100

DOLLARS



Ocean County National
Bank
Member of The Sunbelt Bancorporation
Full Member FDIC

First Union

MEMO

⑆03⑆204309⑆

⑆69⑆004 9⑆ 0443

86040590185



NATIONAL CONSERVATIVE COALITION

3 MAPLE AVENUE, ANDOVER, N.J. 07821

PHONE 201/786-6591

ATTACHMENT
(page 3 of 5)

85 JAN 2 4:53

December 27, 1984

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Tangney:

In response to your letter of December 3, 1984 and our telephone conversation the National Conservative Coalition has decided to follow your second alternative in order to comply with the Federal Election Commission Act, i.e. to receive back a full contribution refund of \$3500.00 from the candidate to the Federal Office Mr. Robert Morris and not to register with the FEC and not to file the FEC Form 3X.

Attached to this letter is a copy of the refund check received by the National Conservative Coalition from the Morris for Senate Campaign Committee (check No. 444 for the amount of \$3500.00).

As per your letter and our telephone conversations this should satisfy our compliance with the Act and close the matter. Please, confirm this in writing.

Thanking for your cooperation.

Sincerely yours,

Nicholas Kins
Nicholas Kins
Director

Enclosure

86040590185

86040590187

MORRIS FOR SENATE CAMPAIGN COMMITTEE

NUMBER

444

Dec 17 1984

EF-430
512

PAY TO THE
ORDER OF

National Conservative Coalition
Thy Five Hundred + 96

\$ 350.00

DOLLARS

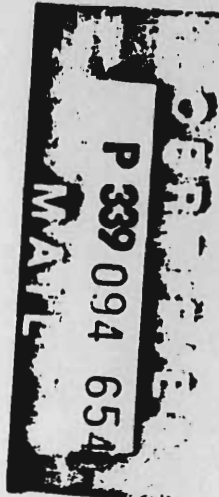


ocean county national
bank
Member of The Sunbelt Bancorporation
First National, The Sunbelt Bank

Rust Manning

⑆03⑆204309⑆

⑆69⑆004 9⑆ 0444



Mr. Mike Tanqney
Report Analyst

Mr. Mike Tanqney
Report Analyst
Reports Analysis Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



85 JAN 2 411:52

88106504098

SCHEDULE A

ITEMIZED RECEIPTS

1984 APRIL QUARTERLY REPORT

Page 1 of 1 for
 John W. Johnson
 This schedule should be filed with
 copy of the Detailed
 Summary Report

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

Name of Committee (in Full)

MASS. REP. E. J. JOHNSON Campaign Committee

A. Full Name, Mailing Address and ZIP Code

*EAST SIDE CONSERVATIVE CLUB of
 NEW YORK
 39 E. 68TH
 NEW YORK CITY, N.Y. 10021*

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)

3-1-84

Amount of Each
Receipt This Period
750.00

Occupation

Aggregate Year-to-Date-\$

B. Full Name, Mailing Address and ZIP Code

*THE CONSERVATIVE CIRCLE P.A.C.
 501 CHURCH STREET
 VIRGINIA, VA. 22180*

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)

3-28-84

Amount of Each
Receipt This Period
500.00

Occupation

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

*EASTERN STATES PAC
 3 MAPLE AVENUE
 ANDOVER, N.J. 07811*

Receipt For: ☒ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)

3-30-84

Amount of Each
Receipt This Period
1000.00

Occupation

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (continued) 750.00

TOTAL This Period (last page this line number only) 750.00

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SCHEDULE A

ITEMIZED RECEIPTS

ATTACHMENT 4

1984 JULY QUARTERLY REPORT

Any information supplied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions, one or for commercial purposes, other than using the name and address of any political committee or other contributions from such committees

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code FEDERAL STATES PAC 3 MAPLE AVENUE ANDOVER NEW JERSEY		Name of Employer Occupation	Date (month, day, year) 6 3 84	Amount of Each Receipt This Period 3500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 4,500.00		
B. Full Name, Mailing Address and ZIP Code NATIONAL LABORATION COALITION 3 MAPLE AVENUE ANDOVER NEW JERSEY		Name of Employer Occupation	Date (month, day, year) 6 3 84	Amount of Each Receipt This Period 3500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 5,500.00		
C. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)				7000.00
TOTAL This Period (Enter page this line number only)				7000.00

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 8402015239



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543
NOV 30 1984

22-2

Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Montclair, NJ 08737

Identification Number: C0017278

Reference: July Quarterly Report (5/17/84-6/30/84)

Dear Mr. Morris:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contribution(s) in question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), prompt action by you to refund the excessive amount will be taken into consideration.

