FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 409

SEE DEPOSITIONS

Date Filmed 7/3/79 Camera No. --- 2

Cameraman GPC

7 9 0 4 0 4 1 2 0 2 1

409 Callahan

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☑ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Zarwin
715 Widener Bldg
1339 Chestnut St
Philadelphia Pa 19107

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943124	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

Judy Lampiasi

4. DATE OF DELIVERY: JUN 16 1978

● POSTMARK: PHILA PA JUN 16

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-236-867

7904014322

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

(1) Find reasonable cause to believe and probable cause to believe that SSDPAC has violated 2 U.S.C. Sections 432, 441a(a)(8), and 434(b), and file a civil suit.

(2) Find probable cause to believe that SSDPAC has violated Sections 433, 434, and 441a and file a civil suit for relief in this matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date 6/9/78

7904014323

EXECUTIVE SESSION
June 7, 1978

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409(77)
Service Station Dealers PAC)

GENERAL COUNSEL'S REPORT

This matter was referred to the Office of General Counsel after a reports review by the Reports Analysis Division indicated that the Green for Senate Committee (GFSC) had received excessive contributions from the Service Station Dealers PAC (SSDPAC), an unregistered committee.1/

The facts of this case are detailed in the General Counsel's report presented to the Commission on March 1, 1978. At that meeting, the Commission adopted the recommendation of the General Counsel to find reason to believe that violations of 2 U.S.C. §432, §441a(a)(8), and §434(b) were committed by SSDPAC. The Commission had previously found reasonable cause to believe that the respondent PAC violated 2 U.S.C. §433, 434, and 441a.

On March 17, 1978, the respondent was sent a conciliation agreement which included the Commission's findings. On May 2, 1978, counsel for the respondent submitted a counterproposal to the Commission's proposed conciliation agreement. The respondent's proposed agreement provided for a civil penalty of $500; the Commission had proposed a penalty of $10,000.

1/ The Green for Senate Committee's acceptance of excessive contributions from the Service Station Dealers PAC is being handled in a separate MUR (MUR 427 (77)).

7904041324

On May 12th, the respondent was notified, via letter, that while this office is willing to negotiate, we do not feel a $500 civil penalty is appropriate for the violations at issue. The respondent was asked to notify this office, no later than May 30th if he wished to continue negotiations. Counsel has not responded.

RECOMMENDATION

(1) Find reasonable cause to believe and probable cause to believe[2/] that SSDPAC has violated 2 U.S.C. §§432, 441a(a)(8), and 434(b).

(2) Find probable cause to believe that SSDPAC has violated §§433, 434, and 441a.

FEDERAL ELECTION COMMISSION

William C. Oldaker
General Counsel

DATE:

2/ Through various communications to counsel for the respondent, the Office of General Counsel has tried to conciliate this case. The respondent has not utilized his statutory right to the informal methods of conference, conciliation and persuasion. In light of the fact that SSDPAC is apparently unwilling to negotiate an agreement in this matter, the Office of General Counsel is recommending that the Commission find both reasonable cause and probable cause to believe that violations of §§432, 441a(a)(8), and 434(b) have been committed.

7904041325

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman P. Zarwin, Esq.
715 Widener Bldg.
1339 Chestnut Street
Philadelphia, Pa 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

This is to notify you that on June , 1978, the Commission determined there is reasonable cause to believe that the Service Station Dealers PAC (SSDPAC) violated 2 U.S.C. §§ 432, 434(b), and 441a(a)(8) and found probable cause to believe that SSDPAC violated the above stated sections of the Act as well as §§ 433, 434, and 441a.

The Commission is prepared to seek civil penalties regarding this matter. Please direct any response to Suzanne Callahan (202/523-4058).

Sincerely,

William C. Oldaker
General Counsel

7904041326

DCC3818

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOcust 9-2800

NEW JERSEY OFFICE
STATION HOUSE-SUITE 214
900 HADDON AVENUE
COLLINGSWOOD, NEW JERSEY 08108
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS
DONALD J. RICHMOND

*MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
**MEMBER OF PENNSYLVANIA, NEW JERSEY & OHIO BAR

FEDERAL ELECTION COMMISSION
78 JUN 16 AM 9:09

803655

June 14, 1978

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 409 (77)

Dear Mr. Oldaker:

Your May 12, 1978 letter has been reviewed with the Service Station Dealers PAC. A review of some of the Commission's penalty assessments have been evaluated and none reach the substantial amount for the inadvertant and modest infractions in this matter demanded by the Commission. We are willing to negotiate but feel the $500.00 offer was more than reasonable comparatively speaking.

Cordially yours,

NORMAN P. ZARWIN

NPZ/mas

7904041327

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107

79041329

PHILADELPHIA, PA
14 JUN
1978

78 JUN 16 AM 9:03

FEDERAL ELECTION COMMISSION

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman P. Zarwin, Esq.
715 Widener Bldg.
1339 Chestnut Street
Philadelphia, Pa 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

This is to notify you that on June 7 , 1978, the Commission determined there is reasonable cause to believe that the Service Station Dealers PAC (SSDPAC) violated 2 U.S.C. §§ 432, 434(b), and 441a(a)(8) and found probable cause to believe that SSDPAC violated the above stated sections of the Act as well as §§ 433, 434, and 441a.

The Commission is prepared to seek civil penalties regarding this matter. Please direct any response to Suzanne Callahan (202/523-4058).

Sincerely,

William C. Oldaker
General Counsel

7904014529

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 24, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS 7291-E by pc

SUBJECT: MUR 409 - Interim Conciliation Report dated 5-17-78
Signed by GC: 5-18-78
Received in OCS: 5-19-78

The above-mentioned document was circulated on a 24 hour no-objection basis at 12:30 p.m., May 23, 1978.

There were no objections to the Interim Conciliation Report.

7904014330

May 19, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409

Please have the attached Interim Conciliation Report on MUR 409 distributed to the Commission.

Thank you.

7 9 0 4 1 0 0 6 7

Before the Federal Election Commission

May 17, 1978

In the Matter of	)	
	)	MUR 409 (77)
Service Station Dealers PAC	)	

Interim Conciliation Report

On March 17, 1978, the Service Station Dealers PAC was sent a conciliation agreement which included the Commission's previous findings of reasonable cause to believe violations of 2 U.S.C. §§433, 434, and 441a had been committed and the Commission's March 1, 1978 finding of reason to believe violations of §§432, 441a(a)(8) and 434(b) had been committed as well.

Counsel for the respondent submitted a counterproposal on May 2, 1978. The Office of General Counsel is continuing negotiations with the respondent in this matter and will report to the Commission in the near future.

5/18/78
Date

William C. Oldaker
General Counsel

7904041332

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 12, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman P. Zarwin, Esq.
715 Widener Bldg.
1339 Chestnut Street
Philadelphia, Pa 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

This is in reference to your letter of May 2, 1978, in which you submitted a counterproposal to the conciliation agreement which this office sent to you on March 17, 1978, concerning the Service Station Dealers PAC. Your proposed agreement provides for a civil penalty of $500; the Commission proposed a penalty of $10,000.

While this office is willing to negotiate with you concerning the conciliation agreement, my position in this matter is such that a $500 civil penalty is not appropriate for the violations at issue; therefore, I will not recommend to the Commission that they accept your proposal.

If you wish to continue negotiations in this matter, please advise this office, in writing, by the close of business May , 1978.

If we are unable to reach an agreement in this matter, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

If you have any questions, please contact Suzanne Callahan (202/523-4058), the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

7904041333

MUR 409 Acc 3449

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION

February 22, 1978

'78 MAY 5 AM 8:50

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

CCL431

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Service Station Delaers Political Action Committee, violated 2 U.S.C. §433, §434 and §441a, and the Commission having found reason to believe that respondent violated 2 U.S.C. §432, §434(b) and §441a(a)(8):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Service Station Dealers PAC having duly entered into conciliation pursuant to §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over respondent and the subject of this proceeding.

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

7904041334

III. That the pertinent facts in this matter are as follows:

A. The Service Station Dealers PAC was organized April 16, 1974, but failed to register with the Commission until September 15, 1977.

B. The Service Station Dealers PAC has made contributions to federal candidates/committees in aggregate amounts exceeding $1,000.

C. The Service Station Dealers PAC did not file appropriate financial statements in a timely fashion as required by the Federal Election Campaign Act of 1971, as amended.

D. The Service Station Dealers PAC exceeded contribution limitations as set forth in the Federal Election Campaign Act of 1971, as amended.

E. The Service Station Dealers PAC failed to keep complete financial records as required by the Federal Election Campaign Act of 1971, as amended.

Therefore, respondent Service Station Dealers PAC agrees:

I. Respondent's actions in not registering with the Commission in a timely fashion is in violation of 2 U.S.C. §433.

II. Respondent's actions in not filing appropriate financial statements in a timely fashion is in violation of 2 U.S.C. §434.

7904041335

III. Respondent's actions in exceeding contribution limitations is in violation of 2 U.S.C. §441a.

IV. Respondent's actions in failing to keep complete contribution and expenditure records is in violation of 2 U.S.C. §432, §434(b), and §441a(a)(8).

V. That respondent will pay a civil penalty in the amount of $500.00 pursuant to 2 U.S.C. §437g(a)(6)(B).

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

GENERAL CONDITIONS

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

II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent Service Station Dealers PAC shall have 30 days from the date of this agreement to implement and comply with the requirements.

7904014336

contained herein, or to so notify the Commission.

Date: _____

William C. Oldaker
General Counsel

Date: May 2, 1978

Thomas Anderson
Secretary/Treasurer
Service Station Dealers
Political Action Committee

7904041337

ZARWIN, BAUM, ARANGIO & ROSS, P. C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
STATION HOUSE-SUITE 214
900 HADDON AVENUE
COLLINGSWOOD, NEW JERSEY 08108
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT I. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS
DONALD J. RICHMOND

*MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
**MEMBER OF PENNSYLVANIA, NEW JERSEY & OHIO BAR

May 2, 1978

Ms. Suzanne Callahan
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C.

Re: Service Station Dealers PAC
MUR 409 (1977)

Dear Ms. Callahan:

Sorry for the tardiness in getting the enclosed Conciliation Agreement returned. I have had a difficult time in catching up with Mr. Anderson who has been all over the country.

Hopefully, this matter can be resolved on the basis proposed.

Cordially yours,

NORMAN P. ZARWIN

NPZ/shb
Enc:

7904011323

ZARWIN, BAUM, ARANGIO & ROSS, P. C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107

FEDERAL ELECTION COMMISSION

'78 MAY 5 AM 8:50

Ms. Suzanne Callahan
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C.

7801141

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 2, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: MUR 409 (77) - Interim Investigatory Report
Dated 4-28-78
Signed by General Counsel: 4-28-78
Received in Office of Commission
Secretary: 4-28-78, 3:45

The above-mentioned document was circulated on a 24 hour no-objection basis at 2:00 p.m., May 1, 1978.

As of 2:00 p.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Investigatory Report.

7904014340

April 28, 1978

MEMORANDUM TO: Marge Ramone

FROM: Elissa T. Garr

SUBJECT: MUR 409

Please have the attached Interim Invest. Report on MUR 409 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7900401341

BEFORE THE FEDERAL ELECTION COMMISSION
28 April 1978

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

INTERIM IVESTIGATORY REPORT

On March 17, 1978, the Service Station Dealers PAC was sent a conciliation agreement which included the Commission's previous findings of reasonable cause to believe violations of 2 U.S.C. §433, §434, and §441a had been committed and the Commission's March 1, 1978, finding of reason to believe that violations of §432, §441a(a)(8) and §434(b) had been committed as well.

Counsel for the respondent has indicated that a counter proposal has been mailed to this office; as of this writing, the agreement has not been received.

We expect to receive and review the respondent's proposal the first week in May, at which time we will report to the Commission.

4/28/78
Date

William C. Oldaker
General Counsel

7904014134 2

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

April 6, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: MUR 409 (77) - Interim Investigatory Report
dated 3-31-78
Signed by General Counsel 4-3-78
Received in Office of Commission
Secretary 4-4-78, 2:20

The above-mentioned document was circulated to the Commissioners on a 24 hour no-objection basis at 9:00 a.m., April 5, 1978.

As of 9:00 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Investigatory Report.

pc

7904014343

April 4, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409

Please have the attached Interim Investigatory Report on MUR 409 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7004014374

Before the Federal Election Commission

March 31, 1978

In the Matter of	)	
	)	MUR 409 (77)
Service Station Dealers PAC	)	

Interim Investigatory Report

The facts of this case are detailed in the General Counsel's Report presented to the Commission on March 1, 1978. At that meeting, the Commission adopted the recommendation of the General Counsel to find reason to believe that violations of 2 U.S.C. §432, §441a(a)(8) and §434(b) have been committed by the Service Station Dealers PAC (SSDPAC).

On March 17, 1978, the respondent was notified of the Commission's March 1st determination and sent a conciliation agreement which included the Commission's previous findings of reasonable cause to believe that SSDPAC has violated 2 U.S.C. §433, §434, and §441a.

On March 24, 1978, the respondent's attorney notified the Office of General Counsel, via letter, of his interest in conciliation. Respondent intends to make a counter-proposal in the near future, at which time we will open negotiations.

4/3/78
Date

William C. Oldaker
General Counsel

7904041345

2003084

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
900 KINGS HIGHWAY NORTH
SUITE 101
CHERRY HILL, NEW JERSEY 08034
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS

* MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
** MEMBER OF PENNSYLVANIA NEW JERSEY & OHIO BAR

RECEIVED
FEDERAL ELECTION COMMISSION
'78 MAR 28 AM 8:35

801307

March 24, 1978

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

Re: MUR 409 (77)

Dear Mr. Oldaker:

Your March 17, 1978 letter and the Conciliation Agreement enclosure has been received.

The violations, if any, in this matter were unintentional. Thus the proposed civil penalty can be best characterized as extraordinary and excessive.

My client has cooperated with FEA, explained why it was thought no filing was required, the amounts contributed are modest, and generally speaking, this matter can hardly be deemed to be a major matter.

I would be very happy to discuss executing a Conciliation Agreement where the civil penalty is more appropriate, but otherwise, my client is not willing to execute the Agreement as it stands.

Very truly yours,

NORMAN P. ZARWIN

NPZ/shb
c.c. Mr. Thomas J. Anderson

ZARWIN, BAUM, ARANGIO & ROSS, P. C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107

7901127

FEDERAL ELECTION COMMISSION

1 PM
MAR
1979

1979 MAR 28 AM 8:35

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

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 17, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman Zarwin, Esquire
715 Widener Building
1339 Chestnut Street
Philadelphia, Pa 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

As you are aware, on March 23, 1977, the Commission determined there is reasonable cause to believe that the Service Station Dealers PAC committed a violation of 2 U.S.C. §433 and §434 of the Federal Election Campaign Act and on July 22, 1977, found reasonable cause to believe a violation of §441a had been committed as well.

Review of the 1974, 1975, and 1976 comprehensive reports submitted by the PAC, coupled with the testimony Mr. Anderson gave on January 17th, indicates that the PAC may have also committed additional reporting violations.

In particular, 2 U.S.C. §441a(a)(8) and 11 CFR 110.6 (c)(1) requires the conduit of earmarked contributions to report the original source of the contributions to both the Commission and the intended recipient.

SSDPAC's failure to keep contributor records of ticket purchasers for the two Green for Senate fundraisers gives the Commission reason to believe a violation of §441a(a)(8) may have been committed.

As set forth in 2 U.S.C. §432, §434(b), and 11 CFR 102.9, the treasurer of a political committee is responsible for the accounting of all contributions and expenditures made to or by the committee and shall disclose certain information in its disclosure reports as outlined in the Commission's regulations.

Mr. Anderson's failure to keep complete contributor and expenditure records gives the Commission reason to

7904014348

believe violations of 2 U.S.C. §432 and §434(b) may have been committed.

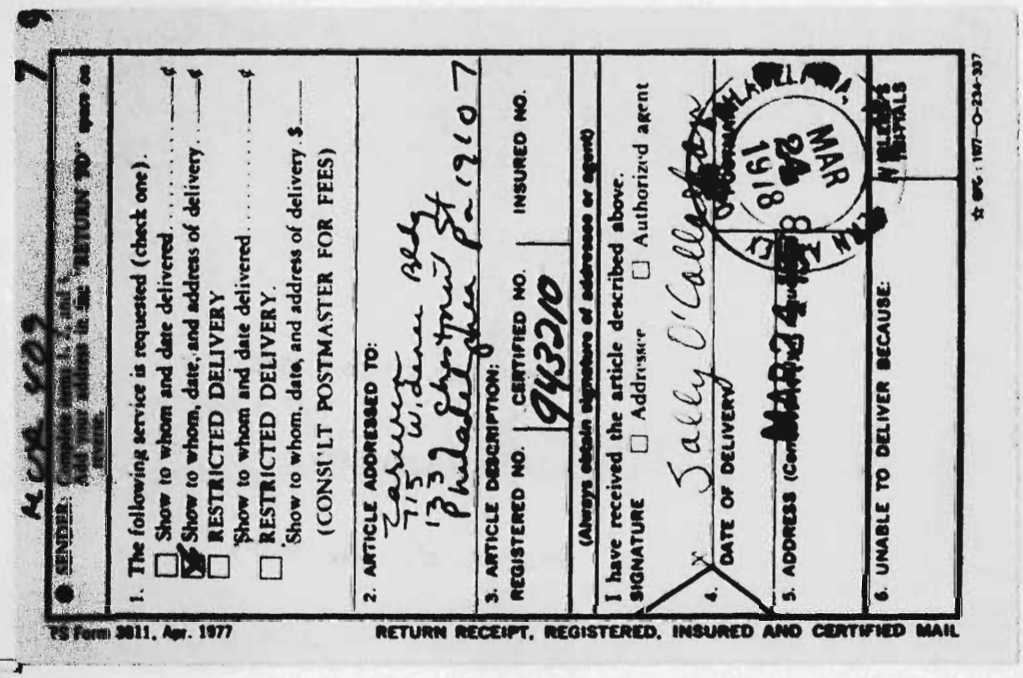
The Commission has a duty to correct such violations by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A).

The provisions of the Federal Election Campaign Act which allow the Commission to determine there is reasonable cause to believe that a violation has occurred and to enter into a conciliation agreement apply regardless of whether or not the violation is found to be knowing and willful. Upon consideration of the circumstances of your client's case, the Commission has determined that a fine of $10,000 should be made part of the conciliation agreement. We have attached a copy of a Conciliation Agreement this office would offer as settlement of the aforementioned violations.

If your client decides to comply with the terms of this Agreement, he should sign and return it to the Commission within ten days. If you have any questions, you should contact Suzanne Callahan (202/523-4058).

Sincerely,

William C. Oldaker
General Counsel



BEFORE THE FEDERAL ELECTION COMMISSION

February 22, 1978

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Service Station Delaers Political Action Committee, violated 2 U.S.C. §433, §434 and §441a, and the Commission having found reason to believe that respondent violated 2 U.S.C. §432, §434(b) and §441a(a)(8):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Service Station Dealers PAC having duly entered into conciliation pursuant to §437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has jurisdiction over respondent and the subject of this proceeding.

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

7904041350

III. That the pertinent facts in this matter are as follows:

A. The Service Station Dealers PAC was organized April 16, 1974, but failed to register with the Commission until September 15, 1977.

B. The Service Station Dealers PAC has made contributions to federal candidates/committees in aggregate amounts exceeding $1,000.

C. The Service Station Dealers PAC did not file appropriate financial statements in a timely fashion as required by the Federal Election Campaign Act of 1971, as amended.

D. The Service Station Dealers PAC exceeded contribution limitations as set forth in the Federal Election Campaign Act of 1971, as amended.

E. The Service Station Dealers PAC failed to keep complete financial records as required by the Federal Election Campaign Act of 1971, as amended.

Therefore, respondent Service Station Dealers PAC agrees:

I. Respondent's actions in not registering with the Commission in a timely fashion is in violation of 2 U.S.C. §433.

II. Respondent's actions in not filing appropriate financial statements in a timely fashion is in violation of 2 U.S.C. §434.

7904041351

III. Respondent's actions in exceeding contribution limitations is in violation of 2 U.S.C. §441a.

IV. Respondent's actions in failing to keep complete contribution and expenditure records is in violation of 2 U.S.C. §432, §434(b), and §441a(a)(8).

V. That respondent will pay a civil penalty in the amount of $10,000 pursuant to 2 U.S.C. §437g(a)(6)(B).

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

GENERAL CONDITIONS

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

II. It is mutually agreed that this agreement shall become effective as to the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent Service Station Dealers PAC shall have 30 days from the date of this agreement to implement and comply with the requirements.

7904041352

contained herein, or to so notify the Commission.

Date:_____

_____
William C. Oldaker
General Counsel

Date:_____

_____
Thomas Anderson
Secretary/Treasurer
Service Station Dealers
Political Action Committee

7904014353

AGC 2897

FEDERAL ELECTION
17 MAR 8 AM 8:48

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
200 KINGS HIGHWAY NORTH
SUITE 101
CHERRY HILL, NEW JERSEY 08034
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS
DONALD J. RICHMOND
* MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
** MEMBER OF PENNSYLVANIA NEW JERSEY & OHIO BAR

March 3, 1978

Biz Van Gelder, Esquire
Federal Election Commission
1328 "K" Street
North West Washington, D.C.20463

Dear Ms. Van Gelder:

Enclosed is the Tom Anderson Transcript. I have reviewed the Transcript and there are a number of typographical and minor spelling errors which are of no moment.

As requested by Susan Callaghan, enclosed are copies of the following:

1. Delaware Valley Service Station Dealers Association Decree, Prelminary Decree and Articles of Incorporation filed with respect to the establishment of a Pennsylvania Non Profit Corporation.

2. Articles of Amendment changing the name to Pennsylvania Service Station Dealers Association.

3. Copy of last revised By-Laws of the Association.

Cordially yours,

NORMAN P. ZARWIN

NPZ/shb
Enc:

BY-LAWS OF THE

PENNSYLVANIA AND DELAWARE
SERVICE STATION DEALERS ASSOCIATION

(Revised, February 13, 1974)

ARTICLE I - NAME, SEAL & INSIGNIA

Section 1. This Association shall be known as the PENNSYLVANIA AND DELAWARE SERVICE STATION DEALERS ASSOCIATION, which name shall also be represented by the initials "P.S.S.D.A. and D.S.S.D.A."

Section 2. There shall be a corporate seal bearing the name or the initials of the Association.

Section 3. There shall be an insignia intended particularly for the use of each member as a public evidence of affiliation with the Association. Such insignia shall be displayed in the member's place of business.

Section 4. The name, initial, seal, emblem or insignia of the Association shall not be used for any purpose other than that specifically authorized by the Board of Directors.

ARTICLE II - OBJECTS & PURPOSES

The principal objects and purposes of the Association are as follows:

(A) To promote the mutual understanding, welfare and the best interest of its members within the Commonwealth of Pennsylvania and the State of Delaware.

(B) To maintain adequate facilities for the proper dissemination of educational and business data relevant to the successful business operations of its members.

(C) To promote higher business standards and better business practices under a Code of Ethics in order to attract and retain good businessmen in the service station industry, and to improve the quality of service to the motoring public.

(D) To seek equitable and just laws, regulations and/or ordinances in order to preserve, protect and further the best interests of its members, their customers and the petroleum retailer's industry.

7904041355

7904014356

ESNP
9/65

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

IN THE MATTER OF: : NO. 65 - 14777

DELAWARE VALLEY SERVICE :
STATION DEALERS ASSOCIATION

DECREE

AND NOW, this 7th day of January, 1966, Articles of Incorporation and Certificate of the Department of State pertaining to the registration of the corporate name issued within six months of the date of the application, having been presented to this Court, together with proofs of publication of notice of this application, as required by the Act of Assembly in such case made and provided, and the Rule of this Court in such case made and provided, it is ORDERED AND DECREED that the Articles of Incorporation, being in proper form and within the provisions of the Act of Assembly, known as the Non-profit Corporation Law, and the purposes set forth in said Articles being lawful and not injurious to the community, said Articles of Incorporation are upon motion of Jesse W. Beechley, Jr., Esquire, approved, and upon the recording of said Articles and this Order and Decree, the said corporation shall exist for the purposes and upon the terms stated therein under the name of DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION.

BY THE COURT:

s/ E. Arnold Fouest

P. J.

Original Articles of Incorporation recorded in the Office for the Recording of Deeds at Norristown Pa. on Jan 7, 1966 and to file with Prothonotary of Montgomery County

9040141357

12 .65

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

IN THE MATTER OF: : NO. 65 - 4777

DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION :

PRELIMINARY DECREE

AND NOW, this 9th day of December, 1965, upon consideration of the within application for Articles of Incorporation, and on motion of Jesse N. Beechley, Jr., Esquire, a hearing is fixed at 9:00 A.M. on Friday, ~~December~~ January 7, 1966 in Court Room "D", Court House, Norristown, Pennsylvania, at which time and place anyone having objections to the granting of a Charter to the proposed non-profit corporation shall appear and make their objections known.

BY THE COURT:

H. Arnold Fineut

P.J.

7 9 0 4 0 1 4 1 3 5 8

:snp
29/65

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

IN THE MATTER OF: : NO. 65 -

DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION :

ARTICLES OF INCORPORATION

TO THE HONORABLE THE JUDGES OF SAID COURT:

The undersigned subscribers, citizens of the Commonwealth of Pennsylvania, having associated themselves together for the purpose of creating and organizing the Delaware Valley Service Station Dealers Association, and desiring to become incorporated according to the provisions of the Act of Assembly of the Commonweath of Pennsylvania entitled "An Act Relating to Non-profit Corporations", approved the 5th day of May, A.D. 1933, and its amendments, do hereby declare, set forth and certify that the following are the purposes, objectives, articles and conditions of their said association for and upon which they desire to be incorporated:

1. The name of the proposed corporation shall be DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION, which name has been registered with the Department of State of the Commonwealth of Pennsylvania within six months of the date of this application for a charter.

2. The location and post office address of the initial registered office of the proposed corporation shall be Montgomery Avenue and Old Lancaster Road, Merion, Montgomery County, Pennsylvania.

3. The purposes for which the corporation is formed are:

A. To promote higher business standards and better business methods under a code of business ethics in order to attract and retain good businessmen in the service station industry and to improve the quality of service to the public.

B. To provide group disability, hospitalization and retirement plans for its members and their employees.

C. To provide courses of study for training programs for service station employees.

D. To provide technical assistance to its members.

E. To promote a public relations program to encourage the use of goods and services of the service station industry by the general public.

F. To publish information of benefit to its members.

4. The proposed corporation does not contemplate pecuniary gain or profit, incidental or otherwise, to its members.

5. The term for which the corporation is to exist shall be perpetual.

6. The names, places of residence, and post office addresses of the incorporators are as follows:

NAME	RESIDENCE	POST OFFICE ADDRESS
Gerald W. Bryans	Penlyn Pike	P.O. Box 248 Blue Bell, Pa.
Augusco Bruno	1110 Anderson Ave.	Drexel Hill, Pa.
Bernard V. DeFont	1100 Alexander Ave.	Drexel Hill, Pa.
Merrill T. Denslow, Jr.	Route #63	Spring House, Pa.
Daniel Kobasa	230 Highland Ave.	Lansdale, Pa.

7. The names, places of residence, and post office addresses of the persons who are to act as Directors of the

corporation until the election of their successors are as follows:

NAME	RESIDENCE	POST OFFICE ADDRESS
Gerald M. Bryans	Penlyn Pike	P.O. Box 248 Blue Bell, Pa.
Augusto Bruno	1110 Anderson Ave.	Drexel Hill, Pa.
Bernard V. DeFont	1100 Alexander Ave.	Drexel Hill, Pa.
Merrill T. Denslow, Jr.	Route #63	Spring House, Pa.
Daniel Kobasa	230 Highland Ave.	Lansdale, Pa.

8. The proposed corporation is to be organized on a non-stock basis.

9. Upon the dissolution of the corporation, the Board of Directors shall, after paying and making provision for the payment of all of the liabilities of the corporation, dispose of all of the remaining assets of the corporation to such similar organization or organizations as shall at the time qualify as an exempt organization or organizations under Section 501 (c) (6) or under Section 501 (c) (3) of the Internal Revenue Code of 1954 (or the corresponding provision of any future United States Internal Revenue Law) as the Board of Directors shall determine. Any of such assets not so disposed of shall be disposed of by the Court of Common Pleas of the County in which the principal office of the corporation is then located exclusively for such purposes or to such organization or organizations as said Court shall determine which are organized and operated exclusively for said purposes.

IN WITNESS WHEREOF, we have hereunto set our respective hands and seals this 9th day of December, 1965.

/s/ Gerald M. Bryans (SEAL)

/s/ Augusto Bruno (SEAL)

/s/ Bernard V. DeFont (SEAL)

/s/ Merrill T. Denslow, Jr. (SEAL)

/s/ Daniel Kobasa (SEAL)

7 9 0 4 0 1 4 1 3 6 1

8-1-71.37 549

Articles of Amendment

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
CORPORATION BUREAU

In compliance with the requirements of Article VII of the Act of the General Assembly of the Commonwealth of Pennsylvania known as the "Nonprofit Corporation Law" approved May 5, 1933 as amended, providing for amendments to the Articles of Incorporation of non-profit corporations, DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION hereby certifies under its corporate seal:

1. That its name is DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION and that its current office is located at 1445 City Line Avenue, Overbrook, Pennsylvania

2. That it is a corporation incorporated and existing under the Act of the General Assembly of the Commonwealth of Pennsylvania known as the "Nonprofit Corporation Law" approved May 5, 1933 as amended; that the decree of incorporation was entered by the Court of Common Pleas, No. 65-14777 of Montgomery County on the 7th day of January A. D. 1966, and that its original Articles of Incorporation and said decree were recorded in the office for the Recording of Deeds for the County of Montgomery, in Norristown, Pennsylvania on January 7, 1966.

3. (a) That a meeting of the members of DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION to take action upon the proposed amendment was held on the 22nd day of June 1971, at 1445 City Line Avenue, Overbrook, Pennsylvania, pursuant to 20 days written notice to all members.

(b) That at the time of the meeting of the members on the 22nd day of June 1971, 68 members were entitled to vote on the proposed amendment and that 68 members voted in favor of the adoption of the resolution, authorizing the amendment to its Articles of Incorporation.

4. That the following resolution was adopted by at least a majority of the members entitled to vote thereon:

RESOLVED, The name of the Nonprofit Corporation be and the same is hereby amended so as to read as follows:

"PENNSYLVANIA SERVICE STATION DEALERS ASSOCIATION"

IN TESTIMONY WHEREOF, DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION has caused these Articles of Amendment to be signed by its President and its corporate seal, duly signed by its Secretary, to be hereunto affixed this 20th day of July, 1971.

DELAWARE VALLEY SERVICE STATION
DEALERS ASSOCIATION

By: _____
President

ATTEST: _____
Secretary

(CORPORATE SEAL)

7904014136 2

3-1-71.37 550

COMMONWEALTH OF PENNSYLVANIA :

ss

COUNTY OF PHILADELPHIA :

BE IT REMEMBERED that on this 30th day of July, A. D. 1971, before me, a Notary Public in and for the County aforesaid, personally appeared LOUIS GOLDBERG and BARTHOLOMEU G. CASIELLO

of the DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION, the corporation being duly sworn, did depose and say that they were personally present at the execution of the foregoing Articles of Amendment and saw the common or corporate seal of the DELAWARE VALLEY SERVICE STATION DEALERS ASSOCIATION affixed thereto; that the seal affixed thereto is the common or corporate seal of the corporation; that the foregoing Articles of Amendment were duly signed, sealed and delivered by and as and for the act and deed of the corporation by the authority and at the direction of a majority of the members of the corporation; and that the names of the said LOUIS GOLDBERG

as President and BARTHOLOMEU G. CASIELLO

as Secretary, subscribed thereto are in their proper and respective handwriting.

LOUIS GOLDBERG

BARTHOLOMEU G. CASIELLO

Sworn to and subscribed

before me this 30th day

of July, 1971.

Notary Public

Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires September 30, 1974

Approved and filed in the Department of State on the 1st day of September, A D. 1971.

Secretary of the Commonwealth

sb

(E) To cooperate with all official agencies (national, state and/or local) and other related groups for the purpose that informational matters and guidance may be made readily available to its members, their customers and the petroleum retailing industry.

(F) To conduct a program of benefits and services for the membership, including but not limited to group hospitalization, disability and retirement plans, business insurance, credit union, scholarship awards, conduct educational and business meetings, conduct trade promotion activities and the promotion of sound and equitable business practices.

ARTICLE III - FISCAL YEAR

The Association's fiscal year shall begin on the first (1st) day of January and shall end on the thirty-first (31st) day of each calendar year.

ARTICLE IV - MEMBERSHIP

Section 1. There shall be four (4) classes of membership, namely Regular, Associate Member, Retiree and Honorable.

Section 2. A Regular Member shall be an independent or lessee dealer who owns or operates a service station facility and who, upon payment of prescribed dues, will be entitled to all of the benefits and privileges of the Association.

Section 3. An Associate Membership is open to individuals or businesses within the State of Pennsylvania and Delaware whose interests are compatible with the objectives of the Association, and upon payment of the prescribed dues shall entitle such member to all of the benefits and privileges of the Association, except for the right to vote and the right to hold elected office.

Section 4. A Retiree member must be a member in good standing for one (1) year prior to retirement. Retiree will receive full benefits including all mailings to his or her domicile for a fee of One Dollar ($1.00) per month.

Section 5. An Honorary Membership is open to those persons, firms and/or corporations which have rendered outstanding service to the Association or to the Industry and who are accepted as such by the unanimous vote of the Board of Directors. This category of special membership shall be exempt from the payment of dues or fees, and such member shall not have the right to vote or hold elected office.

Section 6. Applications for membership shall be submitted to the Board of Directors and be secured by the prescribed fee. An Applicant may be elected to membership by a majority vote of the Board of Directors. The Board of Directors shall have the right to set from time to time Application Fees which must accompany Applications for Membership, and to direct any appropriate inquiry to determine the eligibility of the applicant to be accepted for membership. Whenever an Application is rejected, the fee or a sum equal to the Application Fee, shall be returned.

Section 7. A copy of the By-Laws shall be furnished all members now in good standing and each new member hereafter shall likewise be furnished a copy of the same. All members shall assent to and shall agree to comply with the By-Laws and failure to comply may constitute cause for suspension or revocation of membership.

ARTICLE V - DUES

Section 1. The annual dues and method of payment for new and renewal memberships of all classes, shall be prescribed from time to time by the Board of Directors, with the advice and counsel of the Finance Committee.

Section 2. Dues are payable in advance upon written notice. A member failing to pay dues or other indebtedness to the Association within 60 days after the same is due and payable, may be suspended from all rights, benefits and privileges by the Board of Directors.

Section 3. Members in good standing, by written notice, may withdraw from the Association. However, no dues or fees shall be refunded upon such withdrawal.

Section 4. Dues payments to the Association are non-transferrable.

Section 5. Annual dues of the National Congress of Petroleum Retailers, or any other local, regional or national trade group of which the Association becomes an affiliate, are payable by the Association as an integral part of prescribed dues, and such funds shall be forwarded on a regular schedule to the respective trade group by the local Association.

ARTICLE VI - SUSPENSION & EXPULSION FROM MEMBERSHIP

Section 1. The Board of Directors shall have the full power and authority for cause by a two-thirds vote of the entire Board of Directors to suspend or expel any member of the Association: provided, such member shall have been given notice and a copy in writing of the charges preferred and a reasonable opportunity to be heard prior to such action.

Section 2. A member suspended or expelled pursuant to Section 1 of this Article shall be informed in writing of such action and notice thereof over the Executive Director's signature shall be forwarded by registered mail to the member's last known address.

Section 3. A member suspended or expelled pursuant to Section 1 of this Article may appeal such action at the Association's next regular general membership meeting, in which case a majority of the votes of the members present at a duly constituted meeting shall be necessary to reverse the action of the Board of Directors. Such appeal shall be taken by registered letter mailed to the Executive Director at the Association's office.

Section 4. A member suspended for non-payment of dues may be reinstated, upon application therefore, and contingent upon approval by the Board of Directors. The Board has the option to prescribe, if they should so desire and should the case warrant, a reinstatement fee of a sum no greater than $50. Payment of the reinstatement fee does not waive any time that may be required for participation in the benefits of any Association programs.

PSSDA & DSSDA BY-LAWS

ARTICLE VII - MEMBERSHIP MEETINGS

Section 1. There shall be not less than one (1) general membership meeting each fiscal year, the time and place thereof to be fixed by the President, and each member in good standing shall have due and timely notice thereof. All general membership meetings, at the direction of the President, will be announced as either Open or Closed.

Section 2. Special membership meetings may be called by the President, by a majority of the Board of Directors or by signed petition from not less than 50 members in good standing, at such time at such place and for such purpose as the President, the majority of the Board of Directors or the petitioning members deem proper. Timely notice of such meetings shall be given each member in good standing.

Section 3. A quorum for any general membership meeting, or for any special membership meeting, shall consist of fifty (50) members entitled to vote and who are in good standing.

ARTICLE VIII - COUNTY MEETINGS

Section 1. Meetings of county dealers may be called at the discretion of the President of the Association, by the Vice President, by a majority of the Board of Directors of the Association or by a majority of the members in good standing within a given area. Timely notice shall be given all members within the county.

Section 2. At such county meetings of local dealers, the highest ranking Board of Director member shall preside. If no Board of Director member is present at the meeting, area members will elect by simple plurality from the floor a presiding officer. The presiding officer will keep minutes of the county meeting which shall be filed no later than fourteen (14) days after the meeting at the administrative offices of the Association.

Section 3. A quorum for any county meeting shall consist of at least thirty (30) members of the Association who are in good standing and who are entitled to vote. Failing a quorum, a county meeting may continue, however, all business conducted will be marked "Unofficial" and no action will be taken by the Association.

ARTICLE IX - OFFICERS & DIRECTORS

Section 1. There shall be one (1) Director for each fifty (50) members or fraction thereof per county.

Section 2. All directors shall be elected preferably for a (3) three year term so that no more than one-third (1/3) of the Board will be elected in a one-year period.

Section 3. The Association's officers shall consist of a President, 1st Vice President, 2nd Vice President, 3rd Vice President, 4th Vice President, Insurance Vice President, Membership Vice President, Treasurer, Secretary and Recording Secretary.

Section 4. An Executive Director shall be appointed by the members of the Board of Directors to serve as an ex-officio member of the Board of Directors without the right to vote.

Section 5. The elective officers shall serve without compensation and none shall accept any remunerative employment with the Association except as otherwise approved by the Board of Directors.

Section 6. Notwithstanding any provision herein for firm or corporation membership, individual only shall be eligible to be members of the Board of Directors. Further, no individual shall be eligible for nomination, election or appointment to the Board unless the person shall have been a member in good standing for at least one (1) full year immediately prior to the election or appointment. This requirement can be waived by a three-fourths (3/4) vote of the Board of Directors at a duly constituted meeting.

Section 7. In the case of the death, resignation or removal of the President, the vacancy shall be filled by the 1st Vice President. In the case of the death, resignation or removal of any other officer or member of the Board of Directors, the vacancy shall be filled by vote of the Board of Directors for the remaining term.

Section 8. A fifty-one percent (51%) of total directorship shall constitute a quorum for a Board of Directors meeting.

ARTICLE 7 - DUTIES OF OFFICERS

Section 1. The President shall be the presiding officer of the Association. He shall preside at all meetings of the Association and of the Board of Directors, of which he shall be the Chairman. He shall appoint all standing and special committees, of which he shall serve as ex-officio member. He shall have the power, within the broad scope of the policies adopted by the Association and/or the Board of Directors, to perform, delegate, authorize, empower and approve such action as, in his sole discretion, shall be necessarily required to effectuate the best interests of the Association.

Section 2. The 1st Vice President shall perform the duties of the President in his absence or disability, or when so requested. He shall perform such other duties as may be specifically delegated to him or as may be required under the Assocation's By-Laws.

Section 3. The 2nd Vice President, in cooperation with the Executive Director, shall supervise the keeping of proper minutes and records, the official files, communications with members and correspondence of the Association.

Section 4. The 3rd Vice President's duties are to be assigned by the President.

Section 5. The 4th Vice President's duties are to be assigned by the President.

