



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2579

DATE FILMED 4/3/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040703121

DAVID LANDAU

87 DEC -3 PM 11:56

87 DEC -3 PM 5:18

FEDERAL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

December 1, 1987

Scott E. Thomas, Chairman
Federal Election Commission
PEPCO Building
999 E Street, N.W.
Washington, D.C. 20463

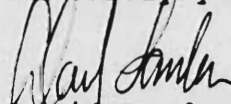
Dear Chairman Thomas:

An examination of Congressman Curt Weldon's campaign finances has revealed that the Congressman received enormous amounts of campaign contributions from individuals who also provided funds for Carl Channel's efforts to provide arms to the Contras through the National Endowment for the Preservation of Liberty ("NEPL").

During the course of the 1984 and 1986 campaigns Mr. Weldon received \$18,500 in contributions from the Hooper family. The Hoopers contributed \$100,000 to NEPL's toy fund, which funded arms for the Contras. I have enclosed documentation of these contributions.

I hereby request the Commission investigate these contributions to determine whether there has been any violation of the federal election laws or whether they are part of a effort to influence improperly the 1984 and 1986 congressional elections in the 7th District of Pennsylvania.

Sincerely yours,


David Landau

88040703122

THE NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY

TOP 25 CONTRIBUTORS

AS OF OCTOBER 3, 1986

CONTRIBUTOR	TOTAL	CAFP	TOYS	FOOD	SDI
GARMODD	2,546,598	501,000	1,995,598	50,000	
NEWINGTON	1,148,471	994,471			
KING	921,500	466,500		5,000	150,000
SACHER	400,000	400,000			
WARM	355,232	335,232			
HUNT	237,500	237,500			
HOOPER	145,000	45,000	100,000		
O'BOYLE	130,000		130,000		
BECK	108,133	108,133			
DRISCOLL	106,000	46,000			60,000
BRANDON	100,000	100,000			
O'NEIL	76,125	76,125			
RAMSEY	48,000	30,000			
GIDDENS	42,500	10,000	32,500		
SALWASSER	42,000	20,000		2,000	
LYNCH	39,000	32,000		4,000	
STARNES	30,000	30,000			
MERCUSSE	22,535	22,535			
ROBERTS	22,125	16,125		1,000	5,000
CLAGGETT	20,000		20,000		
MARVIN	15,000				15,000
ADAMKIEWICZ	11,700	10,500			
ANDERSON	10,000	5,000		5,000	
FERGUSON	10,000	10,000			
PIERCE	10,000				
CHRISTIAN	7,700	2,700		5,000	

1986 CONTRIBUTIONS

DATE	CONTRIBUTOR	SOLICITOR	PROJECT	BANK ACCT	AMOUNT
APR 01	O'BOYLE	JANE	TOYS	PATTON	130,000.00
APR 02	ELI S. JACOBS	JANE	CAFP	SACHER	1,000.00
APR 02	US INT'L CONTAINER	JANE	CAFP	SACHER	250.00
APR 04	LIDDELL	JANE	CAFP	SACHER	1,000.00
APR 07	FERGUSON	JANE	CAFP	SACHER	5,000.00
APR 14	MARTINEZ	JANE	CAFP	SACHER	450.00
APR 14	CHARTS	JANE	CAFP	SACHER	250.00
APR 17	FERGUSON	JANE	CAFP	SACHER	5,000.00
APR 21	CABALLERO	JANE	CAFP	SACHER	300.00
AUG 13	BENDETSEN	JANE	FOOD	NEPL REG	300.00
AUG 28	CONN FIDATN TX	JANE	FOOD	NEPL REG	2,000.00
FEB 86	COLLINS	JANE	CAFP	SPEC 1	500.00
FEB 86	HOOPER	JANE	CAFP	SPEC 1	30,000.00
FEB 86	GOLDMAN	JANE	CAFP	SPEC 1	200.00
FEB 86	BENDETSEN	JANE	CAFP	SPEC 1	100.00
FEB 86	ROBERTS	JANE	CAFP	SPEC 1	10,000.00
JAN 86	STANIS	JANE	CAFP	SPEC 1	30,000.00
JUL 25	BENDETSEN	JANE	SDI	SDI 84	1,000.00
JUL 29	THAKE	JANE	GENERAL PRO.	NEPL REG.	1,000.00
JUN 04	QUERAL/RAHOS	JANE	SDI	SDI 84	50.00
JUN 20	ADAMS	JANE	CAFP	SENTINEL	1,000.00
JUN 23	ROBERTS	JANE	CAFP	SENTINEL	5,000.00
JUN 23	ROBERTS	JANE	SDI	SDI 84	5,000.00
JUN 30	MARVIN	JANE	SDI	SDI 84	15,000.00
MAR 10	ADAMS	JANE	CAFP	SACHER	1,000.00
MAR 12	KILLESANDRA (HOOPER)	JANE	CAFP	SACHER	15,000.00
MAR 13	MILLER	JANE	CAFP	SACHER	50.00
MAR 17	BENDETSEN	JANE	CAFP	SACHER	100.00
MAR 17	MOSBACHER	JANE	CAFP	SACHER	5,000.00
MAR 20	MANATEE STEVE.	JANE	CAFP	SACHER	500.00
MAR 31	TEXAS FIRST	JANE	CAFP	SACHER	747.50
MAY 29	HOOPER	JANE	TOYS	PATTON	100,000.00

344,877.50

88040703124

1986 CASH RECEIPTS ALL ORGANIZATIONS

DATE	CONTRIBUTOR	COLLECTOR	PROJECT	ORGANIZATION	BOOK ACCT	AMOUNT
01/30/86	STROM	JANE	CAPP	NEPL	SPEC 1	30,000.00
02/28/86	ROBERTS	JANE	CAPP	NEPL	SPEC 1	10,000.00
02/28/86	COLLINS	JANE	CAPP	NEPL	SPEC 1	300.00
02/28/86	BENNETSON	JANE	CAPP	NEPL	SPEC 1	100.00
02/28/86	HOOVER	JANE	CAPP	NEPL	SPEC 1	30,000.00
02/28/86	GOLDMAN	JANE	CAPP	NEPL	SPEC 1	200.00
03/10/86	ADAMS	JANE	CAPP	NEPL	SPEC 1	1,000.00
03/12/86	KILLER (WARRA HOOVER)	JANE	CAPP	NEPL	SPEC 1	15,000.00
03/13/86	HOLLER	JANE	CAPP	NEPL	SPEC 1	50.00
03/17/86	HENNINGER	JANE	CAPP	NEPL	SPEC 1	5,000.00
03/17/86	BENNETSON	JANE	CAPP	NEPL	SPEC 1	100.00
03/20/86	HOWARD STEVE	JANE	CAPP	NEPL	SPEC 1	300.00
03/31/86	OSER (TENNIS FIRST)	JANE	CAPP	NEPL	SPEC 1	747.30
04/01/86	O'DWYLE	JANE	TOYS	NEPL	SPEC 2	130,000.00
04/02/86	AL J. S. JACOBS	JANE	CAPP	NEPL	SPEC 1	1,000.00
04/02/86	JAN INT'L CONTAINER	JANE	CAPP	NEPL	SPEC 1	250.00
04/04/86	LEWIS	JANE	CAPP	NEPL	SPEC 1	1,000.00
04/07/86	FERRADON	JANE	CAPP	NEPL	SPEC 1	5,000.00
04/14/86	CHARTS	JANE	CAPP	NEPL	SPEC 1	230.00
04/14/86	MARTINEZ	JANE	CAPP	NEPL	SPEC 1	450.00
04/17/86	FERRADON	JANE	CAPP	NEPL	SPEC 1	5,000.00
04/21/86	CABALLERO	JANE	CAPP	NEPL	SPEC 1	300.00
05/29/86	HOOVER	JANE	TOYS	NEPL	SPEC 2	100,000.00
06/04/86	GUERIN/RANDS	JANE	SDI	NEPL	SPEC 4	50.00
06/20/86	ADAMS	JANE	CAPP	SENT	SENT	1,000.00
06/23/86	ROBERTS	JANE	SDI	NEPL	SPEC 4	5,000.00
06/23/86	ROBERTS	JANE	CAPP	SENT	SENT	5,000.00
06/30/86	MARTIN	JANE	SDI	NEPL	SPEC 4	15,000.00
07/25/86	BENNETSON	JANE	SDI	NEPL	SPEC 4	1,000.00
07/29/86	THANE	JANE	GENERAL PRO.	NEPL	REG	1,000.00
08/13/86	BENNETSON	JANE	FOOD	NEPL	REG	300.00
08/28/86	CORN FIDATH TX	JANE	FOOD	NEPL	REG	2,000.00
09/02/86	WASH CONSLTS GAP	JANE	FOOD	NEPL	REG	1,000.00
09/05/86	OSBURN	JANE	FOOD	NEPL	REG	100.00
09/19/86	ADAMS	JANE	ATAC	ATAC FED	MADISON FED	500.00
09/23/86	WAGLE	JANE	FOOD	NEPL	REG	450.00
10/07/86	HOOVER	JANE	ATAC	ATAC FED	MADISON FED	3,000.00
10/14/86	NOBUSINESS	JANE	ATAC	ATAC SEF	MADISON SEF	2,000.00
10/17/86	HAZEL	JANE	ATAC	ATAC SEF	MADISON SEF	500.00
10/20/86	ROBERTS, DUANE	JANE	ATAC	ATAC SEF	MADISON SEF	2,500.00
10/22/86	MARTINEZ	JANE	GEM	NEPL	REG	100.00
10/27/86	APPERT	JANE	DONOR	WGF	PALM WGF	151.00
10/20/86	MCLAUGHLIN	JANE	DONOR	WGF	PALM WGF	151.00
10/22/86	PARKER	JANE	DONOR	WGF	PALM WGF	302.00
10/27/86	GARVEY	JANE	RADIO	WGF	PALM WGF	800.00
10/29/86	MILLER, MICHAEL	JANE	RADIO	WGF	PALM WGF	50.00

378,481.50

33040703125

HAND DELIVERED

For Authorized Committee

HAND DELIVERED

Clerk of the House #108042

66 SEP 23 AM 10:00

1 Name of person who has filed this report
The Malden For Congress Committee
 Address (Number and Street)
Post Office Box 1989
 City, State and Zip Code
Medford, PA 19063

2 FEC Identification Number
C00175869

3 Is this Report on a Amendment?
☒ YES ☐ NO

4 Check if address is different than previous reports
☐

TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☒ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Reporting Year Only)
- ☐ Tenth day report preceding election on _____
- ☐ Tenth day report following the election on _____ of the State
- ☐ Terminating Report

This report contains activity for: ☒ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Prior Period
5	Covering Period <u>May 1</u> through <u>June 30, 1986</u>		
6	Net Contributions (other than loans)		
	(a) Total Contributions (other than loans) (From Line 11 (a))	77,446.24	236,319.65
	(b) Total Contribution Refunds (From Line 20 (a))	100.00	400.00
	(c) Net Contributions (other than loans) (Subtract Line 6 (b) from 6 (a))	77,346.24	235,919.65
7	Net Operating Expenditures	42,505.01	123,711.35
	(a) Total Operating Expenditures (From Line 17)		
	(b) Total Offset to Operating Expenditures (From Line 14)		44.47
	(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	42,505.01	123,666.88
8	Cash on Hand at Close of Reporting Period (From Line 27)	162,321.20	
9	Debits and Credits Owed TO The Committee (From an Schedule C or Schedule D)	NONE	
10	Debits and Credits Owed BY The Committee (From an Schedule C or Schedule D)	2,122.40	

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

For further information, contact:
 Federal Election Commission
 Toll Free 800-426-6922
 Local 202-453-6800

PRIMA V. CLAYTON
 Vice or Acting Clerk of Committee

Signature of Treasurer

August 7, 1986

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

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

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FOC FORM 3 (JAN)

SCHEDULE A

ITEMIZED RECEIPTS

Page 6 of 8
Line No. T1A

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: THE WELDON FOR CONGRESS COMMITTEE FECA C00175869

Samuel J Talucci

EMPLOYER: Rahn & Mass
OCCUPATION: Executive
Date

Self House Rt
Haverford, PA 19041

05/29/86

Amount

500.00

RECEIPT FOR: General

AGGREGATE YTD: 500.00

James C Buckley

EMPLOYER: Gibbons, Buckley, & Smith
OCCUPATION: Attorney
Date

14 M 2nd St
Media, PA 19063

05/29/86

Amount

500.00

RECEIPT FOR: General

AGGREGATE YTD: 500.00

P M Orr

EMPLOYER: Neill & Co.
OCCUPATION: Consultant
Date

2511 P St NW
Washington, DC 20007

05/30/86

Amount

250.00

RECEIPT FOR: General

AGGREGATE YTD: 250.00

Nancy S DeRose

EMPLOYER:
OCCUPATION: Housewife
Date

Laurier Hill Rd
Bryn Mawr, PA 19010

05/04/86

Amount

1,000.00

RECEIPT FOR: General

AGGREGATE YTD: 1,000.00

George Koudellis

EMPLOYER: Self-employed
OCCUPATION: Attorney
Date

42 Copley Rd
Upper Darby, PA 19082

05/19/86

Amount

500.00

RECEIPT FOR: Primary

AGGREGATE YTD: 500.00

Bruce H Hooper

EMPLOYER: Self-employed
OCCUPATION:
Date

27 Paper Mill Road
Newton Square, PA 19073

05/01/86

Amount

1,000.00

RECEIPT FOR: Primary

AGGREGATE YTD: 2000.00

PAGE SUBTOTAL = 2,750.00

8304070314007

SCHEDULE A

ITEMIZED RECEIPTS

Page 7 of 9
Line No. - 11A

Any information copied from such Reports or Statements may not be sold 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 committee.

Name of Committee: THE NELSON FOR CONGRESS COMMITTEE FECS C00175863

Bruce H Hooper	EMPLOYER: Self-employed OCCUPATION:	Date	Amount
27 Paper Mill Road Newton Square, PA 19073		05/01/86	1,000.00
RECEIPT FOR: General	AGGREGATE YTD:	2000.00	
Eileen S Hooper	EMPLOYER: OCCUPATION: Housewife	Date	Amount
27 Paper Mill Road Newton Square, PA 19073		05/01/86	1,000.00
RECEIPT FOR: Primary	AGGREGATE YTD:	2000.00	
Eileen S Hooper	EMPLOYER: OCCUPATION: Housewife	Date	Amount
27 Paper Mill Road Newton Square, PA 19073		05/01/86	1,000.00
RECEIPT FOR: General	AGGREGATE YTD:	2000.00	
John R Espinger	EMPLOYER: OCCUPATION:	Date	Amount
749 Blair Road Berwyn, PA 19312		05/11/86	200.00
RECEIPT FOR: General	AGGREGATE YTD:	200.00	
Joseph S Betz	EMPLOYER: Conrail OCCUPATION: Dispatch suprv	Date	Amount
711 Saville Avenue Eddystone, PA 19013		05/11/86	300.00
RECEIPT FOR: General	AGGREGATE YTD:	300.00	
Raymond S Wittig	EMPLOYER: Lipson, Hamburger OCCUPATION: Attorney	Date	Amount
4616 Holly Ridge Road Rockville, MD 20853		05/11/86	250.00
RECEIPT FOR: General	AGGREGATE YTD:	250.00	

PAGE SUBTOTAL = 3,750.00

HAND DELIVERED

October, 1986

Name of Candidate or Poll
The Walden For Congress Committee

Address (Street and Box)
Post Office Box 1906

City, State and Zip Code
Harris PA 19063

☐ Check if address is different than previously reported.

Is this Report an Amendment?
☐ YES ☐ NO

TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Twelfth day report preceding decision on _____ in the State of _____
- ☐ Twelfth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

This report contains activity for: ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Cdn Year Prior
5. Covering Period	July 1 through September 30, 1986		
6. Net Contributions (either than listed)			
(a) Total Contributions (either than listed) (From Line 11 add)		188,687.32	436,006.97
(b) Total Contributions Refunds (From Line 20 add)			400.00
(c) Net Contributions (either than listed) (From Line 6 add from 6 add)		188,687.32	435,606.97
7. Net Operating Expenditures			
(a) Total Operating Expenditures (From Line 17)		217,876.01	341,585.36
(b) Total Offset to Operating Expenditures (From Line 18)			44.47
(c) Net Operating Expenditures (From Line 7 add from 7 add)		217,876.01	341,540.89
8. Cash on Hand at Close of Reporting Period (From Line 27)		145,872.93	
9. Debts and Obligations Owed TO The Committee (From Line 28 or Schedule B)		NONE	
10. Debts and Obligations Owed BY The Committee (From Line 29 or Schedule B)		27,449.47	

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

For further information, contact:
Federal Election Commission
400 E Street, N.W.
Washington, D.C. 20543
Tel: 202-456-6000
Local: 202-456-6120

Arlos J. Flores
Type or Print Name of Candidate

[Signature]
Signature of Treasurer

October 11, 1986

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

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

POC FORM 3 (3-86)

88040703129

96013152301

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: THE NELSON FOR CONGRESS COMMITTEE PECO C00173869

Mary B Pastuszek

EMPLOYER: Self Employed
OCCUPATION: Bid. & Plum. Sup.