86040590191
91033:00299

84033:00290

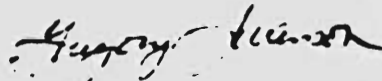
-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution, or any other source. If the candidate borrowed funds from a lending institution or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 CFR 110.10. (11 CFR 100.7(a)(1) and 104.3(d))

-On Schedule D of your report you have failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and ending of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report to include this information. (11 CFR 104.11)

In addition, your previous report disclosed an outstanding balance owed to R.C. Maxwell in the amount of \$646.00. Schedule B of this report shows no payments on this debt and no outstanding balance on Schedule D. Please clarify and amend accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Gregory Swanson
Reports Analyst
Reports Analysis Division

REC-17 40:00
 R S3283
 NJ REP C1464
 5/17-6/30/84

MORRIS FOR SENATE COMMITTEE
 P.O. BOX 1605
 POINT PLEASANT BEACH, N.J. 08742

Gregory Swanson
 Reports Analyst
 Federal Election Commission
 Washington, DC 20463

Dear Mr. Swanson,

I have your letter which was dated November 30 which came here the first week of December. With respect to the two \$3500 contributions from the Eastern States PAC and the National Conservative Coalition, those PACs, since the date of your letter have been given by the FEC two options, one calling for my campaign to return \$7000 and the other my returning \$5000. As of the date of this writing they have not told me which option they are taking and I am prepared to comply. I ask that you allow me an extension until the PACs make their decision.

With respect to my loans of \$40,000 to the campaign, I enclose the evidence of my taking a second lien equity mortgage in the amount of \$50,000 which netted me \$39,000. In addition when the bills came into Mr. Fisher, the former treasurer, the telephone bills and the travel bills (gasoline etc.) charged on my personal accounts could not be paid so I paid them and charged the amounts to campaign debts.

On schedule D - I have reconstructed the items as best I could. I do not understand why Mr. McKenna, the CPA who had been handling the account, did not fill them in. You will notice that I did not fill in Litho Services, the #1 item, the reason being that there is a dispute between Litho and ourselves as to the amounts owed. And we are endeavoring to work it out.

Will you advise me of your response to the above? Please address it to POBox One, Mantoloking, NJ 08738.

Sincerely,

Robert Morris
 Robert Morris

P.S. With respect to R.C. Maxwell item, Maxwell is a subdivision of Outdoor Advertising (Gannett) and has the same billing.

Will you send another form for my file in the future?

85040590193

MEMORANDUM FOR THE FILES ● Telecon

SUBJECT: Response to RFAI sent December 20, 1984 concerning apparent 441a violation and source of candidate loan.
DATE: December 19, 1984
FROM: Mr. Robert Morris (candidate/treasurer)
TO: Gregory Swanson (Analyst)
NAME OF COMMITTEE: Morris for Senate Committee - C00172528/NJ

Mr. Robert Morris telephoned to ask if his written response had been received by the Commission. He also indicated that he disbursed \$7,000 of the Committee's funds to refund the excessive amounts from the two PAC's. I said that the response had been received, however, that another written response was necessary to indicate that the Committee had refunded the excessive amounts. In addition, I explained that the transactions should be included in the Committee's next report.

I explained that his response, concerning the source of the \$40,311 candidate loan, raised a new question as the loan was secured by means of a second lien equity mortgage on his and his wife's home, evidenced by the signed loan agreement attached. I explained that the Commission would require a statement disclosing the value of the property in an amount that is at least double the value of the loan. He said he had just sold the house this last weekend for \$500,000 and would be able to provide a statement to that effect.

86040390194



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

20-3

December 30, 1984

**Robert Morris, Treasurer
Morris for Senate Committee
1212 Ocean Avenue
Montoloking, NJ 08077**

Identification Number: C00172526

Reference: July Quarterly Report (5/17/84-6/30/84)

Dear Mr. Morris:

On November 30, 1984 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 17, 1984 response is incomplete because you have not provided all the requested information. The Commission notes your letter indicating that you are seeking to determine the amounts of the contribution refunds. For this response to be considered adequate, the following information is still required.