Section 6. The Treasurer shall have custody of Association funds. He shall countersign all checks which may be issued against all funds on deposit to the Association's credit in any bank or other financial

institution. He shall prepare, or cause to prepare, the monthly and annual financial report of the Association. He shall perform all other duties customarily associated with the office of Treasurer, with the exception of those duties expressly delegated to the Executive Director.

ARTICLE XI - DUTIES OF THE BOARD OF DIRECTORS

Section 1. The Board of Directors shall have full administrative authority in all matters, except as otherwise provided in the By-Laws. The active management of the Association shall be vested in the Board of Directors at all times.

Section 2. All members, upon election or appointment to the Board of Directors, will agree to abide by the Code of Ethics of the Association and, specifically, by the Code of Practice of the Board.

Section 3. Any Director missing two (2) unexcused meetings will be removed from the Board.

Section 4. Code of Practice:

(A) No Board Member shall initiate in his service station or place of business any action that would have an adverse effect on the retail gasoline market and which would economically harm those dealers with whom he must compete.

(B) Promotions which are gauged to bring in new customers and expose a dealer's service to prospective customers are acceptable, provided, however, that the promotions do not extend beyond a reasonable time, do not occur more than twice in a calendar year and do not involve the dealer's giving away either automotive products or services.

(C) Games of chance, Give-a-Ways and Gimmicks when fostered by the major oil supplier, and Trading Stamp Programs where the cost is absorbed by the dealer, are recognized as destructive marketing diseases for which all will work to remedy as a member of the Board of Directors.

Section 5. Should any officer or member of the Board of Directors find that he cannot abide by the Code of Practice, at that time he will submit his resignation from the Board of Directors so as not to embarrass the Association and its membership.

Section 6. Those members who have so submitted their resignation from the Board of Directors may not be reconsidered for election or appointment to the Board until a minimum of two (2) years has expired.

Section 7. The Board of Directors shall have the sole power to accept or reject applications for membership. Action by the Board of Directors in the rejection of any application shall be final and binding, subject only to a futher review, if warranted, by the Board of Directors.

Section 8. The Board of Directors shall require on an annual basis an examination, audit and verification of all Association financial transactions, including but not limited to an examination of the books of records, health and hospitalization funds, other escrow funds, the official publication, collection, activity and other activities sponsored or endorsed by the Association by a Certified Public Accountant.

Section 9. The Board of Directors shall have the power to engage or terminate the services of the Executive Director, Legal Counsel, appointive officers and employees of the Association; prescribe their duties, fix their compensation and may require from them security for faithful service, monies or property.

Section 10. It shall be the duty of the Board of Directors to hold at least four (4) meetings each Fiscal Year at such time and place as may be fixed by the President with timely notice rendered each member of the Board.

ARTICLE XII - DUTIES OF THE EXECUTIVE BOARD

Section 1. There shall be an Executive Director who shall be appointed by the Board of Directors, to serve at the pleasure of the Board.

Section 2. It shall be the duty of the Executive Director to give notice of, and attend, all meetings of the Association and all committees, as requested, and keep a record of their proceedings; to carry on all correspondence and to carry into execution all orders, votes, and resolutions as may be required; to keep a list of all members of the Association; collect dues, and pay them to the Treasurer; to keep records of the staff, employees and agents of the Association, their salaries and terms of payments and employment, to supervise their performance; to prepare an annual report of the Association; be responsible for the proper conduct of all types of services authorized by the Board of Directors; and generally to devote his best efforts to forwarding the business and advancing the interests of the Association.

Section 3. The Executive Director shall be available to all officers and members of the Board of Directors in an advisory capacity and as such, shall sit on the Board of Directors.

Section 4. The Executive Director shall edit the Association's publications and as such has the responsibility for insuring that all editorial material, all pictures, all advertising material and all elements which constitute a publication are in good taste and commensurate with the purposes and objects of the Association.

Section 5. The Executive Director shall be an official representative to all other associations and organizations with which the Association may become an affiliate, unless otherwise specified by the Board of Directors.

Section 6. It shall be mandatory that the Executive Director shall communicate with the President on a weekly basis. At that time, he will bring the President up to date on all Association matters. The meeting will be held at the convenience of the President when geographically possible.

Section 7. A President's file is to be maintained containing therein all pertinent data, including but not limited to, meeting dates and places with members, prospective members, news media, oil company management personnel, NCPP groups, etc.

ARTICLE XIII - DUTIES OF LEGAL COUNSEL

It shall be the duty of the Legal Counsel to attend all general membership meetings of the Association, and all meetings of the Board of Directors when requested; to legally assist and advise the officers and members of the Board in the conduct of Association business; and to be available for additional legal services.

ARTICLE XIV - NOMINATIONS & ELECTIONS

Section 1. No later than July 22nd of each calendar year, the President shall appoint a Nominating Committee of four (4) members of the Association in good standing, each of whom shall be, or at one time have been, a member of the Board of Directors. The chairman shall be selected by the President.

Section 2. The Nominating Committee shall have access to the roster of active members in good standing and shall, insofar as possible, select at least one candidate therefrom for each open position on the Board of Directors. However, prior to reporting the name of any candidate, the Committee shall first certify that such candidate has been interviewed and has assured the Committee that he, or she, will serve.

Section 3. The Nominating Committee shall file its written report with the President and Board of Directors no later than September 22 of each calendar year or at the September Board of Directors meeting, whichever comes first.

Section 4. Prior to October 7 of each calendar year, the Executive Director shall notify, in writing, all members in good standing the Report of the Nominating Committee. The Notification shall also include the Provision contained herein for adding further nominations from the floor at the next general membership meeting, which will be held in either October or November of each calendar year.

Section 5. At the next general membership meeting after October 7 of each calendar year, the President shall call for any additional nominations from the floor; provided, however, that all such nominations shall be supported by the sponsor's certification that the candidate has been interviewed and has assured the sponsor that he, or she, will serve if and when elected.

Section 6. Thereafter, but not more than 10 days after the general membership meeting and the close of nominations, the Executive Director under supervision of the Elections Committee shall cause an official ballot, showing the names and addresses of all candidates regularly nominated as herein before provided, to be mailed each member in good standing. Such ballots shall also specify the final filing date shall be not more than five (5) days after receipt thereof and said ballots shall be returned to a specifically designated person or place in a sealed envelope to be provided for that purpose.

Section 7. The aforesaid ballots will be checked and tallied by three (3) members of the Association who are appointed by the President as the Election Committee and the results shall be made known to the President and Board of Directors at the November Board of Directors meeting.

Section 8. The President shall report as elected the candidate for each office who has received a plurality of the votes cast for that office.

Section 9. In case of a tie in the ballots cast for any position, and in the event that both candidates cannot take a seat on the Board of Directors, the candidates by common agreement shall draw for the position.

Section 10. New officers and Directors will officially assume their duties at the first Board of Directors meeting in January of each calendar year. Whenever possible and desirable, the outgoing, incoming and incumbent directors will hold an Installation Dinner for such purpose, and for the rewarding of those officers and Directors who are leaving the Board of Directors for a job well done.

ARTICLE XV - STANDING COMMITTEES

Section 1. The President shall, within sixty (60) days following his installation, appoint the following Standing Committees: (1) Finance, (2) Insurance, (3) By-Laws, (4) Legislative, (5) Membership, (6) Editorial, (7) Grievance - Ethics & Standards, and (8) Scholarship.

Section 2. It shall be the duty of the Finance Committee to consider, recommend and report methods whereby the Association may be adequately financed. It shall also act as both a Budget and Auditing Committee, and shall devise methods of maintaining a reasonable balance of receipts and expenditures. This Committee shall consist of at least four (4) members, the Chairman of which shall be the Association's elected Treasurer, and two other members of which must be members of the Board of Directors.

Section 3. There shall be an Insurance Committee, and this Committee shall devise methods whereby hospitalization and other types of insurance may be procured for members at the most reasonable premium rates.

Section 4. It shall be the duty of the By-Laws Committee to (a) be responsible for the official copy of the By-Laws and to see that the same is maintained in an up-to-date status at all times; and (b) prepare and/or review all proposed amendments to the By-Laws.

Section 5. It shall be the duty of the Legislative Committee to study, consider and submit recommendations concerning any and all legislative matters on the local, state or national levels which adversely or favorably affect the members of the Association in the conduct of their lawful business. The Legislative Committee will also serve as the liason between the Association and other groups, organizations and parties during the time of direct political action by members of the Association.

Section 6. There shall be a Membership Committee whose duties shall be that of coordinating activities in the field between the Board of Directors and the Executive Director and his field staff. The Membership Committee may also be charged with the responsibility of checking into the qualifications of Applicants for Membership.

Section 7. It shall be the duty of the Editorial Committee to devise methods whereby the publication and circulation of the Association's official publication may be made most effective. It shall also be the

Committee's responsibility to determine the best means and methods of soliciting the support of the local trade in advertising revenue

Section 8. It shall be the duty of the Grievance, Ethics and Standards Committee to expedite and facilitate the handling of dealer complaints against major suppliers and/or other distributors of petroleum products for resale, other suppliers in the automotive aftermarket, customers and/or other service station operators

Section 9. The Grievance, Ethics and Standards Committee, the chairman of which serves at the pleasure of the President with majority approval of the Board of Directors, will be responsible for the establishment of all Boards of Review consisting of at least four members and no more than seven, one of whom will be the Executive Director, to investigate all complaints.

Section 10. Procedures for conducting an investigation will be established and made available to the Chairman and Members of all Boards of Review.

Section 11. All Board of Review recommendations for action which necessitate the expenditure of Association funds will be both subject to legal review by the Association's Legal Counsel and must have the approval of a majority of the Board of Directors members at a duly constituted meeting

Section 12. All Board of Review recommendations for action which do not necessitate the expenditure of Association funds, but which call for administrative solutions, will be subject to legal review by the Association's Legal Counsel

Section 13. To qualify for a Board of Review investigation, a service station dealer shall have had to be a member in good standing of the Association at the time of the request, and shall have had to be a member of the Association for a period of 120 days immediately prior to the request for Assistance

Section 14. The Grievance, Ethics & Standards Committee shall have the responsibility, with the concurrence of a majority of the Board of Directors at a duly constituted meeting, for allocating Association funds in all cases relating to grievance, ethics and standards proceedings.

Section 15. The Grievance, Ethics & Standards Committee may initiate an Escrow Fund to be called a Mutual Assistance Fund for the sole purpose of raising revenue to protect service station dealer interest and perpetuate dealer welfare

Section 16. The Grievance, Ethics & Standards Committee, with the concurrence of a majority of the Board of Directors at a duly constituted meeting, shall be responsible for writing and enforcing an Association Code of Ethics to which all members may subscribe and which reflects well upon the industry and the service station dealers within it.

Section 17. In the event a Committee chairman relinquishes his position for any reason, it will be the responsibility of the President to appoint a new chairman of that particular committee within 30 days of the vacancy This requirement may be waived if a Committee chairmanship is vacated within a 30-day period of an election at which time a new President will assume office

Section 18. Scholarship Committee - A two-man committee will expedite all correspondence from applicants, administer drawing method, select lottery drawing day, and report progress to President after lottery drawing day. The deadline for filing for scholarships will be March 1st. Any entrant bearing a postmark later than March 1st will not be considered as eligible. All mail must be registered mail, return receipt requested.

Section 19. Scholarships to be awarded will not be based upon grades but will be awarded via the drawing method. The Committee will divide the number of applicants into 100 and each applicant will receive the proportionate number of tickets. The tickets will be mailed or delivered to each applicant between March 15 and April 10 and the winning lottery drawing of May 2nd week using the 6 digit number in the $.50 lottery.

Section 20.

(A) Dealer must enter son or daughter via registered mail, return receipt requested. All entries must be mailed to P.S.S.D.A., One Decker Square, Suite 417, Bala Cynwyd, PA 19004.

(B) Those who are seniors or who are in their last year of an accredited high school are eligible so long as their parent is a member of this Association in good standing (dues paid up as of April 1).

(C) Can prove acceptance from a school, university or college of higher learning (including trade schools and nursing schools).

(D) Scholarship funds cease when the child ceases to be an active student.

(E) The maximum payment shall not exceed $500 in any calendar year and in instance for more than four (4) consecutive years (reference March 1, 1973 News Bulletin).

ARTICLE XVI - LEGAL & LEGISLATIVE FUND

Section 1. Legal & Legislative Fund may be started by the Grievance, Ethics & Standards Committee for purposes of raising and having sufficient revenue to protect the interest of individual service station dealers in their relationship with their suppliers.

Section 2. Legal & Legislative Fund will be controlled by the Grievance, Ethics & Standards Committee, with concurrence of a majority of the Board of Directors at a duly constituted meeting and to provisions of the By-Laws.

Section 3. Qualifications for Assistance

(A) Paid-up member in good standing.
(B) Dealers cause is one which serves the aims and goals of the Association.
(C) Dealer must submit $500 in advance to ensure his follow through and completion of court action as deemed necessary by the Association's Legal Counsel and Board approval.

Section 4. Reimbursement

(A) Dealer will be reimbursed the $500 advance money if his case is settled win or lose
(B) Should a cash settlement be made, the dealer will bear the costs which shall not exceed 50% of the settlement.
(C) The dealer must sign an agreement as to the conditions set forth in Section 3 and 4 prior to expenditure of funds on his behalf.

ARTICLE XVII - SPECIAL COMMITTEES

The President shall have the authority to appoint such other committees, with duties not inconsistent with the provisions of the By-Laws, as he may consider proper and as needed

ARTICLE XVIII - CODE OF ETHICS

Section 1. There shall be a Code of Ethics for the Pennsylvania and Delaware Service Station Dealers Association to which all members shall subscribe.

Section 2 The Code of Ethics shall be printed and distributed to all members in good standing and shall be suitably displayed in the dealer's place of business.

Section 3. The Code of Ethics shall read as follows:

The members of the Pennsylvania and Delaware Service Station Dealers Association believe that the motoring public is entitled to good workmanship, fair prices and quality merchandise and therefore subscribe to the following creed:

1) To earn, establish and maintain a reputation for giving full value at a fair price to all customers, thereby instilling confidence;

2) To employ honesty and accuracy in the performance of all sales and services, and in the advertising or such;

3) To refrain from any acts which would bring discredit to our industry;

4) To adjust promptly any cause of dissatisfaction and to endeavor to make every purchaser a satisfied customer;

5) To use the best in material and automotive skills available to supply our customers with quality workmanship;

6) To serve continually as independent businessmen through our service station association to improve our industry in order that the motoring public may better be served

ARTICLE XIX - NOTICES

All notices pertaining to Board of Directors or regular membership meetings shall be mailed by first class mail at least five (5) days prior to the meeting.

ARTICLE XX - ORDER OF BUSINESS

All proceedings of this Association shall be conducted pursuant to Roberts Rules of Order.

ARTICLE XXI - AMENDMENTS

The Board upon its own initiative at a duly constituted meeting may amend the By-Laws by a two-thirds (2/3) vote of Directors present. Anything in the foregoing to the contrary notwithstanding, the membership at large by vote of a three-fourths (3/4) majority in attendance at a general meeting of the Association may repeal, alter or amend these By-Laws or any of them. Proposed By-Laws changes to be enacted by the membership at large must be submitted to the Executive Director at least thirty (30) days before the date of the meeting. The Executive Director, in turn, will submit a written copy of the proposed change to the last recorded address of each member at least fourteen (14) days before the time of the meeting which is to consider the change. Upon adoption of any By-Laws change, by either the Board or the Membership at large, the Executive Director must mail to each member in good standing of any amendment passed within thirty (30) days after enactment.

7 9 0 1 0 1 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers) MUR 409 (77)
Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 1, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to find reason to believe that violations of 2 U.S.C. Sections 432, 441a(a)(8) and 434(b) have been committed in the above-captioned matter and to so notify the respondent.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date: March 3, 1978

7904041373

February 24, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409 Team #4 Callahan

Please have the attached General Counsel's Report on MUR 409 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of March 1, 1978.

Thank you.

7904014375

BEFORE THE FEDERAL ELECTION COMMISSION
February 22, 1978

In the Matter of	)	
	)	
	)	MUR 409 (77)
Service Station Dealers	)	
Political Action Committee	)	

GENERAL COUNSEL'S REPORT

Background of Case

This matter was referred to the Office of General Counsel after a reports review by the Reports Analysis Division indicated that the Green for Senate Committee (GFSC) had received excessive contributions from the Service Station Dealers PAC (SSDPAC), an unregistered committee. 1/

A reason to believe letter, prepared by the Reports Analysis Division, was sent to the respondent PAC on December 16, 1976 and a reasonable cause to believe letter on March 23, 1977 concerning the PAC's failure to register with the Commission and its failure to file disclosure statements.

On June 28 and July 15, 1977, the Office of General Counsel notified SSDPAC that the Commission had found reason to believe and reasonable cause to believe that a violation of 2 U.S.C. §441a had been committed as well. Thomas Anderson, Secretary/ Treasurer of SSDPAC, did not respond to these notifications.

7904014377

1/ The Green for Senate Committee's acceptance of excessive contributions from the Service Station Dealers PAC is being handled in a separate MUR. (MUR 427 (77))

On August 24, 1977, SSDPAC's attorney, accountant and Thomas Anderson were contacted via phone. At that time, we were informed that the registration and financial reports of the PAC would be forthcoming. By October 13, 1977, SSDPAC had filed a statement of organization and comprehensive reports for 1974, 1975 and 1976.

On January 17, 1978, Mr. Anderson was deposed in Philadelphia, Pennsylvania in connection with issues raised during review of the PAC's comprehensive reports.

Evidence/ Legal Analysis

§433 and §434 violations:

SSDPAC was organized April 16, 1974. Since the committee's inception, it has supported federal candidates/committees. SSDPAC has made the following contributions, aggregated by the year, in support of candidates for federal office:

1974	$ 2,000
1975	None
1976	$19,749
1977	$ 400

Prior to September 15, 1977, SSDPAC failed to register with the Commission as a political committee or file disclosure statements. The Commission has found reasonable cause to believe that the PAC violated 2 U.S.C. §433 and §434.

Mr. Anderson stated, during his deposition, that SSDPAC failed to register or file with the Commission because he was told by a FEC staff member (whom he is unable to identify) that if contributions to federal candidates did not exceed $1,000,

7 9 0 4 0 - 1 - 1 3 7 8

the PAC was not required to file. Mr. Anderson said he interpreted that statement to mean if contributions per candidate did not exceed $1,000, the PAC was not required to register.

$441a violation:

Upon receipt and review of SSDPAC's 1974, 1975 and 1976 comprehensive reports, it was noted that a substantial portion of the funds transferred to the GFSC were proceeds from fundraisers held by the PAC.

Mr. Anderson has testified that the two fundraisers for Green were prearranged with the candidate and that the PAC checking account was used as a conduit. 2/

According to SSDPAC and GFSC, it was understood before the fundraisers took place, that the PAC would transfer the proceeds to Green's committee.

SSDPAC transferred a total of $15,000 to the GFSC in 1976: $14,001 in fundraiser proceeds as well as an outright contribution of $999.

Section 110.6 (d)(2) of the Commission's Regulations state

> If a conduit exercises any direction or control over the choice of the recipient candidate, [of earmarked contributions] the contribution shall be considered a contribution by both the original contributor and the conduit,...

7904041379

2/ Copies of the fundraiser tickets are not available; however, it is the recollection of both Anderson and the GFSC that "Green for Senate Dinner" appeared on the face of the tickets.

Therefore, as previously determined by the Commission, SSDPAC has exceeded the contribution limitations set forth in 2 U.S.C. §441a which precludes individuals and political committees, other than qualified political committees, from making contributions to candidates for federal office in excess of $1,000 per election. 3/

Additional Violations

§441a(a)(8) violation:

SSDPAC, acting as an intermediary, is required under §441a(a)(8) (11CFR 110.6 (c)(1)) to file with the Commission and ... disclose each contribution, regardless of amount, on schedules of itemized receipts and expenditures. The intermediary is also required to report the original source of earmarked contributions to the intended recipient.

In light of the fact that SSDPAC did not keep contributor records in connection with the Green for Senate fundraisers, it appears they are in violation of §441a(a)(8) and 11 CFR 110.6(c)(1).

§434(b) violation:

As set forth in 2 U.S.C. §434(b) (11 CFR 102.9), the treasurer of a political committee is responsible for the accounting of all contributions and expenditures made to or by the committee and shall disclose certain information in its disclosure reports as outlined in the Commission's Regulations.

SSDPAC has disclosed the following unitemized contributions/ expenditures (aggregated on a yearly basis):

3/ SSDPAC is not a qualified multicandidate committee because it registered on September 15, 1977 and terminated on October 13, 1977, less than the 6 months required by 2 U.S.C. §441a

7 9 0 4 0 1 4 1 3 8 0

YEAR	UNITEMIZED CONTRIBUTIONS	UNITEMIZED EXPENDITURES
1974	$18,041.00	$543.00
1975	6,205.00	769.00
1976	20,021.00	------

Mr. Anderson stated, during deposition, that the PAC did not accept contributions in excess of $100 per individual but admitted the possibility that two separate contributions by an individual could have exceeded that amount. According to Mr. Anderson, the unitemized expenditures were for "various committee expenses."

It appears that SSDPAC's failure to keep proper contributor and expenditure records is in violation of 2 U.S.C. §434(b).4/

RECOMMENDATION

The Commission has previously found reasonable cause to believe that SSDPAC has violated 2 U.S.C. §433, §434 and §441.

It is recommended that the Commission find reason to believe that reporting violations of §441a(a)(8) and §434(b) have been committed as well and send the attached notification to the respondent.

2/23/78
Date

William C. Oldaker
General Counsel

7900141381

4/ During Mr. Anderson's deposition, it was also discovered that at the May 23rd fundraising dinner for Green, a raffle was held. The raffle proceeds were not itemized on the PAC's report as required by §434(b)(6)(A).

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 31, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: MUR 409 (77) - Interim Investigatory Report

The above-mentioned document was circulated to the Commissioners on January 27, 1978 at 2:30 p.m.

As of 9:00 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Investigatory Report on MUR 409 (77) dated January 26, 1978.

7 9 0 4 0 1 4 1 3 8 2

ATTACHMENT:
Certification

pc

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers PAC)

MUR 409 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 31, 1978, the Commission accepted without objection the General Counsel's Interim Investigatory Report, dated January 26, 1978, in the above-captioned matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7904041383

January 27, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409

Please have the attached Interim Investigatory Report on MUR 409 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7 8 0 3 1 0 4 0 0 7

BEFORE THE FEDERAL ELECTION COMMISSION
January 26, 1978

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

INTERIM INVESTIGATORY REPORT

On January 5, 1978, the Commission authorized the issuance of a subpoena for deposition of Thomas Anderson, Executive Director of Service Station Dealers PAC (SSDPAC).

On January 17, 1978, Mr. Anderson was deposed in Philadelphia, Pennsylvania. During the deposition, Mr. Anderson detailed the circumstances surrounding the two fundraisers held by SSDPAC for the Green for Senate Committee (GFSC). It appears from Mr. Anderson's statements that SSDPAC was acting as an intermediary pursuant to 2 U.S.C. §441a(a)(7) and (8).

In light of the fact that SSDPAC did not keep contributor records of ticket purchasers, they appear to be in violation of §110.6(c) of the Commission's regulations.

Upon receipt of the transcribed deposition, we will make a final recommendation to the Commission concerning this matter.

7 0 4 0 1 4 1 3 6 5

1/26/78
DATE

William C. Oldaker
GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 20, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: AUTHORIZATION TO ADMINISTER OATHS IN RELATION TO MUR 409 (77)

The approval of four Commissioners has been obtained in relation to the above-mentioned matter.

Copies of the tally sheets showing the Commissioners' signature are attached.

7904011386

ATTACHMENT
Copies of tally sheets

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 18, 1978

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker

SUBJECT: MUR 409 (76)

On December 21, 1977, the Commission authorized a subpoena for deposition be issued to Thomas Anderson, Executive Director of respondent Service Station Dealers PAC.

The Office of General Counsel recommends that the attached authorization to administer oaths or affirmations be issued to Biz Van Gelder who will be taking this deposition.

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
78 JAN 18 P4:58

0 4 0 1 4 1 3 8 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409(77)
Service Station Dealers PAC)

AUTHORIZATION

Pursuant to Section 437d(a)(2) of Title 2, United States Code, the Commission hereby authorizes Biz Van Gelder to administer oaths or affirmations for the purpose of obtaining deposition testimony in the above styled matter, and further authorizes her to take depositions therein.

7904011386

THOMAS E. HARRIS
CHAIRMAN

DATE

VERNON W. THOMSON
COMMISSIONER

DATE

JOAN D. AIKENS
VICE CHAIRMAN

DATE

NEIL O. STAEBLER
COMMISSIONER

DATE

WILLIAM L. SPRINGER
COMMISSIONER

DATE

ROBERT O. TIERNAN
COMMISSIONER

DATE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers PAC) MUR 409(77)

AUTHORIZATION

Pursuant to Section 437d(a)(2) of Title 2, United States Code, the Commission hereby authorizes Biz Van Gelder to administer oaths or affirmations for the purpose of obtaining deposition testimony in the above styled matter, and further authorizes her to take depositions therein.

THOMAS E. HARRIS
CHAIRMAN

DATE

VERNON W. THOMSON
COMMISSIONER

DATE

JOAN D. AIKENS
VICE CHAIRMAN

DATE

NEIL O. STAEBLER
COMMISSIONER

DATE

William L. Springer

WILLIAM L. SPRINGER
COMMISSIONER

DATE

ROBERT O. TIERNAN
COMMISSIONER

DATE

7904041380

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers PAC) MUR 409(77)

AUTHORIZATION

Pursuant to Section 437d(a)(2) of Title 2, United States Code, the Commission hereby authorizes Biz Van Gelder to administer oaths or affirmations for the purpose of obtaining deposition testimony in the above styled matter, and further authorizes her to take depositions therein.

7901041390

THOMAS E. HARRIS
CHAIRMAN

DATE

VERNON W. THOMSON
COMMISSIONER

DATE

JOAN D. AIKENS
VICE CHAIRMAN

DATE

NEIL O. STAEBLER
COMMISSIONER

DATE

WILLIAM L. SPRINGER
COMMISSIONER

DATE

ROBERT O. TIERNAN
COMMISSIONER

DATE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409(77)
Service Station Dealers PAC)

AUTHORIZATION

Pursuant to Section 437d(a)(2) of Title 2, United States Code, the Commission hereby authorizes Biz Van Gelder to administer oaths or affirmations for the purpose of obtaining deposition testimony in the above styled matter, and further authorizes her to take depositions therein.

THOMAS E. HARRIS
CHAIRMAN

DATE

VERNON W. THOMSON
COMMISSIONER

DATE

JOAN D. AIKENS
VICE CHAIRMAN

DATE

NEIL O. STAEBLER
COMMISSIONER

1/19/75
DATE

WILLIAM L. SPRINGER
COMMISSIONER

DATE

ROBERT O. TIERNAN
COMMISSIONER

DATE

7 9 0 4 0 1 4 1 3 9 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers PAC)

MUR 409(77)

AUTHORIZATION

Pursuant to Section 437d(a)(2) of Title 2, United States Code, the Commission hereby authorizes Biz Van Gelder to administer oaths or affirmations for the purpose of obtaining deposition testimony in the above styled matter, and further authorizes her to take depositions therein.

7904014392

THOMAS E. HARRIS
CHAIRMAN

DATE

VERNON W. THOMSON
COMMISSIONER

DATE

JOAN D. AIKENS
VICE CHAIRMAN

DATE

NEIL O. STAEBLER
COMMISSIONER

DATE

WILLIAM L. SPRINGER
COMMISSIONER

DATE

ROBERT O. TIERNAN
COMMISSIONER

DATE

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 10, 1978

Norman Zarwin, Esquire
715 Widener Building
1339 Chestnut Street
Philadelphia, Pennsylvania 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

Enclosed is a copy of correspondence dated January 10, 1978, addressed to your client, Thomas Anderson.

If you have any questions, please direct them to Lester Scall at 202/523-4166.

Sincerely,

William C. Oldaker
General Counsel

enclosure

MVR 409 Callahan

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery .$____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Zarwin
715 Widener Bldg
1339 Chestnut St
Phila Pa 19107

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	944105	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
O'Keefe

4. DATE OF DELIVERY 1/13/78 POSTMARK

5. ADDRESS (Complete only if requested)

JAN 13 3 18

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7 9 0 4 0 1 4 1 3 9 4

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 10, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

Re: MUR 409 (77)

Dear Mr. Anderson:

Enclosed is a money order made payable to you in the amount of $22.00.

Pursuant to §111.14 of the Commission's Regulations, a witness summoned by the Commission shall be paid $20.00 plus mileage. We have computed a 20 mile round trip at 10 cents per mile for your appearance on January 17, 1978. If this estimate is incorrect, please advise this office.

If you have any questions, please direct them to Lester Scall at 202/523-4052.

Sincerely,

William C. Oldaker
General Counsel

enclosure

MVE 409 Callahan

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☐ Show to whom, date, and address of delivery .... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Anderson
425 Commerce Dr
YORDON PA 19052

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	994106	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
M. Kirkman

4. DATE OF DELIVERY
1-13-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-857

7904014396

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas Anderson
Executive Director of the
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

Re: MUR 409

Dear Mr. Anderson:

Enclosed is a subpoena to appear for deposition on January 17, 1978 in connection with Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

Sincerely yours,

William C. Oldaker
General Counsel

7904041397

7 0 0 4 0 1 4 1 3 6 8

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas Anderson
Executive Director of the
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

Re: MUR 409

Dear Mr. Anderson:

Enclosed is a subpoena to appear for deposition on January , 1978 in connection with Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

1/5/78 Sincerely yours,

William C. Oldaker
General Counsel

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

MUR 409 (77)

Subpoena to Appear for Deposition Upon Oral Examination and to Produce Books, Records and Other Relevant Documents

TO: Thomas Anderson
Executive Director
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

At the instance of the Federal Election Commission pursuant to Section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to Service Station Dealers PAC (SSDPAC). Notice is hereby given that the deposition is to be taken at the office of Foster Court Reporting Service, Inc., 117 S. 17th Street, Philadelphia, Pennsylvania 19103 on January 17, 1978, at 2:00 p.m., and at any and all adjournments thereof.

Pursuant to Section 437d of Title 2, United States Code, you are hereby subpoenaed to produce at the time of the deposition:

(a) All correspondence, memoranda, or other relevant documents from or to you under your control associated with SSDPAC's fundraising activities for the Green for Senate Committee.

7904041399

(b) Contemporaneous memoranda and any other records under your control regarding SSDPAC's membership, solicitations and affiliated organizations.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 5th day of January, 1978.

Thomas E. Harris
THOMAS E. HARRIS
Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

7901141400

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman P. Zarwin
715 Widener Building
1339 Chestnut Street
Philadelphia, Pennsylvania 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

Enclosed is a copy of a subpoena for deposition dated January 5 , 1978, which the Commission has just sent to your client, Thomas Anderson, Executive Director of Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

Scott MUR-409

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Norman Zarwin
1339 Chestnut Street
Philadelphia, Pa. 19107

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94482	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
C Kearney

4. DATE OF DELIVERY
7-10-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-937

7 9 0 4 0 1 4 1 4 0 2

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herman P. Zarwin
715 Widener Building
1339 Chestnut Street
Philadelphia, Pennsylvania 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

Enclosed is a copy of a subpoena for deposition dated January , 1978, which the Commission has just sent to your client, Thomas Anderson, Executive Director of Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

7 0 0 4 0 - 4 1 - 4 0 5

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

January 5, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: ISSUANCE OF SUBPOENA IN RELATION TO MUR 409 (77)

The attached subpoena, approved this date, has been signed and sealed.

The approvals of Commissioners Harris, Aikens, Thomson, and Staebler were obtained.

Attachment

7904011404

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Commissioners

FROM: William Oldaker

SUBJECT: Subpoena in Connection with MUR 409 (77)

On December 21, 1977, pursuant to 2 U.S.C. §437d, the Commission voted to seek enforcement of the order and subpoena issued to Service Station Dealers PAC (SSDPAC) on November 23, 1977.

In light of the fact that on January 3, 1978, the subpoenaed information was received by the Commission, the enforcement action is not necessary. We therefore recommend that the enforcement action not be filed.

However, the respondent did not answer all questions adequately nor was he able to produce requested documents.

The Office of General Counsel recommends that the attached subpoena for deposition be issued to Mr. Anderson in order to facilitate the investigation of MUR 409 (77).

FEDERAL ELECTION COMMISSION

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

AUTHORIZATION TO ISSUE A SUBPOENA TO FACILITATE THE INVESTIGATION OF SERVICE STATION DEALERS PAC

The Commission hereby authorizes a subpoena to be issued to Thomas Anderson, Executive Director of Service Station Dealers PAC.

Address: 425 Commerce Drive
Yeadon, Pa.

Thomas E. Harris, Chairman

Vernon W. Thomson, Commissioner

Joan D. Aikens, Vice Chairman

Neil O. Staebler, Commissioner

William L. Springer, Commissioner

Robert O. Tiernan, Commissioner

7 4 1 0 7 3 0

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman P. Zarwin
715 Widener Building
1339 Chestnut Street
Philadelphia, Pennsylvania 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

Enclosed is a copy of a subpoena for deposition dated January , 1978, which the Commission has just sent to your client, Thomas Anderson, Executive Director of Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

AMERICAN REVOLUTION BICENTENNIAL 1775-1976

Y09 Callahan

P3 Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery ..... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery. $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Norman P Zarwin, Esq.
715 Widener Bldg
1339 Chestnut St
Phila Pa 19107

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	835109	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Dolores Kowalczyk

4. DATE OF DELIVERY 5/15/78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977—O-234-337

7904011408

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas Anderson
Executive Director of the
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

Re: MUR 409

Dear Mr. Anderson:

Enclosed is a subpoena to appear for deposition on January , 1978 in connection with Service Station Dealers PAC.

If you have any questions, please direct them to Lester Scall (telephone no. 202-523-4052).

Sincerely yours,

William C. Oldaker
General Counsel

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

MCC 2367

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
900 KINGS HIGHWAY NORTH
SUITE 101
CHERRY HILL, NEW JERSEY 08034
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS

* MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
** MEMBER OF PENNSYLVANIA NEW JERSEY & OHIO BAR

RECEIVED
FEDERAL ELECTION
COMMISSION
'78 JAN 3 PM 12:50

December 30, 1977

703812

Suzanne Callahan, Esquire
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C.

Re: Service Station Dealers PAC
MUR 409 (1977)

Dear Ms. Callahan:

Enclosed are the Answer to the question propounded in the above matter.

Cordially yours,

NORMAN P. ZARWIN

NPZ/shb
Enc:

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	:	
	:	MUR 409 (77)
Service Station Dealers PAC	:	

ANSWERS TO QUESTIONS

Thomas J. Anderson, Executive Director of the Service Station Dealers PAC hereby answers the questions propounded in the Order served on him by the Federal Election Commission:

1. No list was prepared of persons who attended either dinner. Tickets were sold to service station dealers. The cost of the tickets was $25.00.

2. (a) Copies of the tickets were not retained. An attempt is being made to obtain a copy from the printer, if the printer has a copy.

(b) No present recollection whether or not SSDPAC appeared on the face of the ticket.

3. Yes.

4. None.

(a) Inapplicable.

5. (a) (i) (ii) Mr. Green and his staff were aware, presumably, that the SSDPAC was sponsoring the dinners and that the Pennsylvania Service Station Dealers Association was a trade organization composed of service station dealers. Contacts were made with Mr. Green and his staff to arrange for the dinners and insure that Mr. Green would attend. The exact dates and times are not known.

(b) No.

7 9 0 4 0 1 4 1 1

6. (a) Solicitations were mostly by personal contact, some telephoning and mailings.

(b) Search is underway to find a copy of the mailings.

(c) Those persons purchasing the tickets understood the net proceeds of the dinners were earmarked for Mr Green's campaigns. No special fund was established for the Green campaigns.

(d) Contributions were received both by check and cash.

7. No.

7904041412

Thomas J. Anderson

ZARWIN, BAUM, ARANGIO & ROSS, P. C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107

FEDERAL ELECTION COMMISSION

'70 JAN 3 PM 12:50

Suzanne Callahan, Esquire
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 21, 1977, the Commission determined by a vote of 4-0 to seek enforcement in the above-captioned matter pursuant to 2 U.S.C. Section 437d.

Voting for this determination were Commissioners Aikens, Harris, Thomson, and Tiernan. Commissioners Springer and Staebler were not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7904014144

December 16, 1977

MEMORANDUM TO: Margo [redacted]

FROM: Elissa T. Garr

SUBJECT: MUR 409 Team #2 Callahan

Please have the attached Interim Invest. Report on MUR 409 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of December 21, 1977.

Thank you.

7 0 4 0 1 4 1 4 5

BEFORE THE FEDERAL ELECTION COMMISSION
December 13, 1977

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

INTERIM INVESTIGATORY REPORT

The facts of this case are detailed in the Interim Report presented to the Commission on October 13, 1977.

Upon receipt and review of the Service Station Dealers PAC (SSDPAC's) 1974, 1975, and 1976 comprehensive reports, it was noted in the Schedule B of itemized expenditures, that two fundraisers were held specifically for the Green for Senate Committee (the Committee), not for the general treasurey of SSDPAC.

On November 23, 1977, a subpoena was sent to the respondent to clarify the expenditure entries so that the extent of the connection between the two committees could be determined. If the fundraisers run by SSDPAC on behalf of the Committee were authorized, it may be that SSDPAC was acting as an intermediary pursuant to 2 U.S.C. §441(a)(7) and (8).

On December 1, 1977, the Commission received a letter from SSDPAC indicating that the subpoenaed information could not be obtained within the five (5) days allotted by the Commission.

7 9 0 4 0 - 4 1 4 1 5

On December 2nd a call was placed to the respondent's attorney, Norman Zarwin. Mr. Zarwin was informed that Commission policy was not to grant time extensions. Mr. Zarwin indicated that the information would be sent to the Commission by December 16th. If the subpoenaed materials are not received by that date, the Office of General Counsel will recommend that the Commission seek enforcement under §437d.

12/15/77
DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL

7904011417

HCC 2165

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
900 KINGS HIGHWAY NORTH
SUITE 101
CHERRY HILL, NEW JERSEY 08034
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS

* MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
** MEMBER OF PENNSYLVANIA NEW JERSEY & OHIO BAR

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 DEC 1 AM 9:13

703503

November 28, 1977

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: Service Station Dealers PAC
MUR 409 (77)

Dear Mr. Steele:

Acknowledgment is made of the receipt of your November 23rd letter and order.

I will endeavor to obtain the answers required but probably will need more time than five days.

Cordially yours,

NORMAN P. ZARWIN

NPZ:b

2 0 4 0 1 4 1 4 6

NPZ

ZARWIN, BAUM, ARANGIO & ROSS, P. C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

DEC 1 AM 9:13

FED ELECTION COMMISSION
WASHINGTON

79040141

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

November 23, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman Zarwin, Esquire
715 Widener Buildings
1339 Chestnut Street
Philadelphia, Pennsylvania 19107

Re: MUR 409 (77)

Dear Mr. Zarwin:

The Commission's inquiry into violations of 2 U.S.C. §433, §434, and §441a by Service Station Dealers PAC is continuing. Therefore, we are requiring that Mr. Anderson, under Order and Subpoena, answer questions and produce documents, in connection with the Green for Senate Committee and SSDPAC's status as a multicandidate committee. Responses should be submitted within five days of his receipt of this notification. A copy of the Order and Subpoena are enclosed for your information. If you have any questions, please contact Suzanne Callahan (202-523-4166) the staff member assigned to this case.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

Charles N. Steele
Associate General Counsel

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

MUR 409 Callahan

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ..... ¢
- ☒ Show to whom, date, and address of delivery .... ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery .$____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Norman Zarwin

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943187	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Sally O'Callahan

4. DATE OF DELIVERY: 11/25/77 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977—O-234-387

7 9 0 4 0 1 4 1 4 2 1

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

November 23, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Anderson
Executive Director of the
Service Station Dealers PAC
425 Commerce Drive
Yeadon, Pennsylvania 19050

Re: MUR 409 (77)

Dear Mr. Anderson:

Enclosed is an Order and a Subpoena issued by the Federal Election Commission requiring you to answer questions and produce documents in connection with contributions to the Green for Senate Committee and your status as a multicandidate committee. Your responses should be returned to the Commission within five days of your receipt of this letter. A copy of this Order and Subpoena has been forwarded to your attorney, Norman Zarwin.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosures

Charles N. Steele
Associate General Counsel

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

M/R 409 Callahan

PS Form 3811, Mar. 1977

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☒ Show to whom and date delivered
- ☒ Show to whom, date, and address of delivery
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Thomas Anderson
SSD - PAC

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	942188	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
M. Kirkman

4. DATE OF DELIVERY 11-28-77
POSTMARK

5. ADDRESS (Complete only if requested)
425 Comm Ave DC
Yorktown PA 425

6. UNABLE TO DELIVER BECAUSE:
CLERK'S INITIALS

☆ GPO : 1977—O-234-827

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

7904011423

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 409 (77)
Service Station Dealers PAC	)	
	)	

Order to Answer Questions and Subpoena to Produce Documents

The Federal Election Commission, pursuant to its powers under 2 U.S.C. §437d, requires that Thomas Anderson, Executive Director of the Service Station Dealers PAC, submit responses in writing to the attached questions and submit the records requested at its offices at 1325 K Street, N.W., Washington, D.C. 20463, marked to the attention of the Enforcement Division, Office of the General Counsel. The responses should be made by you or your authorized agents having knowledge of the information required and should be submitted within five (5) days of your receipt of this Order and Subpoena.