314 W. Rose Valley Road
Mallingsford, PA 19066

Date Amount
08/31/86 250.00

RECEIPT FOR: General

AGGREGATE YTD: 250.00

Alexander R Pastuszek

EMPLOYER: Self Employed
OCCUPATION: Concrete Cont.

415 Dartmouth Avenue
Swarthmore, PA 19081

Date Amount
08/31/86 250.00

RECEIPT FOR: General

AGGREGATE YTD: 250.00

Geraldine Makieglu

EMPLOYER:
OCCUPATION: Housewife

431 Righters Hill Road
Penn Valley, PA 19027

Date Amount
08/31/86 1,000.00

RECEIPT FOR: General

AGGREGATE YTD: 1,000.00

Joseph Mallon

EMPLOYER: Self
OCCUPATION: President

119 Wilson Wood Lane
Pecola, PA 19063

Date Amount
08/31/86 500.00

RECEIPT FOR: General

AGGREGATE YTD: 500.00

Ray Bricestein

EMPLOYER:
OCCUPATION:

Pecola, PA 19063

Date Amount
08/31/86 500.00

RECEIPT FOR: General

AGGREGATE YTD: 500.00

Paul W. Moser

EMPLOYER: Self Employed
OCCUPATION: Electrician

1300 Three Parkway
Philadelphia, PA 19108

Date Amount
08/31/86 1,000.00

RECEIPT FOR: General

AGGREGATE YTD: 1,000.00

DOCE SUBTOTAL = 3,500.00

NOT 10
CERTIFIED

REPORTS OF RECEIPTS AND DISBURSES
For Authorized Committee

October, 1984 711-51

CLERK OF THE HOUSE 01086

(Summary Page)

ALISON AREA

ALISON AREA

1 Name of Committee (in full)

THE WELDON FOR CONGRESS COMMITTEE

Address (Number and Street)

P.O. Box 1984

City, State and Zip Code

Media, Pa. 19063

000175819

☐ YES

☒ NO

☐ Check if address is different from last year's report

TYPE OF REPORT

☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☒ Twelfth day report preceding

election on 11-6-84

☐ Thirtieth day report following the General Election on

in the State of

☐ Termination Report

This report contains activity for:

☐ Primary Election

☒ General Election

☐ Special Election

☐ Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year to Date
5 Covering Period Oct. 1 through Oct. 17, 1984		
6 Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (a))	95,749.11	359,488.21
(b) Total Contribution Refunds (from Line 20 (d))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	95,749.11	359,488.21
7 Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	83,188.47	277,917.60
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	83,188.47	277,917.60
8 Cash on Hand at Close of Reporting Period (from Line 27)	85,455.69	
9 Debts and Obligations Owed TO The Committee (itemize all on Schedule C or Schedule D)	None	
10 Debts and Obligations Owed BY The Committee (itemize all on Schedule C or Schedule D)	14,173.13	

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

BRIAN W. CLYMER

Type or Print Name of Treasurer

Brian W. Clymer

SIGNATURE OF TREASURER

10-22-84

Date

For further information, contact
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

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

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

FEC FORM 3 (3/80)

8 3 0 4 4 0 1 7 3 1 5 3 4 3

EA

ITEMIZED RECEIPTS

Page 6 of 12
 LINE NUMBER 11A
 This receipt is subject to the same
 category of the General
 Summary Page

Information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for
 purposes, other than using the name and address of any political committee to solicit contributions from such committee
 Committee (in F. WELDON FOR CONGRESS COMMITTEE) FEX 000175869

Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Elaine S. Hooper Rich Neck Farm Earleville Md. 21919	Homemaker	Oct 11 1984	1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date-\$	2,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Anthony J. Iacobucci P.O. Box 1027 Brookhaven Penna. 19015	Self	Oct 2 1984	250.00
Occupation Contractor	Aggregate Year-to-Date-\$	750.00	
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
Frank R. Iacobucci P.O. Box 1027 Brookhaven Penna. 19015	Self	Oct 2 1984	250.00
Occupation Contractor	Aggregate Year-to-Date-\$	750.00	
Receipt For: ☐ Primary ☒ General ☐ Other (specify):			
H. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Charles E. Jacobs 319 Woodland Road Sewickley Penna. 15143		Oct 2 1984	400.00
Occupation	Aggregate Year-to-Date-\$	650.00	
Receipt For: ☐ Primary ☒ General ☐ Other (specify):			
I. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Joseph E. Jamison 450 S. 4th Street Colgan Penna. 19023	Boeing Vertol	Oct 17 1984	500.00
Occupation Qual. Controller	Aggregate Year-to-Date-\$	500.00	
Receipt For: ☐ Primary ☒ General ☐ Other (specify):			
J. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Laura E. Jurich 106 W. Knowlton Road Media Penna. 19063		Oct 17 1984	125.00
Occupation Homemaker	Aggregate Year-to-Date-\$	375.00	
Receipt For: ☐ Primary ☒ General ☐ Other (specify):			
K. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Robert L. Keates 3089 Heather Road Broomall Penna. 19008	Cty. of Del. Media, Pa.	Oct 17 1984	500.00
Occupation	Aggregate Year-to-Date-\$	1,660.00	
Receipt For: ☐ Primary ☒ General ☐ Other (specify):			
SUBTOTAL of Receipts This Page (optional)			3,025.00
TOTAL This Period (last page this line number only)			

89 84 00 4 0 7 3 3 3 3

CERTIFIED MAIL
OCT 18 1984

For Authorized Committee Use

October, 1984
Clerk of the House 1108642

(Summary Page)

NAME AREA

Name of Committee (in Full)
THE WELDON FOR CONGRESS COMMITTEE

2. FEC Identification Number
C00175869

Address (Number and Street)
P. O. Box 1984

3. Is this Report an Amendment?
☐ YES ☒ NO

City, State and Zip Code
Media, Pa. 19063

☐ Check if address is different than previously reported.

TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☒ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Twelfth day report preceding election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

Report contains activity for - ☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>July 1</u> through <u>Sept 30, 1984</u>		
6 Net Contributions (other than loans)		
6(a) Total Contributions (other than loans) (From Line 11 (a))	123,507.33	263,739.10
6(b) Total Contribution Refunds (from Line 20 (d))		
6(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	123,507.33	263,739.10
7 Net Operating Expenditures		
7(a) Total Operating Expenditures (from Line 17)	142,131.52	194,729.13
7(b) Total Offsets to Operating Expenditures (from Line 14)		
7(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	142,131.52	194,729.13
8 Cash on Hand at Close of Reporting Period (from Line 27)	-72,895.05	
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	None	
10 Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	27,774.65	

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

BRIAN W. CLYMER

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

10-15-84

Date

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

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

FEC FORM 3 (3/80)

ITEMIZED RECEIPTS

Page 1 of 17
LINE NUMBER 11A
(Use separate schedule for each category of the Detailed Summary Page)

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) THE WELDON FOR CONGRESS COMMITTEE FEC# C00175869

A. Full Name, Mailing Address and ZIP Code James C. Kelly 307 N. Lansdowne Ave Lansdowne Penna. 19050 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) July 18 1984 750.00	Amount of Each Receipt This Period 750.00
B. Full Name, Mailing Address and ZIP Code F. Evans Parwell Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer 1314 Whitney Bldg. New Orleans La. Occupation Aggregate Year-to-Date-\$	Date (month, day, year) July 25 1984 17000.00	Amount of Each Receipt This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Dominic J. Cappelli 169 Bishops Drive Aston Penna. 19014 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) July 31 1984 250.00	Amount of Each Receipt This Period 250.00
D. Full Name, Mailing Address and ZIP Code Ralph W. Hooper 1300 Parkway Phila. Penna. 19102 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) Aug 2 1984 1,000.00	Amount of Each Receipt This Period 1,000.00
E. Full Name, Mailing Address and ZIP Code Ethel B. Wister Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) Aug 6 1984 1,000.00	Amount of Each Receipt This Period 1,000.00
F. Full Name, Mailing Address and ZIP Code Alfred K. Gallagher 137 Deerfield Road Broomall Penna. 19008 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) Aug 9 1984 200.00	Amount of Each Receipt This Period 200.00
G. Full Name, Mailing Address and ZIP Code Alice G. Waters 508 Oak Crest Lane Wallingford Penna. 19086 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) Aug 9 1984 200.00	Amount of Each Receipt This Period 200.00

ITEMIZED RECEIPTS

12
 LINE NUMBER 112
 (Use separate schedule(s) for each category of the Donor's Summary Page)

Receipts from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for other than using the name and address of any political committee to solicit contributions from such committee.
 (On Full) THE WELDON FOR CONGRESS COMMITTEE
 FEC# C00175869

Full Name, Mailing Address and ZIP Code Mark C. Nagy 101 Locust Grove Road Rosemont Penna. 19010 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Self Occupation Consultant Aggregate Year-to-Date-\$	Date (month, day, year) Aug 17 1984 1,125.00	Amount of Each Receipt this Period 125.00
Full Name, Mailing Address and ZIP Code Charles J. Catania 549 Kelly Avenue Woodlyn Penna. 19094 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self Chester, Pa. Occupation Consul. Engr. Aggregate Year-to-Date-\$	Date (month, day, year) Aug 20 1984 500.00	Amount of Each Receipt This Period 500.00
Full Name, Mailing Address and ZIP Code Alan McIlvain Meadows Bank Road Villanova, Pa. 19096 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Alan McIlvain Lumber Co. Marcus Hook, Pa. Occupation Chmn. of the Board Aggregate Year-to-Date-\$	Date (month, day, year) Aug 22 1984 200.00	Amount of Each Receipt This Period 200.00
Full Name, Mailing Address and ZIP Code Janet B. Norcini 471 King of Prussia Rd. Radnor Penna. 19087 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date-\$	Date (month, day, year) Sept 5 1984 200.00	Amount of Each Receipt This Period 200.00
Full Name, Mailing Address and ZIP Code Thomas J. Giancristoforo 288 Lagrange Avenue Essington Penna. 19029 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self Essington, Pa. Occupation Retired Aggregate Year-to-Date-\$	Date (month, day, year) Sept 5 1984 200.00	Amount of Each Receipt This Period 100.00
Full Name, Mailing Address and ZIP Code John S. Bogosian 131 Charles Drive Havertown Penna. 19083 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$	Date (month, day, year) Sept 7 1984 250.00	Amount of Each Receipt This Period 250.00
Full Name, Mailing Address and ZIP Code Hilary W. Hooper 70 Strathmore Rd #5B Brookline MA 02146 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date-\$	Date (month, day, year) Sept 7 1984 500.00	Amount of Each Receipt This Period 500.00
SUBTOTAL of Receipts This Page (optional).....			1,875

..... (Use this line number only)

ITEMIZED RECEIPTS

Form 1041-10-11A
(Use separate schedules for each category of the Detailed Summary Page)

These Receipts or Statements may not be sold or used by any person for the purpose of soliciting contributions or for other than using the name and address of any political committee to solicit contributions from such committee.

Receipt For: (Full Name) **THE WELDON FOR CONGRESS COMMITTEE**

PEC# 000175869

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Archibald A. Palmer 1350 Plum St. Apt. A-2 Boothwyn Penna. 19061		Sept 27 1984	200.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date—\$	200.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Chris A. Panarello 5000 Chichester Ave. Aston Penna. 19014		Sept 27 1984	200.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date—\$	200.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Bruce H. Hooper 27 Paper Mill Road Newtown Square Penna. 19073	Hooper Bros.	Sept 28 1984	1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Partner	Aggregate Year-to-Date—\$	2,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Eileen S. Hooper 27 Paper Mill Road Newtown Square Penna. 19073		Sept 28 1984	1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Homemaker	Aggregate Year-to-Date—\$	2,000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Thornton D. Hooper II 27 Paper Mill Road Newtown Square Penna. 19073	U.S. Business Press, Inc.	Sept 28 1984	1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Analyst	Aggregate Year-to-Date—\$	2,000.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Cynthia L. Hooper 500 E. Lancaster Ave Apt. 122-C St. Davids Penna. 19087	Bryn Mawr College Bryn Mawr, Pa.	Sept 28 1984	1,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Coach	Aggregate Year-to-Date—\$	2,000.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Lipsen, Hamberger, Whitten & Hamberger 1733 "N" St., N.W. Washington D.C. 20036		Sept 17 1984	1,348.89
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Attorneys	Aggregate Year-to-Date—\$	1,348.89
SUBTOTAL of Receipts This Page (optional)			5,748.89
TOTAL This Period (last page this line number only)			

IN
KIND

STATEMENT OF RECEIPTS AND DISBURSEMENTS
For an Authorized Committee

(Summary Page)

10864 CLERK ON AUG 31 1984

July, 1984

FOR CONGRESS COMMITTEE	2. FEC Identification Number C00175869
(year) 1984	3. Is this Report an Amendment? X YES ☐ NO
4. Check if address is different than previously reported. 1. 19063	

TYPE OF REPORT

- ☐ Twelfth day report preceding _____ (Type of Election)
☐ Thirtieth day report following the General Election
☐ Termination Report
- Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
From <u>April 1</u> Through <u>June 30, 1984</u>		
Contributions (other than loans) (from Line 11e)	\$ 47,396.70	\$ 140,231.77
Contribution Refunds (from Line 20d)	\$	\$
Contributions (other than loans) (Subtract Line 6b from 6a)	\$ 47,396.70	\$ 140,231.77
Operating Expenditures (from Line 17)	\$ 37,107.02	\$ 52,597.61
Offsets to Operating Expenditures (from Line 14)	\$	\$
Operating Expenditures (Subtract Line 7b from 7a)	\$ 37,107.02	\$ 52,597.61
Balance at Close of Reporting Period (from Line 27)	\$ 69,688.17	
Outstanding Obligations Owed TO the Committee (from Schedule C or Schedule D)	\$ None	
Outstanding Obligations Owed BY the Committee (from Schedule C or Schedule D)	\$ 10,985.13	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-633-4366

Richard W. Oliver

Name of Treasurer:

Richard W. Oliver
TREASURER

8-22-84
Date

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

This form is obsolete and should no longer be used

RULE A

ITEMIZED RECEIPTS

Page 1 of 3
 LINE NUMBER
 (This line or space will be used for each
 receipt 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)

THE WELDON FOR CONGRESS COMMITTEE - FEC #C00175869

A. Full Name, Mailing Address and ZIP Code Adrian S. Hooper 1300 Three Parkway Phila., Pa. 19102 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Hooper Bros. Inc. Occupation Executive	Date (month, day, year) May 3 1984	Amount of Each Receipt This Period 1,000.00 Aggregate Year-to-Date-\$ 1,000.00
B. Full Name, Mailing Address and ZIP Code Helen S. Nowak 718 Cambridge Road Brookhaven, Pa. 19015 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer US Dept of Labor & Commerce Occupation Administrator	Date (month, day, year) May 9, 1984	Amount of Each Receipt This Period 45.00 Aggregate Year-to-Date-\$ 205.00
C. Full Name, Mailing Address and ZIP Code 20 Patricia A. Ortlip 3500 Atlantic Avenue Longport, N.J. 08403 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Salt Svc. Inc. Occupation Chief Exec. Ofcr.	Date (month, day, year) May 30 1984	Amount of Each Receipt This Period 200.00 Aggregate Year-to-Date-\$ 200.00
D. Full Name, Mailing Address and ZIP Code 7 0 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code 0 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation	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	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	Date (month, day, year)	Amount of Each Receipt This Period

July, 1984 PA 01

CERTIFIED MAIL

For 8 - 10 - 1984

(FEC 10 - 10 - 1984)

10 - 10 - 1984

1. Name of Candidate (or Full)

The Welfare for Congress Committee

(or Candidate and Spouse)

P.O. Box 1424

City, State and ZIP Code

Mobile, AL 36603

2. FEC ID Number

100131000

3. Date of Report

7-12-84

4. Check if address is different from the last report

TYPE OF REPORT

☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (No election on Year End)

☐ Transfer day report

☐ Transfer day report

☐ Transfer day report

This report contains activity for: ☐ Primary Election ☐ General Election ☐ Special Election

SUMMARY

5. Covering Period: April 15, 1984 Through June 30, 1984

6. Net Contributions (other than loans):

(a) Total Contributions (other than loans) from all sources

\$50,016.00

\$100,000.00

(b) Total Contributions Refunded (from Line 202)

\$0.00

\$0.00

(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)

\$50,016.00

\$100,000.00

7. Net Operating Expenditures:

(a) Total Operating Expenditures (from Line 17)

\$40,527.02

\$50,017.01

(b) Total Offset to Operating Expenditures (from Line 14)

\$0.00

\$0.00

(c) Net Operating Expenditures (Subtract Line 7b from 7a)

\$40,527.02

\$50,017.01

8. Cash on Hand at Close of Reporting Period (from Line 27)

\$99,898.17

\$99,898.17

9. Debts and Obligations Owed TO the Committee

(Itemize all on Schedule C or Schedule D)

\$ None

10. Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

\$10,985.15

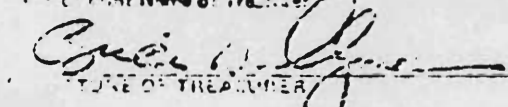
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Brian W. Glynn

Federal Election Commission
Toll Free 1-800-424-9529
Local 202-453-4600

Name of First Name of Treasurer



7-12-84

Date

Signature of Candidate, Treasurer, or the complete information may be submitted to the Commission

ITEMIZED RECEIPTS

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20250

0.80310240703140

This receipt is to be used by any person for the purpose of accounting for the receipt of money or property from any source, and it is to be filled out by the person receiving the money or property. It is to be filled out by the person receiving the money or property, and it is to be filled out by the person receiving the money or property.