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution(s) which exceeds the limits, the Commission recommends that you refund to the donor(s) the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page of your next report. (2 U.S.C. 441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

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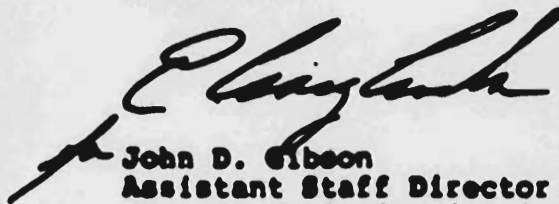
If the contribution(s) question was incorrectly reported and/or you have additional information regarding the contributor(s), you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), prompt action by you to refund the excessive amount will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Gregory Swanson on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

86040590195
9403371059

Robert Morris

100024 All: 20

December 19, 1984

Gregory Swanson
 Reports Analysis Division
 Federal Election Commission
 Washington, DC 20463

Dear Mr. Swanson,

I write to confirm our telephone conversation of today, and report:

1. With respect to the loan taken out as a second lien on our residence, 1201 Ocean Ave., Mantoloking, NJ on December 12 we sold that home for \$525,000 thereby showing my equity.

2. The Morris for Senate Committee has sent \$3500 checks to the Eastern States Political Action Committee and the National Conservative Coalition thus complying with the settlement made by those two PACS with the FEC.

Must I further report this to the Senate or will my reporting to you fulfill my responsibility?

Thank you for your helpfulness in this transaction. I will report the \$3500 returns in the January 15 report.

Sincerely,

Robert Morris

86040590197

94-2700175

1984 YEAR-END
REPORTDETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)

Month (covering the Period)

From

To

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Name Every Unincorporated \$ 675)

(b) Political Party Committees

(c) Other Political Committees

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

13. LOANS

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (add 13a and 13b)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15. OTHER RECEIPTS (Dividends, Interest, etc.)

16. TOTAL RECEIPTS (Add 11e, 12, 13c, 14 and 15)

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

19. LOAN REPAYMENTS

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)

20. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)

21. OTHER DISBURSEMENTS

22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD

24. TOTAL RECEIPTS THIS PERIOD (From Line 16)

25. SUBTOTAL (Add Line 23 and Line 24)

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)

4,675

53,827.25

4,675

7,000

47,311.05

7,000

11,675

103,238.30

846.13

84,209.19

4,200

43,111.05

4,200

7,000

7,000

12,646.13

100,409.19

639.47

11,675

12,314.42

12,000.13

274.34

8604059019816



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 3 1984

Treasurer
National Conservative Coalition
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

In addition, the Act precludes a political committee from making a contribution to a candidate to Federal office in excess of \$1,000 per election, until it becomes a multicandidate committee. The term "multicandidate committee" means a political committee which has been registered with the Commission, Clerk of the House or Secretary of the Senate for at least six months; has received contributions for Federal elections from more than 50 persons; and (except for any State political party organization) has made contributions to five or more Federal candidates. 2 U.S.C. §441a(a)(4) and 11 CFR 100.5(e)(3).

A review of the receipts reported by the Morris for Senate Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC Form 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms enclosed; or

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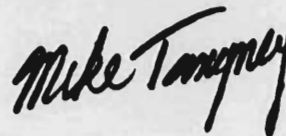
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

Enclosures

86040390200

SCHEDULE A

ITEMIZED RECEIPTS

Use this schedule to report contributions for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code EASTMAN STATES PAC 3 MAPLE AVENUE ANDOVER NEW JERSEY		Name of Employer Occupation	Date (month, day, year) 6-3-84	Amount of Each Receipt This Period 3500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$ 4,500.00		
B. Full Name, Mailing Address and ZIP Code NATIONAL CONSERVATIVE LEAGUE 3 MAPLE AVENUE ANDOVER NEW JERSEY		Name of Employer Occupation	Date (month, day, year) 6-3-84	Amount of Each Receipt This Period 3500.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$ 3,500.00		
C. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$		
D. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$		
E. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$		
F. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$		
G. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (optional)				7000.00
TOTAL This Period (last page this line number only)				7000.00

8 6 0 8400329001250215 3 9



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 8 1984

Treasurer
Eastern States Political
Action League
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year (for the purpose of influencing any election for Federal office). 2 U.S.C. §431(4).

In addition, the Act precludes a political committee from making a contribution to a candidate to Federal office in excess of \$1,000 per election, until it becomes a multicandidate committee. The term "multicandidate committee" means a political committee which has been registered with the Commission, Clerk of the House or Secretary of the Senate for at least six months; has received contributions for Federal elections from more than 50 persons; and (except for any State political party organization) has made contributions to five or more Federal candidates. 2 U.S.C. §441a(a)(4) and 11 CFR 100.5(e)(3).