7904014124

Thomas E. Harris
Chairman

ATTEST

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION

MUR 409 (77)

ATTACHMENT TO ORDER TO ANSWER AND SUBPOENA
TO PRODUCE RECORDS FOR SERVICE STATION DEALERS PAC

NOTE: Hereinafter, the Service Station Dealers PAC will be referred to as SSDPAC

1. Please supply a list of those individuals who attended the Green for Senate fundraiser on May 23, 1976, and October 12, 1976, and describe the source from which the list was drawn up.

2. (a) Please supply copies of the tickets used for the two Green for Senate fundraisers.

(b) Did the name SSDPAC appear on the face of the fundraiser tickets?

3. In connection with the Green for Senate fundraiser, did the SSDPAC issue checks for payment of services? (i.e., for food, music, rental of premises, etc.)

4. Please supply the names of any organizations connected or affiliated with the SSDPAC from 1974 to the present (i.e., entities which pay administrative costs incurred by SSDPAC such as rent, telephone, postal costs, etc. ...)

(a) If such affiliates(s) exist(s), please submit a list of its (their) membership.

5. (a) Did you or any other SSDPAC officers or members discuss or correspond with Mr. Green or any of his Senate campaign or congressional staff (i) regarding the SSDPAC or its activities or (ii) in any other business or social way? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.

(b) Did Mr. Green, his principal campaign committee, or agents offer any suggestions in regard to SSDPAC activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.

7 9 0 4 0 1 4 2 5

6. With regard to SSDPAC solicitations for contributions from 1974 to the present, please describe or respond to the following:

(a) How were the solicitations conducted (i.e. by mail, phone, advertisements, personal contacts, etc.)?

(b) In this regard, please attach copies of any solicitation material utilized by SSDPAC.

(c) Were the contributions to SSDPAC ever earmarked specially for the 1976 Green campaign?

(d) In what manner were the contributions received (i.e.; checks, cash, other)

7. Are any officers, directors or other agents of SSDPAC also officers, directors or agents of any other committees which support Federal candidates?

7904041426

FEDERAL ELECTION COMMISSION

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

November 22, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

SUBJECT: APPROVAL TO ISSUE ORDER AND SUBPOENA IN RELATION TO MUR 409 (77)

The attached Order and Subpoena was circulated on November 22, 1977, and have received the approval of the following Commissioners:

Commissioner Harris
Commissioner Aikens
Commissioner Staebler
Commissioner Springer

The Order-Subpoena has been signed and sealed this date.

Attachment

7904011427

November 21, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Gerr

SUBJECT: MUR 409 (77)

Please circulate for approval the attached Memo to the Commission.

Thank you.

7904014428

FEDERAL ELECTION COMMISSION

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

November 16, 1977

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker

SUBJECT: MUR 409 (77) Order to Answer Questions and Subpoena to Produce Records

7 9 0 4 0 1 4 2 9

Attached is an Order and a Subpoena for Thomas Anderson, Executive Director of the Service Station Dealers PAC, to answer questions and produce documents in connection with this matter.

In our investigation of this matter and in the Commission's consideration of it, questions have arisen about the nature and extent of SSDPAC's connection with other organizations, contributions, and the Green for Senate Committee.

These questions are addressed to these issues. We recommend that the request be made under Commission power pursuant to 2 U.S.C. §437d, because respondents have consistently failed to respond promptly to Commission notifications.

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE A SUBPOENA AND AN ORDER IN CONNECTION WITH MUR 409 (77)

The Commission hereby authorizes a subpoena and an order to Thomas Anderson, Executive Director of the Service Station Dealers PAC

Address: 425 Commerce Drive
Yeadon, Pennsylvania 19050

Thomas E. Harris, Chairman

Vernon W. Thomson, Commissioner

Joan D. Aikens, Vice Chairman

Neil O. Staebler, Commissioner

William L. Springer, Commissioner

Robert O. Tiernan, Commissioner

FEDERAL ELECTION COMMISSION

MUR 409 (77)

ATTACHMENT TO ORDER TO ANSWER AND SUBPOENA
TO PRODUCE RECORDS FOR SERVICE STATION DEALERS PAC

NOTE: Hereinafter, the Service Station Dealers PAC will be referred to as SSDPAC

1. Please supply a list of those individuals who attended the Green for Senate fundraiser on May 23, 1976, and October 12, 1976, and describe the source from which the list was drawn up.

2. (a) Please supply copies of the tickets used for the two Green for Senate fundraisers.

(b) Did the name SSDPAC appear on the face of the fundraiser tickets?

3. In connection with the Green for Senate fundraiser, did the SSDPAC issue checks for payment of services? (i.e., for food, music, rental of premises, etc.)

4. Please supply the names of any organizations connected or affiliated with the SSDPAC from 1974 to the present (i.e., entities which pay administrative costs incurred by SSDPAC such as rent, telephone, postal costs, etc. ...)

(a) If such affiliates(s) exist(s), please submit a list of its (their) membership.

5. (a) Did you or any other SSDPAC officers or members discuss or correspond with Mr. Green or any of his Senate campaign or congressional staff (i) regarding the SSDPAC or its activities or (ii) in any other business or social way? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.

(b) Did Mr. Green, his principal campaign committee, or agents offer any suggestions in regard to SSDPAC activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.

7 9 0 4 0 1 4 1 4 3 1

6. With regard to SSDPAC solicitations for contributions from 1974 to the present, please describe or respond to the following:

(a) How were the solicitations conducted (i.e. by mail, phone, advertisements, personal contacts, etc.)?

(b) In this regard, please attach copies of any solicitation material utilized by SSDPAC.

(c) Were the contributions to SSDPAC ever earmarked specially for the 1976 Green campaign?

(d) In what manner were the contributions received (i.e.; checks, cash, other)

7. Are any officers, directors or other agents of SSDPAC also officers, directors or agents of any other committees which support Federal candidates?

7904041432

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

14 October 1977

MEMORANDUM TO: COMMISSIONERS

FROM: WILLIAM OLDAKER Bill

SUBJECT: MUR 409 INTERIM REPORT

Peggy McCormack has requested that we clarify the statement in our Interim Report dated October 13th concerning the amount of contributions given to the Green for Senate Committee by the Service Station Dealers PAC.

The excessive contribution previously noted was $10,000. However, upon receipt of the SSDPAC's 1976 comprehensive report, it was discovered that the excessive contribution given to Green's committee was $15,000.

7 8 0 1 0 4 0 4 3 4

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

October 14, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409 (77)

Please circulate the attached Memo to the Commission as part of the Interim Report which is on the Compliance Agenda for the Commission meeting of October 19, 1977.

Thank you.

7904041417

October 7, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409 Team #2

Please have the attached Interim Report on MUR 409 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of October 13, 1977.

Thank you.

7 9 0 4 0 1 4 1 4 3

FEDERAL ELECTION COMMISSION

OCTOBER 13, 1977

In the Matter of	)	
	)	MUR 409 (77)
Service Station Dealers PAC	)	

INTERIM REPORT

Our records indicate that the Service Station Dealers PAC (SSDPAC) is not a registered political committee and has contributed $15,000 to the Green for Senate Committee (Pennsylvania) in 1976.

The history of this matter is as follows: On March 23, 1977, the Disclosure Division notified the SSDPAC that the Commission found reasonable cause to believe it was in violation of §433 and §434 for failure to register and file.

On July 20, 1977, the Commission determined that there was reasonable cause to believe that SSDPAC violated §441a for exceeding contribution limitations. Our notification letter to them followed.

On August 24, 1977, after we had received no response to either of our letters, we contacted SSDPAC's attorney, executive director, and accountants. The accountant informed us that the reports were in the process of being completed and would be sent to the Commission shortly.

On September 15, 1977, we received respondent's 1976 comprehensive report and on the same date, we contacted Thomas Anderson, Executive Director of the SSDPAC to question him about the report. Mr. Anderson stated SSDPAC had supported four federal candidates in 1974 and no federal candidates in 1975. We informed him that filings to indicate SSDPAC's activity for those years would have to be submitted as well.

7 9 0 4 0 1 4 3 6

On September 16, 1977, SSDPAC's accountant phoned us to confirm that the 1974 and 1975 reports were being completed and would be forwarded to the Commission by September 23, 1977. As of this writing, the reports have not yet been received.

We expect the receipt of these reports to supply a basis for conciliation.

10/7/77
Date

William C. Oldaker
General Counsel

7904041437

FAC # 1794
NRN

MUR 409

PENNSYLVANIA & DELAWARE SERVICE STATION DEALERS ASSOCIATION

425 Commerce Drive
Yeadon, Pa. 19050

77 OCT 13 AM 10:16

October 11, 1977

Ms. Suzanne Callahan
Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Ms. Callahan:

The following is as per your request for additional information.

The Officers, other than myself (Thomas Anderson) are:

Vincent Mancinelli, Chairman
425 Commerce Drive
Yeadon, PA 19050

As per your second request concerning the disbursement of funds remaining in this account, please be advised that said funds will not be used in Federal Elections for Federal Candidates but will be used for state and local elections.

It is our express desire to cooperate as fully as possible in finalizing this matter and we would appreciate your endeavors in terminating this committe as a federal campaign contributing organization.

Sincerely

Thomas Anderson

THOMAS ANDERSON
Sect. Treasurer

TA/kk

7703060251
7904014138

PENNSYLVANIA AND DELAWARE
SERVICE STATION DEALERS ASSOCIATION
425 COMMERCE DRIVE
YEADON, PA 19050

77 0306 1 2 5 1 2

FEDERAL ELECTION COMMITTEE
1325 K. Street N.W.
Washigton, DC 20463

MUR 409
ATTENTION: Suzanne Callahan

MUR # 1478

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107
CABLE ADDRESS "JUSTICE"
(215) LOCUST 9-2800

NEW JERSEY OFFICE
915 KINGS HIGHWAY NORTH
SUITE 101
CHERRY HILL, NEW JERSEY 08034
(609) 365-0500

NORMAN P. ZARWIN
E. HARRIS BAUM
ROBERT L. ARANGIO
EDWARD J. ROSS*
DAVID W. NIESENBAUM
MARTIN J. RESNICK
JAY I. BOMZE
ROBERT P. WEINER**
MAURICE S. STRAUSS

* MEMBER OF PENNSYLVANIA & NEW JERSEY BAR
** MEMBER OF PENNSYLVANIA NEW JERSEY & OHIO BAR

FEDERAL ELECTION COMMISSION
'77 SEP 16 AM 10:19

777745

September 14, 1977

Suzanne Callahan, Esquire
Federal Election Commission
1325 "K" Street, N.W.
Washington, D. C.

Re: Service Station Dealers PAC
MUR 409 (1977)

Dear Ms. Callahan:

A letter addressed to Thomas Anderson, Executive Director in the above matter, signed by William Oldaker, Esquire, General Counsel of the Federal Election Commission has been sent to me for review.

Please be advised the SSDPAC accountant is in the process of preparing the necessary documentation to establish the absence of the requirement for registration.

The documentation should be submitted within the next few days.

If you have any questions, contact the undersigned.

Cordially yours,

NORMAN P. ZARWIN

NPZ/jr

cc: Mr. Thomas Anderson

ZARWIN, BAUM, ARANGIO & ROSS, P.C.
ATTORNEYS AT LAW
715 WIDENER BUILDING
1339 CHESTNUT STREET
PHILADELPHIA, PA. 19107



Suzanne Callahan, Esquire
Federal Election Commission
1325 "K" Street
Washington, D. C.

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 25, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: MUR 409 (77) Revised Letter

The above-mentioned document was transmitted to the Commissioners on July 22, 1977 at 2:15 p.m.

As of 3:30 p.m., July 25, 1977, no objections have been received to the revised letter.

7904014442

FEDERAL ELECTION COMMISSION

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

21 July 1977

MEMORANDUM TO: COMMISSIONERS

THROUGH: BILL OLDAKER Bill

FROM: SUZANNE CALLAHAN

SUBJECT: MUR 409 (77) REVISED REASONABLE CAUSE TO BELIEVE LETTER TO RESPONDENT

On July 20, 1977, the Commission voted to find reasonable cause to believe that the Service Station Dealers PAC violated 2 U.S.C. section 44la. During the discussion, the Commission also recommended that the notification letter to the Respondent proposed by the Office of the General Counsel be revised in two ways. The General Counsel's office agrees with this recommendation. Attached is the letter with the recommended revisions.

7 9 0 4 1 0 1 4 4 3

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

July 21, 1977

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409 (77)

Please distribute the attached letter on MUR 409(77) on a 24 hour no-objection basis.

Thank you.

7 0 0 1 0 1 4 1 4 4 4

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: In response please refer to MUR 409 (77)

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. section 433 and section 434. It appears that the Service Station Dealers PAC has also exceeded the contribution limitations set forth in 2 U.S.C. section 441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election. As of this date, we have received no response from you.

The Commission has reasonable cause to believe you have violated 2 U.S.C. section 441a.

Should you fail to correct this matter within thirty (30) days of receipt of this letter, the Office of General Counsel will recommend to the Commission that a civil law suit be filed against you.

If you have any question, please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

MUR 4809 GC Callahan

PS Form 3811, Mar. 1975

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 60¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Thomas Anderson, Exec. Dir.
Service Station Dealers PAC
2 Decker Sq.
Bala Cynwyd, PA

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943677	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
M. Kirkman

4. DATE OF DELIVERY: 5-26-77 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1975—O-569-488

7 9 0 4 0 1 4 1 4 4 6

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: In response please refer to MUR 409

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. section 433 and section 434. It appears that the Service Station Dealers PAC has also exceeded the contribution limitations set forth in 2 U.S.C. section 441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

As of this date, we have received no response from you. Your failure to respond gives the Commission reasonable cause to believe you have violated 2 U.S.C. section 441a.

Should you fail to correct this matter within thirty(30) days of receipt of this letter, the Commission will prepare to seek imposition of civil penalties.

If you have any question, please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 20, 1977, the Commission determined by a vote of 5-0 to find Reasonable Cause to Believe a violation of 2 U.S.C. Section 441a had been committed by the respondents in the above-captioned matter. Voting for this finding were Commissioners Aikens, Harris, Staebler, Thomson, and Tiernan; Commissioner Springer was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

7 9 0 4 0 1 1 4 4 6

July 15, 1977

MEMORANDUM TO: Marjorie Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 409 (77)

Please have the attached General Counsel's Report on MUR 409 (77) distributed to the Commission and placed on the Agenda for the Commission meeting of July 20, 1977.

7904010141 49

BEFORE THE FEDERAL ELECTION COMMISSION
July 15, 1977

In the Matter of)
) MUR 409 (77)
Service Station Dealers PAC)

GENERAL COUNSEL'S REPORT

I. Allegation

A review of our records indicates that the Service Station Dealers Political Action Committee has contributed $10,000 to the Green for Senate Committee, a committee supporting a candidate for federal office; therefore, subjecting said committee to the registration and reporting requirements set forth by 2 U.S.C. section 433 and section 434 as well as the contribution limitations set forth in section 441a.

7 9 0 4 0 1 4 5 0

II. Evidence

The Disclosure Division sent the Service Station Dealers PAC a reason to believe letter on December 16, 1976 and a reasonable cause to believe letter on March 23, 1977 concerning their failure to register with the Commission and their failure to file disclosure statements.

On June 28, 1977 the Office of General Counsel notified Mr. Anderson, Executive Director of the PAC, that the Commission had found reason to believe a violation of 2 U.S.C. section 441a had been committed as well. Mr. Anderson has not responded to this notification.

III. Analysis

The Service Station Dealers PAC has failed to register with the Commission as required by 2 U.S.C. section 433 and has failed to file disclosure statements as required by 2 U.S.C. section 434. As defined by 2 U.S.C. section 431(d), the Service Station Dealers Political Action Committee is a political committee; and therefore, has exceeded the contribution limitations set forth in 2 U.S.C. section 441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

IV. Recommendation

The Service Station Dealers PAC has previously been notified that the Commission has found reasonable cause to believe a violation of section 433 and section 434 have been committed and has found reason to believe a violation of section 441a has been committed. It is recommended that the Commission find reasonable cause to believe a violation of 2 U.S.C. section 441a has been committed and the attached letter be sent to Mr. Anderson, Executive Director of the Service Station Dealers PAC.

WILLIAM C. OLDAKER
GENERAL COUNSEL

DATE: 7/15/77

7 6 0 4 0 1 4 1 5 1

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: In response please refer to MUR 409

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. section 433 and section 434. It appears that the Service Station Dealers PAC has also exceeded the contribution limitations set forth in 2 U.S.C. section 441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

As of this date, we have received no response from you. Your failure to respond gives the Commission reasonable cause to believe you have violated 2 U.S.C. section 441a.

Should you fail to correct this matter within thirty(30) days of receipt of this letter, the Commission will prepare to seek imposition of civil penalties.

If you have any question, please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

7 8 0 4 0 1 4 5 2

FEDERAL ELECTION COMMISSION

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

June 28, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

Re: In Reply please refer to MUR 409

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. §433 and §434.

A review of our records indicates that the Service Station Dealers PAC has contributed $10,000 to the Green for Senate Committee, a committee supporting a candidate for federal office. As defined by 2 U.S.C. §431(d), the Service Station Dealers PAC is a political committee and therefore has exceeded the contribution limitation set forth in 2 U.S.C. §441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

Your $10,000 contribution to the Green for Senate Committee gives the Commission reason to believe you have violated 2 U.S.C. §441a. As you are aware, the Commission has previously found reasonable cause to believe a violation has been committed of 2 U.S.C. §433 and §434.

The Commission would appreciate a response from you concerning this matter within 10 days of receipt of this letter.

If you have any questions please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

5/04/77

MEMORANDUM CONCERNING SERVICE STATION DEALERS PAC

From: Bruce Shelton

Mr. Thomas Anderson from the Service Station Dealers Political Action Committee was contacted today concerning the committee's failure to respond to three (3) separate Surface Violation letters requesting the Committee to register with the FEC. Our records indicate the committee has received atleast two of the three letters; the most recent being sent on March 23, 1977.

Mr. Anderson did not offer an explanation why he failed to respond to our requests, but he did state that he thought the Service Station Dealers PAC was registered with the FEC because a Form 1 was on file with the Commission. While the FEC records fail to confirm that statement, Mr. Anderson said he had filed a statement in early 1976 which was "returned" to him so that he might provide information which was missing from the statement (this is not a practice which is followed in the Disclosure Division). After completing the necessary information, the Form 1 was returned to the Commission and since there was no further communication with the FEC, Mr. Anderson assumed the registration process was complete.

In discussing the "contributions" to Green for Senate, Mr. Anderson said his committee made no contribution to Green but had merely sponsored an event. However, further questioning revealed the PAC had sponsored the fundraiser to the extent that they made the necessary arrangements concerning reservations, ticket printing and sales, depositing of funds in the PAC account, payment of expenses and ultimate transfer via PAC check to the Green for Senate Committee.

I informed Mr. Anderson that as defined by the Act, the transfers he made were considered to be contributions to a federal candidate and the committee should register with the FEC; filing reports which disclose the activity of the Committee as necessary.

Later in the day, Mr. Anderson was again contacted by phone and questioned as to how one fundraiser in April could result in three (3) separate transfers; the second occuring in August and the third in September. He responded by indicating that there was now actually <u>two</u> (2) fundraisers.

Based on the failure to respond to the Surface Violation letters and the resulting information to todays conversation, Mr. Anderson has been less than forthcoming in disclosing the activity of the Service Station Dealers PAC.

Addendum on 5/25/77: Mr. Anderson made an appointment on 5/13/77 to discuss the problems outlined above but failed to keep that appointment or contact the Commission since that date.

Schedule A
...Election Commission
...Street, N.W.
...ington, D.C. 20463

Itemized Receipts, Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

(see instructions on back)

Page 1 of 10 for LINE NUMBER: 15

(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full

Green for Senate Committee

Full Name, mailing address and ZIP code	Principal place of business	Occupation / Check if Contributor is self-employed / Aggregate Year-to-Date	Date (month, day, year)	Amount of receipt
Machinists Non-Partisan Political League 1300 Conn. Ave., N.W. Washington, D.C. 20036	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ 5,000	2/20/76	$5,00
American Express Officers Committee for Responsible Government 1701 K St., N.W. Suite 205 Washington, D.C. 20006	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ $200	3/4/76	$200.
Savings Association Political Election Committee P.O. Box 5601 Washington, D.C. 20016	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ $1,000.	3/4/76	$1,00
Laborers' Political League 905 16th St., N.W. Washington, D.C. 20006	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ $3,000.	3/10/76	$1,00
Service Station Dealers Political Action Committee #1 Decker Sq., Suite #17 Bala Cynwyd, Pa. 19004	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ 400	3/10/76 3/25/76	$300. $100.
Seafarers Political Activity Donation 675 Fourth Ave. Brooklyn, N.Y. 11232	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ..... ▷ $ (illegible)	3/12/76	$2,00

Subtotal this page (optional) ..... ▷ $ 0.

Contributions, Loans, and Transfers for Lines Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

(Use separate schedule(s) for each numbered line)

Committee ID No. 20431

Candidate or Committee in full

Green for Senate Committee

Name, mailing address and ZIP code / Place of business / Occupation	Date (month, day, year)	Amount of each receipt this period
Sheet Metal Workers League for Political Education 4010 Levick St., Phila. Pa. 19135 Place of business: Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-Date ▷ $ 25	4/22/76	$25.
I.L.G.W.U. Campaign Committee 1710 Broadway New York, N.Y. 10019 Place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ 2500	4/22/76	$2,500.
Railway Clerks Political Leigue 6300 River Rd. Roseront Ill. 60018 Place of business n/a Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ 1000	4/23/76	$1000.
Carpenters' Legislative Improvement Committee 101 Constitution Ave. N.W. Washington D.C. 20001 Place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ 500	4/23/76	$500.
Teamsters Local No. 115 Political Action Fund 2833 Cottman Ave. Phila., Pa. 19149 Place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ 250	4/24/76	$250.
S.S.D.P.A.C. (Service Station Dealers) One Decker Square Bala Cynwyd, Pa. 19004 Place of business Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ [illegible]	4/24/76	$4,6[illegible]

Total receipts this page (optional) ▷ $ [illegible]

Page [illegible] (next page this type number only) ▷ [illegible]

Numbers 15, 16, and/or 18 of FEC Form 3

CHECK FOR SENATE COMMITTEES

Columbia County Democratic Committee P.O. Box 351 Bloomsburg, Pa. 17815		8-6-76	200.00
	Occupation Amount Year-to-Date $ 200.00		
Stephen R. Wojdak, Senatorial Campaign Funding Committee 7967 Castor Ave. Phila., Pa.		8-6-76	200.00
	Occupation Amount Year-to-Date $ 200.00		
Service Station Dealers Political Action Committee 21 Decker Sq. Belle Chasse, Pa.		8-6-76	1000.00
	Occupation Amount Year-to-Date $ 6000.00		
National Committee for an Effective Congress 10 E. 39th St. New York, N.Y. 10016		8-9-76	4,500.00
	Occupation Amount Year-to-Date $ 4500.		
Attorneys Congressional Campaign Trust 1155 15th St., N.W., Suite 410 Wash., D.C. 20005		8-10-76	2,500.00
	Occupation Amount Year-to-Date $ 2500.00		
M.L. Executives Voluntary Nonpartisan Political Fund 1221 Avenue of the Americas New York, N.Y. 10036		8-16-76	25.00
	Occupation Amount Year-to-Date $ 25.00		
(c) receipts this page (last page this line number only)			$ 8135.00
(d) total (last page this line number only)			$

Numbers 15, 15 ... ued/or 16 of FEC Form 3

Candidate or Committee (Last)

GREEN FOR SENATE COMMITTEE

Name, mailing address and ZIP code	Date (month, day, year)	Amount of each transaction
N.M. & P. Pensioners Action Fund 150 Broadway, Suite 902 New York, N.Y. 10038	9-11-76	5000.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 5 Cccp		
Public Affairs Comm. of Savings Associations P.O. Box 797 Harrisburg, Pa. 17108	9-15-76	200.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 900.00		
Podiatry Political Action Comm. 20 Chevy Chase Circle. Wash., D.C. 20015	9-15-76	500.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 500.00		
Service Station Dealers Political Action Com. 2 Docker Sq. Bala-Cynwyd, Pa	9-16-76	4000.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 10,000.00		
Political & Educational Fund of the Building & Construction (refunded) Trades Dept. 815 16th St., N.W. Pn. 603, Wash. D.C. 20006	9-17-76	1000.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 1000.00		
Democratic Senatorial Campaign Comm. Rm 130, Senate-Office Bldg. Wash., D.C.	9-21-76	2000.00
Principal place of business: — Occupation: — Check if Contribution is refund: — Aggregate Year-to-Date: ▷$ 11000.00		
Total of receipts this page (optional) ▷		= 12,700
Total this period (last page this line number only) ▷		=

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 23, 1977

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Re: In reply please refer to:
2SV3/77-20

Dear Treasurer:

You have been notified twice that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

As of this date, we have received no response from you. Your failure to respond gives the Commission reasonable cause to believe that you may have committed violation of the Act. Should you fail to correct this matter within thirty (30) days of receipt of this letter, this matter will be turned over to our office of General Counsel for appropriate statutory action.

Sincerely,

Thomas E. Harris

Commissioner

Certified:
Return Receipt Requested

7904011459

Service Station Dealers Political
Action Committee
2 Bala Cynwyd Square
Bala Cynwyd, Pennsylvania

December 16, 1976

Dear Treasurer:

On November 12, 1976, you were notified that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of sections 433 and 434.

This Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Nancy Davis (202/382-3494) our reports analyst assigned to you.

Sincerely,

7904011460

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☑ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢

ARTICLE ADDRESSED TO: 4503/22-20
Service Station Dealers
ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 939025 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY 3/24/77 | POSTMARK

ADDRESS (Complete only if requested)
2-417 1 B.C. Pl'd Pd. 19004
Bala Cynwyd

CLERK'S INITIALS

UNABLE TO DELIVER BECAUSE:

☆ GPO: 1976-O-204-430

In reply please refer to MUR0026MD

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

Due 11/27
12/8 (D)

12 NOV 1975

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Dear Sir:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. 2 U.S.C. 431(d) defines a "political committee" to mean any committee, club, association or other group of persons which receives contributions or makes expenditures in excess of $1,000 during a calendar year for the purpose of influencing a Federal Election. Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures".

Furthermore, 2 U.S.C. 441 precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for Federal office in excess of $1,000 per election. The Act defines a multicandidate committee as one which has been registered with the Commission for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

Our review of the receipts reported by a candidate committee indicates that your organization may have made a contribution in excess of $1,000 to a committee supporting a candidate for Federal office. Therefore, it would appear that your organization qualifies as a "political committee" under the Act, subject to registration and reporting requirements as prescribed by 2 U.S.C. 433 and 434, and may also have exceeded the limit noted above.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. If, in addition, you find that the contribution made by your organization was in excess of the limits set forth in the Act, the Commisssion recommends that you notify the recipient and request a refund of the amount in excess of $1,000. This return should be reported immediately by letter and should be reflected on your next report of receipts and expenditures.

7 9 0 4 0 1 4 1 4 6 1

receipts and expenditures.

If you believe that your organization is not a political committee or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter.

If you have any questions concerning the above, please do not hesitate to contact _____ (202/382-3484), our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter
Staff Director

Enclosures
Return Receipt Requested: Certified

7900401411462

RUDOLPH, PALITZ AND COMPANY
CERTIFIED PUBLIC ACCOUNTANTS
1845 WALNUT STREET
PHILADELPHIA, PA. 19103
215 - 564-1125

LOUIS RUDOLPH, C.P.A.
1948 - 1971

77 FEB 14 AM 11:42

February 7, 1977

770502

Commissioner Thomas E. Harris
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Re: Green for Senate Committee No. C00033522
Your No. RAD 0099 ND

Dear Commissioner Harris:

Please excuse our delay in responding to your January 12, 1977 letter to us regarding contributions received from Plumbers Union Local #609 and Service Station Dealers Political Action Committee.

Plumbers Union Local #609

We have been advised by Attorney Robert Kelly that the contribution received is an acceptable contribution as it was a transfer from the National Union's registered Political Action Committee to the Local Union for the Green for Senate Committee. We have been further advised by Attorney Kelly that the contribution was not made from Plumbers' Union Local #609 funds. If any wrong has been committed, it is that the original contributor was not properly identified. If your office advises, we will file an amended report.

Service Station Dealers Political Action Committee

We have been advised by Thomas Anderson, Executive Director, and Norman Zarwin, attorney for the Service Station Dealers Political Action Committee, of the following:

1. The Service Station Dealers PAC is registered with the FEC and is permitted to make contributions in the amount made to the Green for Senate Committee.

2. Tickets were sold for a "fund raising dinner" on or about April 15, 1976, at which time William Green was the speaker. The excess of the revenues over the expenses of the dinner were contributed to the Green for Senate Committee. No single person purchased more than four (4) tickets at $25 each for the dinner.

NEIL GODICK

If any wrong has been committed, it is that the original contributor was not properly recorded as an "event" on line 15(b) and 15(c) on FEC Form 3. If your office advises, we will file an amended report.

Sincerely,

Neil B. Godick
Assistant Treasurer

NBG:ys
CC: Dr. Timothy Michals
Gregory Harvey, Esq.

7 9 0 4 0 1 4 1 4 6 1

FEDERAL ELECTION COMMISSION

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

June 28, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Re: In Reply please refer to MUR 409

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. §433 and §434.

A review of our records indicates that the Service Station Dealers PAC has contributed $10,000 to the Green for Senate Committee, a committee supporting a candidate for federal office. As defined by 2 U.S.C. §431(d), the Service Station Dealers PAC is a political committee and therefore has exceeded the contribution limitation set forth in 2 U.S.C. §441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

Your $10,000 contribution to the Green for Senate Committee gives the Commission reason to believe you have violated 2 U.S.C. §441a. As you are aware, the Commission has previously found reasonable cause to believe a violation has been committed of 2 U.S.C. §433 and §434.

The Commission would appreciate a response from you concerning this matter within 10 days of receipt of this letter.

If you have any questions please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

2 9 0 4 0 1 4 1 4 6 5

409

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Thomas Anderson
Exec. Director
Service Station Dealers
Bal Cynwyd, Pa

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943499	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Kathleen Smith

4. DATE OF DELIVERY 6/30/77 POSTMARK

5. ADDRESS (Complete only if requested)
Suite 417 / B.C. Plaza
Bala-Cynwyd, Pa. 19004

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1975—O-203-465

7 9 0 1 0 1 4 1 4 6 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Service Station Dealers PAC) MUR 409 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 23, 1977, the Commission adopted the recommendation of the General Counsel to find reason to believe a violation of 2 U.S.C. Section 441a has been committed in the above-captioned matter.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7904041467

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 24, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE EMMONS mwe

RE: MUR 409 (77)

At 1:00 p.m. on June 22, 1977, the General Counsel's report on the above-named matter was transmitted to the Commissioners. As of 4 :00 p.m. on June 24, 1977, no objections have been received to the recommendations in the report.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 22, 1977

MEMORANDUM TO: Marge Emmons

FROM: William Oldaker

SUBJECT: MURs 383 (77) and 409 (77)

Please have the attached General Counsel Reports on MUR 383 and MUR 409 distributed to the Commission on a 24-hour no-objection basis.

Thank you.

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 8 0 4 0 1 4 1 5 9

FEDERAL ELECTION COMMISSION
Washington, D. C.

48 HOUR GENERAL COUNSEL REPORT

MUR NO. 409

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION

DATE COMPLAINT RECEIVED BY OGC 5/29/77

ATTORNEY CALLAHAN

Complainant's Name: INTERNAL REFERAL FROM DISCLOSURE DIVISION

Respondent's Name: SERVICE STATION DEALERS PAC

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Relevant Statute: §433, §434, §441

Internal Reports Checked: Green for Senate Committee Federal Agencies Checked N/A

SUMMARY OF ALLEGATION

A review of our records indicates that the Service Station Dealers Political Action Committee has contributed $10,000 to the Green for Senate Committee, a committee supporting a candidate for federal office; therefore, subjecting said committee to the registration and reporting requirements
(Continued on next page)

PRELIMINARY LEGAL ANALYSIS

The Service Station Dealers PAC has failed to register with the Commission as required by 2 U.S.C. §433 and has failed to file disclosure statements as required by 2 U.S.C. §434. As defined by 2 U.S.C. §431(d), the Service Station Dealers PAC is a political committee; and therefore, has exceeded the contribution limitations set forth in 2 U.S.C.§441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions
(Continued on next page)

RECOMMENDATION

The Service Station Dealers PAC has previously been notified that the Commission has found reasonable cause to believe a violation of §433 and §434 have been committed. It is recommended that the Commission find reason to believe a violation of §441a has been committed as well, and the

Date of Next Commission Review:

SUMMARY OF ALLEGATION

set forth by 2 U.S.C. §433 and §434 as well as the contribution limitations set forth in §441a. The Disclosure Division sent the Service Station Dealers PAC a reason to believe letter on December 16, 1976 and a reasonable cause to believe letter on March 23, 1977 concerning their failure to register with the Commission and their failure to file disclosure statements.

Communications with Mr. Thomas Anderson, Executive Director of the PAC, have been unsuccessful in obtaining disclosure of financial activity. Mr. Anderson failed to keep an appointment with the Disclosure staff on May 13, 1977 to discuss this matter. (see attached memo from Bruce Shelton-reports analyst).

PRELIMINARY LEGAL ANALYSIS

to a candidate for Federal office in excess of $1,000 per election.

RECOMMENDATION cont.

attached letter be sent to Mr. Anderson, Executive Director of the Service Station Dealers PAC.

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa.

Re: In Reply please refer to MUR 409

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers PAC has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. §433 and §434.

A review of our records indicates that the Service Station Dealers PAC has contributed $10,000 to the Green for Senate Committee, a committee supporting a candidate for federal office. As defined by 2 U.S.C. §431(d), the Service Station Dealers PAC is a political committee and therefore has exceeded the contribution limitation set forth in 2 U.S.C. §441a which precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for federal office in excess of $1,000 per election.

Your $10,000 contribution to the Green for Senate Committee gives the Commission reason to believe you have violated 2 U.S.C. §441a. As you are aware, the Commission has previously found reasonable cause to believe a violation has been committed of 2 U.S.C. §433 and §434.

The Commission would appreciate a response from you concerning this matter within 10 days of receipt of this letter.

If you have any questions please do not hesitate to contact me. The staff member assigned to this case is Suzanne Callahan (telephone no. 523-4166).

Sincerely,

William C. Oldaker
General Counsel

7 9 0 4 0 1 4 1 4 7 2

5/04/77

MEMORANDUM CONCERNING SERVICE STATION DEALERS PAC

From: Bruce Shelton

Mr. Thomas Anderson from the Service Station Dealers Political Action Committee was contacted today concerning the committee's failure to respond to three (3) separate Surface Violation letters requesting the Committee to register with the FEC. Our records indicate the committee has received atleast two of the three letters; the most recent being sent on March 23, 1977.

Mr. Anderson did not offer an explanation why he failed to respond to our requests, but he did state that he thought the Service Station Dealers PAC was registered with the FEC because a Form 1 was on file with the Commission. While the FEC records fail to confirm that statement, Mr. Anderson said he had filed a statement in early 1976 which was "returned" to him so that he might provide information which was missing from the statement (this is not a practice which is followed in the Disclosure Division). After completing the necessary information, the Form 1 was returned to the Commission and since there was no further communication with the FEC, Mr. Anderson assumed the registration process was complete.

In discussing the "contributions" to Green for Senate, Mr. Anderson said his committee made no contribution to Green but had merely sponsored an event. However, further questioning revealed the PAC had sponsored the fundraiser to the extent that they made the necessary arrangements concerning reservations, ticket printing and sales, depositing of funds in the PAC account, payment of expenses and ultimate transfer via PAC check to the Green for Senate Committee.

I informed Mr. Anderson that as defined by the Act, the transfers he made were considered to be contributions to a federal candidate and the committee should register with the FEC; filing reports which disclose the activity of the Committee as necessary.

Later in the day, Mr. Anderson was again contacted by phone and questioned as to how one fundraiser in April could result in three (3) separate transfers; the second occuring in August and the third in September. He responded by indicating that there was now actually <u>two</u> (2) fundraisers.

Based on the failure to respond to the Surface Violation letters and the resulting information to todays conversation, Mr. Anderson has been less than forthcoming in disclosing the activity of the Service Station Dealers PAC.

Addendum on 5/25/77: Mr. Anderson made an appointment on 5/13/77 to discuss the problems outlined above but failed to keep that appointment or contact the Commission since that date.

7804041473

Schedule A
May 1976
Federal Election Commission
K Street, N.W.
Washington, D.C. 20463

Itemized Receipts, Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See Instructions on back)

Page 1 of 10 for
LINE NUMBER 16 B
(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full

Green for Senate Committee

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Full Name, mailing address and ZIP code	Principal place of business	Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of receipt this
Machinists Non-Partisan Political League 1300 Conn. Ave., N.W. Washington, D.C. 20036	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-Date ▷ $ 5,000	2/20/76	$5,000
American Express Officers Committee for Responsible Government 1701 K St., N.W. Suite 205 Washington, D.C. 20006	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ $200	3/4/76	$200.
Savings Association Political Election Committee P.O. Box 5601 Washington, D.C. 20016	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ $1,000.	3/4/76	$1,000
Laborers' Political League 905 16th St., N.W. Washington, D.C. 20006	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ $1,000.	3/10/76	$1,000
Service Station Dealers Political Action Committee 91 Decker Sq., Suite 417 Bala Cynwyd, Pa. 19004	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ 400	3/19/76 3/25/76	$300. $100.
Seafarers Political Activity Donation 675 Fourth Ave. Brooklyn, N.Y. 11232	n/a	☐ Check if Contributor is self-employed Aggregate Year-to-date ▷ $ [illegible]	3/11/76	$2,000

Subtotal of receipts this page (optional) ▷ $ 9,600

Rebates and Transfers for Line Numbers 15, 16 1. and/or 16 of FEC Form 3

(See instructions on back)

Full Name of Candidate or Committee (in full)

GREEN FOR SENATE COMMITTEE

Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
N.M. & P. Pensioners Action Fund 150 Broadway, Suite 902 New York, N.Y. 10038	9-11-76	5000.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 5000.00		
Public Affairs Comm. of Savings Associations P.O. Box 797 Harrisburg, Pa. 17108	9-15-76	200.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 900.00		
Podiatry Political Action Comm. 20 Chevy Chase Circle. Wash., D.C. 20015	9-15-76	500.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 500.00		
Service Station Dealers Political Action Comm. 2 Decker Sq. Bala-Cynwyd, Pa.	9-16-76	4000.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 10,000.00		
Political & Educational Fund of the Building & Construction Trades Dept. 815 16th St., N.W. Rm. 603, Wash. D.C. 20006 (refunded)	9-17-76	1000.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 1000.00		
Democratic Senatorial Campaign Comm. Rm 130, Senate Office Bldg. Wash., D.C.	9-21-76	2000.00
Full name of business: — Occupation: — Check if Contribution is refunded: — Aggregate Year-to-Date: $ 11000.00		
Subtotal of receipts this page (optional)		$ 12,700
Total to date (last page this line number only)		$

Rebates, and Transfers for Line Numbers 15, 16, 17, and/or 18 of FEC Form

(see instructions on back)

Use separate schedule(s) for each category line.