Thorn J. Hooper 11 27 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer	N.W. Univ Evanston, Ill.	Date (month, day, year)	Amount of Each Receipt - Period
	Occupation	Student	April 3 1984	1,000.00
	Approximate Year to Date - \$	1,000.00		
Center L. Hooper 27 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer	Bryn Mawr College Bryn Mawr, Pa.	Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation	Teacher	April 3 1984	1,000.00
	Approximate Year to Date - \$	1,000.00		
James J. Hooper 111 61 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer		Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation		April 9 1984	200.00
	Approximate Year to Date - \$	200.00		
Robert J. Hooper 61 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer	Roger Gibbons Ins. Agency Bryn Mawr, Pa.	Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation	Insurance Agent	April 10 1984	200.00
	Approximate Year to Date - \$	200.00		
Charles L. Hooper, Jr. 311 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer		Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation		April 18 1984	500.00
	Approximate Year to Date - \$	500.00		
Mark C. Hooper 101 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer	Wilmington College Wilmington, Del.	Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation	College Dean	April 18 1984	500.00
	Approximate Year to Date - \$	1,000.00		
Butcher & Singer 101 E. 111 Road Bryn Mawr, Pa. 19010	Name of Employer	Butcher & Singer Phila., Pa.	Date (month, day, year)	Amount of Each Receipt - This Period
	Occupation		April 18 1984	1,000.00
	Approximate Year to Date - \$	1,000.00		
TOTAL RECEIPTS				4,400.00

ITEMIZED RECEIPTS

Page 1 of 1
LINE 1888-111A
(Use proper check for
amount of the Date
Receipt)

THE WAGON FOR CONGRESS COMMITTEE

FEC# C00175869

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt This Period
George Diakos Walnut & Pine Streets Marcus Hook Penna. 19361	Alpha Machine Works Marcus Hook, Pa.	May 1 1984	1,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: President	Agreement Year(s): 1-5	1,000.00
Adrian S. Becker 1300 19...	Executive	May 3 1984	10.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Agreement Year(s): 1-5	1,000.00	
Kenneth P. Barrow 229 N. Olive Street Melia Penna. 19063	Self Melia, Pa.	May 9 1984	225.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: Attorney	Agreement Year(s): 1-5	225.00
Margaret Lewis 412 Dallas Avenue Glenolden Penna. 19036	Self	May 9 1984	200.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: Attorney	Agreement Year(s): 1-5	200.00
Michael F. X. Gillin 2 Surrey Drive Newtown Square Penna. 19073	Eckell, Sparks Auerbach & Monte	May 9 1984	75.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: Attorney	Agreement Year(s): 1-5	675.00
Relen S. Novak 718 Cambridge Road Brockhaven Penna. 19015	Self	May 9 1984	45.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: Attorney	Agreement Year(s): 1-5	205.00
James J. Becker 1 ... Hungry Harbor Rd. ... Woodmere N. Y. 11561	Kidder, Peabody N. Y.	May 30 1984	300.00
Receipt For: ☐ Primary ☐ General ☐ Other (Specify):	Occupation: Broker	Agreement Year(s): 1-5	300.00

TOTAL of Receipts This Period (Section 1) 2,845.00

Apr 1, 1984

10/07

APR 16 1984

FEDERAL ELECTION COMMISSION
For an Authorised Committee

(Summary Page)

1. Name of Committee (in Full)
THE YALOW FOR CONGRESS COMMITTEE

Address (Number and Street)

P. O. Box 1984

City, State and ZIP Code

Mobile, Ala. 36687

☐ Check if address is different from information reported

2. Date of Report (Month, Day, Year)

APR 18 1984

3. For Report on Account of

YES ☐ NO ☒

TYPE OF REPORT

☒ April 15 Quarterly Report

☐ Twelfth day of month

☐ July 15 Quarterly Report

election on

State of

☐ October 15 Quarterly Report

☐ Thirtieth day of month

General Election

☐ January 31 Year End Report

on

in the State of

☐ July 31 Mid Year Report (from election Year Only)

☐ Termination Report

This report contains activity for — ☒ Primary Election ☐ General Election ☐ Special Election ☐ Recall Election

SUMMARY

Column A
This Period

Column B
Calendar Year-to-Date

5. Covering Period 3-21-84 Through 3-31-84

6. Net Contributions (other than loans):

(a) Total Contributions (other than loans) (from Line 11e) \$8,100.00

\$92,857.07

(b) Total Contribution Refunds (from Line 20d) \$

\$

(c) Net Contributions (other than loans) (Subtract Line 6b from 6a) \$8,100.00

\$92,857.07

7. Net Operating Expenses:

(a) Total Operating Expenditures (from Line 17) \$1,100.91

\$5,123.49

(b) Total Offsets to Operating Expenditures (from Line 14) \$

\$

(c) Net Operating Expenditures (Subtract Line 7b from 7a) \$1,100.91

\$5,123.49

8. Cash on Hand at Close of Reporting Period (from Line 27) \$77,653.46

9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) \$ None

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) \$ 4,413.27

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

For further information contact

Federal Election Commission
Telephone 202-456-6100
Local 202-456-6066

BRIAN W. CLYMER

Type and Print Name of Treasurer

SIGNATURE OF TREASURER

4-16-84

Date

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

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

MODULE A

ITEMIZED RECEIPTS

LINE NUMBER
(Use separate sheet for each category of the Detailed Summary Page)

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Name of Committee (in Full)

THE WELDON FOR CONGRESS COMMITTEE

FDC# C00175869

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Eileen S. Hooper 27 Paper Mill Road Newton Square, Penna. 19073 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Housewife Aggregate Year-to-Date-\$ 1,000.00	March 29 1984	1,000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Bruce H. Hooper 27 Paper Mill Rd Newton Square, Penna. 19073 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Hooper Bros. Penna., Pa. Occupation Partner Aggregate Year-to-Date-\$ 1,000.00	March 29 1984	1,000.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Thomas Hooper 1174 St. Andrews Rd. Bryn Mawr Penna. 19010 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Hooper Bros. Phila., Pa. Occupation Partner Aggregate Year-to-Date-\$ 1,000.00	March 29 1984	1,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Maori Hooper 1174 St. Andrews Rd. Bryn Mawr Penna. 19010 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Housewife Aggregate Year-to-Date-\$ 1,000.00	March 29 1984	1,000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Jack A. Felzer 1213 Drexel Avenue Drexel Hill Penna. 19026 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Jack H. Felzer, CPAS Bala Cynwyd, Pa. Occupation Accountant Aggregate Year-to-Date-\$ 500.00	March 30 1984	500.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Michael F.X. Gillin 2 Surrey Drive Newton Sq. Penna. 19073 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Eckell, Sparks Media Pa Occupation Attorney Aggregate Year-to-Date-\$ 630.00	March 30 1984	30.00
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-\$		
TOTAL of Receipts This Page (optional)			\$4,530.00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1987

Mr. David Landau
PO Box 1762
Media, PA 19063

Dear Mr. Landau:

We have received your letter on December 3, 1987, regarding the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

The 1976 amendments to the Act and Federal Election Commission regulations require that a complaint meet certain specific requirements. Your letter does not meet these requirements. Consequently, the Commission can take no action at this time to investigate this matter.

However, if you desire the Commission to look into the matter discussed in your letter to determine if the Act has been violated, a formal complaint as described in 2 U.S.C. § 437g(a)(1) must be filed. Requirements of this section of the law and Commission regulations at 11 C.F.R. § 111.4 which are a prerequisite to Commission action are detailed below:

- (1) A complaint must be in writing.
(2 U.S.C. § 437g(a)(1))
- (2) Its contents must be sworn to and signed in the presence of a notary public and shall be notarized.
(2 U.S.C. § 437g(a)(1))
- (3) A formal complaint must contain the full name and address of the person making the complaint.
(11 C.F.R. § 111.4)
- (4) A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation. (11 C.F.R. § 111.4)
- (5) A formal complaint should clearly identify the source of information upon which the complaint is based. (11 C.F.R. § 111.4)
- (6) A formal complaint should contain a clear and concise recitation of the facts describing the violation of a

88040703144

statute or law over which the Commission has jurisdiction. (11 C.F.R. § 111.4)

- (7) A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint.
(11 C.F.R. § 111.4)

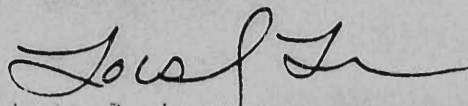
Finally, please include your telephone number, as well as the full names and addresses of all respondents.

Enclosed is a copy of Commission regulations, and your attention is directed to 11 C.F.R. § 111.4 through § 111.10 that deal with preliminary enforcement procedures. Also, enclosed is a compilation of Federal Election Campaign laws on which these regulations are promulgated. I trust these materials will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a 15 day time period during which you may file an amended complaint as specified above.

If we can be of any further assistance, please do not hesitate to contact me at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosures
Excerpts
Procedures

cc: respondents

88040703145



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1987

Brian W. Clymer, Treasurer
The Weldon For Congress
Committee
PO Box 1986
Media, PA 19063

Dear Mr. Clymer:

On December 3, 1987, the Federal Election Commission received a letter alleging that The Weldon For Congress Committee and you, as treasurer, violated sections of the Federal Election Campaign Act of 1971, as amended. However, as indicated from the copy of the enclosed letter to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file closed.

If you have any questions, please do not hesitate to call me at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures

Copy of Complaint
Copy of Letter to Complainant

cc: The Honorable Curt Weldon
House Office Building
Washington, DC 20515

88040703146



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1987

Mr. Carl Channel
2032 Belmont Road, NW
#210
Washington, DC 20009

Dear Mr. Channel:

On December 3, 1987, the Federal Election Commission received a letter alleging that you violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions, please call Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures:

Copy of Complaint

Copy of letter to the Complainant

88040703147



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1987

Executive Director
National Endowment For The
Preservation Of Liberty
1331 Pennsylvania Avenue, NW
Suite 350 South
Washington, DC 20004

Dear Sir:

On December 3, 1987, the Federal Election Commission received a letter alleging that the National Endowment For The Preservation Of Liberty violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions, please call Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures

Copy of Complaint

Copy of letter to the Complainant

88040703148



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

10 December 1987

Mr. Bruce H. Hooper
27 Paper Mill Road
Newtown Square, PA 19073

Dear Mr. Hooper:

On December 3, 1987, the Federal Election Commission received a letter alleging that you violated sections of the Federal Election Campaign Act of 1971, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specified requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions, please call Betha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noche
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosures

- Copy of Complaint
- Copy of letter to the Complainant

38040703149

LAW OFFICES
HOYLE, MORRIS & KEER
ONE LIBERTY PLACE
SUITE 4900
1650 MARKET STREET
PHILADELPHIA, PA 19103
(215) 981-5700

6CC#5040
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JAN -4 AM 9:54

DIRECT DIAL: (215) 981-5773

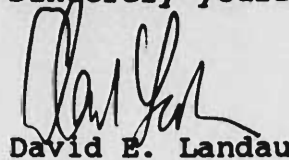
December 29, 1987

Lawrence M. Noble
General Counsel
Federal Action Commission
Washington, DC 20463

Dear Mr. Noble:

Pursuant to your letter of December 10, 1987, concerning certain deficiencies in a complaint I filed on December 3rd, 1987 against Congressman Curt Weldon, I hereby enclose an amended complaint on the matter. I am assuming that you have the documentation which I previously forwarded. If you do not, I would be happy to send you another copy.

Sincerely yours,


David E. Landau

DEL/mc

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 JAN -4 PM 1:20

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DAVID LANDAU

December 29, 1987

Scott E. Thomas
Chairman
Federal Action Commission
PECO Building, 999 "E" Street, N.W.
Washington, DC 20463

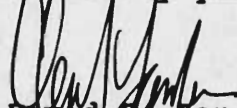
Dear Chairman Thomas:

An examination of Congressman Curt Weldon's campaign finances has revealed that the Congressman had received enormous amounts of campaign contributions from individuals who also provided funds for Carl Channel's efforts to provide arms to the Contras through the National Endowment for the Preservation of Liberty ("NEPL").

Between the course of the 1984-86 campaigns Mr. Weldon received \$19,500 in contributions from the Hooper family. The Hoopers contributed \$100,000 to NEPL's toy fund, which funded arms for the Contras.

It has been previously disclosed by the joint House-Senate committees investigating the Iran contra affair that NEPL attempted to influence congressional elections. I hereby request the Commission to investigate these contributions to determine whether there has been any violation of the federal election laws by any of the parties involved, including but not limited to the provisions of the law concerning independent expenditures and the limits on contributions by individuals. It should be noted that all of Hooper contributors are related to each other and some are dependent children. I would also like the Commission to determine whether there was any general effort by NEPL to influence improperly the 1984 and 1986 congressional elections in the 7th District of Pennsylvania.

Sincerely yours,


David E. Landau

COMMONWEALTH OF PENNSYLVANIA:

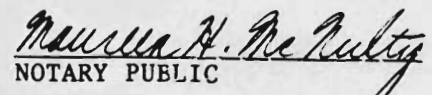
SS

COUNTY OF PHILADELPHIA:

On this, the 30th day of December, 1987, before me, a notary public, the undersigned officer, personally appeared David E. Landau, known to me to be the person whose name is subscribed to the within instrument.

In witness whereof, I hereunto set my hand and official seal.

MAUREEN H. McNULTY, NOTARY PUBLIC
PHILADELPHIA, PHILADELPHIA COUNTY
MY COMMISSION EXPIRES MAY 7, 1990
Member, Pennsylvania Association of Notaries


NOTARY PUBLIC

88040703151



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 13, 1988

Mr. David E. Landau
One Liberty Place
Suite 4900
1650 Market Street
Philadelphia, PA 19103

Dear Mr. Landau:

This is to acknowledge receipt of your letter, which we received on January 4, 1988. Your letter was not properly sworn to.

You must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. A statement by the notary that the complaint was sworn to and subscribed before her will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. 437g.

If you have any questions concerning this matter, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

88040703152

LAW OFFICES
HOYLE, MORRIS & KERR
ONE LIBERTY PLACE
SUITE 4900
1650 MARKET STREET
PHILADELPHIA, PA 19103
(215) 981-5700

600 2 2579
- *turn* 2579

DIRECT DIAL: (215) 981-5773

February 2, 1988

Lois Lerner
Associate General Counsel
Federal Election Commission
Washington, DC 20463

Dear Ms. Lerner:

Pursuant to your letter of January 13, 1988, concerning certain deficiencies in a complaint I filed on December 3rd, 1987 against Congressman Curt Weldon, I hereby enclose an amended complaint on the matter. I am assuming that you have the documentation which I previously forwarded. If you do not, I would be happy to send you another copy.

Sincerely yours,

[Signature]
David E. Landau

DEL/mc

Enclosure

RECEIVED
FEB 8 11:31

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DAVID LANDAU

February 2, 1988

Scott E. Thomas
Chairman
Federal Action Commission
PECO Building, 999 "E" Street, N.W.
Washington, DC 20463

Dear Chairman Thomas:

An examination of Congressman Curt Weldon's campaign finances has revealed that the Congressman had received enormous amounts of campaign contributions from individuals who also provided funds for Carl Channel's efforts to provide arms to the Contras through the National Endowment for the Preservation of Liberty ("NEPL").

Between the course of the 1984-86 campaigns Mr. Weldon received \$19,500 in contributions from the Hooper family. The Hoopers contributed \$100,000 to NEPL's toy fund, which funded arms for the Contras.