A review of the receipts reported by the Morris For Senate Campaign Committee indicates that your organization may have made an excessive contribution to a Federal candidate for the 1984 Primary election. This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization, file disclosure reports on FEC Form 3X, and obtain a contribution refund of the amount in excess of the limitations (relevant informational materials and forms enclosed; or

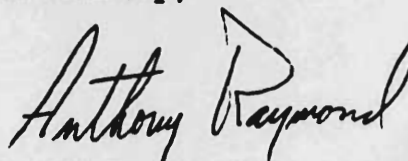
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence Federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, has not made excessive contributions to a Federal candidate, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Anthony Raymond
Reports Analyst
Reports Analysis Division

Enclosures

86040590203

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

Name of Contributor (in Full)

A. Full Name, Mailing Address and ZIP Code

EASTMAN STATES PAC
3 Maple Avenue
Andover New Jersey

Name of Employer

Date (month, day, year)

6.8.84

Amount of Each Receipt This Period
3500.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$ *45,000.00*

B. Full Name, Mailing Address and ZIP Code

NATIONAL CONSERVATIVE LEAGUE
3 Maple Avenue
Andover New Jersey

Name of Employer

Date (month, day, year)

6.8.84

Amount of Each Receipt This Period
3500.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date—\$ *5,000.00*

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)..... *7000.*

TOTAL This Period (last page this line number only)..... *7000.*

86000002400530

TR

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Nicholas Kins

COMMITTEE: Eastern States Political Action League &
National Conservative Coalition

DATE: December 11, 1984

SUBJECT(S): Contributions to the Morris For Senate Committee

Mr. Kins called in response to letters sent the committees concerning their unregistered status and the contributions they had made to the Morris For Senate Committee in the amount of \$3,500 each. He asked what action should be taken to resolve this matter with the FEC. I explained that if the committees registered it would be necessary to obtain a refund of the amount in excess of \$1,000 for each committee. In addition, if they did not register it would be necessary to obtain a full refund or the recipient committee could transfer the funds to an account not used to influence Federal elections. Mr. Kins stated that he would attempt to obtain a full refund from the candidate committee and that he would call me back after contacting the treasurer of that committee.

36040590205

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Nicholas Kins

COMMITTEE: Eastern States Political Action League &
National Conservative Coalition

DATE: December 22, 1984

SUBJECT(S): Contributions to the Morris For Senate Committee

Mr. Kins stated that he had contacted the candidate committee and that an agreement had been reached that a full refund of the contributions would be made. He asked whether this would resolve the problem with the FEC and whether any further action would be taken regarding the non candidate committees. I advised him that when the refunds are received that copies of the checks should be sent to the FEC and that it was not likely that any further action would be taken regarding the matter. Mr. Kins also asked that when the copies of the refunded checks are received that I show the one for Eastern States Political Action League to the analyst that had sent the letter.

86040590206



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1984

Treasurer
National Conservative Coalition
3 Maple Avenue
Andover, NJ 07821

Dear Treasurer:

This is to inform you that as of this date, the Commission has not received your response to our letter dated December 3, 1984. Our letter notified you that a review of reports filed with the Commission indicates that your organization may have made expenditures which qualify it as a political committee and exceed the contribution limitations of the Federal Election Campaign Act.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

If you should have any questions related to this matter, please contact Mike Tangney on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

86040590207



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1984

Treasurer
Eastern States Political
Action League
3 Maple Avenue
Andover, NJ 07821

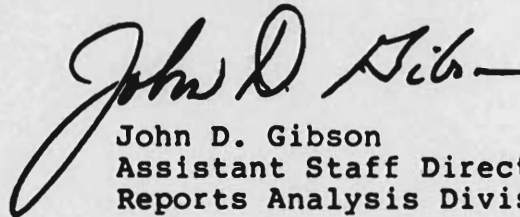
Dear Treasurer:

This is to inform you that as of this date, the Commission has not received your response to our letter dated December 6, 1984. Our letter notified you that a review of reports filed with the Commission indicates that your organization may have made expenditures which qualify it as a political committee and exceed the contribution limitations of the Federal Election Campaign Act.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

If you should have any questions related to this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

86040590208

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Nicholas Kins

COMMITTEE: Eastern States Political Action League &
National Conservative Coalition

DATE: January 11, 1985

SUBJECT(S): Request for confirmation of committee status

Mr. Kins called to inquire if a letter had been sent to him by the FEC confirming that there would be no additional action taken against the non candidate committees with regard to the contributions made to the Morris For Congress Committee. I told him that I did not anticipate any further action but that it was not the practice of this office to send out letters of confirmation.

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86040590210



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2025

Date Filmed 6/2/86 Camera No. --- 2

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