Full Name of Committee

GREEN FOR SENATE COMMITTEE

Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Columbia County Democratic Committee P.O. Box 351 Bloomsburg, Pa. 17815	8-6-76	200.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 200.00		
Stephen R. Wojdak, Senatorial Campaign Funding Committee 7967 Castor Ave. Phila., Pa.	8-6-76	200.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 200.00		
Service Station Dealers Political Action Committee 8 Decker Sq. Yale Cynwyd, Pa.	8-6-76	1000.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 6000.00		
National Committee for an Effective Congress 10 E. 39th St. New York, N.Y. 10016	8-9-76	4,500.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 4500.		
Attorneys Congressional Campaign Trust 1155 15th St., N.W., Suite 410 Wash., D.C. 20005	8-10-76	2,500.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 2500.00		
N.L. Executives Voluntary Nonpartisan Political Fund 1221 Avenue of the Americas New York, N.Y. 10036	8-16-76	25.00
Type of business: — Occupation: — Check if Committee is multicandidate: — Aggregate Year-to-Date: > $ 25.00		
Total receipts this page (optional) ..... >		$ 8125.00
This period (last page this line number only) ..... >		$

Page

Commission
W.
20463

Itemized Receipts, Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

Page 3 of 6 for

LINE NUMBER 18(b)

(Use separate schedule(s) for each numbered line).

Candidate or Committee in full

Green for Senate Committee

Name, mailing address and ZIP code	Principal place of business	Occupation / Check if Contributor is self-employed / Aggregate Year-to-Date	Date (month, day, year)	Amount of each receipt this period
Sheet Metal Workers League for Political Education 4010 Levick St., Phila. Pa. 19135		Aggregate Year-to-Date ▷ $ 25	4/22/76	$25.
I.L.G.W.U. Campaign Committee 1710 Broadway New York, N.Y. 10019		Aggregate Year-to-date ▷ $ 2500	4/22/76	$2,500.
Railway Clerks Political Leigue 6300 River Rd. Rosemont Ill. 60018	n/a	Aggregate Year-to-date ▷ $ 1000	4/23/76	$1000.
Carpenters' Legislative Improvement Committee	101 Constitution Ave. N.W. Washington D.C. 20001	Aggregate Year-to-date ▷ $ 500	4/23/76	$500.
Teamsters Local No. 115 Political Action Fund 2833 Cottman Ave. Phila., Pa. 19149		Aggregate Year-to-date ▷ $ 250.	4/24/76	$250.
S.S.D.P.A.C. (Service Station Dealers) One Decker Square Bala Cynwyd, Pa. 19004		Aggregate Year-to-date ▷ $ 5000	4/24/76	$4,600.

Total of receipts this page (optional) ▷ $ 8375

Total this period (first page this line number only) ▷ $

4/25

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 23, 1977

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Re: In reply please refer to:
2SV3/77-20

Dear Treasurer:

You have been notified twice that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

As of this date, we have received no response from you. Your failure to respond gives the Commission reasonable cause to believe that you may have committed violation of the Act. Should you fail to correct this matter within thirty (30) days of receipt of this letter, this matter will be turned over to our office of General Counsel for appropriate statutory action.

Sincerely,

Thomas E. Harris

Commissioner

Certified:
Return Receipt Requested

7904014178

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

December 16, 1976

Dear Treasurer:

On November 12, 1976, you were notified that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of sections 433 and 434.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Nancy Davis (202/382-3494) our reports analyst assigned to you.

Sincerely,

[signature]

7 8 0 4 0 1 1 4 7 9

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY. Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO: 2503/77-20 Service Station Dealers

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 93905 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
[signature]

4. DATE OF DELIVERY 3/28/77 | POSTMARK

5. ADDRESS (Complete only if requested) C-417 1 B.C. Pl 2d Bdl-Cynwyd Pa. 19004

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆ GPO: 1976-O-203-456

In reply please refer to RAD0096ND

FEDERAL ELECTION COMMISSION

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

Due 11/27
12/8 ND

12 NOV 1976

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Dear Sir:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. 2 U.S.C. 431(d) defines a "political committee" to mean any committee, club, association or other group of persons which receives contributions or makes expenditures in excess of $1,000 during a calendar year for the purpose of influencing a Federal Election. Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures".

Furthermore, 2 U.S.C. 441 precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for Federal office in excess of $1,000 per election. The Act defines a multicandidate committee as one which has been registered with the Commission for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

Our review of the receipts reported by a candidate committee indicates that your organization may have made a contribution in excess of $1,000 to a committee supporting a candidate for Federal office. Therefore, it would appear that your organization qualifies as a "political committee" under the Act, subject to registration and reporting requirements as prescribed by 2 U.S.C. 433 and 434, and may also have exceeded the limit noted above.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. If, in addition, you find that the contribution made by your organization was in excess of the limits set forth in the Act, the Commisssion recommends that you notify the recipient and request a refund of the amount in excess of $1,000. This return should be reported immediately by letter and should be reflected on your next report of receipts and expenditures.

2604011460

receipts and expenditures.

If you believe that your organization is not a political committee or that the Commission is otherwise in error, please submit a statement within ten days which would clarify this matter.

If you have any questions concerning the above, please do not hesitate to contact _____ (202/382-3484), our Reports Analyst assigned to you.

Sincerely,

Orlando B. Potter
Staff Director

Enclosures
Return Receipt Requested: Certified

7 9 0 4 0 1 1 4 0 1

RUDOLPH, PALITZ AND COMPANY
CERTIFIED PUBLIC ACCOUNTANTS
1845 WALNUT STREET
PHILADELPHIA, PA. 19103
215 • 564-1125

LOUIS RUDOLPH, C.P.A.
1949 • 1974

11 FEB 1977

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 FEB 14 AM 11:42

February 7, 1977

770502

Commissioner Thomas E. Harris
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Re: Green for Senate Committee No. C00033522
Your No. RAD 0099 ND

Dear Commissioner Harris:

Please excuse our delay in responding to your January 12, 1977 letter to us regarding contributions received from Plumbers Union Local #609 and Service Station Dealers Political Action Committee.

Plumbers Union Local #609

We have been advised by Attorney Robert Kelly that the contribution received is an acceptable contribution as it was a transfer from the National Union's registered Political Action Committee to the Local Union for the Green for Senate Committee. We have been further advised by Attorney Kelly that the contribution was not made from Plumbers' Union Local #609 funds. If any wrong has been committed, it is that the original contributor was not properly identified. If your office advises, we will file an amended report.

Service Station Dealers Political Action Committee

We have been advised by Thomas Anderson, Executive Director, and Norman Zarwin, attorney for the Service Station Dealers Political Action Committee, of the following:

1. The Service Station Dealers PAC is registered with the FEC and is permitted to make contributions in the amount made to the Green for Senate Committee.

2. Tickets were sold for a "fund raising dinner" on or about April 15, 1976, at which time William Green was the speaker. The excess of the revenues over the expenses of the dinner were contributed to the Green for Senate Committee. No single person purchased more than four (4) tickets at $25 each for the dinner.

NEIL GODICK

If any wrong has been committed, it is that the original contributor was not properly recorded as an "event" on line 15(b) and 15(c) on FEC Form 3. If your office advises, we will file an amended report.

Sincerely,

Neil B. Godick
Assistant Treasurer

NBG:ys
CC: Dr. Timothy Michals
Gregory Harvey, Esq.

7904011483

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

7 June 1977

MEMORANDUM TO: COMMISSIONERS

THROUGH: WILLIAM OLDAKER

FROM: SUZANNE CALLAHAN

SUBJECT: EM013

The General Counsel has recommended that EM 013 be designated as MUR 409 to be discussed at the Commission meeting on June 9, 1977.

1976 0401

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS mwe

SUBJECT: EM 013

The above-mentioned document was transmitted to the Commissioners on June 6, 1977 at 12:00.

Commissioner Aikens submitted an objection as 1:30, June 6, 1977.

EM 013 has been placed on the Compliance Agenda for June 9, 1977.

7801141 85

June 6, 1977

MEMORANDUM TO: Marge Emmons

FROM: Charles N. Steele

SUBJECT: EM 013

Would you please distribute the attached to the Commission on a 24 hour no-objection basis.

Attachment

pwb 6/6/77

cc: Kurt
cc: team secretaries

Sanitized Copy Approved for Release 2010/08/17 : CIA-RDP80M00165A000600010001-0

DATE AND TIME OF TRANSMITTAL: _____

NO. ~~EM 013~~ MUR 409

REC'D: May 31, 1977

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: ~~Internal Referral from Disclosure Division~~

Respondent's Name: Service Station Dealers PAC

Relevant Statute: 2 U.S.C. §433 and §434

Internal Reports Checked: Green for Senate Committee

Federal Agencies Checked: N/A

SUMMARY OF ALLEGATION

The Service Station Dealers PAC has contributed $10,000 to the Green for Senate Committee; however, this committee is not registered with the Commission nor have they filed financial reports as required by 2 U.S.C. §433 and §434. The Disclosure Division has found reasonable cause to believe a violation has been committed.

Communications with Mr. Thomas Anderson, Executive Director of the PAC, have been unsuccessful in obtaining disclosure of financial activity

PRELIMINARY LEGAL ANALYSIS

The Service Station Dealers PAC has failed to register with the Commission as required by 2 U.S.C. §433 and has failed to file disclosure statements as required by 2 U.S.C. §434a.

RECOMMENDATION

It is recommended that the attached letter be sent to The Service Station Dealers PAC before further action is taken.

from the Service Station Dealers PAC. Mr. Anderson failed to keep an appointment with the Disclosure staff on May 13th to discuss this matter. All written correspondence from the Commission to the Service Station Dealers PAC have been received by the committee. (See attached memo from Bruce Shelton-reports analyst).

7 9 0 4 0 1 4 1 4 6

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

Mr. Thomas Anderson
Executive Director
Service Station Dealers PAC
2 Decker Square
Bala Cynwyd, Pa

Re: In Reply Please Refer to
EM #013

Dear Mr. Anderson:

You have been notified on several occasions that the Service Station Dealers Political Action Committee has neither registered with the Commission nor filed appropriate financial statements as required by 2 U.S.C. §433 and §434. Each political committee must file a statement of organization "10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of $1,000."

A review of our records indicates that the Service Station Dealers PAC has contributed in excess of $1,000 to the Green for Senate Committee, a committee supporting a candidate for federal office; therefore, subjecting said committee to the registration and reporting requirements set forth by 2 U.S.C. §433 and §434.

This matter has been received by the Office of General Counsel for appropriate statutory action. The Commission does not intend to take civil action to seek imposition of penalties until you have had a reasonable opportunity to correct this matter by voluntary conciliation. You have until June 18, 1977 to respond to this request before any further action will be taken.

Please feel free to contact me if you have any further questions. The staff member assigned to this matter is Suzanne Callahan (telephone no. 202/523-4166).

Sincerely yours,

William C. Oldaker
General Counsel

7904011480

EMH013

MEMORANDUM

Date: May 25, 1977

To: ~~Charlie~~ Steele, OGC

Through: Lois Zella

From: Bruce Shelton

Subject: RCTB - No response

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

1st letter mailed 11/12/76	Certified receipt received No response
2nd letter mailed 12/16/76	No response
3rd letter mailed 3/23/77	Certified receipt received No response

As required in the Memorandum of Understanding for Reporting Violations dated June 7, 1976, the Disclosure Division's Non-Party Team has completed the necessary steps for obtaining voluntary compliance from the SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE (see attached written documentation). Our attempts have proven unsuccessful, therefore, the attached referral is being forwarded to your office for followup action.

If any responses or communications are received from this committee, you will be notified immediately. Should your office make any requests from this committee or establish new guidlines, please let us know in order for us to monitor any communication/response which may be forthcoming from the committee and to avoid placing this document on the public record.

7004141460

5/04/77

MEMORANDUM CONCERNING SERVICE STATION DEALERS PAC

From: Bruce Shelton

Mr. Thomas Anderson from the Service Station Dealers Political Action Committee was contacted today concerning the committee's failure to respond to three (3) separate Surface Violation letters requesting the Committee to register with the FEC. Our records indicate the committee has received atleast two of the three letters; the most recent being sent on March 23, 1977.

Mr. Anderson did not offer an explanation why he failed to respond to our requests, but he did state that he thought the Service Station Dealers PAC was registered with the FEC because a Form 1 was on file with the Commission. While the FEC records fail to confirm that statement, Mr. Anderson said he had filed a statement in early 1976 which was "returned" to him so that he might provide information which was missing from the statement (this is not a practice which is followed in the Disclosure Division). After completing the necessary information, the Form 1 was returned to the Commission and since there was no further communication with the FEC, Mr. Anderson assumed the registration process was complete.

In discussing the "contributions" to Green for Senate, Mr. Anderson said his committee made no contribution to Green but had merely sponsored an event. However, further questioning revealed the PAC had sponsored the fundraiser to the extent that they made the necessary arrangements concerning reservations, ticket printing and sales, depositing of funds in the PAC account, payment of expenses and ultimate transfer via PAC check to the Green for Senate Committee.

I informed Mr. Anderson that as defined by the Act, the transfers he made were considered to be contributions to a federal candidate and the committee should register with the FEC; filing reports which disclose the activity of the Committee as necessary.

Later in the day, Mr. Anderson was again contacted by phone and questioned as to how one fundraiser in April could result in three (3) separate transfers; the second occuring in August and the third in September. He responded by indicating that there was now actually <u>two</u> (2) fundraisers.

Based on the failure to respond to the Surface Violation letters and the resulting information to todays conversation, Mr. Anderson has been less than forthcoming in disclosing the activity of the Service Station Dealers PAC.

Addendum on 5/25/77: Mr. Anderson made an appointment on 5/13/77 to discuss the problems outlined above but failed to keep that appointment or contact the Commission since that date.

7604141491

4/25

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 23, 1977

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Re: In reply please refer to:
2SV3/77-20

Dear Treasurer:

You have been notified twice that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

As of this date, we have received no response from you. Your failure to respond gives the Commission reasonable cause to believe that you may have committed violation of the Act. Should you fail to correct this matter within thirty (30) days of receipt of this letter, this matter will be turned over to our office of General Counsel for appropriate statutory action.

Sincerely,

Thomas E. Harris

Commissioner

Certified:
Return Receipt Requested

7604014196

In reply please refer to RAD0096ND

dve 1/3

FEDERAL ELECTION COMMISSION
325 K STREET N.W.
WASHINGTON, D.C. 20463

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

December 16, 1976

Dear Treasurer:

On November 12, 1976, you were notified that you may have made contributions to a political committee which raised problems under sections 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

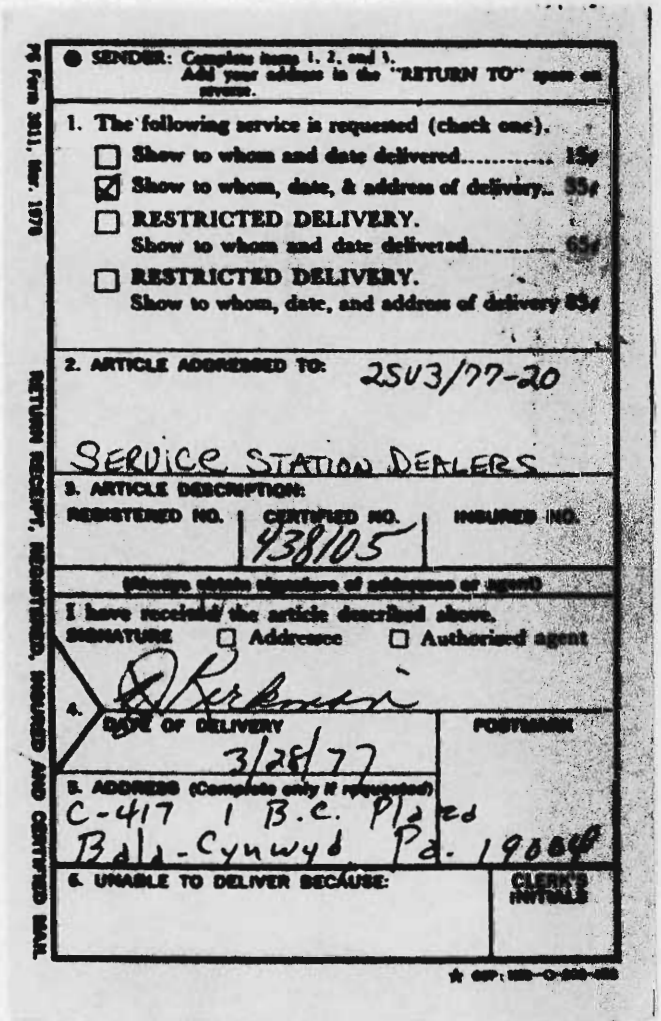
As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of sections 433 and 434.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter and demonstrate why no action should be taken against you. This response should be mailed to the Commission within ten (10) days of receipt of this letter. If you have any questions, please do not hesitate to contact Nancy Davis (202/382-3484) our reports analyst assigned to you.

Sincerely,

Commissioner

7604014493



PS Form 3811, Mar. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO: 2503/77-20

SERVICE STATION DEALERS

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	938105	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY: 3/28/77

POSTMARK

5. ADDRESS (Complete only if requested)
C-417 1 B.C. Plaza
Bala-Cynwyd Pa. 19004

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★ GPO: 1978-O-263-488

7960401414

TRANSMITTALS TO WORD PROCESSING

2nd Notice, Surface Violations

No Response

Appendix XII(NR)

Non-registered Committee

TO: _____
(full name of treasurer)

Service Station Dealers Political Action Committee
(full name of committee)

2 Decker Square
(address)

Bala Cynwyd, Pennsylvania
(city, state, zip)

DATE FIRST LETTER WAS SENT: November 12, 1976

NAME OF ANALYST HANDLING THE VIOLATION: Nancy Davis

IN REPLY PLEASE REFER TO RAD PAD0096ND

CODED BY RJE/D

DATE 12.13.76

In reply please refer to RAD0096ND

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

Due 11/27
12/8 ND

12 NOV 1976

Service Station Dealers Political
Action Committee
2 Decker Square
Bala Cynwyd, Pennsylvania

Dear Sir:

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you know, many and sometimes complex provisions. 2 U.S.C. 431(d) defines a "political committee" to mean any committee, club, association or other group of persons which receives contributions or makes expenditures in excess of $1,000 during a calendar year for the purpose of influencing a Federal Election. Additionally, 2 U.S.C. 431(f)(3) states that transfers of funds to political committees which support Federal candidates are considered "expenditures".

Furthermore, 2 U.S.C. 441 precludes individuals and political committees, other than qualified multicandidate political committees, from making political contributions to a candidate for Federal office in excess of $1,000 per election. The Act defines a multicandidate committee as one which has been registered with the Commission for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

Our review of the receipts reported by a candidate committee indicates that your organization may have made a contribution in excess of $1,000 to a committee supporting a candidate for Federal office. Therefore, it would appear that your organization qualifies as a "political committee" under the Act, subject to registration and reporting requirements as prescribed by 2 U.S.C. 433 and 434, and may also have exceeded the limit noted above.

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and submit a Statement of Organization on FEC FORM 1 within ten days of receipt of this letter. If, in addition, you find that the contribution made by your organization was in excess of the limits set forth in the Act, the Commisssion recommends that you notify the recipient and request a refund of the amount in excess of $1,000. This return should be reported immediately by letter and should be reflected on your next report of receipts and expenditures.

7 9 6 4 0 1 4 9 6

TRANSMITTAL TO VOID BY CLERK
APPARENT REPORTING VIOLATIONS

1. Service Station Dealers Political Action Committee
(full name of committee receiving contributions)

2 Decker Square
(address)

Bala Cynwyd, Pennsylvania
(city, state, zip code)

TREASURER(IF GIVEN):

TYPE OF REPORT: October 10, 1976 Quarterly

NAME OF OFFICE THE ORIGINAL REPORT WAS FILED WITH: Secretary of the Senate
Washington, D.C.

NAME OF GROUP LEADER / ANALYST: Davis / Higgins

ATTACH TWO (2) COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: N

CODED BY : DCH / C
initials/group #

PAD# 0098

DATE : October 20, 1976

2. Green for Senate Committee
(full name of committee receiving contributions)

PO Box 1000
(address)

Philadelphia, Pennsylvania 19107
(city, state, zip code)

TREASURER(IF GIVEN): Dr. Timothy Michels

TYPE OF REPORT: October 10, 1976 Quarterly

NAME OF OFFICE THE ORIGINAL REPORT WAS FILED WITH: Secretary of the Senate
Washington, D.C.

NAME OF GROUP LEADER / ANALYST: Davis / Higgins

ATTACH TWO (2) COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: D(p)

CODED BY : DCH / C
initials/group #

PAD# 0099

DATE : October 20, 1976

Sch. A
Federal Election Commission
Washington, D.C. 20463

Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

LINE NUMBER 18(b)

(Use separate schedule(s) for each numbered line).

Full Name of Candidate or Committee in full
GREEN FOR SENATE COMMITTEE

Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this item
Columbia County Democratic Committee P.O. Box 351 Bloomsburg, Pa. 17815	Principal place of business	8-6-76	200.00
Stephen R. Wojdak, Senatorial Campaign Funding Committee 7967 Castor Ave. Phila., Pa.	Principal place of business	8-6-76	200.00
Service Station Dealers Political Action Committee 2 Decker Sq. Yale Cynwyd, Pa.	Principal place of business	8-6-76	1000.00
National Committee for an Effective Congress 10 E. 39th St. New York, N.Y. 10016	Principal place of business	8-9-76	4,500.00
Attorneys Congressional Campaign Trust 1155 15th St., N.W., Suite 410 Wash., D.C. 20005	Principal place of business	8-10-76	2,500.00
N.L. Executives Voluntary Nonpartisan Political Fund 1221 Aveune of the Americas New York, N.Y. 10016	Principal place of business	8-16-76	25.00

Total of receipts this page (last page this line number only) ▶ $ 8125.00

Total for period (last page this line number only) ▶ $

Schedule A

Contributions, Ticket Purchases, Loans, Rebates, and Transfers for Line Numbers 13, 15, 17 and/or 18 of FEC Form

(See instructions on back)

(Use separate schedule(s) for each numbered line).

Name of Candidate or Committee in full

GREEN FOR SENATE COMMITTEE

Name, mailing address and ZIP code	Occupation / Principal place of business	Date (month, day, year)	Amount of each receipt this line
M.M. & P. Pensioners Action Fund 150 Broadway, Suite 902 New York, N.Y. 10038	Check if Contribution is refunded Aggregate Year-to-Date ▶ $ CC:	9-11-76	5000.00
Public Affairs Comm. of Savings Associations P.O. Box 797 Harrisburg, Pa. 17108	Check if Contribution is refunded Aggregate Year-to-Date ▶ $ 900.00	9-15-76	200.00
Podiatry Political Action Comm. 20 Chevy Chase Circle Wash., D.C. 20015	Check if Contribution is refunded Aggregate Year-to-Date ▶ $ 500.00	9-15-76	500.00
Service Station Dealers Political Action Comm. 2 Decker Sq. Bala-Cynwyd, Pa.	Check if Contribution is refunded Aggregate Year-to-Date ▶ $ 10,000.00	9-16-76	4000.00
Political & Educational Fund of the Building & Construction Trades Dept. 815 16th St., N.W. Rm. 603, Wash. D.C. 20006	(refunded) Check if Contribution is refunded Aggregate Year-to-Date ▶ $ 1000.00	9-17-76	1000.00
Democratic Senatorial Campaign Comm. Rm 130, Senate Office Bldg. Wash., D.C.	Check if Contribution is refunded Aggregate Year-to-Date ▶ $ 11000.00	9-21-76	2000.00

Total of receipts this page (optional) ▶ $ 12,700

Total this period (last page this line number only) ▶ $

11 FEB 1977

RUDOLPH, PALITZ AND COMPANY
CERTIFIED PUBLIC ACCOUNTANTS
1845 WALNUT STREET
PHILADELPHIA, PA. 19103
215 - 564-1125

LOUIS RUDOLPH, C.P.A.
1949 - 1974

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 FEB 14 AM 11:42

February 7, 1977

Commissioner Thomas E. Harris
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

770502

Re: Green for Senate Committee No. C00033522
Your No. RAD 0099 ND

Dear Commissioner Harris:

Please excuse our delay in responding to your January 12, 1977 letter to us regarding contributions received from Plumbers Union Local #609 and Service Station Dealers Political Action Committee.

Plumbers Union Local #609

We have been advised by Attorney Robert Kelly that the contribution received is an acceptable contribution as it was a transfer from the National Union's registered Political Action Committee to the Local Union for the Green for Senate Committee. We have been further advised by Attorney Kelly that the contribution was not made from Plumbers' Union Local #609 funds. If any wrong has been committed, it is that the original contributor was not properly identified. If your office advises, we will file an amended report.

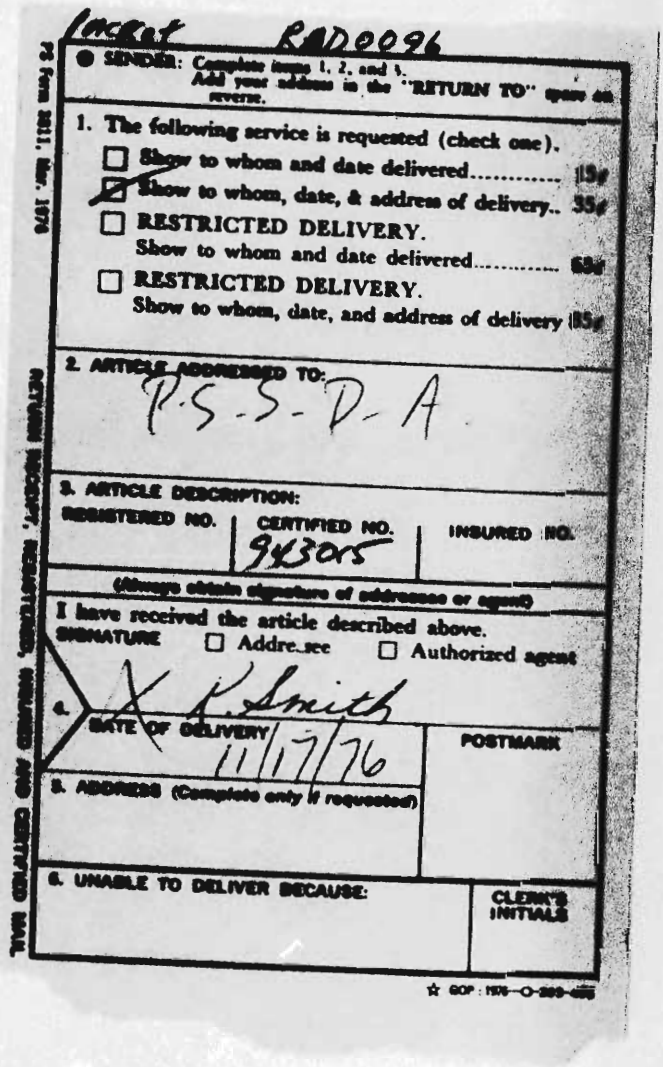
Service Station Dealers Political Action Committee

We have been advised by Thomas Anderson, Executive Director, and Norman Zarwin, attorney for the Service Station Dealers Political Action Committee, of the following:

1. The Service Station Dealers PAC is registered with the FEC and is permitted to make contributions in the amount made to the Green for Senate Committee.

2. Tickets were sold for a "fund raising dinner" on or about April 15, 1976, at which time William Green was the speaker. The excess of the revenues over the expenses of the dinner were contributed to the Green for Senate Committee. No single person purchased more than four (4) tickets at $25 each for the dinner.

NEIL GODICK



Docket RAD0096

RETURN RECEIPT, REGISTERED AND CERTIFIED MAIL

PS Form 3811, Dec. 1974

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered..... 15¢
- ☒ Show to whom, date, & address of delivery.. 35¢
- ☐ RESTRICTED DELIVERY.
  Show to whom and date delivered..... 65¢
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
P.S.S.D.A.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94305	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. X K. Smith

DATE OF DELIVERY 11/17/76

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1976—O-209-465

7904011501

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 409

SEE Depositions

Date Filmed 7/3/79 Camera No. --- 2

Cameraman SPC

7 3 0 4 0 1 1 5 0 2

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:

SERVICE STATION DEALERS :
POLITICAL ACTION COMMITTEE, : MUR 407(77)
RESPONDENT :

PHILADELPHIA, PA, JANUARY 17, 1978

SWORN STATEMENT OF THOMAS ANDERSON HELD IN THE OFFICES OF FOSTER COURT REPORTING SERVICE, INC., 1800 ARCHITECTS BUILDING, AT 2:25 P.M. ON THE ABOVE DATE BEFORE NANCY OKLESSON CYWINSKI, A REGISTERED PROFESSIONAL REPORTER AND NOTARY PUBLIC OF THE COMMONWEALTH OF PENNSYLVANIA.

FOSTER
COURT REPORTING SERVICE, INC.
1800 ARCHITECTS BUILDING - 117 S. 17TH ST.
PHILADELPHIA, PA 19103
(215) 567-2670

7904041505

APPEARANCES:

BIZ VAN GELDER, ESQ.
(1325 K STREET, N.W.
WASHINGTON, D.C. 20463)
ATTORNEY FOR FEDERAL ELECTION COMMISSION

NORMAN P. ZARWIN, ESQ.
ATTORNEY FOR RESPONDENT

PRESENT: SUZANNE CALLAHAN, INVESTIGATOR

7901150

... THOMAS ANDERSON, AFTER HAVING BEEN FIRST DULY SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

BY MS. VAN GELDER:

Q. MR. ANDERSON, COULD YOU GIVE ME YOUR NAME AND ADDRESS?

A. THAT'S NO PROBLEM. THOMAS J., JOSEPH, ANDERSON. 29 ELDON AVENUE, LANSDOWNE, PA 19050.

Q. AND WHAT IS YOUR OCCUPATION, SIR?

A. I AM AN ASSOCIATION EXECUTIVE.

Q. WHICH ASSOCIATION, PLEASE?

A. SERVICE STATION DEALERS ASSOCIATION, PENNSYLVANIA AND DELAWARE SERVICE STATION DEALERS ASSOCIATION.

Q. WHAT IS YOUR BUSINESS ADDRESS?

A. 425 COMMERCE DRIVE, YEADON, PA 19050.

Q. AND HOW LONG HAVE YOU BEEN EMPLOYED IN THAT CAPACITY?

A. SINCE FEBRUARY 1970.

Q. WHAT DID YOU DO BEFORE THEN, SIR?

A. OPERATED A SERVICE STATION.

Q. SERVICE STATION DEALERS, IS IT TRADE ASSOCIATION?

A. YES.

Q. AND WHO ARE THE MEMBERS OF THE TRADE ASSOCIATION?

A. SERVICE STATION DEALERS.

7 9 0 4 0 1 4 1 5 0 5

Q. INDEPENDENTS OR AFFILIATES OF MAJOR -- JUST ANY SERVICE STATION DEALER?
A. YES, ANY SERVICE STATION OPERATOR CAN BELONG.
Q. WHEN DID THIS BECOME ORGANIZED, THE SERVICE STATION DEALERS ASSOCIATION?
A. THE ASSOCIATION WAS INCORPORATED, I BELIEVE, 1966 OR '65. '66, I THINK.
MR. ZARWIN: IT BECAME A PENNSYLVANIA NONPROFIT CORPORATION IN 1965, I BELIEVE, OR '66.
MS. VAN GELDER: THEREABOUTS. FINE. IT'S ONE OF THOSE TWO YEARS.
Q. WHAT IS YOUR AFFILIATION, YOUR, THOMAS ANDERSON'S AFFILIATION, WITH THE SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE?
A. I'M ONE OF THE DIRECTORS. I THINK WE GOT FIVE DIRECTORS.
Q. WHO ARE THE OTHER DIRECTORS, SIR?
A. RUDY MOLNAR, AUGUSTO BRUNO, WILLIAM DAMMION, AND MICHAEL FUSCO.
Q. ARE YOU ALSO THE TREASURER?
A. YES, SECRETARY-TREASURER.
Q. WHEN WAS THE SERVICE STATION DEALERS PAC -- CAN I JUST CALL IT THE PAC?
MR. ZARWIN: SURE.
Q. (CONTINUED) WHEN WAS THE PAC ORGANIZED?

7904011506

A. 1974.
Q. 1974. WHO ORGANIZED IT?
A. I DID.
Q. ALONE? WAS IT YOUR OWN IDEA?
A. IT WAS MY IDEA, YES.
Q. AND WHAT IS THE PURPOSE, IF WE HAD TO UNDERLINE "PURPOSE," OF THE PAC?
A. THE UNDERLINED PURPOSE OF THE PAC, QUITE FRANKLY, IS TO RAISE SOME FUNDS AND WORK FOR CANDIDATES WHO ARE -- LET'S PUT IT POINT BLANK -- WHO SEE THINGS OUR WAY RATHER THAN AS OPPOSED TO NOT SEEING THINGS OUR WAY.
Q. STATE AND FEDERAL CANDIDATES?
A. THEY START OUT THAT WAY, BUT WE'RE ONLY INTERESTED IN STATE CANDIDATES AT THE TIME WE STARTED.
Q. WHAT IS THE ADDRESS OF THE PAC?
A. WELL, WE USE THE SAME ADDRESS AS THE ASSOCIATION OFFICE. THERE'S SO LITTLE ACTIVITY, YOU KNOW.
Q. I'LL GET TO YOUR ACTIVITY IN A SECOND, BUT I WAS WONDERING HOW --
MR. ZARWIN: CAN I HELP A LITTLE BIT ON THE PURPOSES? BECAUSE I THINK IT'S RELEVANT.
MS. VAN GELDER: YES.
MR. ZARWIN: THE TRADE ASSOCIATION IS COMPOSED OF SERVICE STATION DEALERS, AND THE PURPOSE

7 2 0 4 0 1 4 1 5 0 7

IS TO ELECT CANDIDATES WHO ARE FAVORABLE IN TERMS OF LEGISLATIVE GOALS WITH THE INTERESTS OF SERVICE STATION DEALERS PARTICULARLY AS OPPOSED TO MAJOR OIL COMPANIES. AND THE PURPOSE OF THE PAC IS TO WORK TOWARDS THE ELECTION OF SUCH CANDIDATES AS WELL AS LEGISLATION. IT'S NOT JUST FOR ELECTIVE PURPOSES, BUT AS WELL AS TO LOBBY FOR APPROPRIATE LEGISLATION ON THE STATE, LOCAL, AND NATIONAL LEVELS.

BY MS. VAN GELDER:

Q. YOUR SERVICE STATION DEALERS PAC IS A SEPARATE, SEGREGATED FUND OF THE PENNSYLVANIA AND DELAWARE SERVICE STATIONS?

A. TOTALLY SEPARATE.

Q. BUT YOU USE THE SAME OFFICE SPACE?

A. OH, YES.

Q. SAME PERSONNEL? DO YOU HAVE A SECRETARY THAT ANSWERS --

A. NO. THERE'S NO TELEPHONE NUMBER FOR THE PAC AND NOBODY EVER CALLS UP FOR PAC; NO ONE, NOT TO MY KNOWLEDGE. I DON'T ANSWER THE PHONE, BUT I DON'T KNOW OF A MEMBER, ANYONE, EVER CALLING UP AND ASKING FOR THE PAC. SO THE ANSWER TO THAT IS NO.

Q. BUT YOU USE THE SAME ADDRESS?

A. OH, YES, FOR THE PURPOSE OF -- YOU KNOW, PEOPLE SEND IT TO THERE FOR SOLICITATION FOR DINNER TICKETS

7904041506

OR CAMPAIGN CONTRIBUTIONS, ADVERTISEMENTS. YES, THAT'S TRUE, THE MAIL COMES THERE FOR THAT PURPOSE.

Q. WELL, WE'RE TALKING ABOUT CAMPAIGN CONTRIBUTIONS AND ADVERTISEMENTS. IF WE CAN GO TOWARDS YOUR REPORTS, I HAVE YOUR STATEMENT OF ORGANIZATION FOR A POLITICAL COMMITTEE, WHICH IS THE FEC FORM, ONE WHICH YOU SENT ON SEPTEMBER 2, 1977. THE COMMISSION ON NUMEROUS OCCASIONS BEFORE, STARTING IN, I BELIEVE, NOVEMBER OF 1976, SENT YOU NUMEROUS NOTICES WHICH SAID THAT YOU SHOULD REGISTER AND REPORT AND THAT YOU MAY HAVE EXCEEDED YOUR CONTRIBUTION LIMITS.

DO YOU REMEMBER THESE REPORTS?

A. YES.

Q. WHAT DID YOU DO WHEN YOU FIRST GOT THEM?

A. WELL, WHEN I FIRST GOT THEM, I SHOULD HAVE GONE TO NORM, BUT I DIDN'T. I WENT TO SOME OTHER PEOPLE AND WE SAT DOWN, AND I GUESS, QUITE FRANKLY -- I GOT TO ANSWER THIS THING HONESTLY AND FAIRLY; THERE'S NO SENSE IN BEATING AROUND THE BUSH.

ONE, WE WERE TOLD AS LONG AS WE DIDN'T GIVE MORE THAN $1,000 TO A FEDERAL CANDIDATE, WE WERE NOT REQUIRED TO FILE WITH THE FEDERAL ELECTION COMMISSION.

Q. OKAY. BEFORE YOU GO ON, FOR A SECOND, YOU SAID YOU SAT DOWN WITH SOME OTHER PEOPLE. WHO WERE THESE

7 8 0 4 0 1 1 5 0 6

OTHER PEOPLE?

A. WELL, I DID SOMETHING I WILL NEVER DO AGAIN. IT WAS PEOPLE IN YOUR OFFICE.

Q. THAT'S FINE.

A. IN WASHINGTON. OKAY.

Q. YES. BUT DO YOU KNOW WHO THEY WERE?

A. NO. SEE, I SHOULD HAVE WRITTEN THE NAME DOWN.

Q. YES, YOU SURE SHOULD HAVE.

A. WELL, IT'S OKAY. WHAT'S DONE I CAN'T DO ANYTHING ABOUT.

Q. SO YOU SAT DOWN WITH SOME PEOPLE IN OUR OFFICE IN WASHINGTON?

A. YES. I GO TO WASHINGTON QUITE FREQUENTLY.

Q. WHEN WAS THIS YOU SAT DOWN AND TALKED TO THEM?

A. AROUND NOVEMBER OR DECEMBER OF 1976.

Q. CAN YOU REMEMBER WHICH FLOOR YOU WENT TO TO SPEAK TO SOMEBODY?

A. I DON'T. NO, I DON'T. I HAVE A HARD -- YOU KNOW, I HAVE AN EXCELLENT MEMORY. YOU'LL FIND THE FURTHER WE GO, THE BETTER MY MEMORY GETS, BUT I GO SO MANY DIFFERENT PLACES IN WASHINGTON, THE FEA, THE FTC, THE CONGRESSIONAL BUILDINGS. I CAN'T REMEMBER, YOU KNOW, WHERE MY CONGRESSMAN'S OFFICE IS. IF I GET DOWN AND LOOK AROUND FOR THE LANDMARKS, I SAY, "YES, THAT'S IT. IT'S DOWN THIS HALL."