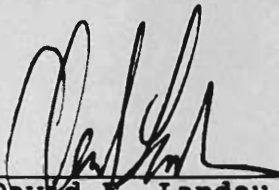
It has been previously disclosed by the joint House-Senate committees investigating the Iran contra affair that NEPL attempted to influence congressional elections. I hereby request the Commission to investigate these contributions to determine whether there has been any violation of the federal election laws by any of the parties involved, including but not limited to the provisions of the law concerning independent expenditures and the limits on contributions by individuals. It should be noted that all of Hooper contributors are related to each other and some are dependent children. I would also like the Commission to determine whether there was any general effort by NEPL to influence improperly the 1984 and 1986 congressional elections in the 7th District of Pennsylvania.

Sincerely yours,

David E. Landau

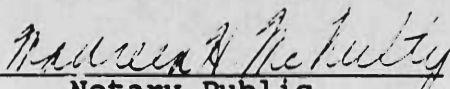
Verification

I swear that the information in the foregoing letter
is true to the best of my knowledge, information and belief.



David E. Landau

Sworn to and subscribed
before me this 2nd day
of February, 1988.



Notary Public

MAUREEN H. MCNULTY, NOTARY PUBLIC
PHILADELPHIA, PHILADELPHIA COUNTY
MY COMMISSION EXPIRES MAY 7, 1990
Member, Pennsylvania Association of Notaries

88040703155



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Mr. David E. Landau
One Liberty Place
Suite 4900
1650 Market Street
Philadelphia, PA 19103

RE: MUE 2579

Dear Mr. Landau:

This letter acknowledges receipt of your complaint, received on February 8, 1988, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by the National Endowment For The Preservation Of Liberty, The Weldon For Congress Committee and Brian W. Clymer, as treasurer, Bruce H. Hooper, Eileen S. Hooper, Ralph W. Hooper, Elaine S. Hooper, Hilary W. Hooper, Cynthia L. Hooper, Thornton D. Hooper, II, Adrian S. Hooper, Thomas Hooper, and Naomi Hooper. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUE 2579. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Regina Dixon, Docket Chief, at (202) 476-7110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois E. Lerner
Associate General Counsel

Enclosure
Procedures

88040703156



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

National Endowment For The
Preservation Of Liberty
c/o Mr. Carl R. Channell
2032 Belmont Road, NW
210
Washington, DC 20009

RE: MUR 2579
National Endowment For
The Preservation Of
Liberty

Dear Mr. Channell:

The Federal Election Commission received a complaint which alleges that the National Endowment For The Preservation Of Liberty may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the National Endowment For The Preservation Of Liberty in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

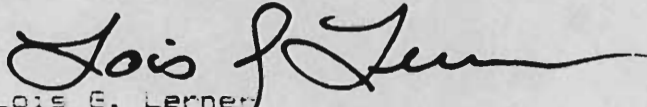
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

88040703157

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703158



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Brian W. Clymer, Treasurer
The Weldon For Congress
Committee
PO Box 1986
Media, PA 19063

RE: MUR 2579
The Weldon For
Congress Committee
Brian W. Clymer, as
treasurer

Dear Mr. Clymer:

The Federal Election Commission received a complaint which alleges that The Weldon For Congress Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and The Weldon For Congress Committee in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

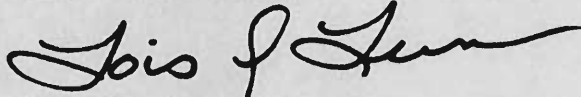
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

cc: The Honorable Curtis W. Weldon
House Office Building
Washington, DC 20515

88040703160



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Mr. Bruce H. Hooper
27 Paper Mill Road
Newtown Square, PA 19073

RE: MUR 2579
Bruce H. Hooper

Dear Mr. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

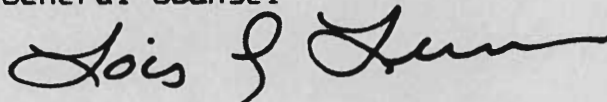
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703162



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Ms. Eileen S. Hooper
27 Paper Mill Road
Newtown Square, PA 19073

RE: MUR 2579
Eileen S. Hooper

Dear Ms. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

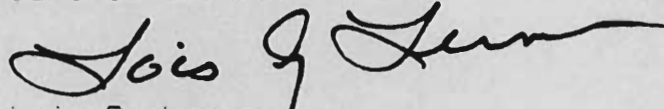
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703164



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Mr. Ralph W. Hooper
1300 Three Parkway
Philadelphia, PA 19102

RE: MUR 2579
Ralph W. Hooper

Dear Mr. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

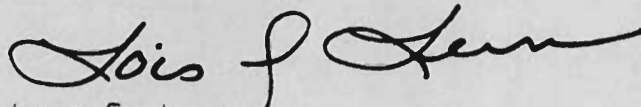
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

88040703165

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703166



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Ms. Elaine S. Hooper
Rich Neck Farm
Earleville, MD 21919

RE: MUR 2579
Elaine S. Hooper

Dear Ms. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

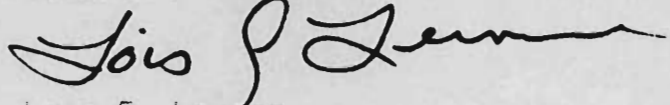
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

88040703167

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-9200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois E. Lerner
Associate General Counsel

Enclosures

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

88040703168



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Ms. Hilary W. Hooper
70 Strathmore Road
#5B
Brookline, MA 02146

RE: MUR 2579
Hilary W. Hooper

Dear Ms. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

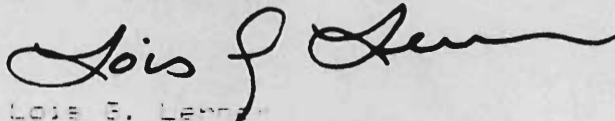
This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2, U.S.C. To notify the Commission in writing that you wish the matter to be made public, if you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

88040703169

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois E. Lerner
Associate General Counsel

Enclosures

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

88040703170



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Ms. Cynthia L. Hooper
500 E. Lancaster Avenue
Apt. 122-C
St. Davids, PA 19087

RE: MUR 2579
Cynthia L. Hooper

Dear Ms. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

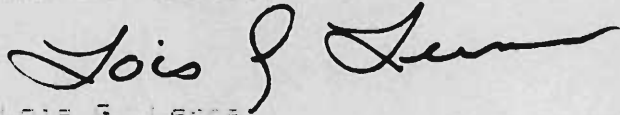
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88040703171

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Latta
Associate General Counsel

Enclosures

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

88040703172



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Mr. Thornton D. Hooper, II
27 Paper Mill Road
Newtown Square, PA 19073

RE: MUR 2579
Thornton D. Hooper, II

Dear Mr. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

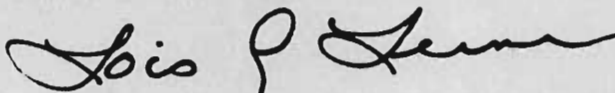
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88040703173

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703174



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Mr. Adrian S. Hooper
1300 Three Parkway
Philadelphia, PA 19102

RE: MUR 2579
Adrian S. Hooper

Dear Mr. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

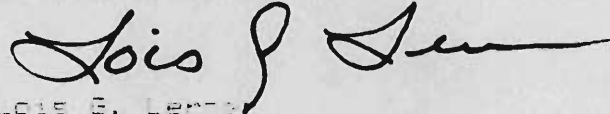
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88040703175

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lento
Associate General Counsel

Enclosures

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

88040703176



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 16, 1988

Mr. Thomas Hooper
1174 St. Andrews Road
Bryn Mawr, PA 19010

RE: MUR 2579
Thomas Hooper

Dear Mr. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

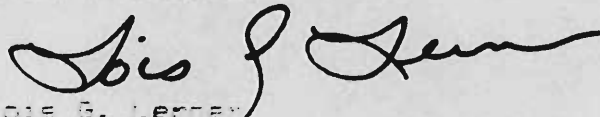
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88040703177

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703178



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 16, 1988

Ms. Naomi Hooper
1174 St. Andrews Road
Bryn Mawr, PA 19010

RE: MUR 2579
Naomi Hooper

Dear Ms. Hooper:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2579. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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88040703179

If you have any questions, please contact Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

88040703180

QCC#6612

HENRY W. SAWYER, III
DAVID S. ASHESBORN
JOHN S. BARNES
PATRICK T. BYRNE
JOHN HARRIS, JR.
E. PHILIP STEINBERG
RALPH H. BLUMBERG
DAVID W. HANBY
WILLIAM H. GOLDBEIN
HENRY S. HILLES, JR.
BERNARD S. JONES
THOMAS S. WOOD
J. PORTIS HIGGS
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JOHN W. FISHER
RUSH T. HAINES, II
STEWART BALZELL
HOWARD L. ELLIOTT
AMY F. DAVIS
BRUCE HOOVER, III
JOSEPH C. BRIGHT, JR.
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JONATHAN A. KANE
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ROBERT H. STRAUSS
JOHN P. LEWIS
ROBERT MEAD JONES, JR.
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JOHN CRESNEY
JOSEPH A. EISENBERG
EILEEN M. LACH
THOMAS J. LEACH
ALFRED W. PUTNAM, JR.
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THEODORE P. BETH
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EDWARD L. HANBY
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CHARLES S. JONES
SUFFIELD ROSSMAN, III
VERNON STUBBS, JR.
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RAYMOND E. KENNETH, JR.
JOHN C. KENNETH, JR.
WILLIAM S. FLOYD
WILLIAM S. FLOYD
W. H. MARSHALL SMITH
ROBERT S. SMITH
DAVID S. WILSON
ALAN SMITH
J. FREDERICK HUNTER, JR.
LAWRENCE J. FOX
SAMUEL S. FOX
CAROL BEADROCK BOULANGER
MELVIN C. BOULANGER
HENRY S. BOULANGER
JOHN J. FINLEY
JAMES E. SWEET
FRANK J. CONNELL, III
EDWARD S. POONER
WILLIAM J. LEWIS
MICHAEL S. JOHNSON
MICHAEL J. DEAUTYMAN
KATHLEEN H. LEVERING
PAUL H. SCHWEIDER
MARK S. SCHWEIDER, JR.
WILSON M. BROWN, III
DAVID S. NATION
E. MORGAN MAXWELL, III
ROBERT J. WOLKOWSKI
JAMES C. HOBAN

OF COUNSEL
LEWIS H. VAN EUSEN, JR.

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PHILADELPHIA NATIONAL BANK BUILDING
BROAD AND CHESTNUT STREETS
PHILADELPHIA, PA 19107

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TELEX: 634664 DEBEMAC
TELECOPIER: (215) 988-2782

1752 N STREET, N.W.
WASHINGTON, DC 20036
(202) 429-7400

JOHN C. GULLITT
1949-1959

405 PARK AVENUE
NEW YORK, NY 10022
(212) 638-5600

HENRY S. DRINKER
1964-1964

DARYL A. AMMON
S. RICHARD POWELL, JR.
CAROL S. BRONKH
RALPH BOBER
FRANK P. ORRALL, JR.
GREGORY J. BOBER
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N. THOMAS HUNT
T. ANDREW GULBERT
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DAVID J. LANGSON
SHERYL A. DONNELLA
SUSAN WOLF FORDHAM
BRIGET M. POLICHENE
JANE R. COLEMAN
MARGOT S. LEBOWITZ
ALAN C. HEDDMAN
CATHERINE L. ANSARI
DOUGLAS S. WENTZ
N. JOHN MICHEL, JR.
LAURA WHEELER CASSAVELL
LISA D. CAMPOLO
DAVID L. MALL
WALTER J. MORTER, JR.
FRANCIS J. MARTIN
JOAN H. PEDERSEN
SUSAN S. COLLINGS
CHRISTOPHER M. CONNORS
SANDRA L. YRENA
STEPHEN M. ROZOL
EVELYN S. HOWARD

KAREN A. FARMER
MICHAEL L. GARMAN
SARAH (SILVERMAN)
LORETTA M. KELLY
MADELINE L. FLEISCHER
W. STEVEN WOODWARD
CHRISTINA T. GARMAN
GEORGE V. STRONG, III
JAMES A. MATTHEWS, III
THOMAS S. SCHAMPELBERGER
JOHN CHILKINS BURNETT
SHARON L. KUNDELSON
HOWARD S. MALL, JR.
ELIZABETH J. YOUNG
LINDA C. MORRIS
DOROTHY ALYN BARNETT
MICHAEL BUDAGU
MARY S. KIMMART
KATHLEEN MERRIETH
DEBORA FRASER
JOHN S. STANLEY
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DETTEANN HULTGREN
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MARY BETH M. WONG
RANDY H. PATTERSON
THERESA HAJOS
SUSANNE E. COYLE
JOHN S. STODOLSKY
MICHAEL S. YARVIN
ROBERT V. DELL OGA
BARBARA J. LIPSHUTZ
ROBERT S. PUTNEY, III
PETER NORDGREN
KAREN L. MASTERTSON
P. DOUGLAS RAYMOND, III
DAVID M. SCOLNIC
JOSEPH P. GALA
KARL A. THALLNER, JR.
MARIA P. RAMU
ANDREW P. POSTER
BARRY A. SOLOMON
ANDREW W. KAWECI

* ADMITTED IN DISTRICT OF COLUMBIA
† ADMITTED IN NEW YORK
‡ NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 988-2934

February 26, 1988

Federal Express
CONFIDENTIAL

Sandra Robinson, Esquire
Federal Election Commission
999 I Street, N. W
Washington, D. C. 20463

Re: MUR 2579

Dear Ms. Robinson:

As I mentioned to you on the telephone on Wednesday, February 24, we represent Adrian S. Hooper, Thomas Hooper, Naomi Hooper and Cynthia L. Hooper, respondents in the above-cited Matter Under Review. As I mentioned to you, we believe we will represent Bruce Hooper and Ralph Hooper, and other members of the family, but have been unable to confirm this fact because both gentlemen are out of the country.

Needless to say, with respect to the four Hoopers as to whom we have confirmed representation, we want to respond to the baseless charges of Mr. Landau. We have every reason to believe that the other Hoopers will also want to respond.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

88 FEB 29 AM 12:47

HAND DELIVERED
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 FEB 29 AM 9:25

1813070406088

DRINKER BIDDLE & REATH

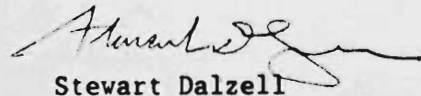
Sandra Robinson, Esq.
Federal Election Commission
February 26, 1988
Page Two

As to the latter group, it seems that the clock has likely not begun ticking since 11 C.F.R. §111.6(a) gives respondents the "opportunity to demonstrate that no action should be taken...within fifteen (15) days from receipt of a copy of the complaint...." As of this writing it would appear that neither Mr. and Mrs. Bruce Hooper nor Mr. and Mrs. Ralph Hooper have received the Landau complaint. Recognizing, however, that the statutory purpose of §437g of the Act contemplates a prompt resolution of matters like this, I would propose a common deadline which represents an extension of only fifteen days from the earliest "receipt" date of which we are aware, i.e., February 20.

I therefore propose that, subject to our confirming representation in the next week, all the Hoopers will respond to this complaint on or before March 21, 1988. If you agree to this procedure, please confirm that assent in writing at your first convenience.

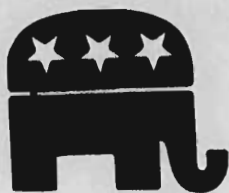
In any event, please feel free to call me at any time at my direct telephone number, (215) 988-2934.

Sincerely,


Stewart Dalzell

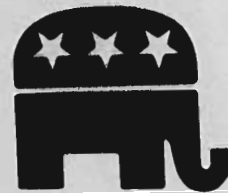
SD:kc

88040703182



CURT WELDON

U.S. CONGRESS



Campaign Chairman
Joseph W. Dorsey
Treasurer
Brian W. Clymer

February 29, 1988

Federal Election Commission
Washington, D.C. 20463

RE: MUR2579
The Weldon for Congress Committee
Brian W. Clymer, Treasurer

Commissioners:

This letter is in response to the above referenced complaint filed by David Landau against the Weldon for Congress Committee.

The complaint is based entirely on the coincidence that certain contributors to the Committee also made contributions to the National Endowment for the Preservation for Liberty (NEPL).

Mr. Landau presents absolutely no evidence of any violations of the Federal Election Commission Act (FECA) or amendments thereto. In fact, it appears from paragraph three of the complaint as though the filer is requesting the Commission to go in and look for alledged "evidence" that should have been presented with the complaint.

Specifically, no evidence is provided that:

- (1) any individual made contributions in excess of FECA limits.
- (2) any independent expenditures were made by NEPL in the 7th District of Pennsylvania at any time or
- (3) NEPL made contributions to or assisted in any way the Weldon for Congress Committee or the campaign of any candidate for Congress in the 7th Congressional District of Pennsylvania at any time.

P.O. BOX 1988 • MEDIA, PA • 19063 • (215) 891-9127

Paid for by The Weldon for Congress Comm. Brian W. Clymer, Treas.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 MAR -8 AM 11:05

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
88 MAR -8 AM 10:34

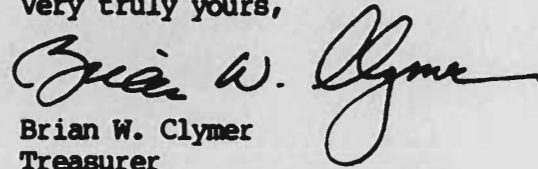
Federal Election Commission
February 29, 1988
Page Two

In addition, the Committee is unaware of the existence of any evidence to any of the foregoing items.

Consequently, the Committee respectfully requests the Federal Election Commission to dismiss this complaint as soon as possible. If I may provide you with any additional information that would expedite the resolution of this complaint, I can be reached:

c/o Clymer Merves & Amon
50 South Providence Road
Media, PA 19063
(215) 565-1120

Very truly yours,


Brian W. Clymer
Treasurer

BWC/jac

88040703184

66A6657

HENRY B. SAWYER, JR.
DAVID S. ACHESON
JOHN S. GAGNE
PATRICK T. JOHAN
JOHN MARBLE, JR.
R. PHILIP STEINBERG
RALPH J. SLIVER
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W. BRUCE MCCONNELL, III
JOSEPH S. BRIGHT, JR.
WILLIAM S. BULLITT
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TIMOTHY S. RUSSELL
ROBERT H. STROUSE
JOHN P. LLOYD
ROBERT REAG JONES, JR.
MARK H. WILSON
JOHN CHESTNEY
JOSEPH A. SWEETERY
EILEEN H. LACH
THOMAS J. LEACH
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KENNETH C. FRAZER
THEODORE P. SETO
JEFFREY A. DALE

JOHN AMES BALLARD
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CHARLES S. WILF
SHAFIELD ACHESON, III
VERNON STEINBERG, JR.
DAVID R. STEINBERG
JOSEPH S. STEINBERG, JR.
RICHARD S. STEINBERG, JR.
JOHN S. STEINBERG, JR.
MICHAEL S. FLAT
DAVID S. SMYTER
W. H. HARRIS, JR.
ROBERT S. CHOLSON
DAVID S. WILSON
ALAN BLEW
J. FREEDLEY HUNTER, JR.
LAWRENCE A. PERI
DAVID E. BOSS
SAMUEL DEANWICK DOULAN
MELVIN C. BRENNAN
HENRY S. BOYAN
JOHN J. PERLEY
JAMES H. BRYANT
FRANCIS M. DONNELL, III
EDWARD S. FOSHER
WILLIAM A. LEMARE
EDWARD S. JORDAN
ROBERT J. DEAUTYMAN
KATHRYN H. LEVERING
PAM H. SCHNEIDER
HARRY S. SCHNEIDER, JR.
WILSON H. BROWN, III
DAVID S. HAYTON
E. MORGAN MAXWELL, III
ROBERT J. HOELSCHER
JAMES C. INGRAM

OF COUNSEL
LEWIS H. VAN DUSEN, JR.

LAW OFFICES
DRINKER BIDDLE & REATH
PHILADELPHIA NATIONAL BANK BUILDING
BROAD AND CHESTNUT STREETS
PHILADELPHIA, PA 19107

TELEPHONE: (215) 988-2700
TELEX: 834884 DEBEMAC
TELECOPIER: (215) 988-2782

1752 N STREET, N.W.
WASHINGTON, DC 20036
(202) 428-7400

JOHN C. BULLITT
1949-1982

405 PARK AVENUE
NEW YORK, NY 10022
(212) 636-8600

HENRY S. DRINKER
1904-1964

GARY S. ANDERSON
S. RICHARD POWELL, JR.
CAROL S. BROWN
RALPH BUCKLE
FRANCIS F. GREGG, JR.
ORRIS J. BROWN
WALTER T. PRATT
N. THOMAS HUNT
T. ANDREW GILBERT
LOUIS T. SOLOVITZ
BARBARA A. SALVANO
DANIEL M. FINE
STEPHEN P. CHAMBERG
GARY L. BATHYTON
VINCENT J. HARRIS, III
STUART A. LAW, JR.
BARBARA LEONTOVICH HEYWOOD
MARTY A. LAW
DAVID F. JENSEN
MARY H. ANDERSON
KAREN S. FOR
PATRICIA A. GOTSCHALK
SUSAN S. GILMER
ANDREW S. HADNER
MICHAEL P. MALLOY
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* ADMITTED IN DISTRICT OF COLUMBIA
† ADMITTED IN NEW YORK
‡ NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 988-2934

March 1, 1988

Sandra Robinson, Esquire
Federal Election Commission
999 I Street, N. W.
Washington, D. C. 20463

Re: MUR 2579

Dear Ms. Robinson:

Here are the designations of counsel of Thomas and Naomi Hooper. I expect to have such documents for Bruce, Eileen, Thomas and Cynthia by the end of the week.

As I mentioned on the telephone, I really must know as soon as possible whether Thomas and Naomi have the extension I proposed, since they received their papers the earliest.

Sincerely,

Stewart Dalzell
Stewart Dalzell

SD:kc
Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF FEDERAL COUNSEL
88 MAR -2 PM 1:47

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
88 MAR -2 AM 11:48

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell, Esquire

ADDRESS: Drinker Biddle & Reath

1100 Philadelphia National Bank Building

Broad & Chestnut Streets—Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

26 February 1988
Date

Thomas Hooper.
Signature

RESPONDENT'S NAME: Thomas Hooper

ADDRESS: 1174 St. Andrews Road

Bryn Mawr, Pennsylvania 19010

HOME PHONE: (215) 527-4576

BUSINESS PHONE: _____

88040703186

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell, Esquire

ADDRESS: 1100 Philadelphia National Bank Building
Broad & Chestnut Streets--Broad and Chestnut Sts.
Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

2/26/88
Date

Naomi Hooper
Signature

RESPONDENT'S NAME: Naomi Hooper

ADDRESS: 1174 St, Andrews Road
Bryn Mawr, Pennsylvania 19010

HOME PHONE: (215) 527-4526

BUSINESS PHONE: _____

88040703187

R.W. Hooper
#8 Valley Forge Executive Mall
650 E. Swedesford Road
Room 126
Wayne, PA 19087

88 MAR 14 AM 9:18

March 1, 1988

Sandra Robinson, Esq.
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Dear Ms. Robinson:

RE: MUR 2579
Ralph W. Hooper / Hilary W. Hooper

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF RECORDS & COMMUNICATIONS
88 MAR 14 PM 3:08

Unfortunately, I did not receive the Federal Election Commission letters to me and to Hilary W. Hooper until February 29; therefore, we are closely approaching the date by which you requested a reply. I have, by phone, as you may know, requested a couple of days extension for my comments.

At the present moment I do not intend to be represented by counsel. Not only have I a clear conscience but I remain proud of having supported an outstanding congressman, Curt Weldon. Your records, I am sure, will show that I have contributed to many other candidates in the United States Congress but, as I said, I am particularly pleased in this case and fully intend to do so again in the forthcoming election.

Because Hilary W. Hooper is enrolled at the Fletcher School of Law and Diplomacy, I shall appreciate the opportunity to reply to your letter addressed to her. Once when we were discussing politics in 1986, she asked if there were anything she could do, so I replied that she could send Curt Weldon a check; frankly, I didn't recall our conversation until these papers arrived and I'm personally gratified that she did send the contribution.

Thank you very much for your advice that I may attempt to demonstrate that no action should be taken against me or her:

° Hilary should be disassociated from the monies given to aid the Freedom Fighters of Nicaragua. She had nothing to do with that Foundation nor the deliberations and decisions to aid the Freedom Fighters.

° Members of the Hooper family have known the Weldon family for over 20 years and during that time have developed a great admiration for them, so it is not just a party obligation but a personal privilege to support Curt Weldon.

° To the best of my knowledge, I have not spoken to Congressman

88040703188

Sandra Robinson, Esq.

Page 2

March 1, 1988

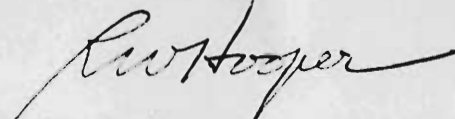
Weldon from the time of his election until today, March 1, 1988, for the first time; nor, emphatically, have I discussed nor written to him or his staff about how he may vote in the United States Congress.

° We are registered Republicans and have for many years supported every Republican Congressional candidate in our district.

° The inference that there is a connection between support for the Freedom Fighters and campaign contributions by Mrs. Hooper, Hilary or myself is not only outrageous but is calumnious to the extent that it is contemptible to me.

A citizen who supports political candidates should be prepared to accept any justifiable scrutiny by the Federal Election Commission and, of course, I do; however, I would appreciate your prompt attention so that your review can be dispatched quickly. Mr. Landau does not deserve my public response but I am distraught that there has been some needless publicity pertaining to this matter; therefore, I not only appreciate but respectfully request your scrutiny of these complaints which I perceive to be a spurious form of campaigning.

Yours very truly,



Ralph W. Hooper

cc: Hilary W. Hooper
Curt Weldon, Member of Congress

83040703189

HENRY H. BARTON, III
DAVID S. BARNES
JOHN S. BARNES
PATRICK T. BYAN
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JAMES C. HOBAN

OF COUNSEL
LEWIS H. VAN DUSEN, JR.

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WASHINGTON, DC 20036
(202) 420-7400

JOHN C. GULLITT
1849-1902

405 PARK AVENUE
NEW YORK, NY 10022
(212) 638-5600

HENRY S. DRINKER
1884-1964

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BARRY A. SOLOMON
ANDREW W. KAWCZAK

* ADMITTED IN DISTRICT OF COLUMBIA
† ADMITTED IN NEW YORK
‡ NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 988-2934

March 4, 1988

Sandra Robinson, Esquire
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: MUR 2579

Dear Ms. Robinson:

I enclose designations of counsel forms for Adrian S. Hooper, Thornton D. Hooper, II, and Cynthia H. Bell (nee Cynthia Hooper). I expect to receive similar forms on Monday from Bruce and Eileen S. Hooper. We have still not confirmed whether we will represent Ralph, Elaine and Hilary Hooper.

This will also confirm our telephone conversation of this morning, in which you advised that the Commission will provide a common deadline of March 21 for our clients. As I mentioned to you on the telephone, I would expect to get responses on behalf of at least the seven Hoopers to you by the middle or end of next week, since we would like to put this matter to rest as soon as possible.

HAND DELIVERED
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FEDERAL ELECTION COMMISSION
MAIL ROOM

88 MAR -7 AM 9:40

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

88 MAR -7 PM 12:25

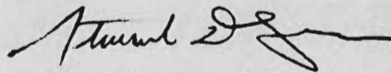
88040703190

DRINKER BIDDLE & REATH

Ms. Sandra Robinson
March 4, 1988
Page Two

In any event, thank you for your courtesy in granting the common
deadline of March 21.

Very truly yours,



Stewart Dalzell

SD:kc
Enclosures

Federal Express

88040703191

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: Stewart Dalzell, Esq.

ADDRESS: Drinker Biddle & Reath

Philadelphia National Bank Building

Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

2/3/88
Date

Adrian S. Hooper
Signature

RESPONDENT'S NAME: Adrian S. Hooper

ADDRESS: 222 Waterloo Road

Devon, PA 19335

HOME PHONE: _____

BUSINESS PHONE: (215) 687-1901

88040703192

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell, Esq.

ADDRESS: 1100 Philadelphia National Bank Building
Broad and Chestnut Streets
Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

March 3, 1988
Date

Thornton D. Hooper II
Signature

RESPONDENT'S NAME: Thornton D. Hooper II

ADDRESS: 27 Paper Mill Road
Newtown Square, PA 19073

HOME PHONE: (215) 688-6118

BUSINESS PHONE: (212) 697-1900 x745

88040703193

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell

ADDRESS: 1100 Philadelphia National Bank Building
Broad and Chestnut Streets
Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

3/4/88
Date

Cynthia H. Bell
Signature

RESPONDENT'S NAME: Cynthia H. Bell

ADDRESS: 1220 Rose Lane
Berwyn, PA 19312

HOME PHONE: (215) 647-8481

BUSINESS PHONE: (215) 645-6366

88040703194

QCC#6712

HENRY W. BAUTER, III
DAVID G. JENNISON
JOHN E. BARNES
DANIEL E. EVAN
JOHN MADOLE, JR.
R. PHILIP STEPHENS
RALPH H. GLOVER
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MICHAEL J. DEATHMAN
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WILLIAM H. SCHNEIDER, III
DAVID D. NATHAN
E. NORMAN MAXWELL, III
ROBERT J. HOELSCHER
JAMES C. HERRMAN

OF COUNSEL
LEWIS H. VAN DUSEN, JR.

LAW OFFICES
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1752 N STREET, N.W.
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1949-1992

408 PARK AVENUE
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HENRY S. DRINKER
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D. RICHARD POWELL, JR.
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FRANKLIN P. DEAN, JR.
DAVID J. DEAN
WILLIAM T. DEAN
H. THOMAS DEAN
T. ANDREW GILBERT
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BARBARA A. GILBERT
DAVID H. GILBERT
STEPHEN P. GILBERT
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BARBARA LORENTSON HETWOOD
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MARY H. ANDERSON
KAREN S. FINE
PATRICIA A. GUTENBERG
SUSAN D. GUTENBERG
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MICHAEL P. MALLOY
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H. JOHN MICHEL, JR.
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LISA D. CAMPOLO
DAVID L. MALL
WALTER J. MOSTER, JR.
FRANCIS J. MARTIN
JOAN H. FEDERSEN
SUSAN S. COLLINGS
CHRISTOPHER H. CONNORS
SANDRA L. THEMA
STEPHEN H. KOZOL
EVELYN S. HOWARD

KAREN A. FARRER
WILLIAM A. GORMAN
KAREY S. GORMAN
LORETTA M. GORMAN
MADEIRA L. FLEISHER
W. STEVEN FLEISHER
CHRISTINA T. FLEISHER
GORDON E. FLEISHER, II
JAMES A. FLEISHER, III
THOMAS S. FLEISHER
JOHN GILBERT FLEISHER
WILLIAM A. FLEISHER
WILLIAM D. FLEISHER
ELIZABETH A. FLEISHER
LINDA S. FLEISHER
SUSAN ALYN FLEISHER
MICHAEL FLEISHER
KATHLEEN FLEISHER
SUSAN FLEISHER
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SUTHERLAND M. GORDON
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CHARLES S. GORDON
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MARGA F. RABIN
ANDREW P. POSTER
SANDY A. SOLOMON
ANDREW W. SAWCHUK

ADMITTED IN DISTRICT OF COLUMBIA
ADMITTED IN NEW YORK
NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 986-2934

March 7, 1988

Sandra Robinson, Esquire
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: MUR 2579

Dear Ms. Robinson:

Here are the statements of designation of counsel of Eileen S. Hooper and Bruce H. Hooper in connection with the above-cited MUR.

I can now confirm that we will not represent Ralph, Elaine, or Hilary Hooper. On behalf of the seven Hoopers we do represent, however, I will submit affidavits on their behalf, together with a letter brief, probably within the next two days.

Sincerely,

Stewart Dalzell
Stewart Dalzell

SD:kc
Enclosures
Federal Express

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
88 MAR -8 AM 11:05

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MAIL ROOM
88 MAR -8 AM 9:32

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell, Esquire

ADDRESS: Drinker Biddle & Reath
1100 Philadelphia National Bank Building

Broad and Chestnut Streets

Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

3/7/88

Date

Signature

Bruce H. Hooper

RESPONDENT'S NAME: Bruce H. Hooper

ADDRESS: 27 Paper Mill Road

Newtown Square, PA 19073

HOME PHONE: (215) 688-6118

BUSINESS PHONE: (215) 293-0216

88040703196

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2579

NAME OF COUNSEL: Stewart Dalzell, Esquire

ADDRESS: Drinker Biddle & Reath
1100 Philadelphia National Bank Building
Broad and Chestnut Streets

Philadelphia, PA 19107

TELEPHONE: (215) 988-2934

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.

3/7/88
Date

Eileen S. Hooper
Signature

RESPONDENT'S NAME: Eileen S. Hooper

ADDRESS: 27 Paper Mill Road

Newtown Square, PA 19073

HOME PHONE: (215) 688-6118

BUSINESS PHONE:

88040703197



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 7, 1988

Stewart Dalzell
Drinker Biddle & Reath
Broad and Chestnut Streets
Philadelphia, PA 19107

RE: MUR 2579
Thomas Hooper, et al.