7 2 0 4 0 1 4 1 5 1 0

Q. WHAT MADE YOU GO TO THE FEC OFFICE IN WASHINGTON?
A. I GOT A LETTER FROM THEM.
Q. AROUND DECEMBER OR NOVEMBER?
A. IT MAY HAVE BEEN JANUARY. I'M NOT LYING TO YOU.
Q. WHEN YOU WENT TO THE FEC, IT WAS IN RESPONSE TO A LETTER YOU GOT IN PROBABLY NOVEMBER OR DECEMBER?
A. I WOULD SAY SO. I DIDN'T GO UNTIL AFTER I GOT THE LETTER.
Q. USUALLY LETTERS SAY, "IF YOU HAVE ANY QUESTIONS CONCERNING THIS, PLEASE CONTACT," AND THERE'S A NAME. FOR INSTANCE, YOU'VE GOT A LETTER DECEMBER 16 THAT SAYS TO CONTACT A NANCY DAVIES.
A. YES.
Q. WAS THE PERSON THAT YOU SPOKE TO A MAN OR A WOMAN; DO YOU REMEMBER?
A. NO. IT WAS A MAN. WHEN I WENT TO WASHINGTON, I SPOKE TO A MAN.
Q. WAS IT SOME PEOPLE OR ONE PERSON YOU SPOKE TO?
A. NO. IT WAS ONLY ONE PERSON.
Q. OKAY. AND YOU CAN'T DESCRIBE THE MAN? WAS HE YOUNG, OLD, FAT, THIN, DARK HAIR, LIGHT HAIR, ET CETERA?
A. I'LL TELL YOU, I BEST COULD PROBABLY DESCRIBE HIM, HE WAS A FAIRLY YOUNG FELLOW, AND THE BEST WAY I COULD DESCRIBE HIM, HE LOOKS LIKE EVERY OTHER

7 0 4 0 - 4 1 5 - -

LEGISLATIVE AID IN WASHINGTON. SOMEHOW OR ANOTHER THEM GUYS ALL FIT A PATTERN TO ME. THEY'RE YOUNG, THEY'RE THIN, THEY'RE 29, 28, 26, WHATEVER.

Q. YOU SPOKE TO HIM, AND WHAT DID HE TELL YOU?

A. I QUESTIONED HIM. I SAID, "I GOT A PROBLEM." I SAID, "I GOT A LETTER." I SAID, "WHY WOULD WE HAVE TO FILE A FEDERAL ELECTION FORM?"

HE SAID, "WELL, DID YOU CONTRIBUTE TO FEDERAL CANDIDATES?"

I SAID, "YES." I SAID, "BUT I WAS TOLD THAT AS LONG AS IT DIDN'T EXCEED $1,000 THAT WE WERE OFF THE HOOK FOR THAT ALL RIGHT."

HE SAID, "WELL, THAT'S CORRECT."

I SAID, "WELL, WE DIDN'T GIVE ANYBODY MORE THAN A THOUSAND DOLLARS."

"IF YOU DIDN'T GIVE ANY MORE THAN A THOUSAND DOLLARS, YOU DON'T HAVE TO FILE."

I SAID, "OKAY. THANK YOU."

Q. YOU SAID YOU TOLD THIS MAN YOU WERE TOLD. WHO TOLD YOU ORIGINALLY THAT YOU DIDN'T HAVE TO FILE?

A. WELL, I TALKED TO OTHER PEOPLE IN PHILADELPHIA, BECAUSE I HAD CONTRIBUTED TO SOME PEOPLE IN PHILADELPHIA; AND WESTERN PENNSYLVANIA IS INCLUDED, AND I CALLED HIM.

Q. CALLED WHOM, SIR?

7 9 0 4 0 - 4 1 5 - 2

A. I SPOKE TO CONGRESSMAN LEDERER. HE SAID HE DIDN'T REALLY KNOW WHAT THE LAW WAS, BUT HE SAID, "I'LL GET A HOLD OF SOMEBODY." HE SAID, "NEXT TIME NOTHING OVER A THOUSAND BUCKS."

Q. YOU GAVE MR. LEDERER A THOUSAND DOLLARS?

A. FIVE AND FIVE, FIVE TO THE GENERAL AND FIVE TO THE PRIMARY.

Q. NOW, YOU DIDN'T CONSIDER THE TRANSFERS TO MR. GREEN'S SENATE CAMPAIGN OVER A THOUSAND DOLLARS?

A. LET ME EXPLAIN THAT. OKAY. NOW, NO, WE DID NOT, AND I GOT TO TELL YOU WHY.

WHAT WE DID WAS, OUR PEOPLE HAPPENED TO HAVE LOVED CONGRESSMAN GREEN. HE WAS VERY INSTRUMENTAL IN KNOCKING OUT THE OIL DEPLETION ALLOWANCE, WHICH WE WERE BITTERLY OPPOSED TO; YOU KNOW, ALL THOSE VOTES. WE'RE TALKING ABOUT ONLY OUR INDUSTRY NOW. I CAN'T SPEAK FOR ANY OTHER INDUSTRY, BUT IN OUR INDUSTRY HIS VOTING RECORD WAS 100%. SO WE WANTED TO SUPPORT HIM. OKAY.

NOW, MAYBE THE WAY WE DID IT COULD HAVE BEEN INCORRECT; I DON'T KNOW ABOUT THAT. BUT WE WANTED TO RUN A DINNER FOR HIM, FOR CONGRESSMAN GREEN, FOR THE SENATE CAMPAIGN, WHICH WE SOLD DINNER TICKETS FOR $25 AT PALUMBO'S RESTAURANT IN PHILADELPHIA.

Q. YES.

7 9 0 4 0 1 4 1 5 1 3

A. WELL, THEY RAISED A LOT OF MONEY FOR HIM. I UNDERSTAND SINCE THEN THAT WHAT WE SHOULD HAVE DONE WAS SET UP A SEPARATE CHECKING ACCOUNT. BUT THE DINNER WAS FOR HIM, SO WE JUST USED THE PAC CHECKING ACCOUNT AS A CONDUIT. THE PROBLEM IS, WE HAVE SO MANY CHECKING ACCOUNTS, THEY'RE DRIVING ME INSANE. WE HAVE A PAYROLL ACCOUNT, A TAX ACCOUNT, AN INSURANCE ACCOUNT, CREDIT UNION ACCOUNTS.

Q. WHEN YOU SAY "WE HAVE" THESE ACCOUNTS --

A. THEY'RE ALL IN OUR OFFICE, YOU KNOW.

Q. AND THAT OFFICE IS THE SERVICE STATION DEALERS ASSOCIATION?

A. RIGHT.

Q. LET'S GO BACK TO THE FORMS. WE'LL DISCUSS THE FUNDRAISING IN A SECOND.

WHEN YOU WENT TO THE -- THAT WAS DECEMBER THAT YOU WENT TO --

A. WELL, DECEMBER OR JANUARY. YOU KNOW, I DON'T WANT TO GET PINNED DOWN, BECAUSE MAYBE IT WASN'T DECEMBER; MAYBE IT WAS IN JANUARY.

Q. AND THIS WAS JANUARY OF '77? BETWEEN DECEMBER '76 AND JANUARY '77?

A. IT WAS AFTER WE GOT THE LETTER. WHATEVER THAT WAS, AFTER WE GOT THE LETTER.

Q. AND THEN LATER ON IN FEBRUARY YOU GOT MORE

2 0 0 4 0 1 4 1 5 1 4

NOTIFICATION FROM THE COMMISSION, DIDN'T YOU?
A. YES.
Q. WHAT HAPPENED THEN?
A. WELL, THEN WE TURNED IT OVER TO AN ACCOUNTANT.
Q. MR. WHO OR MS. WHO?
A. MR. BILKER.
Q. WHAT DID MR. BILKER SAY?
A. I SAID, "MIKE, FIND OUT ABOUT THIS AND LET'S GET IT STRAIGHTENED OUT, WHATEVER."
Q. AND THAT WAS IN FEBRUARY?
A. WELL, FEBRUARY OR MARCH, SOMEWHERE IN THERE.
Q. LET'S JUMP DOWN THEN TO MAY, AROUND MAY 4. YOU WERE CONTACTED AGAIN BY THE COMMISSION BY TELEPHONE, THIS TIME ASKING YOU ABOUT THE FUNDRAISERS, WHICH WE'LL DISCUSS LATER.
A. YES.
Q. STILL AT THIS TIME YOU HADN'T FILED REPORTS?
A. NO.
Q. WHY NOT?
A. BECAUSE I WOULD RATHER GO TO JAIL FOR ONE YEAR THAN FILE A FALSE REPORT AND GO FOR FIVE. IT'S EASIER DONE THAT WAY, IF NECESSARY. I WANTED THE REPORT TO BE FILED AND I WANT IT TO BE FILED CORRECTLY IF IT HAS TO BE FILED.
Q. WHY DO YOU THINK IT WOULD BE FILED INCORRECTLY?

A. I REALLY HAVEN'T GOT THE FAINTEST IDEA. THE REPORTS SCARE THE HELL OUT OF ME, BECAUSE AT THE BOTTOM IT SAYS "PENALTIES" AND SO FORTH. SO I'D JUST RATHER TAKE MY TIME AND BE SAFE THAN SORRY.

Q. ARE YOU FAMILIAR WITH THE FEDERAL ELECTION CAMPAIGN ACT AT ALL?

A. NO.

Q. HAVE YOU RECEIVED A COPY OF IT EVER? WHEN YOU WENT TO THE FEC, DID YOU PICK UP A COPY?

A. NO.

Q. DID YOUR ATTORNEY OR YOUR ACCOUNTANT EVER TELL YOU ABOUT IT, THAT THERE IS A FEDERAL ELECTION CAMPAIGN ACT?

A. HE GOT COPIES OF IT THERE.

Q. I JUST GIVE GAVE HIM THOSE.

A. WELL, WHATEVER.

Q. NO ONE EVER TOLD YOU THAT REPORTS HAD TO BE FILED QUARTERLY? IF YOU MADE EXPENDITURES FOR FEDERAL CAMPAIGNS, THAT --

A. IF THEY EXCEEDED A THOUSAND DOLLARS.

Q. YES.

A. WE KNEW THAT.

Q. YOU KNEW THAT?

A. I KNEW THAT. YES, I KNEW THAT.

7 8 0 4 0 1 4 1 5 1 6

BY MR. ZARWIN:
Q. WELL, DID YOU KNOW THAT THEY HAD TO BE FILED QUARTERLY? THAT'S THE QUESTION.
A. OH, NO. I KNEW THEY DIDN'T HAVE TO BE FILED AT ALL. AM I CORRECT? OR IF INCORRECT, IF IT'S NOT FOR MORE THAN A THOUSAND DOLLARS.
BY MS. VAN GELDER:
Q. WELL, DO YOU KNOW, IF YOU HAVE AN ORGANIZATION, A POLITICAL COMMITTEE, THAT WAS PLANNING ON MAKING MONEY, SPENDING CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS, THAT YOU HAD TO FILE A STATEMENT OF ORGANIZATION WITH THE COMMISSION?
A. I DON'T THINK I UNDERSTAND WHAT YOU'RE SAYING.
Q. IF YOU EVER SPENT MORE THAN A THOUSAND DOLLARS ON A FEDERAL ELECTION, YOU HAD TO HAVE A STATEMENT OF ORGANIZATION SIMILAR TO THE ONE THAT YOU FILED ON SEPTEMBER 2 WITH THE COMMISSION.
A. WELL, I DON'T UNDERSTAND THAT LAW. DOES THAT MEAN A THOUSAND DOLLARS, PERIOD, OR A THOUSAND DOLLARS PER CANDIDATE?
Q. A THOUSAND DOLLARS, PERIOD.
A. NO, I DIDN'T KNOW THAT.
Q. DO YOU REMEMBER IN 1974 MAKING POLITICAL CONTRIBUTIONS TO CANDIDATES?
A. COULD I LOOK AT MY RECORDS?

7 6 0 4 0 1 4 1 5 1 7

Q. SURELY.
A. YES, WE DID.
Q. AND MADE CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS?
A. FOR THE YEAR?
Q. FOR THE YEAR
A. YES.
Q. OR FOR THE ELECTION. AND NO ONE AT THAT TIME EVER TOLD YOU --
A. WELL, WAIT A MINUTE. WE DIDN'T MAKE IT FOR AN ELECTION. WE MADE IT FOR THE YEAR.
Q. WELL, IF YOU GAVE A THOUSAND DOLLARS TO SCHULTZE, 9/26, AND $500 TO WILLIAMS, 9/25, THAT'S $1,500 THERE.
A. WELL, $500 WAS FOR PRIMARY AND $500 WAS FOR GENERAL.
Q. IF YOU MAKE A THOUSAND DOLLARS, IT DOESN'T MATTER IF YOU GAVE $250 TO FOUR CANDIDATES.
A. WELL, WE KNOW THAT NOW.
Q. YOU DIDN'T KNOW THAT IN '74?
A. NO.
Q. YOU DIDN'T KNOW THAT IN '75?
A. NO.
Q. THE FIRST TIME YOU KNEW OF IT WAS WHEN?
A. HAD TO BE IN '76.
Q. SO WHAT HAPPENED BETWEEN MAY OF '77 AND SEPTEMBER

7 8 0 4 0 1 4 1 5 6

WHEN YOU FINALLY GOT THE REPORTS INTO THE COMMISSION, SEPTEMBER AND OCTOBER?

A. WHAT HAPPENED? WHAT DO YOU MEAN "WHAT HAPPENED"?

Q. OBVIOUSLY SOMEBODY TOLD YOU THAT THAT HAD TO BE DONE?

A. YES. HE DID.

Q. MR. ZARWIN?

A. YES.

MS. VAN GELDER: HE WAS POINTING TO MR. ZARWIN.

Q. LET'S GO BACK TO THE '74 RECORDS WHICH ARE IN FRONT OF YOU.

A. YES.

Q. IN 1974 I NOTICE THAT YOU WENT TO A LOT OF DINNERS OR SOMEBODY WENT TO A LOT OF DINNERS. I MEAN, ALL OF YOUR EXPENDITURES ARE USUALLY FOR TEN TICKETS TO THE LARRY WILLIAMS DINNER OR TWO TICKETS TO GO TO THE MAC DONALD DINNER.

A. I HAVE A HARD TIME EVEN GIVING THEM AWAY, BELIEVE IT OR NOT.

Q. IS THAT RIGHT?

A. YES.

Q. WHO BUYS THEM. SERVICE STATION DEALERS PAC?

A. YES.

760-0141-5-0

Q. AND DO THEY SOLICIT YOU OR DO YOU FIND OUT --
A. I GUARANTEE YOU ONE THING: I DO NOT SOLICIT TO BUY TICKETS; I'LL GUARANTEE YOU THAT. I HAVE ENOUGH PROBLEMS WITH THEM COMING TO US TO SELL TICKETS.
Q. AND WHEN YOU BUY THESE TWO TICKETS, FOR INSTANCE, THE LATE CONGRESSMAN MAC DONALD'S TICKETS, WHAT DO YOU DO WITH THE TICKETS?
A. THIS ONE?
Q. YES.
A. I WAS IN WASHINGTON FOR THAT ONE. ACTUALLY WE WERE DOWN THERE AT THAT TIME, ANYWAY, SO WE WENT TO THAT DINNER.
Q. DID YOU EVER RUN FOR OFFICE YOURSELF, SIR?
A. NO.
Q. I JUST NOTICE THAT YOU TOOK AS A POLITICAL ACTION RECEIPT, YOU RECEIVED $29,700.
A. I DID?
Q. WELL, THE THOMAS ANDERSON TESTIMONIAL DINNER.
A. OH, YES, THAT'S RIGHT.
Q. AND THAT WAS ON BEHALF OF YOURSELF?
A. WELL, I DIDN'T RUN THAT. OKAY. SO THAT DINNER MADE MONEY, AND IT WAS SUPPOSED TO GO TO ME AND I SAID, "NO WAY. JUST THROW IT IN THE POLITICAL ACTION COMMITTEE."
Q. SO IT WENT TO THE POLITICAL ACTION COMMITTEE?

7904041520

A. YES.
Q. DO YOU HAPPEN TO KNOW WHETHER OR NOT THAT WOULD HAVE BEEN A CONTRIBUTION FROM YOU TO THE POLITICAL ACTION COMMITTEE?
A. I DON'T THINK IT'S EVER LISTED THAT WAY.
Q. NO, IT WASN'T.
A. WHY WOULD I WANT IT LISTED THAT WAY? YOU SEE, YOU WANT TO GIVE ME $5,000, I SAID, "LOOK, YOU GIVE IT TO THEM. I DON'T NEED IT. YOU KNOW, I DON'T WANT IT. WHAT I GOT TO DO NOW IS A LOT OF EXPLAINING, PUTS ME IN ANOTHER TAX BRACKET."
Q. WELL, WE DON'T HAVE JURISDICTION OVER INCOME YOU HAVE TO REPORT.
A. WELL, I DIDN'T GET IT, SO I DON'T HAVE TO REPORT IT.
Q. I NOTICE YOU HAVE UNITEMIZED EXPENDITURES OF $18,040.50. HOW DID YOU GET THAT MUCH IN UNITEMIZED EXPENDITURES? THESE ARE UNITEMIZED RECEIPTS; I'M SORRY. YOU RECEIVED $18,040.50 IN UNITEMIZED RECEIPTS?
A. YES.
Q. HOW DID YOU COLLECT THAT MONEY, SIR?
A. $10 CONTRIBUTIONS, $5, $2, $25.
Q. FROM HOW MANY PEOPLE? WHO WERE THE PEOPLE?
A. OH, HUNDREDS OF THEM, HUNDREDS OF SERVICE STATION

OPERATORS.

Q. DO YOU ALWAYS COLLECT MONEY FROM SERVICE STATION OPERATORS?

A. YES.

Q. DO YOU COLLECT MONEY FROM ANYONE ELSE?

A. IF THEY WANT TO GIVE IT, YES, WE'LL TAKE IT FROM THEM, TOO. I'M NOT TRYING TO BE A WISE GUY. BUT IF, YOU KNOW, I'M GOING TO LIE AND SAY, "NO, WE WON'T ACCEPT IT FROM ANYBODY ELSE," THAT'S WRONG; WE'LL ACCEPT IT.

Q. FROM ANYBODY WHO WILL GIVE IT TO YOU?

A. OTHER THAN CORPORATIONS.

Q. HOW DO YOU GO ABOUT COLLECTING THIS CONTRIBUTION? DO YOU SEND OUT A MAILING? DO YOU HAVE A PHONE BANK?

A. NO. WE HAVE SEVEN FIELD MEN, YOU KNOW, BUSINESS AGENTS ON THE STREET, AND WE MAKE UP A -- YOU KNOW, MAYBE HAVE A PAMPHLET OR SOMETHING, AND THEY GIVE IT OUT FOR WHAT WE'RE TRYING TO RAISE MONEY FOR.

Q. COULD YOU NAME THOSE SEVEN MEN, PLEASE?

A. SURE. NINO KUZZOLA, FROM ERIE, PENNSYLVANIA; HERB FEDELA, PITTSBURGH, PA; JACK FORESPRING, GREENSBURG, PA; VINCENT MANCINELLI, PHILADELPHIA; ALBERT ALTIERI, SPRINGFIELD, PENNSYLVANIA -- THAT'S SPRINGFIELD, DELAWARE COUNTY -- LAWRENCE MANIERI, NORRISTOWN, PA; EDWARD WILLIAMS, ARDSLEY, PA.

760411 52

Q. AND THOSE SEVEN MEMBERS, YOU SAID YOU GIVE THEM PAMPHLETS?

A. WELL, YOU KNOW, MAYBE WE'LL PRINT UP -- SEE, WE HAVE A LITTLE PRINTING, YOU KNOW, OFFSET PRESS IN THE OFFICE, AND WE'LL JUST RUN THIS OFF AND GIVE EACH GUY MAYBE 2, 3 HUNDRED. AND WHEN HE GOES AROUND -- BECAUSE THEY GOT TO SEE HIM, ANYWAY; THEY GOT TO SEE HIM ABOUT DELINQUENT DUES OR TALK TO HIM ABOUT HIS BLUE CROSS-BLUE SHIELD OR GENERAL PROBLEMS.

SO WHILE THEY'RE MAKING THE ROUNDS -- IT DON'T COST THEM NOTHING -- THEY SAY, "YOU GOT AN EXTRA 10 OR 20?"

NOW, A LOT OF TIMES WE HAVE TICKETS FOR 25 BUCKS THAT WE'RE GOING TO HAVE A DINNER, AND THE GUY SAYS, "GEE, I CAN'T MAKE THAT NOW."

AND WE SAY, "WELL, YOU CAN DONATE 10 BUCKS, 20 BUCKS IF YOU WANT." AND THAT'S THE WAY IT COMES IN, BUT WE DON'T LIST IT UNDER "SALES AND COLLECTIONS INCLUDED ABOVE."

Q. SO THAT $18,040.50 IS FROM INDIVIDUAL CONTRIBUTIONS TAKEN AT INTERMITTENT TIMES?

A. OH, YES.

Q. THERE'S NO SET --

A. NO, THERE'S NOTHING SET. IF A GUY WANTS TO GIVE, FINE, HE GIVES. IF HE DON'T, HE DON'T.

7 9 0 4 0 1 4 1 5 2 3

Q. DO YOU HAPPEN TO HAVE ANY COPIES OF THOSE PAMPHLETS?
A. NO.
Q. OR BRING ANY RECEIPTS? DO YOU KEEP ANY?
A. NO.
Q. CAN YOU KIND OF REMEMBER WHAT ONE OF THEM WOULD SAY?
A. OH, I COULD TELL YOU VERY POINT BLANK WHAT THEY WOULD SAY. YOU KNOW, WE'RE TRYING TO RAISE MONEY TO HELP SUPPORT SUCH AND SUCH A CANDIDATE OR SUCH AND SUCH A GROUP OF CANDIDATES WHO HAVE BEEN HELPFUL AND WE CITE VERY POINT BLANK, YOU KNOW, THE PAST VOTING RECORD. FOR EXAMPLE, IN PENNSYLVANIA ON OUR FRANCHISE BILL THEY WERE VERY HELPFUL AND THEY GOT THE BILL THROUGH, AND WE'D LIKE TO SEE THEM STAY BACK IN OFFICE.
Q. SO IN 1974 YOU COLLECTED 18,000 SOMETHING PLUS THE 29,700 FROM YOUR TESTIMONIAL DINNER WHICH YOU GAVE OVER TO THE SERVICE STATION DEALERS PAC?
A. I DON'T KNOW WHETHER THAT'S QUITE THE RIGHT WAY TO SAY IT.
BY MR. ZARWIN:
Q. IS THAT THE DINNER FOR SHAPP?
A. WELL, THEY WERE THERE FOR THE TESTIMONIAL DINNER.
BY MS. VAN GELDER:

7504011552

Q. BUT IT WAS A TESTIMONIAL FOR YOU?
A. WHAT THEY DO, THEY SAID, "THIS MONEY, ANYTHING OVER AND ABOVE IS FOR YOU."
I SAID, "HEY, NO WAY."
Q. WHO SAID THAT TO YOU?
A. THE GROUP THAT WAS, YOU KNOW, RUNNING THE DINNER.
Q. WHO WERE THEY?
A. I GUESS WE'D HAVE TO SAY IT WAS BRUNO AND DAMMION; JUST OUR REGULAR GUYS THAT ARE ALWAYS AROUND.
Q. BRUNO AND DAMMION?
A. YES. SEE, I DRAW A BIGGER CROWD THAN THE POLITICIANS WOULD.
Q. I NOTICE. THEN YOU HAVE OPERATING EXPENDITURES THAT WENT OUT TO PAY FOR THE TESTIMONIAL DINNER AND TO VARIOUS CANDIDATES IN '74 THAT CAME OUT TO ABOUT $2,000 TO FEDERAL CANDIDATES.
A. I WOULD IMAGINE YOU'RE PROBABLY CORRECT. IN '74?
Q. YES.
A. WELL, WE'RE STILL TALKING ABOUT THE SAME ONES. IT WAS $200 TO TAUBERT MAC DONALD, $1,000 TO SCHULTZE, LARRY WILLIAMS WAS $500, AND ROONEY WAS $300.
A. SO YOU GOT $2,000.
Q. WHILE WE'RE AT IT, WE MIGHT JUST GO THROUGH IT. LET'S TRY YOUR '75 REPORTS. '75 WAS A LEAN YEAR FOR

7904011525

UNITEMIZED RECEIPTS.
A. YES.
Q. WHY?
A. IT WAS AN OFF YEAR. LEGISLATORS WEREN'T RUNNING; STATE SENATORS WEREN'T RUNNING; CONGRESSMEN WEREN'T RUNNING.
Q. AND YOU HAD NO MORE TESTIMONIALS?
A. I HAVE NEVER HAD ANOTHER ONE.
Q. I'M INTERESTED, DOWN IN THE EXPENDITURES ON PAGE 2 YOU HAVE COMMITTEE EXPENSES OF $769.25. PAGE 2.
A. OKAY.
Q. DOWN ON PART II.
A. YES.
Q. WHERE DID THAT $769.25 GO?
A. WHERE DID IT GO TO?
Q. YES.
A. I HAVEN'T GOT THE FAINTEST IDEA, UNLESS IT WENT FOR TICKETS.
MR. ZARWIN: UNITEMIZED COMMITTEE EXPENSES?
A. (CONTINUED) THIS IS '75, RIGHT. YOU'RE RIGHT; IT WAS A VERY LEAN YEAR. I WISH I COULD ANSWER THIS A LITTLE BETTER, BUT SOMETHING IS WRONG HERE.
Q. TAKE YOUR TIME, SIR.
MS. VAN GELDER: DO YOU WANT TO GO OFF

7 9 0 4 0 1 4 1 5 2 6

THE RECORD FOR A SECOND?

MR. ZARWIN: YES. LET'S LOOK AT THEM.

(DISCUSSION OFF THE RECORD.)

Q. YOU HAD VARIOUS EXPENSES, BY THE WAY, IN 1974 OF $542.84. JUST FOR INFORMATION PURPOSES, THE ACT REQUIRES, FOR FUTURE REFERENCE, ANYWAY, THAT IF YOU MAKE AN EXPENDITURE OVER A HUNDRED DOLLARS, THAT HAS TO BE ITEMIZED, AND IF YOU MAKE SMALLER EXPENDITURES THAT ARE LESS THAN A HUNDRED DOLLARS -- FOR INSTANCE, IF YOU PAY MR. ZARWIN, YOU KNOW, FIVE CHECKS OF $25 -- IF SOMETHING AGGREGATES TO MORE THAN A HUNDRED DOLLARS OVER THE YEAR, THAT HAS TO BE AGGREGATED AND PUT DOWN.

IT'S JUST CURIOUS TO SEE THAT LARGE AMOUNT OF MONEY IN UNITEMIZED EXPENSES.

A. WELL, LET ME SAY THIS IN ALL FAIRNESS: WITH GOD'S HELP AND A LITTLE BIT OF LUCK, THERE AIN'T TO GOING TO BE ANY MORE REPORTS TO FEDERAL ELECTION. BECAUSE I TOLD ALL THESE GUYS ALREADY, "YOU BETTER LOOK ELSEWHERE." "THERE'S NO WAY," I SAYS. "YOU THING I'M GOING TO GO THROUGH ALL THIS AGGRAVATION? FORGET IT."

AS A MATTER OF FACT, I THINK WHEN WE FILED IN COURT, WE FILED IT AS A FINAL.

Q. YOU TERMINATED IT, YES.

7 6 0 1 4 1 5 2 7

A. HEY, ENOUGH'S ENOUGH. I CAN'T BEAT A GOVERNMENT BOOKKEEPER.

Q. SO JUST TO RECAP, YOU HAVE NO PRESENT RECOLLECTION OF WHAT THE COMMITTEE EXPENSES IN 1975 OF $769.25 ARE?

A. AT THE MOMENT THE ANSWER IS ABSOLUTELY NOT.

Q. OKAY. NOW WE'LL MOVE ON TO THE YEAR 1976. SEE HOW QUICK THIS GOES.

IN 1976 YOU COLLECTED 20,000?

A. CAN YOU HOLD ON A MINUTE?

Q. SURE.

A. OKAY. CONTINUE.

Q. OKAY. YOU COLLECTED $20,020 IN '76, $20,020.90 OF UNITEMIZED RECEIPTS?

A. THAT'S CORRECT.

Q. AND THESE WERE COLLECTED IN THE SAME FASHION AS IN '74 AND '75?

A. YES.

Q. AND YOU HAVE NEVER HAD ONE PERSON GIVE OVER A HUNDRED DOLLARS?

A. NO. I GOT A HARD TIME COLLECTING $20 A MONTH OUT OF THEM IN DUES. YOU'RE ASKING THEM FOR HARD DOLLARS, LIKE ASKING THEM FOR THEIR WALLET. WE HAD A COUPLE GUYS THAT DONATED MORE THAN A HUNDRED DOLLARS, AND, AS A MATTER OF FACT, WE SENT THE MONEY BACK TO THEM.

P-6041-115-26

WE JUST DON'T WANT TO GET MIXED UP IN A WHOLE LOT OF BOOKKEEPING. IF IT'S GOING TO PUT US INTO REGULATIONS, I DON'T NEED THE 150 BUCKS; I JUST DON'T NEED THAT.

Q. DO YOU THINK THERE'S ANY WAY, THOUGH, YOU COULD HAVE COLLECTED FROM DIFFERENT SERVICE STATION DEALERS IN AMOUNTS LESS THAN A HUNDRED DOLLARS AND THEN THEY BOUGHT A COUPLE OF TICKETS AT $20 APIECE THAT PUT THEM ABOVE?

A. IT'S A POSSIBILITY. I'M NOT GOING TO LIE TO YOU. IT'S A POSSIBILITY.

Q. YOU COLLECTED 20,000 IN UNITEMIZED AND THEN YOU GOT $35,750 IN EVENTS, SCHEDULED EVENTS?

A. I THINK -- I MAY NOT BE CORRECT. I THINK, IF I'M NOT MISTAKEN, IT WAS THREE DINNERS.

Q. THREE DINNERS?

A. RIGHT.

Q. WHY DON'T WE TAKE A SECOND AND GO TO THE DINNERS THEN.

A. YES.

Q. THESE DINNERS WERE TWO GREEN-FOR-SENATE DINNERS AND ONE FOR SERVICE STATION DEALERS PAC?

A. RIGHT.

Q. THE GREEN-FOR-SENATE DINNER WAS ON MAY 3, '77?

A. WAIT A MINUTE.

7904041529

Q. YOU CAN REFER TO FORM 3. IT'S THIS FORM RIGHT HERE, PAGE 1.
A. I WOULD SAY THAT THAT WAS PROBABLY MAY 3. PROBABLY THAT'S CORRECT.
Q. WHERE WAS THAT HELD?
A. AT PALUMBO'S.
Q. PALUMBO'S IN PHILADELPHIA?
A. YES.
Q. AND 750 PEOPLE ATTENDED?
A. NOW, WAIT A MINUTE. I WOULDN'T SAY THAT. COULD HAVE BEEN 750 PEOPLE; IT COULD HAVE BEEN LESS. I'M JUST SAYING THIS IS HOW MANY TICKETS WE SOLD. SEE, SOMETIMES EVERYBODY DON'T SHOW UP.
Q. YOU SHOULD BE A LAWYER. THAT'S RIGHT. YOU SOLD 750 TICKETS RIGHT AT $25 APIECE?
A. YES.
Q. DO YOU HAPPEN TO KNOW IF ANYBODY BOUGHT MORE THAN FOUR TICKETS?
A. I WISH I COULD TAKE YOU AROUND TO MEET THESE CHARACTERS THAT WE DO BUSINESS WITH, HONEST TO GOD. WE HAVE A HARD TIME GETTING OUR COLLECTION OFF THEM. FOUR TICKETS? THEY GIVE YOU AGITA FOR $25; THAT'S ITALIAN FOR ULCERS.
Q. HOW DO YOU SPELL THAT, SIR?
A. I DON'T KNOW HOW YOU SPELL THAT.

7040141530

Q. TO THE BEST OF YOUR RECOLLECTION, THOUGH, YOU DON'T THINK THAT ANYONE COULD BUY MORE THAN FOUR?
A. NO. GEES, WE HAVE A HELL OF A TIME GETTING HIM TO BUY A TICKET FOR HIM AND HIS WIFE; YOU KNOW, THAT'S 50 BUCKS.
Q. WHAT ABOUT MR. DAMMION? YOU HAVE A REFUND TO MR. DAMMION?
A. $250.
Q. THAT'S RIGHT?
A. HE BOUGHT A WHOLE TABLE. HE BOUGHT TEN TICKETS, SONS, DAUGHTERS, AND SO ON. I SAID, "SEND IT BACK AND MAKE IT OUT." THAT'S EXACTLY WHAT WE DID.
Q. SO THEN HIS SONS AND HIS DAUGHTERS BOUGHT ONE BY THEMSELVES?
A. NO. THEY DIDN'T COME. OKAY.
Q. THAT'S GOOD.
A. NOW, THE IRONIC PART ABOUT IT WAS, ABOUT A WEEK AND A HALF BEFORE THAT HIS MOTHER DIED. AND HIM, ABOVE ALL. I SAID, "YOU, ABOVE ALL, SHOULD KNOW DON'T GIVE US A CHECK FOR $250, AND YOU ON THE COMMITTEE."
BY MR. ZARWIN:
Q. BY THE WAY, I THINK IT'S RELEVANT WHY YOU KNEW TO SEND THAT BACK.
A. IT WAS MORE THAN A HUNDRED DOLLARS. I DON'T WANT

7904014150

ANYTHING FOR MORE THAN A HUNDRED DOLLARS. NOW, WE DO HAVE SOME CHECKS FOR MORE THAN A HUNDRED DOLLARS. I'M GLAD I REMEMBERED THIS. OKAY.

BY MS. VAN GELDER:

Q. YES.

A. AND THE REASON FOR THAT IS VERY SIMPLY THIS. I HOPE YOU CAN UNDERSTAND IT; IF YOU CAN'T, WELL, YOU CAN QUESTION OUR FIELD PEOPLE.

MAYBE THEY'LL PICK UP 3 OR 4 HUNDRED DOLLARS IN A DAY. 90% OF THAT THE GUYS WILL GIVE YOU, YOU KNOW, BECAUSE SERVICE STATION DEALERS ALWAYS HAVE A LOT OF CASH IN THEIR POCKET, AND TO BUY THE TICKET, THEY'LL GIVE YOU THE $25 RATHER THAN WRITE OUT A CHECK. SO MAYBE THE GUY'S GOT 300, $350, AND WE TELL THEM, "DON'T WALK AROUND WITH IT, BECAUSE IF YOU GET HIT OVER THE HEAD, YOU GET HIT TWICE, BECAUSE I'M GOING TO TAKE THE 300 OR $350 OUT OF YOUR PAYCHECK."

SO WHAT THEY DO IS DEPOSIT IT AND THEN THEY'LL WRITE A CHECK OUT OF THEIR ACCOUNT TO THE PAC ACCOUNT. THAT'S ONLY DONE FOR SAFETY REASONS. THEY DO THE SAME THING, YOU KNOW, WITH OUR OTHER ACCOUNTS WHEN THEY'RE COLLECTING: THEY MAKE THE DEPOSITS AND BRING THE GIRLS IN THE RECEIPTS AND SLIP.

Q. GETTING BACK TO THE QUESTION THAT MR. ZARWIN ANTICIPATED, WHY IN MARCH OF '76 DID YOU KNOW ENOUGH

7 9 0 4 0 1 - 4 1 5 3 6

NOT TO COLLECT MORE THAN A HUNDRED DOLLARS?
A. WELL, I'LL TELL YOU THE VERY SIMPLE REASON FOR THAT: WE WOULD COLLECT UP TO A HUNDRED BUCKS, BECAUSE THE PHILADELPHIA CITY COMMITTEE WOULD NEVER TAKE ANYTHING OVER A HUNDRED DOLLARS UNLESS YOU REGISTERED IT. I SAID, "WHAT DO YOU MEAN?"

THEY SAID, "WELL, IF IT'S OVER A HUNDRED DOLLARS, WE GOT TO HAVE THE NAME, THE ADDRESS, AND THE BUSINESS."

"OH," I SAYS, "IS THAT RIGHT?"

THEY SAID, "YES."

OKAY. NEVER TOOK IT. IF THEY DIDN'T TAKE IT, WHY SHOULD I?

Q. IF THEY DIDN'T TAKE IT, WHY SHOULD YOU?
A. YES.
Q. YOU NEVER ASKED THEM WHY THAT LAW WAS IN EFFECT?
A. NO, I DON'T HAVE TO ASK WHY THAT LAW'S IN EFFECT. ON THAT DAY THEY TAKE AS MUCH AS THEY CAN GET. THE SKY'S THE LIMIT. I'M TELLING YOU.
Q. THEY WON'T ACCEPT MORE THAN A HUNDRED DOLLARS IN CASH?
A. RIGHT.
Q. BUT THEY'LL ACCEPT A HUNDRED DOLLARS IN CHECK?
A. OH, YES, THAT'S RIGHT. BUT THEN YOU GOT TO HAVE THE ADDRESS AND ALL THIS OTHER STUFF. I HAVEN'T GOT

7904014153

NO TIME FOR THAT. I'D RATHER GET $99. FOR THE OTHER DOLLAR I DON'T NEED IT THAT BAD THAT I HAVE TO KEEP RECORDS ON THIS.

Q. HOW DO YOU KNOW IF YOU'RE NOT GOING TO COLLECT $99 TWICE IN CASH AND THEN THE GUY IS OVER A HUNDRED DOLLARS?

A. I HAVEN'T GOT THE FAINTEST IDEA. I HAVE TO BE HONEST WITH YOU. BUT I GOT NEWS FOR YOU: IF YOU CAN GET IT TWICE OUT OF THESE GUYS OUT HERE, YOU SHOULD HAVE MY JOB. I'LL TELL YOU, YOU'D DO TERRIFIC.

Q. WELL, LET'S GO BACK TO THIS GREEN-FOR-SENATE DINNER IN PHILADELPHIA. THAT WAS THE FIRST ONE IN MAY OF '77?

A. THAT'S RIGHT.

Q. WHAT MADE YOU THINK OF A DINNER FOR MR. GREEN?

A. WELL, HE WAS HAVING OPPOSITION IN THE PRIMARY. AND I MET BILL ONE NIGHT AND I SAID, "ANY WAY WE CAN HELP?"

AND HE SAID, "WELL, YOU KNOW, I COULD USE SOME FINANCING."

AND I SAID, "WELL, COULD WE GET TOGETHER AND RUN A DINNER FOR YOU?"

HE SAID, "WHAT ARE WE TALKING ABOUT?"

I SAID, "I DON'T KNOW. 5, 10 THOUSAND. I HAVEN'T THE FAINTEST IDEA UNTIL WE START

7 9 0 4 0 - 4 1 5 3 4

SELLING THE TICKETS. WHATEVER TICKETS WE CAN SELL."

HE SAID, "THAT WOULD BE A HELL OF A HELP."

I SAID, "OKAY."

Q. SO YOU TALKED TO MR. GREEN YOURSELF?

A. YES.

Q. DO YOU KNOW HOW MUCH IN ADVANCE THAT WAS?

A. IT WAS A FEW WEEKS IN ADVANCE, SEVERAL WEEKS IN ADVANCE.

Q. YOU CAN SET UP A DINNER PRETTY QUICKLY, THEN?

A. GIVE ME THREE WEEKS. THAT'S ENOUGH, YES. SEE, YOU GOT SEVEN, EIGHT GUYS, TEN PEOPLE SELLING TICKETS. YOU KNOW YOU CAN ZING THEM.

YOU SEE, YOU GOT TO UNDERSTAND OUR SITUATION HERE. WE CAN'T DO THIS ALL OVER THE STATE. THE PHILADELPHIA AREA WE HAVE NO PROBLEM, BECAUSE, IN ALL HONESTY, WE CAN RUN A DINNER AT FRANK PALUMBO'S, HAVE A FILET MIGNON DINNER WITH SPAGHETTI, RAVIOLIS, BREAD, BUTTER, COFFEE, TEA, MILK, SPUMONI ICE CREAM, THE WHOLE SCHMEAR; HAVE A FLOOR SHOW, ELISHA KASHI, YOU KNOW, ONE OF THE BIG-NAME ENTERTAINERS.

IT'S $11 A PERSON. YOU CHARGE 25 FOR A TICKET; YOU'RE MAKING $14. I DON'T HAVE TO PUT TOO MANY PEOPLE IN THERE AT $14 PROFIT PER HEAD, YOU SEE. SO WHAT YOU DO IS BASICALLY HAVE A LOT OF FELLOWS WHO

WILL COME. HIM AND HIS WIFE WILL COME OR HIM AND HIS GIRL FRIEND. BECAUSE THEY HAVE A WONDERFUL FLOOR SHOW AND THEY CAN DANCE AND HAVE A BAR THERE WHERE THEY CAN DRINK; THEY GOT TO PAY FOR THAT. YOU GOT A FILET MIGNON.