Dear Mr. Dalzell:

This is in response to your letters dated February 26, 1988, and March 1, 1988, which we received on February 29, 1988, and March 3, 1988, respectively, requesting an extension of 15 days to respond to the complaint in the above referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 22, 1988.

If you have any questions, please contact Sandra H. Robinson the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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QW#6730

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ANDREW W. KAWCHIK

* ADMITTED IN DISTRICT OF COLUMBIA
† ADMITTED IN NEW YORK
‡ NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 988-2934

Confidential

March 9, 1988

Lois G. Lerner, Esquire
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

RE: MUR 2579

Dear Ms. Lerner:

As Ms. Robinson knows from prior filings, we represent Bruce, Eileen, Thornton, Thomas, Naomi, and Adrian Hooper, as well as Cynthia Hooper Bell (hereinafter referred to as "the Hooper Family"), respondents in the above-cited Matter Under Review.

As you are aware, the instant MUR was prompted by a complaint of David E. Landau, Esquire, who is seeking the nomination of the Democratic Party as its candidate for Congress in the Seventh Congressional District here in Pennsylvania. Specifically, Mr. Landau submitted his initial request for a Commission investigation on or about December 1, 1987. Apparently pursuant to the Federal Election Commission General Counsel's letter of December 10, 1987 "concerning certain deficiencies" in the first submission, Mr. Landau submitted what he styled an "amended complaint" on or about December 29, 1987. Apparently pursuant to your letter of January 13, 1988, "concerning certain deficiencies" in the second complaint, on or about February 2, 1988, Mr. Landau submitted yet

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DRINKER BIDDLE & REATH

Lois G. Lerner, Esquire
March 9, 1988
Page Two

another "complaint" to Chairman Thomas. I will refer to the February 2, 1988 submission as the "Third Landau Complaint."

Pursuant to 11 C.F.R. §111.6(a), the Hooper Family respectfully submit that the Commission should take no action on the basis of the Third Landau Complaint, for the following reasons.

What The Complaint Alleges

It is hard to decipher what, precisely, the Third Landau Complaint alleges that the Hooper Family did that purportedly violated the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act").

We note that Mr. Landau makes reference to certain contributions the members of the Hooper Family, and other Hooper respondents, made to the 1984 and 1986 campaigns of Congressman Weldon, as well as to grants certain members of the Hooper Family caused two family Foundations to make to the National Endowment for the Preservation of Liberty (hereinafter referred to as "NEPL"). Apparently referring to both classes of gifts, Mr. Landau requests the Commission

....to investigate these contributions to determine whether there has been any violation of the federal election laws by any of the parties involved, including but not limited to the provisions of the law concerning independent expenditures and the limits on contributions by individuals. It should be noted that all of Hooper contributors [sic] are related to each other and some are dependent children.

We submit that the cited language from the Third Landau Complaint is so vague that it cannot reasonably be regarded as stating any claim against the Hooper Family under the Act, and, therefore, should be dismissed out of hand for its failure to state such a claim. The Hooper Family should not be required to guess at what purported illegality exists in the vapor of a politically-motivated, vague complaint like this.

The Hooper Family therefore respectfully move that the complaint be dismissed for failure to state a claim against any member of the Hooper Family under the Act.

Lois G. Lerner, Esquire
March 9, 1988
Page Three

Assuming, however, that the Commission believes some allegations in the Third Landau Complaint may lurk with sufficient particularity that it may state some claim requiring a substantive response, it would seem to us that the only such conceivable allegations would be that (1) members of the Hooper Family, in their contributions to Curtis Weldon's campaigns, somehow exceeded "the limits on contributions by individuals"; (2) the contributions to NEPL were "independent expenditures" that were not properly reported under the Act and the regulations promulgated thereunder; and (3) some of the contributions to the Weldon campaigns were from "dependent children" who were disabled from making contributions under the Act. It is, obviously, uncontested that all of the respondents with the surname "Hooper" and Cynthia H. Bell "are related to each other", but this reality is plainly of no significance whatever under any provision of the Act, and could require no further response.

We will now address these three theoretical claims seriatim.

(1) "Limits on Contributions by Individuals"

The Hooper Family have each submitted affidavits attached to this letter. These affidavits detail each and every contribution to any of the four campaigns of Curtis Weldon in 1984 and 1986.

Paragraphs 2 of the affidavits of Bruce, Eileen, Thomas, Naomi, and Adrian Hooper, together with ¶¶3 of the affidavits of Thornton D. Hooper, II and Cynthia H. Bell, leave not one iota of doubt that no member of the Hooper Family gave in excess of \$1,000 to any one of the four Weldon campaigns that took place in 1984 and 1986. Although Naomi Hooper gave her contributions in 1984 through a joint account with her husband, this fact is irrelevant since, as noted in 11 C.F.R. §110.1(i)(1), "the limitations on contributions of this section shall apply separately to contributions made by each spouse even if only one spouse has income."

Any allegations that any member of the Hooper Family exceeded the contribution limits should, therefore, be rejected.

(2) "Independent Expenditures"

As noted above, it seems to be the theory of the Third Landau Complaint that the actions of certain members of the Hooper Family with regard to NEPL are somehow to be linked to those individuals' support of

Lois G. Lerner, Esquire
March 9, 1988
Page Four

Congressman Weldon. That being so, this theory would apparently aver that these Hoopers made "independent expenditures" that were not reported consistent with the Act and Part 109 of the Commission's regulations.

A glance at Part 109 reveals the absurdity of this claim. 11 C.F.R. §109.1(a) defines "independent expenditure" as:

....an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate.

As an examination of the attached affidavits will show, certain members of the Hooper Family indeed supported gifts by the Elizabeth S. Hooper Foundation and the Killeshandra Foundation to NEPL. Specifically, Adrian, Bruce, and Thomas Hooper are among the directors of the Elizabeth S. Hooper Foundation (hereinafter referred to as "the Hooper Foundation"), and in 1986 they each voted in favor of \$130,000 to be granted to NEPL. In addition, Bruce Hooper is also among the directors, along with Naomi Hooper, of the Killeshandra Foundation, which in 1986 awarded \$15,000 to NEPL.

On the face of the affidavits of these four Hoopers, however, it is absolutely clear that each person's "only purpose" in supporting either the Hooper or Killeshandra Foundations' gifts "to NEPL was to provide aid to the freedom fighters in Nicaragua in their cause against the Communist regime in that country" [emphasis added]. Furthermore, each of these Hoopers state flatfootedly that he or she "...had no intention whatever that the gift[s] would in any way relate to the election of Congressman Weldon (or any other candidate) or to the defeat of any opponent of Congressman Weldon (or any other candidate)."

The Hoopers' support of their respective Foundations' gifts to NEPL was therefore exclusively motivated by patriotism and humanitarian concerns, and were utterly unrelated to "the election or defeat of a clearly identified candidate...." This being the case, the reporting and other requirements of Part 109 were never triggered, and, therefore, that Part has no applicability at all to anything any Hooper did with regard to NEPL.

DRINKER BIDDLE & REATH

Lois G. Lerner, Esquire
March 9, 1988
Page Five

(3) "Dependent Children"

Of the seven persons among the Hooper Family responding herein, only Thornton D. Hooper, II and Cynthia Hooper Bell could ever be conceivably considered a "dependent child" at the time of any contribution to Congressman Weldon.

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Their two affidavits, however, make it clear that they were not "minor children" within the meaning of 11 C.F.R. §110.1(i)(2), which defines such individuals as "children under 18 years of age." As noted in ¶2 of Cynthia Hooper Bell's affidavit, she was born on July 26, 1961 and was, therefore, 23 by the time of the General Election in 1984. Paragraph two of Thornton D. Hooper II's affidavit reveals his birthday as June 13, 1963, and he was, therefore, 21 by the time of the 1984 General Election.

Further, ¶3 of Cynthia H. Bell's affidavit demonstrates that, in 1984, she "was employed full-time as a teacher of physical education at Bryn Mawr College." The same paragraph of her affidavit, and ¶3 of Thornton D. Hooper II's affidavit, reveal that each individual "was the sole beneficiary of a trust that had been created many years before for" each person's benefit. The resources of either employment, trust income or both enabled each person to make the contributions he or she made to Mr. Weldon's 1984 campaigns. Such sources are, of course, specifically cited as enabling "minor children" to make contributions, as mentioned at 11 C.F.R. §110.1(i)(2)(ii). As demonstrated above, neither was a minor child in 1984.

In the case of both Cynthia and Thornton, the contributions they made in 1984 were the product of their own view "that Mr. Weldon would be a far superior Member of Congress than his opponent, the Rev. Mr. Edgar." Paragraphs four of these two affidavits thus leave no doubt whatever that contributions were "made knowingly and voluntarily" by these two adults.

* * * *

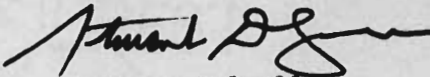
In view of the foregoing, the Hooper Family believe that they have shown beyond doubt that no action should be taken by the Commission on the basis of the Third Landau Complaint. Indeed, the affidavits attached hereto make clear that no conceivable adverse conclusion can be made against any member of the Hooper Family under the Act in connection with their support of Congressman Weldon and with their individual support of the freedom fighters in Nicaragua.

DRINKER BIDDLE & REATH

Lois G. Lerner, Esquire
March 9, 1988
Page Six

We therefore look forward to receiving your written advice that the Commission has concluded that no further investigation of any member of the Hooper Family is warranted.

Respectfully submitted,


Stewart Dalzell

SD:kc
Attachments

cc: Sandra Robinson, Esquire
The Hooper Family

Federal Express

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COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF DELAWARE

:

AFFIDAVIT OF BRUCE H. HOOPER

Bruce H. Hooper, being duly sworn according to law,
deposes and says:

1. I am a citizen of the Commonwealth of
Pennsylvania and reside in Newtown Square. I am a registered
voter in the Seventh Congressional District in Pennsylvania,
and have been for many years prior to 1984.

2. In March of 1984, I gave \$1,000 in support of
Curtis Weldon's Primary Election campaign. In September of
1984, I gave \$1,000 in support of Mr. Weldon's General
Election campaign. In May of 1986, I gave \$1,000 to Mr.
Weldon's Primary and \$1,000 to his General Election campaigns.

3. The contributions mentioned in ¶2 are the only
gifts I made to Congressman Weldon's campaigns of 1984 and
1986. I made the contributions of my own free will and as a
result of the exercise of my own judgment. In 1984, 1986 and
in many other years, I have consistently supported candidates
of the Republican Party.

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4. I am one of five directors of the Elizabeth Hooper Foundation (hereinafter referred to as the "Hooper Foundation"). In 1986, I believed a contribution of \$130,000 to the National Endowment for the Preservation of Liberty (hereinafter referred to as "NEPL") would be appropriate. The other members of the Board agreed that the Hooper Foundation should make this gift, and so the contribution was duly authorized and remitted to NEPL in 1986.

5. I am also one of three directors of the Killeshandra Foundation. In 1986, I believed a contribution of \$15,000 to NEPL would be appropriate. A majority of the Board agreeing that the Killeshandra Foundation should make this gift, it was duly authorized and remitted in March of 1986.

6. In voting to authorize the Hooper and Killeshandra Foundations to support NEPL, I had no intention whatever that the gifts would in any way relate to the election of Congressman Weldon (or any other candidate) or to the defeat of any opponent of Congressman Weldon (or any other candidate). My only purpose in supporting the Hooper and Killeshandra Foundations' gifts to NEPL was to provide aid to

the freedom fighters in Nicaragua in their cause against the Communist regime in that country.

Bruce H. Hooper
Bruce H. Hooper

Sworn to and subscribed
before me this 4th
day of March, 1988.

Kathryn A. Lechler
Notary Public

KATHRYN ANN LECHLER, NOTARY PUBLIC
MARPLE TOWNSHIP, DELAWARE COUNTY
MY COMMISSION EXPIRES JUNE 19, 1989
Member, Pennsylvania Association of Notaries

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF DELAWARE

:

AFFIDAVIT OF EILEEN S. HOOPER

Eileen S. Hooper, being duly sworn according to law, deposes and says:

1. I am a citizen of the Commonwealth of Pennsylvania and reside in Newtown Square. I am a registered voter in the Seventh Congressional District in Pennsylvania, and have been for many years prior to 1984.

2. In March, 1984, I gave \$1,000 in support of Curtis Weldon's Primary Election campaign, and in September of 1980 I gave \$1,000 in support of Mr. Weldon's General Election campaign. In May of 1986, I gave \$1,000 to Mr. Weldon's Primary and \$1,000 to his General Election campaigns.

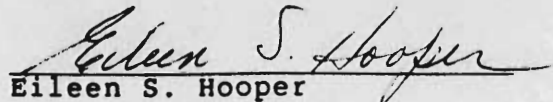
3. The contributions referred to in #2 are the only gifts I made to Congressman Weldon's campaigns of 1984 and 1986. I made the contributions of my own free will and as a result of the exercise of my own judgment. In 1984, 1986 and in many other years, I have consistently supported candidates of the Republican Party.

4. I am one of three directors of the Killeshandra Foundation. In 1986, I believed a contribution of \$15,000 to the National Endowment for the Preservation of Liberty

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(hereinafter referred to as "NEPL") would be appropriate. A majority of the Board agreed that the Killeshandra Foundation should make this gift, and so the contribution was duly authorized to NEPL.

5. In voting to authorize the Killeshandra Foundation to support NEPL, I had no intention whatever that this gift would in any way relate to the election of Congressman Weldon (or any other candidate) or to the defeat of any opponent of Congressman Weldon (or any other candidate). My only purpose in supporting the Killeshandra Foundation's gift to NEPL was to provide aid to the freedom fighters in Nicaragua in their cause against the Communist regime in that country.


Eileen S. Hooper

Sworn to and subscribed
before me this 4th
day of March, 1988.



KATHRYN ANN LECHLER, NOTARY PUBLIC
MARPLE TOWNSHIP, DELAWARE COUNTY
MY COMMISSION EXPIRES JUNE 19, 1989
Member, Pennsylvania Association of Notaries

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF PHILADELPHIA :

AFFIDAVIT OF CYNTHIA H. BELL

Cynthia H. Bell, being duly sworn according to law,
deposes and says:

1. I am a citizen of the Commonwealth of
Pennsylvania, and am the daughter of Bruce and Eileen Hooper.

2. I was born on July 26, 1961, and upon reaching my
eighteenth birthday in 1979, I registered to vote in the
Seventh Congressional District of Pennsylvania, where I remain
registered.

3. On September 21, 1984, I gave \$1,000 in support
of the General Election campaign of Curtis Weldon. In March
of 1984, I gave a like amount to Mr. Weldon's Primary Election
campaign. Throughout 1984, I was employed full-time as a
teacher of physical education at Bryn Mawr College.

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Additionally, in that year (and up to the present), I was (and am) the sole beneficiary of a trust that had been created many years before for my benefit. The income from the trust, and my employment income, enabled me to support Mr. Weldon in 1984.

4. I did not make any contributions to Congressman Weldon's campaign in 1986. My financial support in 1984 was given of my own free will and as a result of the exercise of my own judgment. My support of Mr. Weldon's campaign in 1984 was the product of my independently-obtained conclusion that Mr. Weldon would be a far superior Member of Congress than his opponent, the Rev. Mr. Edgar.

Cynthia H. Bell
Cynthia H. Bell

Sworn to and subscribed
before me this 4th
day of March, 1988.

Linda M. Cecot
Notary Public

LINDA M. CECOT
Notary Public, Phila. Phila. Co.
Commission Expires Nov. 6, 1989

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF PHILADELPHIA :

AFFIDAVIT OF THORNTON D. HOOPER, II

Thornton D. Hooper, II, being duly sworn according to law, deposes and says:

1. I am a citizen of the Commonwealth of Pennsylvania, and am the son of Bruce and Eileen Hooper.

2. I was born on June 13, 1963, and upon reaching my eighteenth birthday in 1981, I registered to vote in the Seventh Congressional District of Pennsylvania, where I remain registered.

3. On March 26, 1984, I gave \$1,000 in support of the Primary Election campaign of Curtis Weldon, and on September 17, 1984, I gave a like amount in support of Mr. Weldon's General Election campaign. At the time of each contribution, I was the sole beneficiary of a trust that had been created many years before for my benefit, and the income from the trust enabled me to make my contributions to Mr. Weldon's campaigns.

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4. These were the only gifts I made to Congressman Weldon's campaigns of 1984 and 1986. I made the contributions of my own free will and as a result of the exercise of my own judgment. My contributions to Mr. Weldon's campaign in 1984 were the product of my independent decision that Mr. Weldon would be a far superior Member of Congress than his opponent, the Rev. Mr. Edgar.