WHERE CAN YOU GO IN WASHINGTON AND HAVE A FILET MIGNON DINNER AND HAVE A FLOOR SHOW? YOU CAN'T DO IT HERE EXCEPT FOR PALUMBO'S. SEE, THAT'S WHY WE CAN PUT SO MANY PEOPLE IN THERE.

Q. LET ME UNDERSTAND THIS: YOU KNOW MR. GREEN, APPARENTLY?

A. OH, YES. I KNEW HIS FATHER, TOO.

Q. AND YOU WERE JUST SPEAKING TO HIM IN CASUAL CONVERSATION?

A. YES.

Q. WHEN YOU FINALLY TOLD HIM THAT YOU WERE GOING TO PUT ON A FUNDRAISER OR THAT YOU HAD THE RESOURCES TO PUT ON A FUNDRAISER --

A. I CALLED HIM UP TO ASK HIM IF HE WAS AVAILABLE MAY 3.

AND HE SAID, "YES. NO PROBLEM."

Q. DID YOU MAKE ANY OTHER ARRANGEMENTS WITH HIM?

A. MADE ONE FOR PITTSBURGH.

Q. NO. I MEAN WITH THIS ONE. I MEAN, IS THAT ALL YOU DISCUSSED?

ACCURATE REPORTING

A. THAT WAS IT.
Q. DID YOU EVER DISCUSS ANYTHING ABOUT SAYING THAT YOU'D TAKE YOUR EXPENSES OFF?
A. OH, NO. WE GOT TO PAY FOR THE FOOD, YOU KNOW. YOU KNOW, I CAN'T AFFORD TO DO THAT.
"I'LL GIVE YOU, YOU KNOW, WHATEVER PROFITS I CAN GIVE YOU, BUT, YOU KNOW, I HAVE TO TAKE THE MONEY AND PAY FOR THE FOOD." IF WE GIVE HIM THE FULL $25 FOR EVERY TICKET, WHO PAYS FOR PALUMBO'S? ME? I'M AFRAID NOT. I'D LIKE YOU, BUT --
Q. YOU DON'T LIKE HIM THAT MUCH?
A. I JUST CAN'T DO IT. WE HAVEN'T GOT THAT KIND -- YOU KNOW, WE RAISED NICE MONEY; THERE'S NO QUESTION. I'M VERY HAPPY. BUT I JUST CAN'T AFFORD THAT KIND OF THING.
MR. ZARWIN: OFF THE RECORD.
(DISCUSSION OFF THE RECORD.)
Q. WHEN YOU SPOKE TO MR. GREEN, DID HE UNDERSTAND THAT?
A. I WOULD ASSUME HE DID; AT LEAST I HOPE HE DID. YOU KNOW, HE'S FROM PHILADELPHIA. THAT'S THE WAY YOU DO POLITICS IN PHILADELPHIA: YOU RUN A DINNER FOR SOMEBODY, YOU TAKE THE EXPENSES OUT, AND HE GETS THE REST.
Q. DID YOU EVER SPEAK TO ANYONE ON HIS CAMPAIGN

7 6 0 4 0 1 4 1 5 3 7

STAFF JUST TO MAKE SURE?

A. NO. I CALLED BILL. I SAID, "CAN YOU BE THERE THE MAY 3," OR WHATEVER NIGHT.

AND HE SAYS, "OKAY." AND THEN WE HAD TO WAIT AN HOUR FOR HIM TO COME UP FROM WASHINGTON. HE WAS ON THE METROLINER LIKE YOU WERE, AND THE METROLINER WAS STOPPED, AND WE HAD ALL THE TELEVISION CAMERAS AND EVERYTHING WAITING, WAITING, WAITING, AND HE JUST ABOUT MADE THE 11 O'CLOCK NEWS.

Q. SO THEN YOU HAD ALL THE TICKETS PRINTED?

A. YES.

Q. AND HOW DID YOU GET PEOPLE TO BUY TICKETS? THROUGH THESE SEVEN BUSINESS AGENTS AGAIN?

A. YES. THEY'RE GOING AROUND THE STREET[redacted] WHEN THEY GO IN, THEY SAID, "HEY, WE'RE HAVING THIS DINNER FOR GREEN. HOW ABOUT IT? WHO BOUGHT A TICKET? WHO BOUGHT TWO?"

Q. I HAD A FEW MORE QUESTIONS ABOUT THE FIRST DINNER. IT WAS SO SUCCESSFUL YOU HAD ANOTHER ONE IN PITTSBURGH?

A. THE TRUTH OF THE MATTER WAS, THE FELLOWS OUT IN THE WESTERN END OF THE STATE, SOME OF THEM CAME DOWN AND TALKED TO GREEN, AND THEY WANTED TO HAVE A DINNER FOR HIM THERE.

Q. OH, THEY CAME DOWN TO THE FIRST ONE?

A. OH, YES. SOME OF THE GUYS COME FROM ERIE AND PITTSBURGH AND STAY OVERNIGHT AND GO BACK THE NEXT DAY.

Q. THESE TICKETS -- WE ASKED YOU THIS IN THE SUBPOENA -- DO YOU HAVE ANY RECOLLECTION WHAT THE TICKET SAID?

A. IT SAID "GREEN FOR SENATE."

Q. DID IT SAY "SERVICE STATION DEALERS" ON IT AT ALL?

A. GEE, YOU KNOW, TO THE BEST OF MY KNOWLEDGE, I DON'T REMEMBER OUR NAME BEING ON IT ALL.

Q. OKAY. IF YOU SEARCH AT THE PRINTER'S, COULD YOU GET ONE?

A. SEE, WE DID IT OURSELVES. WE MADE THOSE PARTICULAR TICKETS OURSELVES. THE BROCHURES WE HAD DONE AT THE PRINTER.

Q. YOU NEVER SAVED ANY OF THESE THINGS?

A. LIKE I TOLD YOU, WE HAVE A LITTLE OFFSET PRESS. WHATEVER WE COULD DO IN OUR OFFICE, WE DO, RATHER THAN PAY SOMEBODY THREE, FOUR TIMES THE PRICE OUTSIDE.

Q. THIS IS, JUST AGAIN FOR YOUR INFORMATION, IF YOU EVER WANT TO DO THIS AGAIN --

A. NEVER.

Q. -- THE REGULATIONS ARE THAT YOU HAVE TO GIVE FOUR RECORDS OF TICKET SALES, EVEN THOUGH IT MIGHT BE LESS THAN A HUNDRED DOLLARS, EVEN UNDER 50.

FOTO-411-5

A. THAT'S WHAT I MEAN; THAT'S WHY I TELL YOU NO MORE.
Q. SO YOU DIDN'T HAVE ANY EXPENSES OTHER THAN THE PRINTING EXPENSES FOR THE PAPER AND THE --
A. THAT'S ABOUT IT, I GUESS.
Q. I NOTICED THAT ONE OF THEM -- TO GO BACK HERE A SECOND -- THE ONE IN PITTSBURGH, WHERE WAS THAT HELD?
A. THAT -- SEE, THAT PROBABLY WAS ONE OF THE WORSE PROBLEMS WE HAD ALL THE TIME. IT WAS AT THE SHERATON ON THE MALL IN MONROEVILLE, YOU KNOW, WHICH IS JUST OUTSIDE OF PITTSBURGH. I'LL NEVER FORGET THAT.
Q. WHY?
A. BECAUSE WE WOULD HAVE BEEN ALL DONE WITH WHATEVER WE GAVE BILL. IF YOU NOTICE, WE DIDN'T GIVE IT TO HIM ALL IN ONE LUMP SUM, BECAUSE WE DIDN'T COLLECT IT ALL IN ONE LUMP SUM. AND THEN THERE WERE SOME GUYS IN PITTSBURGH WHO SAID, "BECAUSE HE DIDN'T SPEAK AT THE DINNER, HE SHOULDN'T GET THE MONEY."
Q. WHO SAID THAT?
A. YOU KNOW, I REALLY DON'T KNOW WHO IT WAS. THERE WAS ABOUT FIVE, SIX GUYS. YOU ALWAYS GOT A BUNCH OF RADICALS. I DON'T CARE WHAT ORGANIZATION YOU GOT. YOU GOT SOME GUYS THAT GOT COOL, CALM HEADS AND YOU GOT SOME SCREAMERS.
SO THEY DIDN'T WANT TO GIVE THEM THE MONEY, AND WE DIDN'T WANT TO HAVE A COURT ACTION. SO

F6040141540

WE WITHHELD IT FOR A WHILE AND THEN WE GAVE IT TO HIM. BUT I'LL TELL YOU WHAT HAPPENED: HE FLEW IN TO SPEAK AT THAT DINNER.

Q. "THAT DINNER" BEING THE PITTSBURGH DINNER?

A. YES. AND I FLEW IN FROM PHILADELPHIA. AND THEY PICKED ME UP AT THE AIRPORT AND WE WENT DOWN TO THE SHERATON. AND I ALMOST COMMITTED SUICIDE. THERE WAS A PICKET LINE. THE EMPLOYEES WERE ON STRIKE THE NIGHT BEFORE.

BUT WE COULDN'T DO NOTHING ABOUT IT. THE TICKETS WERE SOLD, THE PEOPLE WERE COMING. BUT BILL GREEN WOULDN'T CROSS THE PICKET LINE. SO THE NET RESULT WAS, HE DIDN'T SPEAK IN THERE THAT NIGHT.

Q. HOW WAS THE MEAL?

A. TERRIBLE. I'LL TELL YOU HOW GOOD IT WAS: WE'VE NEVER BE THERE SINCE, NEVER BEEN THERE TO EVEN STAY.

Q. WHY WERE THE TICKETS 35 INSTEAD OF 25?

A. I REALLY DON'T REMEMBER, TO TELL YOU THE TRUTH. I DIDN'T PARTICULARLY RUN THAT ONE. I'M RESPONSIBLE FOR IT.

Q. WHO RAN IT?

A. WE HAD A GROUP OF GUYS OUT IN WESTERN PENNSYLVANIA THAT SOLD THE TICKETS, AND IT WAS, YOU KNOW, THE FIELD DIRECTORS OUT THERE. NO QUESTION ABOUT IT; I JUST COULDN'T RUN BACK AND FORTH JUST TO

P-0040-41154

MAKE ARRANGEMENTS. MOST OF THE ARRANGING WAS DONE OVER THE TELEPHONE, AND THE REASON FOR IT -- AGAIN I'LL GO RIGHT BACK TO WHAT I TOLD YOU: IT AIN'T NO PALUMBO'S. THE DIFFERENCE WAS, WE HAD A SHOW, BUT WE HAD TO PAY FOR THE SHOW; WE HAD AN ORCHESTRA, BUT WE HAD TO PAY FOR THE ORCHESTRA; WE HAD TO GET ALL OF THAT, WHICH WAS TERRIFIC, YOU KNOW, BECAUSE, AS YOU SEE, THERE WASN'T -- WHEN YOU COMPARE THOSE TWO DINNERS, THERE JUST ISN'T ANY COMPARISON.

Q. LET'S GO BACK TO THAT FOR A SECOND.

WHO WERE THE PEOPLE IN THE WESTERN PART OF THE STATE WHO ORGANIZED THAT?

A. YES. HERB FEDELA AND NINO.

Q. WHEN DID YOU ASK MR. GREEN -- THE SECOND ONE WAS HELD ON MAY 23, '76?

A. THE SECOND ONE WAS HELD ON ABOUT THEN, YES, I WOULD THINK SO. WE USUALLY PAY, YOU KNOW, FOR THE DINNER THE SAME NIGHT. THE LAST COUPLE OF YEARS, IF WE'VE HAD ANY DINNERS, THEY'VE NOT BEEN POLITICAL ACTION DINNERS, YOU KNOW. WE HAVE A SCHOLARSHIP DINNER. THEY MAIL US A BILL. I GUESS WE GOT CREDIT ESTABLISHED NOW.

Q. WHEN DID YOU ASK HIM TO COME TO THE MAY 23 ONE?

A. WHEN HE WAS AT THE MAY 3 ONE.

Q. DID YOU HAVE THAT DATE SET UP AT THAT TIME?

A. WE HAD A COUPLE OF POTENTIAL DATES.
Q. AND HE PICKED THAT ONE?
A. WELL, YOU KNOW, IF I RECALL, I SAID, "WE CAN HAVE EITHER THIS, THIS, THIS, OR THIS." AND I DON'T KNOW WHETHER, QUITE FRANKLY -- I DON'T REMEMBER WHETHER HE COMMITTED THAT NIGHT OR THE NEXT DAY. IT MAY HAVE BEEN THE NEXT DAY OR, YOU KNOW, WITHIN -- LET'S SAY, TO GIVE ME A LITTLE BIT OF GROUND, A 72-HOUR PERIOD, BUT NO MORE THAN THAT, YOU KNOW, BECAUSE I HAD TO HAVE THAT MUCH TIME IN ORDER TO GET THE GUYS OUT SELLING THE TICKETS.
Q. ALL OF YOUR CONVERSATIONS THEN WITH REGARD TO THESE FUNDRAISERS HAD ONLY BEEN WITH MR. GREEN?
A. YES, HIM AND SOMEBODY ELSE THAT I DON'T KNOW THE GUY'S NAME. YOU KNOW, SOMEBODY WAS ALWAYS TRAVELING WITH HIM AND IT WAS HELLO, YES, YES, YES, YES, AND THAT WAS IT. I NEVER BOTHERED TO TALK TO HIM, YOU KNOW, REALLY.
Q. I SEE YOUR EXPENSES FOR THE BAND AND RESTAURANT. THEY BILLED YOU?
A. YES. WELL, THE BAND WAS A FRIEND OF ONE OF OUR MEMBERS, YOU KNOW. HE KNEW THE MONEY WAS GOOD. THEY SENT US THE BILL AND WE SENT THEM THE CHECK. I KNOW WE DIDN'T PAY THE BAND OR THE ENTERTAINMENT THE SAME NIGHT.

790401-4154

Q. NOW, YOU MENTIONED THAT THERE WAS SOME SORT OF PROBLEM WITH GETTING HIM HIS MONEY, MR. GREEN. I'M TALKING ABOUT THE MONEY AS TO THE SECOND DINNER.

HOW ABOUT THE FIRST DINNER; DID HE GET HIS MONEY STRAIGHT OFF THE TOP?

A. HE GOT HIS MONEY WHEN WE GOT IT.

Q. WHICH WAS?

A. AS WE GOT IT, HE GOT IT.

Q. COMING IN?

A. YES.

Q. I NOTICED THAT --

A. SOME GUYS BUY ON CREDIT, YOU KNOW.

Q. LET'S GO TO THE TRANSFERS FOR A SECOND. 4/21 YOU GAVE HIM A PARTIAL TRANSFER OF DINNER-DANCE PROCEEDS?

A. WHAT PAGE IS THAT?

Q. THAT'S PAGE 3 OF 8 IN THE SCHEDULE B, EXPENDITURES. I SEE $4,600 ON APRIL 21, '76; THAT WAS A PARTIAL TRANSFER.

DO YOU KNOW IF THAT'S A PARTIAL TRANSFER FROM WHAT DANCE, WHAT DINNER? THE FIRST FUNDRAISER OR THE SECOND FUNDRAISER?

BY MR. ZARWIN:

Q. THAT WAS MAY 3?

A. NO. WAIT A MINUTE. EXCUSE ME. IF I'M NOT MISTAKEN, I THINK THAT DINNER WAS IN APRIL INSTEAD OF

760401-4154

MAY. I'M SURE THAT THAT DINNER WAS IN APRIL INSTEAD OF MAY.

Q. WELL, IF YOU DON'T KNOW, YOU DON'T KNOW.

A. NO. I DO. I'M TRYING TO RECALL IT. WE PAID PALUMBO IN MAY -- THAT'S WHAT IT WAS -- AND THAT'S WHY HE GOT THE DATE OF MAY 3.

BY MS. VAN GELDER:

Q. DID YOU PAY PALUMBO LIKE THAT NIGHT, GIVE HIM A CHECK? BECAUSE IF YOU NOTICE ON PAGE 2 OF YOUR EXPENDITURES, YOU GAVE PALUMBO $6,307 ON MARCH 3.

A. HE BILLED US FOR THAT. WE DIDN'T PAY THAT NIGHT. NOW, LET ME SEE. WAIT A MINUTE. LET'S GO BACK HERE. YES, INDEED. I THOUGHT I WAS CORRECT. IT WAS $6,700. WHERE WAS THAT?

Q. WELL, IT'S 6,300, BUT YOU MAY HAVE MORE LATER. THAT'S MARCH 3, '76.

A. MARCH 4.

Q. WELL, IT SAYS MARCH 3 IN YOUR REPORT, PAGE 2.

A. OKAY. THAT WAS THE DEPOSIT AND THAT WAS THE BALANCE. THE DINNER WAS THAT NIGHT.

Q. IN MARCH, NOT MAY?

A. THAT'S CORRECT.

Q. NOW WE'RE REALLY CONFUSED, AREN'T WE? BUT THE SECOND DINNER THEN WAS IN MAY, THE ONE IN PITTSBURGH?

A. THE SECOND DINNER WAS IN PITTSBURGH, WAS IN MAY,

7 8 0 4 9 1 4 1 5 4 5

CORRECT.

THE WITNESS: SOMEHOW OR ANOTHER -- EXCUSE ME -- IT LOOKS LIKE THE ACCOUNTANT PICKED IT UP WRONG, NORM.

MR. ZARWIN: IT LOOKS LIKE HE PICKED UP THE DATE OF THE DINNER --

THE WITNESS: SEE, HE HAS IT MAY 3, '77.

IT WASN'T NO MAY 3, 1977. ON THE BACK PAGE --

MS. VAN GELDER: RIGHT. I THOUGHT THAT WAS JUST A TYPO.

MR. ZARWIN: IT SHOULD HAVE BEEN 3/5/77?

THE WITNESS: 3/4, SO IT WAS 3/3, PROBABLY.

BY MS. VAN GELDER:

Q. "3" IS WHAT YOU HAVE LISTED ON PAGE 2, FORM B.

A. BECAUSE THERE IS A CHECK FOR PALUMBO'S AFTER THAT; I KNOW THAT. I DON'T KNOW WHERE HE GOT THAT FIGURE FROM.

MR. ZARWIN: PALUMBO'S RESTAURANT, 6307.

A. (CONTINUED) HERE IT IS RIGHT HERE: MARCH 4. WELL, I'M NOT WORRIED ABOUT A DAY.

7 0 4 0 1 - 4 1 5 4 6

Q. NOW, LET'S SEE IF WE CAN SET IT STRAIGHT: YOU'VE ONLY HAD TWO FUNDRAISERS FOR GREEN; CORRECT?
A. THAT'S CORRECT.
Q. NO MORE?
A. NO.
Q. NO COFFEE CLATCH OR ANYTHING?
A. NO.
Q. AND THEY WERE WHEN? FOR THE RECORD, WHAT WERE THE DATES?
A. MARCH 3 OR MARCH 4 AND MAY 23.
Q. OKAY. MARCH 3 OR MARCH 4?
A. SEE, BECAUSE I KNOW THESE CHECKS ARE MADE OUT IN ORDER. THAT WAS FOR PALUMBO'S RESTAURANT FOR THE BALANCE OF THE PAC DINNER MARCH 4, 1977, AND THAT COINCIDES WITH THIS AND IT COINCIDES WITH THAT, BUT ON THE OTHER IT SAYS "MAY 3, '77." I DON'T KNOW WHERE THAT CAME FROM.
Q. NOW, CAN YOU REMEMBER THEN, IF IT WAS IN MARCH OF '76 WHEN YOU HAD THE ACTUAL DINNER, WHEN DID YOU ASK MR. GREEN? CAN YOU GO BACK?
A. IT WAS MAYBE THREE, FOUR WEEKS BEFORE THAT.
Q. CAN YOU REMEMBER THE CIRCUMSTANCES WHERE YOU WERE THAT YOU ASKED HIM? WERE YOU OVER HIS HOUSE? DID YOU SEE HIM IN THE STREETS?
A. WHERE IN THE HELL WAS I? I GOT TO BE FRANK ABOUT

A-C-R-S-1-4-1-5-4-7

IT: I JUST DON'T RECALL WHERE I MET HIM.
Q. OKAY. THAT'S ALL RIGHT.
A. HEY, HE PROBABLY WAS AT SOME DINNER. AS YOU CAN SEE, WE GO TO SO MANY DINNERS.
Q. YOU HAD THESE DINNERS, AND YOU ASKED MR. GREEN -- I'M CONFUSED NOW BECAUSE OF THE DATES. I JUST HAVE TO RECAP: YOU HAD THE DINNERS --
A. THAT'S WHY I'M LOOKING HERE, BECAUSE IT SEEMED TO ME I SAID MAY 3. GEES, IT WAS SO CLOSE. IT DON'T SEEM THAT IT WAS SO CLOSE.
Q. SO MAY 23 AND MAY 3 WERE THE TWO DATES AND THE EXPENSES, THE ONLY EXPENSES, YOU HAD WERE FOR THE ACTUAL DINNER, THE RESTAURANT, AT PALUMBO'S?
A. THAT'S IT.
Q. AND THE TICKETS?
A. YES. WELL, THAT WAS -- ACTUALLY, THEY WEREN'T TICKETS; THEY WERE LITTLE BOOKLETS. PUT A BOOKLET ON EVERYBODY'S TABLE. TICKETS IS NO PROBLEM; WE DO THEM.
Q. ON YOUR REPORTS HERE YOU'VE GOT -- YOU CAN CHECK YOUR OWN RECORDS -- AROUND MARCH 29 YOU HAVE TICKET PRINTING, 23.32 AND 125.61.
BY MR. ZARWIN:
Q. THAT'S IN PITTSBURGH?
A. YES, THAT ONE WAS AT PITTSBURGH.
NOW, THAT'S A PECULIAR ONE, TOO,

79040-41548

BECAUSE THAT WAS A RAFFLE.

BY MS. VAN GELDER:

Q. YOU HAD A RAFFLE?

A. YES, IT WAS A RAFFLE. YOU KNOW HOW THE CHURCHES ARE, A BUCK A BOOK, EVERYBODY LOSES.

Q. EVERYBODY LOST?

A. NO. SOMEBODY WALKED AWAY WITH A COLOR TV. SOMEBODY WALKED AWAY WITH A RIFLE, TOO.

Q. THE TICKETS FOR THE GREEN DINNER, THE 125, WAS A RAFFLE, ALSO?

A. YES. THAT'S PITTSBURGH. THEN SEE WE WENT BACK AND PAID ANOTHER 50.88. THE DRAWING -- YOU KNOW, THE RAFFLE TICKETS, THEY WENT BETTER THAN THE DINNER TICKETS. SEE, A GUY COULDN'T BUY A TICKET; HE'D BUY MAYBE A BUCK'S WORTH, TWO BUCKS' WORTH OF RAFFLES.

Q. YOU DON'T HAVE ANY OF THOSE RAFFLE TICKETS LEFT OVER?

A. NO.

Q. WHO BOUGHT THE COLOR TV?

A. I THINK IT WAS RUDY MOLNAR; I THINK IT WAS RUDY OR HERB. THEY GOT IT AT A WHOLESALE PLACE.

Q. AND HE DONATED IT FOR THE RAFFLE?

A. NO, HE DIDN'T DONATE IT. WE PAID FOR IT.

Q. YOU PAID FOR IT OUT OF THE RAFFLE SALES?

A. OH, YES.

2004011542

Q. HOW MUCH DID THE RAFFLE PERSON WIN; DO YOU REMEMBER?
A. WELL, ONE GUY WON A COLOR TV. ONE GUY WON A SHOTGUN OR A 30.06.
Q. A SHOTGUN?
A. YES.
Q. I SUPPOSE THAT COMES IN HANDY IN YOUR BUSINESS?
A. NO. YOU GOT OUT WESTERN PENNSYLVANIA, THEY HUNT QUAIL, DEER, GIRLS.
Q. WELL, OKAY. NOW, YOU NEVER LISTED THIS RAFFLE AS AN EVENT, THOUGH?
A. NO. THAT ALL WENT IN WITH THE -- WELL, THAT JUST WAS ALL IN ONE BIG LUMP SUM, YOU KNOW.
Q. WHEN WAS THE DRAWING? AT THE DINNER?
A. YES, IT WAS RIGHT AT THE DINNER.
Q. WEREN'T YOU AFRAID THAT SOMEBODY WAS GOING TO TAKE THE SHOTGUN AND SHOOT MR. GREEN FOR NOT COMING?
A. NO. WE KEPT THE SHOTGUN UNTIL AFTER EVERYBODY LEFT.
Q. BUT THIS WAS A RAFFLE THAT -- LET ME GET THIS STRAIGHT -- THE MAN BOUGHT THE TV AND THEN YOU REIMBURSED HIM WHEN YOU GOT THE MONEY IN FROM THE RAFFLE TICKETS?
A. YES. NOW, HOW THEY DID THAT -- YOU KNOW, I'VE GOT TO BE FRANK ABOUT IT. I DON'T KNOW WHETHER WE

7 9 0 4 0 1 4 1 5 0

PAID HIM OR, YOU KNOW, THEY TOOK THE MONEY OUT OF THE RAFFLE TO PAY HIM. BUT, YOU KNOW, THAT'S THE WAY IT WAS. HE DIDN'T DONATE THE TELEVISION, YOU KNOW.

Q. THEN AT THIS -- WE'LL CALL IT THE -- PITTSBURGH DINNER, INSTEAD OF CONFUSING OURSELVES WITH DATES -- GREEN DIDN'T CROSS THE PICKET LINE, SO HE NEVER SPOKE?

A. THAT'S CORRECT. BUT THE DINNER WAS FOR HIM.

Q. AND THEN HOW MUCH MONEY DID YOU GET FOR THAT ONE? DO YOU HAPPEN TO REMEMBER HOW MUCH MONEY YOU TRANSFERRED? YOU COLLECTED $7,000, I GUESS?

A. I DON'T KNOW. WAIT A MINUTE.

Q. I THINK YOU'VE GOT IT $35 A PIECE, 200 TICKETS?

A. THAT'S ABOUT IT, YES.

Q. AND YOU SAID THAT THAT WAS HELD UP FOR A WHILE? YOU DIDN'T PASS IT RIGHT OVER TO GREEN?

A. NO, HE DIDN'T GET IT RIGHT AWAY. I CONVINCED THE GUYS TO GIVE IT TO HIM LATER. I SAID, "HEY, LOOK, HE MADE THE TRIP ALL THE WAY FROM WASHINGTON. YOU KNOW, IT WASN'T HIS FAULT IT WAS A PICKET LINE." I SAID, "IF IT HAD BEEN ANY OTHER DAY, I WOULDN'T HAVE CROSSED IT."

Q. WHO PAID FOR MR. GREEN'S TRANSPORTATION TO GO TO THE DINNER FROM WASHINGTON TO PHILADELPHIA, WASHINGTON TO PITTSBURGH?

A. HAVEN'T GOT THE FAINTEST IDEA. ALL I KNOW, IT

79040141 SI

WASN'T ME. WE DIDN'T GIVE HIM A NICKEL FOR THAT.
Q. "WE" MEANING THE SERVICE STATION DEALERS PAC?
A. NOR ANYBODY I KNOW OF.
Q. I NOTICE, IF YOU LOOK AT YOUR TRANSFERS TO MR. GREEN THAT ARE CONTAINED IN THE REPORTS --
A. WHAT PAGE ARE YOU ON?
Q. WE'LL START OFF AT EXPENSES, PAGE 3 OF 8.
A. 3 OF 8, RIGHT.
Q. YOU'VE GOT 4,000.
A. 4,600.
Q. YOU'VE GOT 4,600 IN APRIL.
A. RIGHT.
Q. AND THEN YOU DON'T GIVE HIM ANY MORE MONEY UNTIL AUGUST, AUGUST 3, I THINK. YOU GAVE HIM --
A. YES, THAT'S CORRECT.
Q. YOU GAVE HIM A THOUSAND. WHY? WHY WAS THE REST OF IT HELD UP, AND THEN IN SEPTEMBER AND OCTOBER YOU GAVE HIM THE REST?
A. BECAUSE OUR FIELD GUYS -- SEE, WHAT HAPPENS, THE GUY SAYS, "OKAY. LEAVE ME TWO TICKETS. I'LL GO." HE LEAVES HIM TWO TICKETS. IT MAY NOT BE THREE MONTHS BEFORE HE GETS BACK TO COLLECT IT. I GOT NEWS FOR YOU: THERE IS NO WAY I'M GOING TO PAY THAT MONEY OUT IF IT DON'T COME IN. IT'S SIMPLE, YOU KNOW.
Q. SO WHEN DID YOU DECIDE TO MAKE ALL THESE

7 8 0 4 0 1 4 1 5 5 2

TRANSFERS?

A. WHEN WE GET THE MONEY, WE TRANSFERRED IT. BUT I DON'T WANT TO TRANSFER A HUNDRED, 200, 300. I PILED IT UP, YOU KNOW.

Q. TO THE BEST OF YOUR KNOWLEDGE -- AND I REALIZE THAT THIS PROBABLY IS -- YOU DON'T HAVE TO ANSWER IF YOU DON'T WANT TO -- BUT WHEN, YOU KNOW, JOHN Q. EXXON WANTS TO BUY A TICKET, DID HE THINK HE WAS MAKING A CONTRIBUTION TO THE SERVICE STATION DEALERS OR TO GREEN?

A. I DON'T KNOW REALLY HOW I COULD ANSWER IT, YOU KNOW. WE TOLD HIM THAT IT WAS FOR GREEN; THERE WAS NO QUESTION ABOUT IT. AS I SAID BEFORE, I WOULD THINK THAT HE WAS PROBABLY MAKING IT BECAUSE OF US, BUT HE KNEW HE WAS MAKING IT TO GREEN. BECAUSE, LIKE I SAID, THIS GUY'S VOTING RECORD FOR US ALWAYS WAS 100%.

Q. IN YOUR CONVERSATIONS WITH MR. GREEN AND IN SETTING UP THE DINNER, EITHER BEFORE OR AFTER THE DINNER, DID ANYONE EVER TELL YOU THAT IF IT WAS A FUNDRAISER AND THAT YOU WERE COLLECTING MONEY FOR SOMEBODY ELSE THAT YOU HAD CERTAIN OTHER REQUIREMENTS UNDER THE ACT?

A. NO.

Q. ARE YOU FAMILIAR NOW WITH THOSE REQUIREMENTS?

7040155

A. NO. I DON'T THINK SO, ANYHOW.
Q. IF YOU'RE GOING TO MAKE -- HOW WOULD YOU CHARACTERIZE YOUR ROLE? AS A SERVICE STATION DEALER? YOU USED AN ADJECTIVE BEFORE. YOU SAID THAT YOU WERE A CONDUIT.
A. WELL, THE CHECKING ACCOUNT. WE JUST USE THAT, YOU KNOW, AS SOMEPLACE TO DEPOSIT THE FUNDS.
Q. BUT MR. GREEN OR NO ONE ELSE EVER TOLD YOU THAT CONDUITS HAVE TO MAKE SPECIAL REPORTS TO THE COMMISSION LISTING THE INDIVIDUAL CONTRIBUTOR'S NAME REGARDLESS OF THE SIZE OF THE CONTRIBUTION?
A. NO.
Q. AND THAT HE HAS TO FILE ANOTHER FORM?
A. WELL, I DON'T REMEMBER HIM EVER TELLING ME, NO. SEE, THE THING I CAN'T UNDERSTAND IS THAT, OKAY, IF WE DID THIS AND IF WE DID IT WRONG, YOU KNOW, I DON'T THINK ANYBODY WAS REALLY TRYING TO HIDE ANYTHING, BECAUSE IT WINDS UP, IT WAS PUBLISHED RIGHT IN HIS REPORT; SO HE WASN'T TRYING TO HIDE NOTHING. WHAT WE DID, MAYBE WE DIDN'T DO IT ACCORDING TO THE WAY THE RULE SAID TO DO IT. BUT, YOU KNOW, NOBODY -- I'M CONVINCED THAT NOBODY WAS TRYING TO MAKE A SHAM OUT OF THE RULES OR REGULATIONS.
Q. OKAY.
A. YOU KNOW, OF COURSE, I GUESS HINDSIGHT IS BETTER

7904014154

THAN FORESIGHT.
Q. BUT MR. GREEN NEVER TOLD YOU ABOUT ANY SPECIFIC OR NO ONE EVER TOLD YOU AND YOU NEVER LOOKED AT THE ACT AT WHATEVER REQUIREMENTS --
A. I DIDN'T EVEN KNOW THE DAMN THING WAS THERE.
Q. EVEN THOUGH YOU GOT NOTICES AROUND THIS TIME?
A. AROUND WHAT TIME?
Q. YOU GOT NOTICES -- OKAY. I'M AT THE WRONG YEAR.
A. YOU'RE THE RIGHT YEAR. YOU'RE JUST A LITTLE BIT LATER IN THE YEAR.
Q. RIGHT. MR. GREEN'S ATTORNEY AT ONE POINT HAD STATED THAT YOU'RE A REGISTERED COMMITTEE. DID YOU EVER TELL HIM THAT OR DID HE JUST --
A. I TOLD HIM THAT WE HAVE ONE. OUR NATIONAL IS A REGISTERED COMMITTEE.
Q. YOUR NATIONAL WHAT?
A. OUR NATIONAL CO`GRESS OF PETROLEUM RETAILERS. SEE, YOU KNOW, THE FUNNY PART ABOUT ALL THIS IS THAT I COULD HAVE SAVED ALL THIS PROBLEM. I'LL TAKE THE MONEY OUT OF NATIONAL, THEY WOULD HAVE FILED IT, AND EVERYTHING WOULD HAVE BEEN FINE. BUT I KNEW NOTHING ABOUT THIS THING.
Q. WE'LL GET BACK TO THE NATIONAL IN A SECOND. I JUST WANT TO CLEAR UP A COUPLE OF QUESTIONS ON THE FUNDRAISER.

790401 4135

FOR INSTANCE, YOU ENDED UP WITH $4,600 IN TRANSFERS FROM THE DINNERS, THE TWO DINNERS, AND THEN YOU BOUGHT, IF YOU LOOK IN YOUR RECORDS, AROUND MARCH 3 AND MARCH 24 $400 WORTH OF DINNER TICKETS. WERE THOSE FOR YOUR GREEN DINNER OR ANOTHER GREEN DINNER?

A. NO. THEY'RE FOR ANOTHER GREEN DINNER. WE HAD TWO.

Q. AND YOUR TICKET SALES FOR THESE DINNERS CAME UP TO ABOUT $25,700, THE $18,750 FOR YOUR PALUMBO ONE AND 7,000 FOR YOUR PITTSBURGH ONE?

A. YES.

Q. AND YOUR EXPENSES CAME UP TO 11,000, INCLUDING YOUR RAFFLE TICKETS, YOUR DINNERS AND RESTAURANTS, BANDS. AND ON THE BAND, HERB FEDEL?

A. THAT'S ONE OF OUR BUSINESS AGENTS -- HE'S ON THE RECORD -- FROM PITTSBURGH.

Q. AND YOU REIMBURSED HIM?

A. THAT'S RIGHT.

Q. WELL, IF YOU TAKE YOUR --

A. SEE, I TOLD YOU HE WAS -- THE GUY FROM THE BAND WAS RELATED TO HIM; YOU KNOW, NEPHEW, UNCLE, WHATEVER.

Q. IF I TAKE YOUR SALES AND I SUBTRACT YOUR EXPENSES, I GET $14,001, SO YOU MUST HAVE GIVEN HIM A LITTLE EXTRA?

7904014156

A. YES. WE GAVE HIM THE THOUSAND DOLLARS THAT WE THOUGHT WE COULD GIVE HIM.
Q. FORTUNATELY YOU GAVE HIM 999. SO IT'S EVEN BETTER FOR YOU.
A. WHATEVER, YOU KNOW. IF I GET THAT CLOSE, I'M HAPPY.
Q. BUT THAT 15,000 IS ALL THE MONEY YOU EVER GAVE GREEN?
MR. ZARWIN: I DON'T THINK HE GAVE HIM 15,000.
A. YES, 15,000.
BY MR. ZARWIN:
Q. YOU GAVE HIM 15,000?
A. YES. I KNEW WHAT HE GOT.
BY MS. VAN GELDER:
Q. AND THAT'S ALL THE MONEY YOU GAVE GREEN, RIGHT, DURING 1976?
A. THAT'S ALL WE EVER GAVE HIM, PERIOD.
Q. OKAY.
A. SEE, WE NEVER MADE ANY CAMPAIGN CONTRIBUTIONS TO BILL WHEN HE RUN FOR CONGRESS, YOU KNOW, BECAUSE HE WAS FROM A SAFE SEAT TO START WITH AND HE NEVER TOOK CONTRIBUTIONS.
Q. OKAY. HOW WOULD YOU CHARACTERIZE THAT $999 EXTRA?
A. DONATION, CONTRIBUTION.

790141557

Q. BUT YOU JUST ADDED IT INTO THE TRANSFERS, NOT AS A SEPARATE CONTRIBUTION?
A. RIGHT.
Q. IF WE CAN TAKE A SECOND, STILL LOOKING AT YOUR REPORTS, YOU MENTIONED SOMETHING ABOUT A -- ON PAGE 1 OF 3 -- THIS IS SCHEDULE B -- YOU'VE GOT SOMETHING THAT SAYS "PSSDA - ERIE CHAPTER." WHAT IS THAT?
A. YES, THAT'S RIGHT. THEY HAVE A LITTLE --
Q. WHO ARE "THEY," FIRST OF ALL?
A. WHAT CAN I SAY TO YOU? THEY'RE -- THEY HAVE A LITTLE GROUP OF FELLOWS UP THERE IN ERIE COUNTY. RIGHT.
Q. YES.
A. AND I WISH THE REST OF THEM WERE AS GOOD AS THEM. THEY'RE RATHER POLITICALLY ACTIVE. ONE OF THEM'S A LEGISLATOR, TWO OF THEM ARE ON CITY COUNCIL, AND THEY FORMED A LITTLE CHAPTER FOR THEMSELVES UP THERE, AND THEY RAN A DINNER. OKAY.
Q. YES.
A. AND WE BOUGHT THREE TICKETS OFF OF THEM -- THE PAC BOUGHT THREE TICKETS OFF OF THEM. BUT THEY'RE JUST A LITTLE CHAPTER AND THEY --
Q. A LITTLE CHAPTER OF THE SERVICE STATION DEALERS ASSOCIATION?
A. ASSOCIATION, YES. AND WE BOUGHT THE THREE

7 9 0 4 0 1 4 1 5 5 6

DINNERS. THEY WERE SELLING TICKETS AND THEY NEEDED THREE MORE TO BE A SELLOUT, YOU KNOW.

Q. SO YOU BOUGHT THEM?

A. SO WE BOUGHT THEM. TOOK A VOTE AND WE BOUGHT THEM.

Q. A VOTE OF THE SEVEN AGENTS?

A. NO, NO. THE GUYS ON THE PAC. THE ONE GUY WAS FROM -- LIKE I SAID, HE'S FROM WESTERN PENNSYLVANIA. HE SAYS, "HEY, THEY ONLY GOT THREE MORE TICKETS TO BUY, AND THE DINNER'S TOMORROW NIGHT." THERE WAS A CHANCE; I THINK YOU WIN $1,500 OR SOMETHING. SO WE BOUGHT THREE, AND WE LOST AGAIN.

Q. WHO PAYS FOR THE PAC'S POSTAGE, PHONES, RENT, AND ADMINISTRATIVE COSTS?

A. THE PAC.

Q. HOW COME I DON'T SEE ANY EXPENDITURES FOR THAT? I SEE A FEW FOR FOOD AND FOR TICKETS.

A. IT SAYS "POSTAGE" OVER HERE, AND THEN HERE'S THE ADDRESS --

Q. THAT'S THE ONLY ONE YOU HAVE. THAT'S IN 11 --

A. RIGHT, 11/12/76.

Q. BUT IN '74, '75, AND UP UNTIL NOVEMBER 12, '76, YOU NEVER MAILED A THING OUT?

A. NO.

Q. WHAT WAS THIS MAILING FOR?

7 9 0 4 0 1 4 1 5 5 2

A. WE -- QUITE FRANKLY, THIS WAS A GUESS. WE HAD USE OF POSTAGE TO MAIL TO LIKE OUR DIFFERENT FIELD MEN. WE FIGURE SO MANY PIECES, SO MUCH, AND WE GUESSED AND THEN ADDED ABOUT $20, BECAUSE I RENTED ME OVER AND THEN UNDER. BECAUSE WE DON'T PAY NO RENT OR ANYTHING LIKE THAT.

Q. WHAT WAS THE PURPOSE OF THE MAILING?

A. OH, THIS WAS JUST TO MAIL THESE LITTLE PAMPHLETS OUT TO OUR FIELD MEN.

Q. OKAY.

A. SEE, WE HAVE A MAILING MACHINE IN OUR OFFICE.

Q. YOUR OFFICE BEING THE ASSOCIATION?

A. THE ASSOCIATION OFFICE. SO I'M GOING TO MAKE THESE THINGS UP, PUT THEM IN A PACKAGE. MAYBE POSTAGE IS $2.50. WE PUT THE LABEL ON THERE.

Q. IS THAT AN AGGREGATE?

A. OH, YES THAT'S AN AGGREGATE FOR THE WHOLE YEAR AND A HALF.

Q. THE ADDRESS PLATE. OBVIOUSLY YOU HAD TO HAVE ADDRESSES FOR AN ADDRESS PLATE.

A. WELL, THEY'RE MADE UP -- REALLY WHAT IT WAS, IT WAS A -- LET'S SEE IF WE CAN GET DOWN TO BRASS TACKS ON THIS. IT WAS A LETTER FROM JIMMY CARTER TO -- WHO? -- IT WAS A LETTER TO JIMMY CARTER -- I DON'T REMEMBER TO WHOM IT WAS ADDRESSED, BUT IT WAS A COPY

7904014156

OF HIS STAND ON SOME ENERGY QUESTION. BUT WE TOOK THIS -- SEE, LIKE THIS HAS A PICTURE OVER HERE.

Q. A PICTURE OF WHOM?

A. IT HAD A PICTURE OF JIMMY CARTER, AND THEN IT HAD SOME WRITING OVER HERE. THIS WAS HIS POSITION ON THIS. SO WHAT WE DID, WE TOOK THIS DOWN TO THIS MASTER GRAPHICS AND I SAID TO THEM, "COULD YOU ETCH ME A PLATE OF THIS?" OKAY. AND TOGETHER WITH THAT WENT A COPY OF SOMEBODY'S PERMISSION TO USE IT, WHATEVER -- I DON'T REMEMBER THE NAME, BUT IT WAS SOMEBODY. AND I TOOK IT BACK AND I RUN OFF A COUPLE THOUSAND, AND THEN I GIVE THEM TO THE FIELD MEN AND, YOU KNOW, THEY HANDED THEM OUT AS THEY WENT AROUND.

Q. DID IT HAVE "SERVICE STATION DEALERS PAC" ON IT?

A. NO. IT WAS A COPY OF A LETTER, YOU KNOW, THAT WAS WRITTEN BY OR AT LEAST SIGNED BY JIMMY CARTER; HAD HIS PICTURE OVER THERE.

Q. HOW DID YOU GET IT; DO YOU KNOW?

A. DAMNED IF I REMEMBER. I FORGET HOW I GOT MY HANDS ON IT.

Q. AND --

A. IT COULD HAVE COME -- MAYBE IT COULD HAVE COME FROM OUR NATIONAL OFFICE. I REALLY DON'T KNOW.

Q. BUT YOUR MAILINGS DON'T GO TO INDIVIDUAL SERVICE STATION DEALERS?

7 6 0 4 0 - 4 1 5 6 1

A. NO.
Q. THEY GO TO WHOM?
A. THEY GO TO OUR FIELD PEOPLE; WELL, OUR BUSINESS AGENT. IF YOU'RE A BUSINESS AGENT -- YOU KNOW, I HAVE 500 OF THESE MADE UP, PUT THEM IN BROWN PAPER, OKAY, GO OVER, GET THE POSTAGE, PUT IT ON THERE. I MAIL IT TO YOU AT YOUR HOUSE IN MAYBE ERIE OR PITTSBURGH OR GREENSBURG, AND YOU HAND THEM OUT AS YOU GO AROUND.
Q. AND DO YOU KNOW AS THE HEAD OF THE SERVICE STATION DEALERS PAC WHOM THEY GIVE THEM TO?
A. THEY GIVE THEM TO OUR MEMBERS, I'M SURE OF THAT. THEY MAY GIVE THEM TO SOME NONMEMBERS TRYING TO SOLICIT THEIR MEMBERSHIP.
Q. WHEN YOU TALK ABOUT YOUR MEMBERS, WHOSE MEMBERS ARE YOU TALKING ABOUT? YOU SAID WE GIVE THEM TO "OUR MEMBERS."
A. YES.
Q. WHOSE MEMBERS? THE SERVICE STATION DEALERS?
A. THE SERVICE STATION DEALERS ASSOCIATION.
Q. AND THOSE MEMBERS ARE JUST PEOPLE WHO PAY THE $20 A MONTH TO JOIN THE PENNSYLVANIA-DELAWARE SERVICE STATION DEALERS ASSOCIATION?
A. YES, THE DUES IS $20 A MONTH, RIGHT.
Q. AND IF I OWNED A SERVICE STATION AND IF I WAS A

7904011562

MEMBER OF THE SERVICE STATION DEALERS ASSOCIATION, THEN I'D HAVE A BUSINESS AGENT?

A. YES, THAT'S RIGHT. YOU WOULDN'T. YOU KNOW, WE HAVE THE BUSINESS AGENT.

Q. THAT COMES OUT TO ME?

A. TO YOU, RIGHT.

Q. AND I CAN YELL AT HIM ABOUT MY PENSION OR MY LIFE INSURANCE PROGRAMS, WHATEVER THE TRADE ASSOCIATION HAS?

A. YES, BUT YOU REALLY DON'T HAVE TO DO THAT. WE HAVE A WATS LINE. YOU CAN CALL US DIRECT ON THE WATS LINE.

Q. BUT THAT BUSINESS AGENT WILL OCCASIONALLY ASK ME FOR MONEY FOR THESE DINNERS?

A. YES.

Q. AND HE'LL ALSO EVERY ONCE IN A WHILE GIVE ME SOMETHING LIKE THIS?

A. YES.

Q. AND I CAN CALL YOU IF I WANT TO YELL AT YOU DIRECTLY? FOR INSTANCE, I CAN SAY, "WHAT ARE YOU HAVING ANOTHER GREEN DINNER FOR?" I CAN CALL YOU ON THE WATS LINE?

A. YES.

Q. WHO PAYS FOR THE WATS LINE?

A. THE ASSOCIATION DOES.

7904011563

Q. AND THEY ALSO PAY FOR -- ARE YOU THE ONLY PERSON THAT DOES THE WORK FOR THE PAC?
A. YES, I'M THE ONLY ONE THAT DOES THE WORK.
Q. DO YOU HAVE A SECRETARY?
A. YES.
Q. DOES SHE SOMETIMES TYPE THINGS OUT FOR YOU, GIVE YOU A HAND?
A. YES.
Q. AND YOU PAY THEM FOR THE POSTAGE OVER THE YEAR FOR '76?
A. YES, FOR ABOUT FOUR, FIVE, SIX REAMS OF PAPER, TOO, YOU KNOW.
Q. AND THE PHONE AND THE RENT, THEY SORT OF JUST LET YOU DO IT?
A. YES.
Q. YOU ALSO MENTIONED --
A. WHAT RENT? YOU KNOW, MY DESK IS THERE. I GOT ONE LITTLE THING IN THE DRAWER ABOUT THAT WIDE, YOU KNOW. HOW MUCH RENT COULD YOU CHARGE FOR THAT?
Q. OKAY. AND I NOTICE THAT OCCASIONALLY YOU USE SERVICE STATION DEALERS ASSOCIATION PAPER. YOU WROTE ME ONCE, YOU WROTE SUZANNE ONCE.
A. YES.
Q. HERE IT IS.
A. OKAY.

2040141564

Q. SO IT DOESN'T COST MUCH FOR PAPER, EITHER?
A. NO. YOU CAN SEE YOU SURE WOULDN'T CALL THAT EXPENSIVE WRITING PAPER. THAT'S PHOTOSTATED ON THERE. THAT'S WHY WE HAD TO GET A NEW PHOTOSTAT MACHINE.
Q. YOU ALSO SAID SOMETHING ABOUT THE NATIONAL CONGRESS OF PETROLEUM RETAILERS POLITICAL ACTION.
A. RIGHT.
Q. HOW IS SERVICE STATION DEALERS PAC -- LET ME GO BACK FOR A SECOND.

HOW IS THE NATIONAL CONGRESS OF PETROLEUM RETAILERS CONNECTED WITH THE SERVICE STATION DEALERS?

A. ALL RIGHT. THE NATIONAL CONGRESS OF PETROLEUM RETAILERS IS AN ORGANIZATION OF ORGANIZATIONS. OKAY?
Q. YES.
A. MAYBE COULD BE A CITY, COULD BE A MULTI-STATE ORGANIZATION, COULD BELONG TO THE NATIONAL. ALL RIGHT. THE NATIONAL CONGRESS OF PETROLEUM RETAILERS ONLY HAS MAYBE ABOUT, I THINK, 43 MEMBERS, BUT EACH ONE OF THOSE MEMBERS ARE AN ASSOCIATION. YOU CAN'T JOIN THAT AS AN INDIVIDUAL.
Q. CAN PENNSYLVANIA OR DELAWARE SERVICE STATION DEALERS --
A. OH, YES, WE BELONG TO THAT.
Q. AND YOU MENTIONED THAT TO AVOID ALL THE HASSLES

7904014156

THAT YOU'RE GETTING NOW WITH THE FEDERAL ELECTION COMMISSION THAT YOU COULD HAVE SAVED YOURSELF ALL THE TROUBLE AND JUST SENT --

A. IF WE HAD KNOWN.

Q. WHAT WERE YOU GOING TO DO TO SAVE YOURSELF THE TROUBLE?

A. WELL, I COULD THINK OF A THOUSAND WAYS. FIRST, THE BEST WAY IS TELL THEM BUG OFF. YOU GO TO WASHINGTON --

Q. NO. YOU MENTIONED SOMETHING ABOUT SENDING IT TO --

A. YES. 1420 K STREET. YOU GUYS ARE IN WASHINGTON ALL THE TIME. TELL THEM THAT I SENT YOU OVER FOR A COUPLE BUCKS. BECAUSE, AS YOU CAN SEE, WE CONTRIBUTED TO THAT PAC, TOO.

Q. DID YOU MENTION ABOUT SENDING SOME MONEY UP TO THAT PAC, TOO?

A. WE COULD HAVE THAT WAY. WHAT'S TO STOP THEM FROM DONATING $10,000 OR WHATEVER? AND THEN THEY DONATE IT TO HIM. YOU WOULD HAVE GOT ALL THE REPORTS ON IT RIGHT WHERE IT CAME FROM AND WHERE IT WENT.

Q. UNLESS YOU SAY THAT YOU'RE CONNECTED WITH THESE FELLOWS, THE NATIONAL ASSOCIATION OF PETROLEUM RETAILERS POLITICAL ACTION COMMITTEE.

MR. ZARWIN: BUT THEY'RE A MEMBER.

79040141566

THEY'RE A DUES-PAYING MEMBER.

A. WAIT A MINUTE. WE'RE NOT A DUES-PAYING MEMBER OF THE PAC. WE DONATE TO THE MEMBER. WE'RE A DUES-PAYING MEMBER TO NCPR, BUT NOT THE NCPR PAC.

Q. I'M JUST TRYING TO GET THIS RECORD, BECAUSE IF, YOU KNOW, YOU'RE CONFUSED BY OUR LAW, WE'RE CONFUSED BY YOUR REPORTS.

A. THEN WHAT THE HELL? WE'RE MUTUALLY CONFUSED.

Q. SO IT SEEMS TO ME YOU'VE GOT SORT OF TWO LINES. YOU'VE GOT SERVICE STATION DEALERS TRADE ASSOCIATION.

A. YES.

Q. AND THEY'RE A MEMBER OF THE NATIONAL CONGRESS OF RETAILERS?

A. PETROLEUM RETAILERS.

Q. AND THEN YOU'VE GOT THE SERVICE STATION DEALERS PAC AND THEY CONTRIBUTE TO THAT PAC?

A. YES, WE GIVE TO THAT PAC. IT'S LISTED RIGHT THERE: $500.

Q. HAVE THEY EVER GIVEN YOU ANY MONEY, THE NATIONAL RETAILERS?

A. NO. WE COULD RAISE MORE ONE IN ONE DAY THAN THEY CAN IN A YEAR.

Q. OKAY.

A. IF IT WASN'T FOR US AND A COUPLE OTHER STATES, THEY WOULD NEVER HAVE A NICKEL.

7904014156 7

Q. OKAY. GOING BACK FOR A SECOND, YOU PUT ALL THE MONEY THAT YOU MADE FOR GREEN IN YOUR OWN ACCOUNTS AND THEN YOU GAVE HIM A CHECK?
A. YES.
Q. THOSE ACCOUNTS ARE WITH THE FIDELITY BANK?
A. YES. WE DON'T HAVE ANY ACCOUNT WITH ANY OTHER BANK, ANYHOW.
Q. AND THAT'S A SEPARATE ACCOUNT FROM THE SERVICE STATION DEALERS ASSOCIATION?
A. OH, YES.
Q. OKAY. AND WHAT DID YOU DO WITH THE INTEREST? I WAS JUST WONDERING ABOUT THAT. DID IT EARN ANY INTEREST WHILE IT WAS SITTING THERE WAITING?
A. NO, YOU DON'T EARN ANY INTEREST IN A CHECKING ACCOUNT.
Q. OH, IT WAS IN A CHECKING ACCOUNT?
A. YES. WAIT A MINUTE. WAIT A MINUTE. WE EARN INTEREST BECAUSE WE GOT MONEY TO THE CREDIT UNION.
Q. WELL, WAS IT IN A CHECKING OCTOBER OR SAVINGS ACCOUNT?
A. NO, NO. SAVINGS ACCOUNT.
Q. OH, I THOUGHT YOU SAID CHECKING ACCOUNT.
A. WE HAVE IT IN A CHECKING ACCOUNT AND THEN WE HAVE SOME ALSO IN A CREDIT UNION. SEE, WE HAVE OUR OWN CREDIT UNION FOR OUR OWN PEOPLE.

7004014566

Q. THE PAC HAS?
A. NO, NO. THE ASSOCIATION HAS.
Q. OKAY.
A. LET'S STICK WITH PAC.
Q. YOU PUT THE MONEY IN A CHECKING ACCOUNT?
A. PAC HAS A CHECKING ACCOUNT AND A SAVINGS ACCOUNT.
Q. AND YOU PUT THE MONEY THAT YOU GOT FROM GREEN IN THE CHECKING OR SAVINGS ACCOUNT?
A. CHECKING.
Q. SO IT WOULDN'T HAVE INTEREST?
A. NO, THAT WOULDN'T HAVE ANY INTEREST AT ALL.
Q. AND BACK TO THE STATEMENT OF ORGANIZATION HERE -- THIS IS RIGHT AT THE BEGINNING -- YOU FILED THIS SEPTEMBER 2, THIS THING RIGHT HERE. OKAY.

JUST TO WRAP IT UP HERE, I GUESS THIS IS WHAT CONFUSES ME: YOU HAVE THE SAME ADDRESS AND USE OF STATIONERY AND USE THE SAME MEMBERS AS THE SERVICE STATION DEALERS ASSOCIATION, BUT YOU SAY YOU'RE NOT CONNECTED WITH THEM.

A. IT'S SEPARATE.

MR. ZARWIN: OKAY. WELL, WE TALKED ABOUT THAT, AS A MATTER OF FACT, TODAY COMING OVER HERE, AND THE QUESTION WAS IN TOM'S MIND, "WHAT'S IT MEAN BY AFFILIATION OR CONNECTED."

MS. VAN GELDER: OKAY.

7 9 0 4 0 1 4 1 5 6 9

Q. BASICALLY IF YOU'RE AN AFFILIATED ORGANIZATION, YOU TAKE THOSE MEMBERS AS YOUR MEMBERS, AND THAT MEANS THAT YOU CAN MAKE PARTISAN COMMUNICATIONS TO YOUR MEMBERS. YOU CAN SAY, "SUPPORT JIMMY CARTER." YOU CAN SAY, "SUPPORT BILL GREEN." AND YOU CAN HAVE JIMMY CARTER COME AND SPEAK TO YOUR MEMBERS WITHOUT IT BEING A CONTRIBUTION IN KIND TO THE CANDIDATE. YOU'RE BETTER OFF IF YOU'RE AFFILIATED, BASICALLY.

A. WAIT A MINUTE. RUN THAT PAST AGAIN. IN OTHER WORDS, IF ALL THE MEMBERS OF THE ASSOCIATION ARE MEMBERS OF THE PAC --

Q. RIGHT.

A. -- THEN WE COULD INVITE, LET'S SAY, GREEN TO A DINNER. ARE YOU SAYING THAT WE COULD GIVE HIM MONEY?

Q. OKAY. UNDER THE REGULATIONS, WELL, YOU CAN ALWAYS GIVE GREEN MONEY. YOU CAN ONLY GIVE HIM A THOUSAND DOLLARS UNLESS YOU GIVE TO MORE THAN FIVE CANDIDATES, AND IF YOU HAVE MORE THAN 50 MEMBERS AND GIVE TO MORE THAN FIVE CANDIDATES, THEN YOU CAN GIVE THEM 5,000.

OKAY. RIGHT NOW THE SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE IS A COMMITTEE AND THEY CAN ONLY GIVE A FEDERAL CANDIDATE A THOUSAND DOLLARS A CANDIDATE. IF IT QUALIFIES AS A MULTI-CANDIDATE COMMITTEE, YOU CAN GIVE $5,000. IF

YOU HAVE MORE THAN --

A. WHAT THE HELL? EVERYBODY THAT'S A MEMBER OF THE ASSOCIATION IS A MEMBER OF PAC.

Q. AND IN SIX MONTHS, WHICH IS AFTER MARCH, YOU'LL BE ABLE TO GIVE THEM -- YOU HAVE TO BE REGISTERED WITH THE COMMISSION FOR SIX MONTHS. SO SIX MONTHS FROM SEPTEMBER. OH, YOU'VE TERMINATED. IF YOU DIDN'T TERMINATE, OKAY, SIX MONTHS. $5,000 FOR FIVE CANDIDATES, 50 MEMBERS.

A. THE RECORDS SHOW WE GIVE TO MORE THAN FIVE CANDIDATES. YOU MEAN FIVE CANDIDATES?

Q. FIVE FEDERAL CANDIDATES.

MR. ZARWIN: HE WASN'T SURE WHAT "CONNECTED" OR "AFFILIATED" MEANT.

A. I DIDN'T KNOW WHAT THAT MEANT.

MS. VAN GELDER: OKAY.

Q. YOU MIGHT WANT TO AMEND YOUR REPORTS, BECAUSE IT LOOKS AS IF YOU HAVE ALL THE ISSUES THAT WILL GET YOU FOR AFFILIATION. UNDER THE REGULATIONS, WHICH YOU HAVE THERE, ALSO --

MS. VAN GELDER: OFF THE RECORD.

(DISCUSSION OFF THE RECORD.)

Q. (CONTINUED) "ALL COMMITTEES INCLUDING SEPARATE, SEGREGATED FUND ESTABLISHED, FINANCED, MAINTAINED, OR CONTROLLED BY THE SAME ORGANIZATION, LABOR

790401457

ORGANIZATION, PERSON, GROUP OF PERSONS, INCLUDING ANY PARENTS OR SUBSIDIARY BRANCH DIVISION, LOCAL OR UNITS THEREOF, ARE AFFILIATED," AND THEN IT ALSO TALKS ABOUT ALL POLITICAL BODIES, INCLUDING A TRADE ASSOCIATION OR PROFESSIONAL ASSOCIATION AND/OR BY RELATED STATE OR LOCAL ENTITIES ARE AFFILIATED, WHICH MEANS THAT IF SERVICE STATION DEALERS SET UP A SEPARATE, SEGREGATED FUND AND USE BASICALLY THE SAME OFFICE SPACE, PERSONNEL, THEN THEY'RE AFFILIATED, WHICH MEANS NOW THE BENEFITS OF AFFILIATION ARE THAT YOU CAN COMMUNICATE TO YOUR MEMBERS, AND THOSE COMMUNICATIONS ARE EXEMPT FROM THE STATUTE.

THAT'S SOMETHING THAT MR. ZARWIN CAN GIVE YOU MORE OF.

A. YES, BUT WOULDN'T WE LOSE THE NONPROFIT STATUS THAT WAY?

Q. NO. THE FEDERAL ELECTION CAMPAIGN ACT ALSO INCLUDES PARTS OF EXEMPT ORGANIZATIONS.

A. I'LL TELL YOU THE TRUTH: THAT'S REALLY WHY WE SEPARATED THEM, BECAUSE WE DIDN'T WANT TO LOSE OUR TEX-EXEMPT STATUS.

Q. I SEE. WELL, MAYBE YOU COULD TALK TO YOUR POLITICAL PEOPLE. BUT SEPARATE, SEGREGATED FUNDS ARE STILL CALLED EXEMPT ORGANIZATIONS WITHIN THE MEANING OF THE INTERNAL REVENUE CODE; IT'S TAKEN CARE OF BY

7 9 0 4 0 1 4 1 5 7 2

THAT.

BUT YOU MIGHT THINK OF AMENDING YOUR REPORTS TO SAY THAT YOU'RE AFFILIATED, IF IN FACT ALL YOUR MEMBERS ARE THE SAME MEMBERS AS THE SERVICE STATION DEALERS AND ALL OF YOUR CONTRIBUTIONS COME FROM MEMBERS OF THE SERVICE STATION DEALERS AND YOU USE THEIR FACILITIES RENT FREE.

BUT THAT'S MORE OF AN EDUCATION THAN A DEPOSITION. I WAS JUST WONDERING, WHAT WAS YOUR REASON FOR NOT SAYING THAT YOU WERE AFFILIATED?

A. WELL, WE SET THIS UP BECAUSE WE DIDN'T WANT TO LOSE NONPROFIT STATUS. WE JUST WANT TO PUT THIS OVER HERE AND KEEP IT SEPARATE SO THAT ONE DIDN'T INTERFERE WITH THE OTHER.

Q. WHO'S "WE"?

A. YOU KNOW, THE ASSOCIATION, PAC. WE SAID, "HEY, IF THE ASSOCIATION HAS A PAC, THEN WE COULD WE STAND A CHANCE TO LOSE OUR NONPROFIT STATUS."

Q. DID YOU SPEAK TO A LAWYER OR ANYONE ABOUT THAT?

A. YES. I THINK IT WAS ONE OF THEM DODOS THAT CAME DOWN THE NCPR MEETING.

Q. NATIONAL CONGRESS OF PETROLEUM RETAILERS?

A. YES. HE WASN'T OUR ATTORNEY. HE'S SMARTER THAN THAT.

Q. YOU SPOKE TO A GUY IN OUR OFFICE, MR. SHELTON,

7904011573

AND HE CALLED YOU UP A COUPLE TIMES LAST MAY, AND YOU STATED THAT YOU HAD TWO FUNDRAISERS AND THAT YOU TOOK CARE OF ALL THE ARRANGEMENTS, AND THEN YOU SAID YOU'D COME IN TO SEE HIM AROUND MAY 13. CAN YOU REMEMBER WHY?

A. YES. HE SAID TO ME, "I DON'T KNOW WHETHER THAT WOULD BE NECESSARY."

I SAID, "OKAY." NOW, IF IT'S NECESSARY, FINE. BUT HE NEVER COME BACK TO ME AFTER THAT.

Q. OKAY. ON SEPTEMBER 12, '77, YOU GAVE $200 TO ED MITCHELL.

A. YES.

Q. ARE YOU NOW AWARE THAT IF YOU GIVE OVER A THOUSAND DOLLARS, YOU HAVE TO REREGISTER WITH THE COMMISSION?

A. NOW, GIVE ME THIS AGAIN.

Q. IF YOU MAKE CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS IN THE AGGREGATE --

A. FOR '77?

Q. ANY TIME. YES, '77.

A. I DON'T THINK WE GAVE IN '77.

Q. NO, NO. I'M JUST SAYING, YOU'VE TERMINATED YOUR REPORTS WITH THE COMMISSION AND YOU'RE STILL MAKING FEDERAL CONTRIBUTIONS.

7 9 0 4 0 1 4 1 5 7 4

A. I THINK THAT WAS THE ONLY ONE, THOUGH, RIGHT.
Q. RIGHT. FOR THE RECORD I'M TELLING YOU, IF YOU MAKE OVER A THOUSAND DOLLARS IN CONTRIBUTIONS, YOU HAVE TO REPORT AGAIN.
A. YOU MEAN OVER A PERIOD OF A YEAR OR SEVEN YEARS?
Q. NO. PER YEAR.
A. RIGHT. THAT'S WHY I GIVE IT TO HIM: BECAUSE I KNEW WE DIDN'T GET UP THAT HIGH. THAT WAS TO HELP HIM PAY OFF A CAMPAIGN DEBT.
Q. CAMPAIGN DEBT FROM HIS LAST ELECTION?
A. YES.

MS. VAN GELDER: MR. ZARWIN, I'D BE MORE THAN HAPPY TO LET YOU CROSS-EXAMINE HIM IF YOU WANT.

MR. ZARWIN: NO, I REALLY DON'T.

(WITNESS EXCUSED.)

(WHEREUPON THE STATEMENT ADJOURNED AT 3:10 P.M.)

---

7 9 0 4 0 1 4 1 5 7 5

I HEREBY CERTIFY THAT I HAVE READ THE FOREGOING TRANSCRIPT OF MY TESTIMONY IN THE ABOVE MATTER AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

THOMAS ANDERSON

DATE:

7604014576

7904014577

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:

SERVICE STATION DEALERS :
POLITICAL ACTION COMMITTEE, : MUR 407(77)
RESPONDENT :

PHILADELPHIA, PA, JANUARY 17, 1978

SWORN STATEMENT OF THOMAS ANDERSON HELD IN THE OFFICES OF FOSTER COURT REPORTING SERVICE, INC., 1800 ARCHITECTS BUILDING, AT 2:25 P.M. ON THE ABOVE DATE BEFORE NANCY OKLESSON CYWINSKI, A REGISTERED PROFESSIONAL REPORTER AND NOTARY PUBLIC OF THE COMMONWEALTH OF PENNSYLVANIA.

7904015578

FOSTER
COURT REPORTING SERVICE, INC.
1800 ARCHITECTS BUILDING - 117 S. 17TH ST.
PHILADELPHIA, PA 19103
(215) 567-2670

APPEARANCES:

BIZ VAN GELDER, ESQ.
(1325 K STREET, N.W.
WASHINGTON, D.C. 20463)
ATTORNEY FOR FEDERAL ELECTION COMMISSION

NORMAN P. ZARWIN, ESQ.
ATTORNEY FOR RESPONDENT

PRESENT: SUZANNE CALLAHAN, INVESTIGATOR

7 9 0 4 0 1 4 1 5 7 0

... THOMAS ANDERSON, AFTER HAVING BEEN FIRST DULY SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

BY MS. VAN GELDER:

Q. MR. ANDERSON, COULD YOU GIVE ME YOUR NAME AND ADDRESS?

A. THAT'S NO PROBLEM. THOMAS J., JOSEPH, ANDERSON. 29 ELDON AVENUE, LANSDOWNE, PA 19050.

Q. AND WHAT IS YOUR OCCUPATION, SIR?

A. I AM AN ASSOCIATION EXECUTIVE.

Q. WHICH ASSOCIATION, PLEASE?

A. SERVICE STATION DEALERS ASSOCIATION, PENNSYLVANIA AND DELAWARE SERVICE STATION DEALERS ASSOCIATION.

Q. WHAT IS YOUR BUSINESS ADDRESS?

A. 425 COMMERCE DRIVE, YEADON, PA 19050.

Q. AND HOW LONG HAVE YOU BEEN EMPLOYED IN THAT CAPACITY?

A. SINCE FEBRUARY 1970.

Q. WHAT DID YOU DO BEFORE THEN, SIR?

A. OPERATED A SERVICE STATION.

Q. SERVICE STATION DEALERS, IS IT TRADE ASSOCIATION?

A. YES.

Q. AND WHO ARE THE MEMBERS OF THE TRADE ASSOCIATION?

A. SERVICE STATION DEALERS.

7904041560

Q. INDEPENDENTS OR AFFILIATES OF MAJOR -- JUST ANY SERVICE STATION DEALER?
A. YES, ANY SERVICE STATION OPERATOR CAN BELONG.
Q. WHEN DID THIS BECOME ORGANIZED, THE SERVICE STATION DEALERS ASSOCIATION?
A. THE ASSOCIATION WAS INCORPORATED, I BELIEVE, 1966 OR '65. '66, I THINK.
MR. ZARWIN: IT BECAME A PENNSYLVANIA NONPROFIT CORPORATION IN 1965, I BELIEVE, OR '66.
MS. VAN GELDER: THEREABOUTS. FINE. IT'S ONE OF THOSE TWO YEARS.
Q. WHAT IS YOUR AFFILIATION, YOUR, THOMAS ANDERSON'S AFFILIATION, WITH THE SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE?
A. I'M ONE OF THE DIRECTORS. I THINK WE GOT FIVE DIRECTORS.
Q. WHO ARE THE OTHER DIRECTORS, SIR?
A. RUDY MOLNAR, AUGUSTO BRUNO, WILLIAM DAMMION, AND MICHAEL FUSCO.
Q. ARE YOU ALSO THE TREASURER?
A. YES, SECRETARY-TREASURER.
Q. WHEN WAS THE SERVICE STATION DEALERS PAC -- CAN I JUST CALL IT THE PAC?
MR. ZARWIN: SURE.
Q. (CONTINUED) WHEN WAS THE PAC ORGANIZED?

7 6 0 4 0 - 4 1 5 6 1

A. 1974.
Q. 1974. WHO ORGANIZED IT?
A. I DID.
Q. ALONE? WAS IT YOUR OWN IDEA?
A. IT WAS MY IDEA, YES.
Q. AND WHAT IS THE PURPOSE, IF WE HAD TO UNDERLINE "PURPOSE," OF THE PAC?
A. THE UNDERLINED PURPOSE OF THE PAC, QUITE FRANKLY, IS TO RAISE SOME FUNDS AND WORK FOR CANDIDATES WHO ARE -- LET'S PUT IT POINT BLANK -- WHO SEE THINGS OUR WAY RATHER THAN AS OPPOSED TO NOT SEEING THINGS OUR WAY.
Q. STATE AND FEDERAL CANDIDATES?
A. THEY START OUT THAT WAY, BUT WE'RE ONLY INTERESTED IN STATE CANDIDATES AT THE TIME WE STARTED.
Q. WHAT IS THE ADDRESS OF THE PAC?
A. WELL, WE USE THE SAME ADDRESS AS THE ASSOCIATION OFFICE. THERE'S SO LITTLE ACTIVITY, YOU KNOW.
Q. I'LL GET TO YOUR ACTIVITY IN A SECOND, BUT I WAS WONDERING HOW --
MR. ZARWIN: CAN I HELP A LITTLE BIT ON THE PURPOSES? BECAUSE I THINK IT'S RELEVANT.
MS. VAN GELDER: YES.
MR. ZARWIN: THE TRADE ASSOCIATION IS COMPOSED OF SERVICE STATION DEALERS, AND THE PURPOSE

7 9 6 4 0 1 4 1 5 8 2

IS TO ELECT CANDIDATES WHO ARE FAVORABLE IN TERMS OF LEGISLATIVE GOALS WITH THE INTERESTS OF SERVICE STATION DEALERS PARTICULARLY AS OPPOSED TO MAJOR OIL COMPANIES. AND THE PURPOSE OF THE PAC IS TO WORK TOWARDS THE ELECTION OF SUCH CANDIDATES AS WELL AS LEGISLATION. IT'S NOT JUST FOR ELECTIVE PURPOSES, BUT AS WELL AS TO LOBBY FOR APPROPRIATE LEGISLATION ON THE STATE, LOCAL, AND NATIONAL LEVELS.

BY MS. VAN GELDER:

Q. YOUR SERVICE STATION DEALERS PAC IS A SEPARATE, SEGREGATED FUND OF THE PENNSYLVANIA AND DELAWARE SERVICE STATIONS?

A. TOTALLY SEPARATE.

Q. BUT YOU USE THE SAME OFFICE SPACE?

A. OH, YES.

Q. SAME PERSONNEL? DO YOU HAVE A SECRETARY THAT ANSWERS --

A. NO. THERE'S NO TELEPHONE NUMBER FOR THE PAC AND NOBODY EVER CALLS UP FOR PAC; NO ONE, NOT TO MY KNOWLEDGE. I DON'T ANSWER THE PHONE, BUT I DON'T KNOW OF A MEMBER, ANYONE, EVER CALLING UP AND ASKING FOR THE PAC. SO THE ANSWER TO THAT IS NO.

Q. BUT YOU USE THE SAME ADDRESS?

A. OH, YES, FOR THE PURPOSE OF -- YOU KNOW, PEOPLE SEND IT TO THERE FOR SOLICITATION FOR DINNER TICKETS

79 5 4 0 - 4 1 5 6 3

OR CAMPAIGN CONTRIBUTIONS, ADVERTISEMENTS. YES, THAT'S TRUE, THE MAIL COMES THERE FOR THAT PURPOSE.

Q. WELL, WE'RE TALKING ABOUT CAMPAIGN CONTRIBUTIONS AND ADVERTISEMENTS. IF WE CAN GO TOWARDS YOUR REPORTS, I HAVE YOUR STATEMENT OF ORGANIZATION FOR A POLITICAL COMMITTEE, WHICH IS THE FEC FORM, ONE WHICH YOU SENT ON SEPTEMBER 2, 1977. THE COMMISSION ON NUMEROUS OCCASIONS BEFORE, STARTING IN, I BELIEVE, NOVEMBER OF 1976, SENT YOU NUMEROUS NOTICES WHICH SAID THAT YOU SHOULD REGISTER AND REPORT AND THAT YOU MAY HAVE EXCEEDED YOUR CONTRIBUTION LIMITS.

DO YOU REMEMBER THESE REPORTS?

A. YES.

Q. WHAT DID YOU DO WHEN YOU FIRST GOT THEM?

A. WELL, WHEN I FIRST GOT THEM, I SHOULD HAVE GONE TO NORM, BUT I DIDN'T. I WENT TO SOME OTHER PEOPLE AND WE SAT DOWN, AND I GUESS, QUITE FRANKLY -- I GOT TO ANSWER THIS THING HONESTLY AND FAIRLY; THERE'S NO SENSE IN BEATING AROUND THE BUSH.

ONE, WE WERE TOLD AS LONG AS WE DIDN'T GIVE MORE THAN $1,000 TO A FEDERAL CANDIDATE, WE WERE NOT REQUIRED TO FILE WITH THE FEDERAL ELECTION COMMISSION.

Q. OKAY. BEFORE YOU GO ON, FOR A SECOND, YOU SAID YOU SAT DOWN WITH SOME OTHER PEOPLE. WHO WERE THESE

7 0 4 0 1 4 1 5 8 4

OTHER PEOPLE?
A. WELL, I DID SOMETHING I WILL NEVER DO AGAIN. IT WAS PEOPLE IN YOUR OFFICE.
Q. THAT'S FINE.
A. IN WASHINGTON. OKAY.
Q. YES. BUT DO YOU KNOW WHO THEY WERE?
A. NO. SEE, I SHOULD HAVE WRITTEN THE NAME DOWN.
Q. YES, YOU SURE SHOULD HAVE.
A. WELL, IT'S OKAY. WHAT'S DONE I CAN'T DO ANYTHING ABOUT.
Q. SO YOU SAT DOWN WITH SOME PEOPLE IN OUR OFFICE IN WASHINGTON?
A. YES. I GO TO WASHINGTON QUITE FREQUENTLY.
Q. WHEN WAS THIS YOU SAT DOWN AND TALKED TO THEM?
A. AROUND NOVEMBER OR DECEMBER OF 1976.
Q. CAN YOU REMEMBER WHICH FLOOR YOU WENT TO TO SPEAK TO SOMEBODY?
A. I DON'T. NO, I DON'T. I HAVE A HARD -- YOU KNOW, I HAVE AN EXCELLENT MEMORY. YOU'LL FIND THE FURTHER WE GO, THE BETTER MY MEMORY GETS, BUT I GO SO MANY DIFFERENT PLACES IN WASHINGTON, THE FEA, THE FTC, THE CONGRESSIONAL BUILDINGS. I CAN'T REMEMBER, YOU KNOW, WHERE MY CONGRESSMAN'S OFFICE IS. IF I GET DOWN AND LOOK AROUND FOR THE LANDMARKS, I SAY, "YES, THAT'S IT. IT'S DOWN THIS HALL."

7 6 0 4 0 1 4 1 5 6 5

Q. WHAT MADE YOU GO TO THE FEC OFFICE IN WASHINGTON?
A. I GOT A LETTER FROM THEM.
Q. AROUND DECEMBER OR NOVEMBER?
A. IT MAY HAVE BEEN JANUARY. I'M NOT LYING TO YOU.
Q. WHEN YOU WENT TO THE FEC, IT WAS IN RESPONSE TO A LETTER YOU GOT IN PROBABLY NOVEMBER OR DECEMBER?
A. I WOULD SAY SO. I DIDN'T GO UNTIL AFTER I GOT THE LETTER.
Q. USUALLY LETTERS SAY, "IF YOU HAVE ANY QUESTIONS CONCERNING THIS, PLEASE CONTACT," AND THERE'S A NAME. FOR INSTANCE, YOU'VE GOT A LETTER DECEMBER 16 THAT SAYS TO CONTACT A NANCY DAVIES.
A. YES.
Q. WAS THE PERSON THAT YOU SPOKE TO A MAN OR A WOMAN; DO YOU REMEMBER?
A. NO. IT WAS A MAN. WHEN I WENT TO WASHINGTON, I SPOKE TO A MAN.
Q. WAS IT SOME PEOPLE OR ONE PERSON YOU SPOKE TO?
A. NO. IT WAS ONLY ONE PERSON.
Q. OKAY. AND YOU CAN'T DESCRIBE THE MAN? WAS HE YOUNG, OLD, FAT, THIN, DARK HAIR, LIGHT HAIR, ET CETERA?
A. I'LL TELL YOU, I BEST COULD PROBABLY DESCRIBE HIM, HE WAS A FAIRLY YOUNG FELLOW, AND THE BEST WAY I COULD DESCRIBE HIM, HE LOOKS LIKE EVERY OTHER

7901415

LEGISLATIVE AID IN WASHINGTON. SOMEHOW OR ANOTHER THEM GUYS ALL FIT A PATTERN TO ME. THEY'RE YOUNG, THEY'RE THIN, THEY'RE 29, 28, 26, WHATEVER.

Q. YOU SPOKE TO HIM, AND WHAT DID HE TELL YOU?

A. I QUESTIONED HIM. I SAID, "I GOT A PROBLEM." I SAID, "I GOT A LETTER." I SAID, "WHY WOULD WE HAVE TO FILE A FEDERAL ELECTION FORM?"

HE SAID, "WELL, DID YOU CONTRIBUTE TO FEDERAL CANDIDATES?"

I SAID, "YES." I SAID, "BUT I WAS TOLD THAT AS LONG AS IT DIDN'T EXCEED $1,000 THAT WE WERE OFF THE HOOK FOR THAT ALL RIGHT."

HE SAID, "WELL, THAT'S CORRECT."

I SAID, "WELL, WE DIDN'T GIVE ANYBODY MORE THAN A THOUSAND DOLLARS."

"IF YOU DIDN'T GIVE ANY MORE THAN A THOUSAND DOLLARS, YOU DON'T HAVE TO FILE."

I SAID, "OKAY. THANK YOU."

Q. YOU SAID YOU TOLD THIS MAN YOU WERE TOLD. WHO TOLD YOU ORIGINALLY THAT YOU DIDN'T HAVE TO FILE?

A. WELL, I TALKED TO OTHER PEOPLE IN PHILADELPHIA, BECAUSE I HAD CONTRIBUTED TO SOME PEOPLE IN PHILADELPHIA; AND WESTERN PENNSYLVANIA IS INCLUDED, AND I CALLED HIM.