Thornton D. Hooper II
Thornton D. Hooper, II

Sworn to and subscribed
before me this 4th
day of March, 1988.

Linda M. Cecot
Notary Public

LINDA M. CECOT
Notary Public, Phila., Phila. Co.
My Commission Expires Nov. 6, 1989

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COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF PHILADELPHIA :

AFFIDAVIT OF THOMAS HOOPER

Thomas Hooper, being duly sworn according to law,
deposes and says:

1. I am a citizen of the Commonwealth of
Pennsylvania and reside in Bryn Mawr. I am a registered voter
in Pennsylvania, and have been for many years prior to 1984.

2. On or about March 21, 1984, I signed a check on
the joint account maintained with my wife, Naomi, for \$2,000
in favor of the Weldon for Congress Committee. The check
represented a \$1,000 contribution from me and \$1,000 from my
wife.

3. The contribution referred to in ¶2 is the only
gift I made to Congressman Weldon's campaigns of 1984 and
1986. I made the contribution of my own free will and as a
result of the exercise of my own judgment. In 1984 and in
many other years, I have consistently supported candidates of
the Republican Party.

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4. I am one of five directors of the Elizabeth Hooper Foundation (hereinafter referred to as the "Hooper Foundation"). In 1986, I believed a contribution of \$130,000 to the National Endowment for the Preservation of Liberty (hereinafter referred to as "NEPL") would be appropriate. The other members of the Board present agreed that the Hooper Foundation should make this gift, and so the contribution was duly authorized to NEPL.

5. In voting to authorize the Hooper Foundation to support NEPL, I had no intention whatever that this gift would in any way relate to the election of Congressman Weldon (or any other candidate) or to the defeat of any opponent of Congressman Weldon (or any other candidate). My only purpose in supporting the Hooper Foundation's gift to NEPL was to provide aid to the freedom fighters in Nicaragua in their cause against the Communist regime in that country.

Thomas Hooper

Thomas Hooper

Sworn to and subscribed before
me this 2nd day of March, 1988.

Linda M. Cecot
Notary Public

LINDA M. CECOT
Notary Public, Phila., Phila. Co.
My Commission Expires Nov. 6, 1999

88040703215

COMMONWEALTH OF PENNSYLVANIA:

: ss.

COUNTY OF PHILADELPHIA :

AFFIDAVIT OF NAOMI HOOPER

Naomi Hooper, being duly sworn according to law,
deposes and says:

1. I am a citizen of the Commonwealth of Pennsylvania and reside in Bryn Mawr. I am a registered voter in Pennsylvania, and have been for many years prior to 1984.

2. On or about March 21, 1984, my husband, Thomas, and I agreed that we should each give \$1,000 to Mr. Curtis Weldon's campaign against then-Congressman Robert W. Edgar. In furtherance of that decision, my husband signed a check from our joint account for \$2,000 in favor of Mr. Weldon's campaign, representing a \$1,000 gift for me and \$1,000 for my husband. There is no limitation on my use of the funds in our joint account and, therefore, I have equal access to that account with my husband.

3. Our contributions to Mr. Weldon in 1984 were not the only contributions we made in support of Republican candidates. Indeed, Thomas and I have provided financial

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support to many Republican candidates over the years. My contribution to Mr. Weldon's campaign in 1984 was the product of my independent decision that Mr. Weldon would be a far superior Member of Congress than his opponent, the Rev. Mr. Edgar, who I always opposed.

Naomi Hooper
Naomi Hooper

Sworn to and subscribed before
me this 2nd day of March, 1988.

Linda M. Cecot
Notary Public

LINDA M. CECOT
Notary Public, Phila., Phila. Co.
My Commission Expires Nov. 6, 1989

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COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF PHILADELPHIA :

AFFIDAVIT OF ADRIAN S. HOOPER

Adrian S. Hooper, being duly sworn according to law, deposes and says:

1. I am a citizen of the Commonwealth of Pennsylvania and reside in Devon. I am a registered voter in Pennsylvania, and have been for many years prior to 1984.

2. On or about April 24, 1984, I signed a check on my personal account for \$1,000 in favor of "The Weldon for Congress Committee."

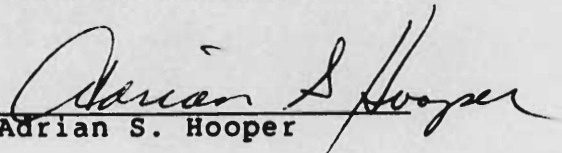
3. The contribution referred to in ¶2 is the only gift I made to Congressman Weldon's campaigns of 1984 and 1986. I made the contribution of my own free will and as a result of the exercise of my own judgment. In 1984 and in many other years, I have regularly supported candidates of the Republican Party.

4. I am one of five directors of the Elizabeth Hooper Foundation (hereinafter referred to as the "Hooper Foundation"). In 1986, I believed a contribution of \$130,000 to the National Endowment for the Preservation of Liberty (hereinafter referred to as "NEPL") would be appropriate. The other members of the Board agreed that the Hooper Foundation

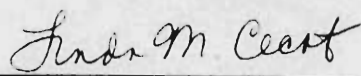
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should make this gift, and so the contribution was duly authorized and remitted to NEPL in 1986.

5. In voting to authorize the Hooper Foundation to support NEPL, I had no intention whatever that this gift would in any way relate to the election of Congressman Weldon (or any other candidate) or to the defeat of any opponent of Congressman Weldon (or any other candidate). My only purpose in supporting the Hooper Foundation's gift to NEPL was to provide aid to the freedom fighters in Nicaragua in their cause against the Communist regime in that country.


Adrian S. Hooper

Sworn to and subscribed
before me this 7th
day of March, 1988.


Notary Public

LINDA M. CECOT
Notary Public, Phila., Phila. Co.
My Commission Expires May 9, 1990

6CC#6772

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JOHN E. BARNES
PATRICK T. EVAN
JOHN MARBLE, JR.
R. PHILIP STEINBERG
RALPH H. GLENN
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MARIA F. BANI
ANDREW P. POSTER
GARY A. SOLOMON
ANDREW W. KAWCZAK

* ADMITTED IN DISTRICT OF COLUMBIA
† ADMITTED IN NEW YORK
‡ NOT ADMITTED IN PENNSYLVANIA

DIRECT DIAL (215) 988-2934

March 11, 1988

Lois G. Lerner, Esquire
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: MUR 2579

Dear Ms. Lerner:

I write to correct an inadvertent error of one word in my letter to you of March 9.

Specifically, the last sentence of the second full paragraph on page four should refer to "Eileen S. Hooper", and not "Naomi Hooper". Thus, the sentence should read:

In addition, Bruce Hooper is also among the directors, along with Eileen S. Hooper, of the Killeshandra Foundation, which in 1986 awarded \$15,000 to NEPL.

As you will see at paragraph four of Eileen Hooper's affidavit, the error in the March 9 letter was purely inadvertent.

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88 MAR 14 AM 11:48

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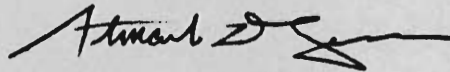
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DRINKER BIDDLE & REATH

Lois G. Lerner, Esquire
March 11, 1988
Page Two

Thank you for correcting this technical error, which I hope
causes no inconvenience.

Respectfully submitted,



Stewart Dalzell

SD:kc
Enclosure

cc: Sandra Robinson, Esquire
Mrs. Eileen S. Hooper
Mr. Bruce H. Hooper

Federal Express

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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

MUR 2579
DATE COMPLAINT RECEIVED BY
OGC: February 8, 1988
DATE OF NOTIFICATION TO
RESPONDENTS: February 16,
1988
STAFF MEMBER: Sandra H. Robinson

RECEIVED
FEDERAL ELECTION COMMISSION

88 MAR 31 PM 12:52

EXECUTIVE SESSION
APR 12 1988
SENSITIVE

COMPLAINANT: David E. Landau

RESPONDENTS: National Endowment for the Preservation of Liberty

The Weldon for Congress Committee and Brian W.
Clymer, as treasurer

Bruce H. Hooper

Eileen S. Hooper

Ralph W. Hooper

Elaine S. Hooper

Hilary W. Hooper

Cynthia Hooper Bell

Thornton D. Hooper, II

Adrian S. Hooper

Thomas Hooper

Naomi Hooper

**RELEVANT
STATUTES:**

2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b
2 U.S.C. § 441f
11 C.F.R. § 100.8(a)(3)
11 C.F.R. § 109.1
11 C.F.R. § 110.1(i)

INTERNAL

REPORTS CHECKED: Disclosure Reports

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FEDERAL AGENCIES
CHECKED:

None

I. GENERATION OF MATTER

On February 8, 1988, the Office of the General Counsel received a complaint from David E. Landau. The complaint alleged that Congressman Curt Weldon, through his principal campaign committee, The Weldon for Congress Committee ("the Weldon Committee"), received contributions from members of the Hooper family, some of whom were dependent children. The allegations suggested that certain contributions may have been made by minors in violation of 11 C.F.R. § 110.1(i); that certain contributions may have been made in the name of others in violation of 2 U.S.C. § 441f; and that as a result of the preceding alleged violations, certain persons may have exceeded the contribution limitation in violation of 2 U.S.C. § 441a(a)(1)(A).

The complaint also alleged that members of the Hooper family contributed to the National Endowment for the Preservation of Liberty ("NEPL") and asked for an investigation into whether some of NEPL's activities, including alleged independent expenditures, were directed towards influencing the outcome of the 1984 and 1986 Congressional elections in the 7th district of Pennsylvania, which is currently represented by Congressman Weldon. In raising the connection between the Hooper family and NEPL, the complaint also suggested that the Hoopers donated funds to NEPL knowing that such funds would be used to influence the federal election in Pennsylvania in violation of 2 U.S.C. § 441a(a)(1)(A), and that NEPL and the Weldon Committee violated 2 U.S.C. § 441b(a).

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Seven of the Hoopers designated the same counsel, who requested an extension of time to respond to the complaint.^{1/} An extension was granted and a response was received from that group of respondents on March 10, 1988; corrective information was received on March 14, 1988. Attachment I. Ralph W. Hooper submitted a response on his, and Hilary W. Hooper's, behalf on March 14, 1988. Attachment II. Elaine Hooper did not respond to the complaint. The Weldon Committee submitted a response on March 8, 1988. Attachment III. NEPL also did not respond to the complaint.

II. FACTUAL AND LEGAL ANALYSIS

A. The Law

The Federal Election Campaign Act of 1971, as amended ("the Act") provides in relevant parts the following:

Section 441a(a)(1)(A) prohibits a person from making any contributions to any Federal candidate or his authorized political committees with respect to any election which, in the aggregate, exceed \$1,000.

Section 441a(f) prohibits a candidate or political committee from knowingly accepting any contribution or making any expenditure in violation of the provisions of Section 441a. Officers and employees of political committees are prohibited from knowingly accepting a contribution made for the benefit or use of a candidate, or knowingly making any expenditure on behalf

^{1/} Designation of counsel forms were submitted on behalf of Bruce H. Hooper, Eileen S. Hooper, Cynthia L. Hooper (Bell), Thornton D. Hooper, II, Adrian S. Hooper, Thomas Hooper, and Naomi Hooper.

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of a candidate, in violation of any limitation imposed on contributions and expenditures under Section 441a.

The Commission's regulations, at 11 C.F.R. § 100.8(a)(3) define an expenditure to include independent expenditures. The regulations further define an independent expenditure to mean an expenditure by a person for a communication which expressly advocates the election or defeat of a clearly identified candidate, and such expenditures can not be made with the cooperation of the candidate or his authorized committee. 11 C.F.R. § 109.1(a). The regulations specifically exclude a corporation from the term "person" for the purposes of this definition. 11 C.F.R. § 109.1(b)(1).

In addition, Section 441b(a) makes it unlawful for any corporation to make a contribution in connection with any election to any political office, specifically, it is unlawful to make a contribution or expenditure in connection with any election at which a Representative in Congress is to be elected.

Section 441f of the Act prohibits a person from making a contribution in the name of another, or from knowingly permitting his name to be used in such a manner. Persons, including political committees, are also prohibited from knowingly accepting such contributions.

The Commission's regulations at 11 C.F.R. § 110.1(i) provide that the limitations on contributions (pursuant to 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1) shall apply separately to contributions made by each spouse even if only one spouse has

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income. This section also provides that minor children (children under 18 years of age) may make contributions to any candidate or political committee which in the aggregate do not exceed the limitations on contributions. Certain criteria must be met in this circumstance:

(i) the decision to contribute must be made knowingly and voluntarily by the minor child;

(ii) the funds, goods, or services contributed must be owned or controlled exclusively by the minor child; and

(iii) the contributions cannot be made from the proceeds of a gift provided for the purpose of making a contribution, or which is in any way controlled by another individual.

B. ANALYSIS

1. Allegations pertaining to contributions made by minor children or in the name of another and excessive contributions

As stated, the complainant's reference to contributions made by "dependent children" suggested that such contributions may have been made in violation of 2 U.S.C. § 441f and 11 C.F.R. § 110.1(i), also resulting in a violation of 2 U.S.C. § 441a(a)(1)(A). The complaint did not identify the dependent children by name or by age. A review of the Weldon Committee's disclosure reports on file with the Commission showed that each of the Hooper respondents contributed to at least one of the 1984 and 1986 primary and general election campaigns of Congressman Curt Weldon. Each contribution was for \$1,000, except one from Hilary Hooper for the 1984 general election campaign in the

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amount of \$500. Although several of the Hoopers shared the same addresses, it was impossible to discern the exact familial relationships between the individuals. The response submitted by counsel included affidavits signed by the individuals he represented, which clarified some of the relationships. Counsel conceded in his cover letter that all of the Hoopers and Cynthia Hooper Bell are related.^{2/} Attachment I(3). Counsel also stated that, of his clients, only Thornton D. Hooper, II, and Cynthia Hooper Bell could possibly be considered dependent children at the time the contributions at issue were made, however, neither was a minor child. Attachment I(5).

A review of the affidavits revealed the following:

1) Bruce and Eileen Hooper are husband and wife, and the parents of Cynthia Hooper Bell and Thornton D. Hooper, II. Each of these individuals contributed to at least two of the 1984 and 1986 primary and general election campaigns of Congressman Weldon. Each person contributed the maximum of \$1,000 each time and neither exceeded the limitation imposed by Section 441a(a)(1)(A) of the Act.^{3/} Attachment I(7)-(15).

Bruce Hooper and Eileen Hooper individually contributed \$1,000 to the Weldon Committee for each of the 1984 and 1986

^{2/} In a telephone conversation on February 24, 1988, counsel informed staff that Bruce Hooper, Adrian Hooper, Ralph Hooper and Thomas Hooper are brothers.

^{3/} Counsel confirmed via telephone, that the date of Eileen S. Hooper's contribution for the 1984 general election was September 1984, and not September 1980, as stated in the affidavit. Counsel stated that this was a typographical error.

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primary and general election campaigns. Since the regulations permit separate application of the contribution limitation to each spouse even in single income situations, Eileen Hooper's contributions would be permissible regardless of whether she has her own income.

At the time Cynthia Hooper Bell made her \$1,000 contributions to the Committee for the 1984 primary and general elections, she was approximately 23 years old (her birthdate is July 26, 1961 and the contributions were made in September and March 1984). In her affidavit, Ms. Bell stated that she was employed as a physical education teacher at Bryn Mawr College throughout 1984. She also stated that she was, and continues to be, the sole beneficiary of a trust "created many years before" for her benefit. Attachment I(12)-(13). Clearly, Ms. Bell was not a minor at the time she made her contribution to the Weldon Committee, and she apparently had sufficient income to make such contributions.

In the affidavit signed by Thornton Hooper, II, he stated that he was born on June 13, 1963, and further that in 1984 he contributed \$1,000 to the Weldon Committee for the primary election and \$1,000 for the general election. Mr. Hooper stated that the source of the income enabling him to make such contributions was a trust of which he is the sole beneficiary. Attachment I(14)-(15). Mr. Hooper was approximately 21 years old at the time he made the contributions, and apparently had sufficient income to make such contributions.

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Therefore, the regulations governing contributions made by minor children are not applicable to Cynthia Hooper Bell and Thornton D. Hooper, II, as both were adults at the time their contributions were made. They both used their own personal assets to make such contributions.

Based on the foregoing, this Office recommends that the Commission find no reason to believe Bruce H. Hooper, Eileen S. Hooper, Cynthia Hooper Bell, or Thornton D. Hooper, II, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

2) Thomas and Naomi Hooper are husband and wife. In March 1984, Thomas Hooper signed a check drawn on a joint account held with his wife, made payable to the Weldon Committee. The check was for the amount of \$2,000, and represented a \$1,000 contribution on behalf of Thomas Hooper and Naomi Hooper. Attachment I(16), (18)-(19). Naomi Hooper further explained in her affidavit that there are no restrictions on the joint account and that she has equal access to the funds therein. Attachment I(18). These contributions were the only ones made by these individuals to the Weldon Committee during the 1984 election cycle; they did not make any contributions in 1986. These contributions appear to have been made as permitted by 11 C.F.R. § 110.1(i). Therefore, this Office recommends that the Commission find no reason to believe Thomas Hooper or Naomi Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

3) Adrian Hooper stated in his affidavit that he has been a registered voter "for many years prior to 1984," thereby

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alleviating any consideration of him as a minor during the time that he made a contribution to the Weldon Committee. He made only one contribution of \$1,000 to the Weldon Committee, designated for the 1984 general election. Adrian Hooper stated further that the check for the contribution was drawn on his personal account. Attachment I(20). Therefore, this Office recommends that the Commission find no reason to believe Adrian Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

Ralph W. Hooper did not provide substantial information in his response to determine his relationship with Hilary W. Hooper. He stated, however, that because she is in school, he would respond on her behalf.

On behalf of Hilary Hooper, Ralph Hooper stated that in response to her question about whether there was anything "she could do," during a discussion of politics in 1986, he suggested that she "send Curt Weldon a check." He further indicated that he was not aware that a contribution had been made until he received the complaint in this matter. Attachment II(1). Although the conversation relayed by Mr. Hooper appears to involve the 1986 elections, and he has apparently assumed that the contribution at issue resulted from that conversation, the Weldon Committee did not disclose any contribution from Hilary Hooper during the 1986 election cycle. A review of the Weldon Committee's disclosure reports showed that Hilary W. Hooper contributed \$500 only to the 1984 general election campaign. At the time of such contribution she was listed as a "homemaker."

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There is no evidence that Hilary Hooper was a minor at the time of making the contribution or that the funds used were other than her own. Therefore, this Office recommends that the Commission find no reason to believe Hilary W. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

As to his own contributions to the Weldon Committee, Ralph Hooper stated that he has always supported Congressman Weldon and will continue to do so. There was no information to suggest that Ralph Hooper is a minor or without funds under his control from which to make political contributions. As previously noted, he is one of the Hooper brothers. A review of the Weldon Committee's disclosure reports showed that Ralph Hooper contributed \$1,000 to the 1984 general election campaign and \$1,000 to the 1986 general election campaign. Therefore, this Office recommends that the Commission find no reason to believe Ralph W. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

As previously stated, Elaine S. Hooper did not respond to the complaint. The Weldon Committee's disclosure reports showed that she contributed \$1,000 to the 1984 general election campaign.^{4/} There is no information provided in the complaint or

^{4/} The 1984 Pre-General Report disclosed this contribution and indicated that Elaine Hooper had contributed a yearly aggregate of \$2,000 to the Weldon Committee. However, from a review of that report and the ones preceding, it appears that the Weldon Committee did not disclose any other contributions from Elaine Hooper. In any case, she could have legally contributed \$1,000 for the primary election, as well as the \$1,000 reported for the general election.

the responses from other respondents to suggest that Elaine Hooper was a minor at the time she made her contribution, that she was without her own funds from which to make such a contribution, or that any of the other Hooper respondents provided her with the funds to make her contribution. Therefore, this Office recommends that the Commission find no reason to believe that Elaine S. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

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The response from the Weldon Committee does not specifically address the allegations as they pertain to the making or accepting of contributions made in the name of another. However, there is no information provided in the complaint or the responses to substantiate the allegation that the Weldon Committee knowingly accepted a contribution made in the name of another, or that it accepted excessive contributions from the Hooper respondents. Therefore, this Office recommends that the Commission find no reason to believe The Weldon for Congress Committee and Brian W. Clymer, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441f.

2. Allegations pertaining to corporate contributions

The scenario described in the complaint suggests that individual Hoopers donated money to the National Endowment for the Preservation of Liberty, and that NEPL may have conducted activities, some in the form of independent expenditures, to influence the outcome of the 1984 and 1986 election in the 7th Congressional District in Pennsylvania. The complainant,

however, does not identify any specific activities by NEPL that allegedly were in connection with these elections. The complaint seems to speculate that some connection between NEPL's activities and the Weldon campaigns exists because the Hoopers provided substantial funds to both NEPL and the Weldon Committee.

NEPL was incorporated in the District of Columbia in May 1984, by Carl Russell Channell. NEPL has not responded to the complaint. The affidavits submitted by counsel for some of the Hoopers showed that there were two foundations, the Elizabeth S. Hooper Foundation ("Hooper Foundation") and the Killeshandra Foundation ("Killeshandra"), associated with certain individual Hoopers, which made \$130,000 and \$15,000 contributions, respectively, to NEPL.

Bruce Hooper, Thomas Hooper, and Adrian Hooper each stated that he is one of five directors at the Hooper Foundation. They stated that the decision to contribute \$130,000 to NEPL was based on providing aid to "the freedom fighters in Nicaragua," and that its purpose was not intended to influence the election of Congressman Weldon, or any other candidate.^{5/} Attachment I(8)-(9), (17), (20)-(21).

Bruce Hooper and Eileen Hooper each declared to be one of three directors at Killeshandra. They stated that the decision

^{5/} Based on the information provided in the complaint, it appears that the Hooper Foundation may have given an additional \$3,000 to the Anti-Terrorism American Committee ("ATAC") in October 1986, a federal political committee associated with Carl Russell Channell.

to contribute \$15,000 to NEPL was based on providing aid to "the freedom fighters in Nicaragua," and that its purpose was not to influence the election of Congressman Weldon or any other candidate. Attachment I(8)-(11), (22). Thus, the Hoopers have denied any connection between contributions to NEPL and contributions to the Weldon Committee.

Furthermore, the complaint does not identify any activities by NEPL in connection with the 7th Congressional District of Pennsylvania elections in 1984 and 1986. According to the joint Report of the Congressional Committees Investigating the Iran-Contra Affair, H.R. Rep. No. 433, 100th Cong., 1st Session, Ch. 4 (1987), NEPL's activities (apart from financial assistance to the Contras) consisted of television advertising, speaking tours, polling, letter-writing and other lobbying efforts. There has been no evidence presented to the Commission to show that NEPL conducted any polling or letter-writing activity in the 7th Congressional District of Pennsylvania in 1984 or 1986. The only television advertisement broadcast in Philadelphia was sponsored and paid for by the American Conservative Trust State Election Fund, an incorporated, nonfederal political committee registered with the State of Virginia. The advertisement was broadcast during April 18-23, 1985. It urged viewers to support President Reagan's policy in Nicaragua and to tell their Congressman they wanted "freedom to stay alive in Nicaragua." NEPL's speaking tours were aimed at cities in the South and Southeast.

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The complaint may also be construed as alleging that the Weldon Committee coordinated activities with NEPL, with the purpose of influencing the 1984 and 1986 federal elections in violation of 2 U.S.C. § 441b(a). However, there has been no evidence presented to the Commission to show that any of NEPL's activities were done in cooperation with, or at the request, or suggestion of, Congressman Weldon or the Weldon Committee.

Based on the foregoing, this Office recommends that the Commission find no reason to believe NEPL violated 2 U.S.C. § 441b(a) with respect to the 7th Congressional District of Pennsylvania elections in 1984 and 1986. This Office also recommends that the Commission find no reason to believe the Weldon Committee violated 2 U.S.C. § 441b(a).

III. RECOMMENDATIONS

1. Find no reason to believe Bruce H. Hooper, Eileen S. Hooper, Cynthia Hooper Bell, Thornton D. Hooper, II, Thomas Hooper, Naomi Hooper, Adrian S. Hooper, Ralph W. Hooper, Hilary W. Hooper, and Elaine S. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.
2. Find no reason to believe The Weldon for Congress Committee and Brian W. Clymer, as treasurer, violated 2 U.S.C. §§ 441a(f), 441f, and 441b(a).
3. Find no reason to believe the National Endowment for the Preservation of Liberty violated 2 U.S.C. § 441b(a) with respect to the Seventh Congressional District of Pennsylvania elections in 1984 and 1986.

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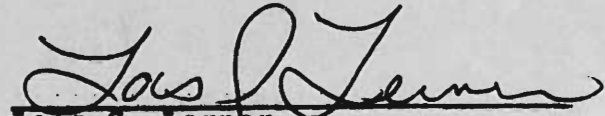
4. Approve the attached letters.
5. Close the file.

Lawrence M. Noble
General Counsel

Date

3/30/88

BY:



Lois G. Lerner
Associate General Counsel

Attachments

1. Response from Hoopers through Counsel
2. Response from Ralph W. Hooper
3. Response from The Weldon for Congress Committee and Brian W. Clymer, as treasurer
4. Letters(6)

Staff Person: Sandra H. Robinson

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Endowment for the)
Preservation of Liberty)
The Weldon for Congress)
Committee and Brian W.)
Clymer, as treasurer)
Bruce H. Hooper)
Eileen S. Hooper) MUR 2579
Ralph W. Hooper)
Elaine S. Hooper)
Hilary W. Hooper)
Cynthia Hooper Bell)
Thornton D. Hooper, II)
Adrian S. Hooper)
Thomas Hooper)
Naomi Hooper)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of April 12,
1988, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2579:

1. Find no reason to believe Bruce H. Hooper,
Eileen S. Hooper, Cynthia Hooper Bell,
Thornton D. Hooper, II, Thomas Hooper,
Naomi Hooper, Adrian S. Hooper, Ralph W.
Hooper, Hilary W. Hooper, and Elaine S.
Hooper violated 2 U.S.C. §§ 441a(a)(1)(A)
and 441f.

(continued)

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Federal Election Commission
Certification for MUR 2579
April 12, 1988

Page 2

2. Find no reason to believe The Weldon for Congress Committee and Brian W. Clymer, as treasurer, violated 2 U.S.C. §§ 441a(f), 441f, and 441b(a).
3. Find no reason to believe the National Endowment for the Preservation of Liberty violated 2 U.S.C. § 441b(a) with respect to the Seventh Congressional District of Pennsylvania elections in 1984 and 1986.
4. Approve the letters attached to the General Counsel's report dated March 30, 1988.
5. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

4-12-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

88040703238



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: APRIL 6, 1988

SUBJECT: OBJECTION MUR 2579 - FIRST G.C. REPORT
SIGNED MARCH 30, 1988

The above-captioned document was circulated to the Commission on Friday, April 1, 1988 at 12:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X

This matter will be placed on the Executive Session agenda for April 12, 1988.

Please notify us who will represent your Division before the Commission on this matter.

88040703239



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1988

Brian W. Clymer, Treasurer
The Weldon for Congress Committee
P.O. Box 1988
Media, PA 19063

RE: MUR 2579
The Weldon for Congress
Committee and Brian W.
Clymer, as treasurer

Dear Mr. Clymer:

On February 16, 1988, the Federal Election Commission notified The Weldon for Congress Committee and Brian W. Clymer, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 12, 1988, the Commission found, on the basis of the information in the complaint, and information provided by you, and other respondents, that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 441f, and 441b(a).

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040703240



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1988

Ralph W. Hooper
Hilary W. Hooper
#8 Valley Forge Executive Mall
650 E. Swedesford Road
Room 126
Wayne, PA 19087

RE: MUR 2579
Ralph W. Hooper
Hilary W. Hooper

Dear Mr. Hooper and Ms. Hooper:

On February 16, 1988, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 12, 1988, the Commission found, on the basis of the information in the complaint, and information provided by Ralph W. Hooper, that there is no reason to believe Ralph W. Hooper and Hilary W. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

38040703241



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1988

Elaine S. Hooper
Rich Neck Farm
Earleville, Maryland 21919

RE: MUR 2579
Elaine S. Hooper

Dear Ms. Hooper:

On February 16, 1988, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 12, 1988, the Commission found, on the basis of the information in the complaint, and information provided by other respondents, that there is no reason to believe Elaine S. Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040703242



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1988

Stewart Dalzell, Esquire
Drinker Biddle & Reath
1100 Philadelphia National Bank
Building
Broad and Chestnut Streets
Philadelphia, PA 19107

RE: MUR 2579
Bruce H. Hooper, Eileen
S. Hooper, Cynthia Hooper
Bell, Thornton D. Hooper,
II, Adrian S. Hooper,
Thomas Hooper, and Naomi
Hooper

Dear Mr. Dalzell:

On February 16, 1988, the Federal Election Commission notified Bruce H. Hooper, Eileen S. Hooper, Cynthia Hooper Bell, Thornton D. Hooper, II, Adrian S. Hooper, Thomas Hooper, and Naomi Hooper, your clients, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 12, 1988, the Commission found, on the basis of the information in the complaint, and information provided by your clients, that there is no reason to believe Bruce H. Hooper, Eileen S. Hooper, Cynthia Hooper Bell, Thornton D. Hooper, II, Adrian S. Hooper, Thomas Hooper, and Naomi Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040703243



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1988

National Endowment for the
Preservation of Liberty
c/o Mr. Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

RE: MUR 2579
National Endowment for
the Preservation of
Liberty

Dear Mr. Channell:

On February 16, 1988, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On April 12, 1988, the Commission found, on the basis of the information in the complaint, and information provided by other respondents, that there is no reason to believe the National Endowment for the Preservation of Liberty violated 2 U.S.C. § 441b(a) with respect to the Seventh Congressional District of Pennsylvania elections in 1984 and 1986.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040703244



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 20, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

David E. Landau
One Liberty Place
Suite 4900
1650 Market Street
Philadelphia, PA 19103

RE: MUR 2579

Dear Mr. Landau:

On April 12, 1988, the Federal Election Commission reviewed the allegations of your complaint dated February 2, 1988; and found that on the basis of the information provided in your complaint and information provided by respondents that there is no reason to believe that the National Endowment for the Preservation of Liberty violated 2 U.S.C. § 441b(a) with respect to the Seventh Congressional District of Pennsylvania elections in 1984 and 1986; or that The Weldon for Congress Committee and Brian W. Clymer, as treasurer, violated 2 U.S.C. §§ 441a(f), 441f, and 441b(a). The Commission also found no reason to believe that Bruce H. Hooper, Eileen S. Hooper, Ralph W. Hooper, Elaine S. Hooper, Hilary W. Hooper, Cynthia Hooper Bell, Thornton D. Hooper, II, Adrian S. Hooper, Thomas Hooper, and Naomi Hooper violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f. Accordingly, on April 12, 1988, the Commission closed the file in this matter. The Federal Election Campaign Act of 1971, as amended ("the Act"), allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

88040703245

6CC # 9181

FEDERAL ELECTION COMMISSION

88 MAY -2 1110:34

ADRIAN S. HOOPER
SUITE 200
220 WEST LANCASTER AVENUE
DEVON, PENNSYLVANIA 19333
215-687-1001

April 29, 1988

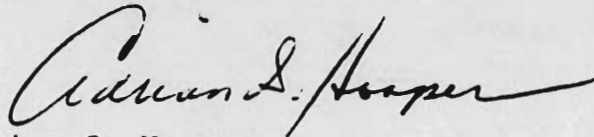
Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Dear Sir:

I am in receipt of your finding in MUR 2579, compiled by Staff Member Sandra H. Robinson, dated March 30, 1988.

As one of the individuals named in the complaint, I thank you for the recommendations. I am now going to proceed, along with some of the others involved, to discover what action I should take against David E. Landau, the individual who filed the complaint and caused us not only emotional distress, but legal fees involved in responding to the complaint.

Sincerely,



Adrian S. Hooper

CC: Mr. David E. Landau
Morgan R. Jones, Esq.

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAY -2 PM12:30

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2579

DATE FILMED 6/3/88 CAMERA NO. 2

CAMERAMAN K.A.U.

88040703247



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

- N 8.25.88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2579 .

88040712655

6cc # 9181

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 MAY -2 AM 10: 34

ADRIAN S. HOOPER
SUITE 200
223 WEST LANCASTER AVENUE
DEVON, PENNSYLVANIA 19333
215-667-1901

April 29, 1988

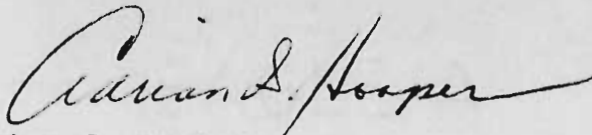
Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Dear Sir:

I am in receipt of your finding in MUR 2579, compiled by Staff Member Sandra H. Robinson, dated March 30, 1988.

As one of the individuals named in the complaint, I thank you for the recommendations. I am now going to proceed, along with some of the others involved, to discover what action I should take against David E. Landau, the individual who filed the complaint and caused us not only emotional distress, but legal fees involved in responding to the complaint.

Sincerely,



Adrian S. Hooper

CC: Mr. David E. Landau
Morgan R. Jones, Esq.

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAY -2 PM 12: 30

88040712656