Q. CALLED WHOM, SIR?

2 6 8 4 0 1 4 1 5 6 7

A. I SPOKE TO CONGRESSMAN LEDERER. HE SAID HE DIDN'T REALLY KNOW WHAT THE LAW WAS, BUT HE SAID, "I'LL GET A HOLD OF SOMEBODY." HE SAID, "NEXT TIME NOTHING OVER A THOUSAND BUCKS."

Q. YOU GAVE MR. LEDERER A THOUSAND DOLLARS?

A. FIVE AND FIVE, FIVE TO THE GENERAL AND FIVE TO THE PRIMARY.

Q. NOW, YOU DIDN'T CONSIDER THE TRANSFERS TO MR. GREEN'S SENATE CAMPAIGN OVER A THOUSAND DOLLARS?

A. LET ME EXPLAIN THAT. OKAY. NOW, NO, WE DID NOT, AND I GOT TO TELL YOU WHY.

WHAT WE DID WAS, OUR PEOPLE HAPPENED TO HAVE LOVED CONGRESSMAN GREEN. HE WAS VERY INSTRUMENTAL IN KNOCKING OUT THE OIL DEPLETION ALLOWANCE, WHICH WE WERE BITTERLY OPPOSED TO; YOU KNOW, ALL THOSE VOTES. WE'RE TALKING ABOUT ONLY OUR INDUSTRY NOW. I CAN'T SPEAK FOR ANY OTHER INDUSTRY, BUT IN OUR INDUSTRY HIS VOTING RECORD WAS 100%. SO WE WANTED TO SUPPORT HIM. OKAY.

NOW, MAYBE THE WAY WE DID IT COULD HAVE BEEN INCORRECT; I DON'T KNOW ABOUT THAT. BUT WE WANTED TO RUN A DINNER FOR HIM, FOR CONGRESSMAN GREEN, FOR THE SENATE CAMPAIGN, WHICH WE SOLD DINNER TICKETS FOR $25 AT PALUMBO'S RESTAURANT IN PHILADELPHIA.

Q. YES.

7 0 8 4 9 1 4 1 5 6 8

A. WELL, THEY RAISED A LOT OF MONEY FOR HIM. I UNDERSTAND SINCE THEN THAT WHAT WE SHOULD HAVE DONE WAS SET UP A SEPARATE CHECKING ACCOUNT. BUT THE DINNER WAS FOR HIM, SO WE JUST USED THE PAC CHECKING ACCOUNT AS A CONDUIT. THE PROBLEM IS, WE HAVE SO MANY CHECKING ACCOUNTS, THEY'RE DRIVING ME INSANE. WE HAVE A PAYROLL ACCOUNT, A TAX ACCOUNT, AN INSURANCE ACCOUNT, CREDIT UNION ACCOUNTS.

Q. WHEN YOU SAY "WE HAVE" THESE ACCOUNTS --

A. THEY'RE ALL IN OUR OFFICE, YOU KNOW.

Q. AND THAT OFFICE IS THE SERVICE STATION DEALERS ASSOCIATION?

A. RIGHT.

Q. LET'S GO BACK TO THE FORMS. WE'LL DISCUSS THE FUNDRAISING IN A SECOND.

WHEN YOU WENT TO THE -- THAT WAS DECEMBER THAT YOU WENT TO --

A. WELL, DECEMBER OR JANUARY. YOU KNOW, I DON'T WANT TO GET PINNED DOWN, BECAUSE MAYBE IT WASN'T DECEMBER; MAYBE IT WAS IN JANUARY.

Q. AND THIS WAS JANUARY OF '77? BETWEEN DECEMBER '76 AND JANUARY '77?

A. IT WAS AFTER WE GOT THE LETTER. WHATEVER THAT WAS, AFTER WE GOT THE LETTER.

Q. AND THEN LATER ON IN FEBRUARY YOU GOT MORE

2904014569

NOTIFICATION FROM THE COMMISSION, DIDN'T YOU?
A. YES.
Q. WHAT HAPPENED THEN?
A. WELL, THEN WE TURNED IT OVER TO AN ACCOUNTANT.
Q. MR. WHO OR MS. WHO?
A. MR. BILKER.
Q. WHAT DID MR. BILKER SAY?
A. I SAID, "MIKE, FIND OUT ABOUT THIS AND LET'S GET IT STRAIGHTENED OUT, WHATEVER."
Q. AND THAT WAS IN FEBRUARY?
A. WELL, FEBRUARY OR MARCH, SOMEWHERE IN THERE.
Q. LET'S JUMP DOWN THEN TO MAY, AROUND MAY 4. YOU WERE CONTACTED AGAIN BY THE COMMISSION BY TELEPHONE, THIS TIME ASKING YOU ABOUT THE FUNDRAISERS, WHICH WE'LL DISCUSS LATER.
A. YES.
Q. STILL AT THIS TIME YOU HADN'T FILED REPORTS?
A. NO.
Q. WHY NOT?
A. BECAUSE I WOULD RATHER GO TO JAIL FOR ONE YEAR THAN FILE A FALSE REPORT AND GO FOR FIVE. IT'S EASIER DONE THAT WAY, IF NECESSARY. I WANTED THE REPORT TO BE FILED AND I WANT IT TO BE FILED CORRECTLY IF IT HAS TO BE FILED.
Q. WHY DO YOU THINK IT WOULD BE FILED INCORRECTLY?

A. I REALLY HAVEN'T GOT THE FAINTEST IDEA. THE REPORTS SCARE THE HELL OUT OF ME, BECAUSE AT THE BOTTOM IT SAYS "PENALTIES" AND SO FORTH. SO I'D JUST RATHER TAKE MY TIME AND BE SAFE THAN SORRY.

Q. ARE YOU FAMILIAR WITH THE FEDERAL ELECTION CAMPAIGN ACT AT ALL?

A. NO.

Q. HAVE YOU RECEIVED A COPY OF IT EVER? WHEN YOU WENT TO THE FEC, DID YOU PICK UP A COPY?

A. NO.

Q. DID YOUR ATTORNEY OR YOUR ACCOUNTANT EVER TELL YOU ABOUT IT, THAT THERE IS A FEDERAL ELECTION CAMPAIGN ACT?

A. HE GOT COPIES OF IT THERE.

Q. I JUST GIVE GAVE HIM THOSE.

A. WELL, WHATEVER.

Q. NO ONE EVER TOLD YOU THAT REPORTS HAD TO BE FILED QUARTERLY? IF YOU MADE EXPENDITURES FOR FEDERAL CAMPAIGNS, THAT --

A. IF THEY EXCEEDED A THOUSAND DOLLARS.

Q. YES.

A. WE KNEW THAT.

Q. YOU KNEW THAT?

A. I KNEW THAT. YES, I KNEW THAT.

7 6 0 4 0 1 4 1 5 6 1

BY MR. ZARWIN:

Q. WELL, DID YOU KNOW THAT THEY HAD TO BE FILED QUARTERLY? THAT'S THE QUESTION.

A. OH, NO. I KNEW THEY DIDN'T HAVE TO BE FILED AT ALL. AM I CORRECT? OR IF INCORRECT, IF IT'S NOT FOR MORE THAN A THOUSAND DOLLARS.

BY MS. VAN GELDER:

Q. WELL, DO YOU KNOW, IF YOU HAVE AN ORGANIZATION, A POLITICAL COMMITTEE, THAT WAS PLANNING ON MAKING MONEY, SPENDING CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS, THAT YOU HAD TO FILE A STATEMENT OF ORGANIZATION WITH THE COMMISSION?

A. I DON'T THINK I UNDERSTAND WHAT YOU'RE SAYING.

Q. IF YOU EVER SPENT MORE THAN A THOUSAND DOLLARS ON A FEDERAL ELECTION, YOU HAD TO HAVE A STATEMENT OF ORGANIZATION SIMILAR TO THE ONE THAT YOU FILED ON SEPTEMBER 2 WITH THE COMMISSION.

A. WELL, I DON'T UNDERSTAND THAT LAW. DOES THAT MEAN A THOUSAND DOLLARS, PERIOD, OR A THOUSAND DOLLARS PER CANDIDATE?

Q. A THOUSAND DOLLARS, PERIOD.

A. NO, I DIDN'T KNOW THAT.

Q. DO YOU REMEMBER IN 1974 MAKING POLITICAL CONTRIBUTIONS TO CANDIDATES?

A. COULD I LOOK AT MY RECORDS?

Q. SURELY.
A. YES, WE DID.
Q. AND MADE CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS?
A. FOR THE YEAR?
Q. FOR THE YEAR.
A. YES.
Q. OR FOR THE ELECTION. AND NO ONE AT THAT TIME EVER TOLD YOU --
A. WELL, WAIT A MINUTE. WE DIDN'T MAKE IT FOR AN ELECTION. WE MADE IT FOR THE YEAR.
Q. WELL, IF YOU GAVE A THOUSAND DOLLARS TO SCHULTZE, 9/26, AND $500 TO WILLIAMS, 9/25, THAT'S $1,500 THERE.
A. WELL, $500 WAS FOR PRIMARY AND $500 WAS FOR GENERAL.
Q. IF YOU MAKE A THOUSAND DOLLARS, IT DOESN'T MATTER IF YOU GAVE $250 TO FOUR CANDIDATES.
A. WELL, WE KNOW THAT NOW.
Q. YOU DIDN'T KNOW THAT IN '74?
A. NO.
Q. YOU DIDN'T KNOW THAT IN '75?
A. NO.
Q. THE FIRST TIME YOU KNEW OF IT WAS WHEN?
A. HAD TO BE IN '76.
Q. SO WHAT HAPPENED BETWEEN MAY OF '77 AND SEPTEMBER

F 6040-41 5 6 3

WHEN YOU FINALLY GOT THE REPORTS INTO THE COMMISSION, SEPTEMBER AND OCTOBER?

A. WHAT HAPPENED? WHAT DO YOU MEAN "WHAT HAPPENED"?

Q. OBVIOUSLY SOMEBODY TOLD YOU THAT THAT HAD TO BE DONE?

A. YES. HE DID.

Q. MR. ZARWIN?

A. YES.

MS. VAN GELDER: HE WAS POINTING TO MR. ZARWIN.

Q. LET'S GO BACK TO THE '74 RECORDS WHICH ARE IN FRONT OF YOU.

A. YES.

Q. IN 1974 I NOTICE THAT YOU WENT TO A LOT OF DINNERS OR SOMEBODY WENT TO A LOT OF DINNERS. I MEAN, ALL OF YOUR EXPENDITURES ARE USUALLY FOR TEN TICKETS TO THE LARRY WILLIAMS DINNER OR TWO TICKETS TO GO TO THE MAC DONALD DINNER.

A. I HAVE A HARD TIME EVEN GIVING THEM AWAY, BELIEVE IT OR NOT.

Q. IS THAT RIGHT?

A. YES.

Q. WHO BUYS THEM. SERVICE STATION DEALERS PAC?

A. YES.

1-800-411-5054

Q. AND DO THEY SOLICIT YOU OR DO YOU FIND OUT --
A. I GUARANTEE YOU ONE THING: I DO NOT SOLICIT TO BUY TICKETS; I'LL GUARANTEE YOU THAT. I HAVE ENOUGH PROBLEMS WITH THEM COMING TO US TO SELL TICKETS.
Q. AND WHEN YOU BUY THESE TWO TICKETS, FOR INSTANCE, THE LATE CONGRESSMAN MAC DONALD'S TICKETS, WHAT DO YOU DO WITH THE TICKETS?
A. THIS ONE?
Q. YES.
A. I WAS IN WASHINGTON FOR THAT ONE. ACTUALLY WE WERE DOWN THERE AT THAT TIME, ANYWAY, SO WE WENT TO THAT DINNER.
Q. DID YOU EVER RUN FOR OFFICE YOURSELF, SIR?
A. NO.
Q. I JUST NOTICE THAT YOU TOOK AS A POLITICAL ACTION RECEIPT, YOU RECEIVED $29,700.
A. I DID?
Q. WELL, THE THOMAS ANDERSON TESTIMONIAL DINNER.
A. OH, YES, THAT'S RIGHT.
Q. AND THAT WAS ON BEHALF OF YOURSELF?
A. WELL, I DIDN'T RUN THAT. OKAY. SO THAT DINNER MADE MONEY, AND IT WAS SUPPOSED TO GO TO ME AND I SAID, "NO WAY. JUST THROW IT IN THE POLITICAL ACTION COMMITTEE."
Q. SO IT WENT TO THE POLITICAL ACTION COMMITTEE?

7 9 0 4 0 - 4 1 5 6 5

A. YES.
Q. DO YOU HAPPEN TO KNOW WHETHER OR NOT THAT WOULD HAVE BEEN A CONTRIBUTION FROM YOU TO THE POLITICAL ACTION COMMITTEE?
A. I DON'T THINK IT'S EVER LISTED THAT WAY.
Q. NO, IT WASN'T.
A. WHY WOULD I WANT IT LISTED THAT WAY? YOU SEE, YOU WANT TO GIVE ME $5,000, I SAID, "LOOK, YOU GIVE IT TO THEM. I DON'T NEED IT. YOU KNOW, I DON'T WANT IT. WHAT I GOT TO DO NOW IS A LOT OF EXPLAINING, PUTS ME IN ANOTHER TAX BRACKET."
Q. WELL, WE DON'T HAVE JURISDICTION OVER INCOME YOU HAVE TO REPORT.
A. WELL, I DIDN'T GET IT, SO I DON'T HAVE TO REPORT IT.
Q. I NOTICE YOU HAVE UNITEMIZED EXPENDITURES OF $18,040.50. HOW DID YOU GET THAT MUCH IN UNITEMIZED EXPENDITURES? THESE ARE UNITEMIZED RECEIPTS; I'M SORRY. YOU RECEIVED $18,040.50 IN UNITEMIZED RECEIPTS?
A. YES.
Q. HOW DID YOU COLLECT THAT MONEY, SIR?
A. $10 CONTRIBUTIONS, $5, $2, $25.
Q. FROM HOW MANY PEOPLE? WHO WERE THE PEOPLE?
A. OH, HUNDREDS OF THEM, HUNDREDS OF SERVICE STATION

7 3 0 4 0 1 4 1 5 0 6

OPERATORS.
Q. DO YOU ALWAYS COLLECT MONEY FROM SERVICE STATION OPERATORS?
A. YES.
Q. DO YOU COLLECT MONEY FROM ANYONE ELSE?
A. IF THEY WANT TO GIVE IT, YES, WE'LL TAKE IT FROM THEM, TOO. I'M NOT TRYING TO BE A WISE GUY. BUT IF, YOU KNOW, I'M GOING TO LIE AND SAY, "NO, WE WON'T ACCEPT IT FROM ANYBODY ELSE," THAT'S WRONG; WE'LL ACCEPT IT.
Q. FROM ANYBODY WHO WILL GIVE IT TO YOU?
A. OTHER THAN CORPORATIONS.
Q. HOW DO YOU GO ABOUT COLLECTING THIS CONTRIBUTION? DO YOU SEND OUT A MAILING? DO YOU HAVE A PHONE BANK?
A. NO. WE HAVE SEVEN FIELD MEN, YOU KNOW, BUSINESS AGENTS ON THE STREET, AND WE MAKE UP A -- YOU KNOW, MAYBE HAVE A PAMPHLET OR SOMETHING, AND THEY GIVE IT OUT FOR WHAT WE'RE TRYING TO RAISE MONEY FOR.
Q. COULD YOU NAME THOSE SEVEN MEN, PLEASE?
A. SURE. NINO CUZZOLA, FROM ERIE, PENNSYLVANIA; HERB FEDELA, PITTSBURGH, PA; JACK FORESPRING, GREENSBURG, PA; VINCENT MANCINELLI, PHILADELPHIA; ALBERT ALTIERI, SPRINGFIELD, PENNSYLVANIA -- THAT'S SPRINGFIELD, DELAWARE COUNTY -- LAWRENCE MANIERI, NORRISTOWN, PA; EDWARD WILLIAMS, ARDSLEY, PA.

7 6 4 0 - 4 1 5 6 7

Q. AND THOSE SEVEN MEMBERS, YOU SAID YOU GIVE THEM PAMPHLETS?

A. WELL, YOU KNOW, MAYBE WE'LL PRINT UP -- SEE, WE HAVE A LITTLE PRINTING, YOU KNOW, OFFSET PRESS IN THE OFFICE, AND WE'LL JUST RUN THIS OFF AND GIVE EACH GUY MAYBE 2, 3 HUNDRED. AND WHEN HE GOES AROUND -- BECAUSE THEY GOT TO SEE HIM, ANYWAY; THEY GOT TO SEE HIM ABOUT DELINQUENT DUES OR TALK TO HIM ABOUT HIS BLUE CROSS-BLUE SHIELD OR GENERAL PROBLEMS.

SO WHILE THEY'RE MAKING THE ROUNDS -- IT DON'T COST THEM NOTHING -- THEY SAY, "YOU GOT AN EXTRA 10 OR 20?"

NOW, A LOT OF TIMES WE HAVE TICKETS FOR 25 BUCKS THAT WE'RE GOING TO HAVE A DINNER, AND THE GUY SAYS, "GEE, I CAN'T MAKE THAT NOW."

AND WE SAY, "WELL, YOU CAN DONATE 10 BUCKS, 20 BUCKS IF YOU WANT." AND THAT'S THE WAY IT COMES IN, BUT WE DON'T LIST IT UNDER "SALES AND COLLECTIONS INCLUDED ABOVE."

Q. SO THAT $18,040.50 IS FROM INDIVIDUAL CONTRIBUTIONS TAKEN AT INTERMITTENT TIMES?

A. OH, YES.

Q. THERE'S NO SET --

A. NO, THERE'S NOTHING SET. IF A GUY WANTS TO GIVE, FINE, HE GIVES. IF HE DON'T, HE DON'T.

7 8 0 4 0 1 4 1 5 0 6

Q. DO YOU HAPPEN TO HAVE ANY COPIES OF THOSE PAMPHLETS?
A. NO.
Q. OR BRING ANY RECEIPTS? DO YOU KEEP ANY?
A. NO.
Q. CAN YOU KIND OF REMEMBER WHAT ONE OF THEM WOULD SAY?
A. OH, I COULD TELL YOU VERY POINT BLANK WHAT THEY WOULD SAY. YOU KNOW, WE'RE TRYING TO RAISE MONEY TO HELP SUPPORT SUCH AND SUCH A CANDIDATE OR SUCH AND SUCH A GROUP OF CANDIDATES WHO HAVE BEEN HELPFUL AND WE CITE VERY POINT BLANK, YOU KNOW, THE PAST VOTING RECORD. FOR EXAMPLE, IN PENNSYLVANIA ON OUR FRANCHISE BILL THEY WERE VERY HELPFUL AND THEY GOT THE BILL THROUGH, AND WE'D LIKE TO SEE THEM STAY BACK IN OFFICE.
Q. SO IN 1974 YOU COLLECTED 18,000 SOMETHING PLUS THE 29,700 FROM YOUR TESTIMONIAL DINNER WHICH YOU GAVE OVER TO THE SERVICE STATION DEALERS PAC?
A. I DON'T KNOW WHETHER THAT'S QUITE THE RIGHT WAY TO SAY IT.
BY MR. ZARWIN:
Q. IS THAT THE DINNER FOR SHAPP?
A. WELL, THEY WERE THERE FOR THE TESTIMONIAL DINNER.
BY MS. VAN GELDER:

7604014596

Q. BUT IT WAS A TESTIMONIAL FOR YOU?
A. WHAT THEY DO, THEY SAID, "THIS MONEY, ANYTHING OVER AND ABOVE IS FOR YOU."
I SAID, "HEY, NO WAY."
Q. WHO SAID THAT TO YOU?
A. THE GROUP THAT WAS, YOU KNOW, RUNNING THE DINNER.
Q. WHO WERE THEY?
A. I GUESS WE'D HAVE TO SAY IT WAS BRUNO AND DAMMION; JUST OUR REGULAR GUYS THAT ARE ALWAYS AROUND.
Q. BRUNO AND DAMMION?
A. YES. SEE, I DRAW A BIGGER CROWD THAN THE POLITICIANS WOULD.
Q. I NOTICE. THEN YOU HAVE OPERATING EXPENDITURES THAT WENT OUT TO PAY FOR THE TESTIMONIAL DINNER AND TO VARIOUS CANDIDATES IN '74 THAT CAME OUT TO ABOUT $2,000 TO FEDERAL CANDIDATES.
A. I WOULD IMAGINE YOU'RE PROBABLY CORRECT. IN '74?
Q. YES.
A. WELL, WE'RE STILL TALKING ABOUT THE SAME ONES. IT WAS $200 TO TAUBERT MAC DONALD, $1,000 TO SCHULTZE, LARRY WILLIAMS WAS $500, AND ROONEY WAS $300.
A. SO YOU GOT $2,000.
Q. WHILE WE'RE AT IT, WE MIGHT JUST GO THROUGH IT. LET'S TRY YOUR '75 REPORTS. '75 WAS A LEAN YEAR FOR

7904014600

UNITEMIZED RECEIPTS.

A. YES.

Q. WHY?

A. IT WAS AN OFF YEAR. LEGISLATORS WEREN'T RUNNING; STATE SENATORS WEREN'T RUNNING; CONGRESSMEN WEREN'T RUNNING.

Q. AND YOU HAD NO MORE TESTIMONIALS?

A. I HAVE NEVER HAD ANOTHER ONE.

Q. I'M INTERESTED, DOWN IN THE EXPENDITURES ON PAGE 2 YOU HAVE COMMITTEE EXPENSES OF $769.25. PAGE 2.

A. OKAY.

Q. DOWN ON PART II.

A. YES.

Q. WHERE DID THAT $769.25 GO?

A. WHERE DID IT GO TO?

Q. YES.

A. I HAVEN'T GOT THE FAINTEST IDEA, UNLESS IT WENT FOR TICKETS.

MR. ZARWIN: UNITEMIZED COMMITTEE EXPENSES?

A. (CONTINUED) THIS IS '75, RIGHT. YOU'RE RIGHT; IT WAS A VERY LEAN YEAR. I WISH I COULD ANSWER THIS A LITTLE BETTER, BUT SOMETHING IS WRONG HERE.

Q. TAKE YOUR TIME, SIR.

MS. VAN GELDER: DO YOU WANT TO GO OFF

7 6 0 4 0 1 - 4 1 6 0 1

THE RECORD FOR A SECOND?

MR. ZARWIN: YES. LET'S LOOK AT THEM.

(DISCUSSION OFF THE RECORD.)

Q. YOU HAD VARIOUS EXPENSES, BY THE WAY, IN 1974 OF $542.84. JUST FOR INFORMATION PURPOSES, THE ACT REQUIRES, FOR FUTURE REFERENCE, ANYWAY, THAT IF YOU MAKE AN EXPENDITURE OVER A HUNDRED DOLLARS, THAT HAS TO BE ITEMIZED, AND IF YOU MAKE SMALLER EXPENDITURES THAT ARE LESS THAN A HUNDRED DOLLARS -- FOR INSTANCE, IF YOU PAY MR. ZARWIN, YOU KNOW, FIVE CHECKS OF $25 -- IF SOMETHING AGGREGATES TO MORE THAN A HUNDRED DOLLARS OVER THE YEAR, THAT HAS TO BE AGGREGATED AND PUT DOWN.

IT'S JUST CURIOUS TO SEE THAT LARGE AMOUNT OF MONEY IN UNITEMIZED EXPENSES.

A. WELL, LET ME SAY THIS IN ALL FAIRNESS: WITH GOD'S HELP AND A LITTLE BIT OF LUCK, THERE AIN'T TO GOING TO BE ANY MORE REPORTS TO FEDERAL ELECTION. BECAUSE I TOLD ALL THESE GUYS ALREADY, "YOU BETTER LOOK ELSEWHERE." "THERE'S NO WAY," I SAYS. "YOU THING I'M GOING TO GO THROUGH ALL THIS AGGRAVATION? FORGET IT."

AS A MATTER OF FACT, I THINK WHEN WE FILED IN COURT, WE FILED IT AS A FINAL.

Q. YOU TERMINATED IT, YES.

7 9 0 4 0 1 4 1 6 0 2

A. HEY, ENOUGH'S ENOUGH. I CAN'T BE A GOVERNMENT BOOKKEEPER.

Q. SO JUST TO RECAP, YOU HAVE NO PRESENT RECOLLECTION OF WHAT THE COMMITTEE EXPENSES IN 1975 OF $769.25 ARE?

A. AT THE MOMENT THE ANSWER IS ABSOLUTELY NOT.

Q. OKAY. NOW WE'LL MOVE ON TO THE YEAR 1976. SEE HOW QUICK THIS GOES.

IN 1976 YOU COLLECTED 20,000?

A. CAN YOU HOLD ON A MINUTE?

Q. SURE.

A. OKAY. CONTINUE.

Q. OKAY. YOU COLLECTED $20,020 IN '76, $20,020.90 OF UNITEMIZED RECEIPTS?

A. THAT'S CORRECT.

Q. AND THESE WERE COLLECTED IN THE SAME FASHION AS IN '74 AND '75?

A. YES.

Q. AND YOU HAVE NEVER HAD ONE PERSON GIVE OVER A HUNDRED DOLLARS?

A. NO. I GOT A HARD TIME COLLECTING $20 A MONTH OUT OF THEM IN DUES. YOU'RE ASKING THEM FOR HARD DOLLARS, LIKE ASKING THEM FOR THEIR WALLET. WE HAD A COUPLE GUYS THAT DONATED MORE THAN A HUNDRED DOLLARS, AND, AS A MATTER OF FACT, WE SENT THE MONEY BACK TO THEM.

76041603

WE JUST DON'T WANT TO GET MIXED UP IN A WHOLE LOT OF BOOKKEEPING. IF IT'S GOING TO PUT US INTO REGULATIONS, I DON'T NEED THE 150 BUCKS; I JUST DON'T NEED THAT.

Q. DO YOU THINK THERE'S ANY WAY, THOUGH, YOU COULD HAVE COLLECTED FROM DIFFERENT SERVICE STATION DEALERS IN AMOUNTS LESS THAN A HUNDRED DOLLARS AND THEN THEY BOUGHT A COUPLE OF TICKETS AT $20 APIECE THAT PUT THEM ABOVE?

A. IT'S A POSSIBILITY. I'M NOT GOING TO LIE TO YOU. IT'S A POSSIBILITY.

Q. YOU COLLECTED 20,000 IN UNITEMIZED AND THEN YOU GOT $35,750 IN EVENTS, SCHEDULED EVENTS?

A. I THINK -- I MAY NOT BE CORRECT. I THINK, IF I'M NOT MISTAKEN, IT WAS THREE DINNERS.

Q. THREE DINNERS?

A. RIGHT.

Q. WHY DON'T WE TAKE A SECOND AND GO TO THE DINNERS THEN.

A. YES.

Q. THESE DINNERS WERE TWO GREEN-FOR-SENATE DINNERS AND ONE FOR SERVICE STATION DEALERS PAC?

A. RIGHT.

Q. THE GREEN-FOR-SENATE DINNER WAS ON MAY 3, '77?

A. WAIT A MINUTE.

760410-1160

Q. YOU CAN REFER TO FORM 3. IT'S THIS FORM RIGHT HERE, PAGE 1.
A. I WOULD SAY THAT THAT WAS PROBABLY MAY 3. PROBABLY THAT'S CORRECT.
Q. WHERE WAS THAT HELD?
A. AT PALUMBO'S.
Q. PALUMBO'S IN PHILADELPHIA?
A. YES.
Q. AND 750 PEOPLE ATTENDED?
A. NOW, WAIT A MINUTE. I WOULDN'T SAY THAT. COULD HAVE BEEN 750 PEOPLE; IT COULD HAVE BEEN LESS. I'M JUST SAYING THIS IS HOW MANY TICKETS WE SOLD. SEE, SOMETIMES EVERYBODY DON'T SHOW UP.
Q. YOU SHOULD BE A LAWYER. THAT'S RIGHT. YOU SOLD 750 TICKETS RIGHT AT $25 APIECE?
A. YES.
Q. DO YOU HAPPEN TO KNOW IF ANYBODY BOUGHT MORE THAN FOUR TICKETS?
A. I WISH I COULD TAKE YOU AROUND TO MEET THESE CHARACTERS THAT WE DO BUSINESS WITH, HONEST TO GOD. WE HAVE A HARD TIME GETTING OUR COLLECTION OFF THEM. FOUR TICKETS? THEY GIVE YOU AGITA FOR $25; THAT'S ITALIAN FOR ULCERS.
Q. HOW DO YOU SPELL THAT, SIR?
A. I DON'T KNOW HOW YOU SPELL THAT.

760 1816 5

Q. TO THE BEST OF YOUR RECOLLECTION, THOUGH, YOU DON'T THINK THAT ANYONE COULD BUY MORE THAN FOUR?
A. NO. GEES, WE HAVE A HELL OF A TIME GETTING HIM TO BUY A TICKET FOR HIM AND HIS WIFE; YOU KNOW, THAT'S 50 BUCKS.
Q. WHAT ABOUT MR. DAMMION? YOU HAVE A REFUND TO MR. DAMMION?
A. $250.
Q. THAT'S RIGHT?
A. HE BOUGHT A WHOLE TABLE. HE BOUGHT TEN TICKETS, SONS, DAUGHTERS, AND SO ON. I SAID, "SEND IT BACK AND MAKE IT OUT." THAT'S EXACTLY WHAT WE DID.
Q. SO THEN HIS SONS AND HIS DAUGHTERS BOUGHT ONE BY THEMSELVES?
A. NO. THEY DIDN'T COME. OKAY.
Q. THAT'S GOOD.
A. NOW, THE IRONIC PART ABOUT IT WAS, ABOUT A WEEK AND A HALF BEFORE THAT HIS MOTHER DIED. AND HIM, ABOVE ALL. I SAID, "YOU, ABOVE ALL, SHOULD KNOW DON'T GIVE US A CHECK FOR $250, AND YOU ON THE COMMITTEE."
BY MR. ZARWIN:
Q. BY THE WAY, I THINK IT'S RELEVANT WHY YOU KNEW TO SEND THAT BACK.
A. IT WAS MORE THAN A HUNDRED DOLLARS. I DON'T WANT

79041416 06

ANYTHING FOR MORE THAN A HUNDRED DOLLARS. NOW, WE DO HAVE SOME CHECKS FOR MORE THAN A HUNDRED DOLLARS. I'M GLAD I REMEMBERED THIS. OKAY.

BY MS. VAN GELDER:

Q. YES.

A. AND THE REASON FOR THAT IS VERY SIMPLY THIS. I HOPE YOU CAN UNDERSTAND IT; IF YOU CAN'T, WELL, YOU CAN QUESTION OUR FIELD PEOPLE.

MAYBE THEY'LL PICK UP 3 OR 4 HUNDRED DOLLARS IN A DAY. 90% OF THAT THE GUYS WILL GIVE YOU, YOU KNOW, BECAUSE SERVICE STATION DEALERS ALWAYS HAVE A LOT OF CASH IN THEIR POCKET, AND TO BUY THE TICKET, THEY'LL GIVE YOU THE $25 RATHER THAN WRITE OUT A CHECK. SO MAYBE THE GUY'S GOT 300, $350, AND WE TELL THEM, "DON'T WALK AROUND WITH IT, BECAUSE IF YOU GET HIT OVER THE HEAD, YOU GET HIT TWICE, BECAUSE I'M GOING TO TAKE THE 300 OR $350 OUT OF YOUR PAYCHECK."

SO WHAT THEY DO IS DEPOSIT IT AND THEN THEY'LL WRITE A CHECK OUT OF THEIR ACCOUNT TO THE PAC ACCOUNT. THAT'S ONLY DONE FOR SAFETY REASONS. THEY DO THE SAME THING, YOU KNOW, WITH OUR OTHER ACCOUNTS WHEN THEY'RE COLLECTING: THEY MAKE THE DEPOSITS AND BRING THE GIRLS IN THE RECEIPTS AND SLIP.

Q. GETTING BACK TO THE QUESTION THAT MR. ZARWIN ANTICIPATED, WHY IN MARCH OF '76 DID YOU KNOW ENOUGH

7 9 0 4 0 1 4 1 6 0 7

NOT TO COLLECT MORE THAN A HUNDRED DOLLARS?
A. WELL, I'LL TELL YOU THE VERY SIMPLE REASON FOR THAT: WE WOULD COLLECT UP TO A HUNDRED BUCKS, BECAUSE THE PHILADELPHIA CITY COMMITTEE WOULD NEVER TAKE ANYTHING OVER A HUNDRED DOLLARS UNLESS YOU REGISTERED IT. I SAID, "WHAT DO YOU MEAN?"

THEY SAID, "WELL, IF IT'S OVER A HUNDRED DOLLARS, WE GOT TO HAVE THE NAME, THE ADDRESS, AND THE BUSINESS."

"OH," I SAYS, "IS THAT RIGHT?"

THEY SAID, "YES."

OKAY. NEVER TOOK IT. IF THEY DIDN'T TAKE IT, WHY SHOULD I?
Q. IF THEY DIDN'T TAKE IT, WHY SHOULD YOU?
A. YES.
Q. YOU NEVER ASKED THEM WHY THAT LAW WAS IN EFFECT?
A. NO, I DON'T HAVE TO ASK WHY THAT LAW'S IN EFFECT. ON THAT DAY THEY TAKE AS MUCH AS THEY CAN GET. THE SKY'S THE LIMIT. I'M TELLING YOU.
Q. THEY WON'T ACCEPT MORE THAN A HUNDRED DOLLARS IN CASH?
A. RIGHT.
Q. BUT THEY'LL ACCEPT A HUNDRED DOLLARS IN CHECK?
A. OH, YES, THAT'S RIGHT. BUT THEN YOU GOT TO HAVE THE ADDRESS AND ALL THIS OTHER STUFF. I HAVEN'T GOT

NO TIME FOR THAT. I'D RATHER GET $99. FOR THE OTHER DOLLAR I DON'T NEED IT THAT BAD THAT I HAVE TO KEEP RECORDS ON THIS.

Q. HOW DO YOU KNOW IF YOU'RE NOT GOING TO COLLECT $99 TWICE IN CASH AND THEN THE GUY IS OVER A HUNDRED DOLLARS?

A. I HAVEN'T GOT THE FAINTEST IDEA. I HAVE TO BE HONEST WITH YOU. BUT I GOT NEWS FOR YOU: IF YOU CAN GET IT TWICE OUT OF THESE GUYS OUT HERE, YOU SHOULD HAVE MY JOB. I'LL TELL YOU, YOU'D DO TERRIFIC.

Q. WELL, LET'S GO BACK TO THIS GREEN-FOR-SENATE DINNER IN PHILADELPHIA. THAT WAS THE FIRST ONE IN MAY OF '77?

A. THAT'S RIGHT.

Q. WHAT MADE YOU THINK OF A DINNER FOR MR. GREEN?

A. WELL, HE WAS HAVING OPPOSITION IN THE PRIMARY. AND I MET BILL ONE NIGHT AND I SAID, "ANY WAY WE CAN HELP?"

AND HE SAID, "WELL, YOU KNOW, I COULD USE SOME FINANCING."

AND I SAID, "WELL, COULD WE GET TOGETHER AND RUN A DINNER FOR YOU?"

HE SAID, "WHAT ARE WE TALKING ABOUT?"

I SAID, "I DON'T KNOW. 5, 10 THOUSAND. I HAVEN'T THE FAINTEST IDEA UNTIL WE START

7 8 0 4 0 1 4 1 6 0 6

SELLING THE TICKETS. WHATEVER TICKETS WE CAN SELL."

HE SAID, "THAT WOULD BE A HELL OF A HELP."

I SAID, "OKAY."

Q. SO YOU TALKED TO MR. GREEN YOURSELF?

A. YES.

Q. DO YOU KNOW HOW MUCH IN ADVANCE THAT WAS?

A. IT WAS A FEW WEEKS IN ADVANCE, SEVERAL WEEKS IN ADVANCE.

Q. YOU CAN SET UP A DINNER PRETTY QUICKLY, THEN?

A. GIVE ME THREE WEEKS. THAT'S ENOUGH, YES. SEE, YOU GOT SEVEN, EIGHT GUYS, TEN PEOPLE SELLING TICKETS. YOU KNOW YOU CAN ZING THEM.

YOU SEE, YOU GOT TO UNDERSTAND OUR SITUATION HERE. WE CAN'T DO THIS ALL OVER THE STATE. THE PHILADELPHIA AREA WE HAVE NO PROBLEM, BECAUSE, IN ALL HONESTY, WE CAN RUN A DINNER AT FRANK PALUMBO'S, HAVE A FILET MIGNON DINNER WITH SPAGHETTI, RAVIOLIS, BREAD, BUTTER, COFFEE, TEA, MILK, SPUMONI ICE CREAM, THE WHOLE SCHMEAR; HAVE A FLOOR SHOW, ELISHA KASHI, YOU KNOW, ONE OF THE BIG-NAME ENTERTAINERS.

IT'S $11 A PERSON. YOU CHARGE 25 FOR A TICKET; YOU'RE MAKING $14. I DON'T HAVE TO PUT TOO MANY PEOPLE IN THERE AT $14 PROFIT PER HEAD, YOU SEE. SO WHAT YOU DO IS BASICALLY HAVE A LOT OF FELLOWS WHO

7 8 0 4 0 1 4 1 6 1 0

WILL COME. HIM AND HIS WIFE WILL COME OR HIM AND HIS GIRL FRIEND. BECAUSE THEY HAVE A WONDERFUL FLOOR SHOW AND THEY CAN DANCE AND HAVE A BAR THERE WHERE THEY CAN DRINK; THEY GOT TO PAY FOR THAT. YOU GOT A FILET MIGNON.

WHERE CAN YOU GO IN WASHINGTON AND HAVE A FILET MIGNON DINNER AND HAVE A FLOOR SHOW? YOU CAN'T DO IT HERE EXCEPT FOR PALUMBO'S. SEE, THAT'S WHY WE CAN PUT SO MANY PEOPLE IN THERE.

Q. LET ME UNDERSTAND THIS: YOU KNOW MR. GREEN, APPARENTLY?

A. OH, YES. I KNEW HIS FATHER, TOO.

Q. AND YOU WERE JUST SPEAKING TO HIM IN CASUAL CONVERSATION?

A. YES.

Q. WHEN YOU FINALLY TOLD HIM THAT YOU WERE GOING TO PUT ON A FUNDRAISER OR THAT YOU HAD THE RESOURCES TO PUT ON A FUNDRAISER --

A. I CALLED HIM UP TO ASK HIM IF HE WAS AVAILABLE MAY 3.

AND HE SAID, "YES. NO PROBLEM."

Q. DID YOU MAKE ANY OTHER ARRANGEMENTS WITH HIM?

A. MADE ONE FOR PITTSBURGH.

Q. NO. I MEAN WITH THIS ONE. I MEAN, IS THAT ALL YOU DISCUSSED?

7 0 0 4 0 1 4 1 6 1 1

A. THAT WAS IT.
Q. DID YOU EVER DISCUSS ANYTHING ABOUT SAYING THAT YOU'D TAKE YOUR EXPENSES OFF?
A. OH, NO. WE GOT TO PAY FOR THE FOOD, YOU KNOW. YOU KNOW, I CAN'T AFFORD TO DO THAT.
"I'LL GIVE YOU, YOU KNOW, WHATEVER PROFITS I CAN GIVE YOU, BUT, YOU KNOW, I HAVE TO TAKE THE MONEY AND PAY FOR THE FOOD." IF WE GIVE HIM THE FULL $25 FOR EVERY TICKET, WHO PAYS FOR PALUMBO'S? ME? I'M AFRAID NOT. I'D LIKE YOU, BUT --
Q. YOU DON'T LIKE HIM THAT MUCH?
A. I JUST CAN'T DO IT. WE HAVEN'T GOT THAT KIND -- YOU KNOW, WE RAISED NICE MONEY; THERE'S NO QUESTION. I'M VERY HAPPY. BUT I JUST CAN'T AFFORD THAT KIND OF THING.
MR. ZARWIN: OFF THE RECORD.
(DISCUSSION OFF THE RECORD.)
Q. WHEN YOU SPOKE TO MR. GREEN, DID HE UNDERSTAND THAT?
A. I WOULD ASSUME HE DID; AT LEAST I HOPE HE DID. YOU KNOW, HE'S FROM PHILADELPHIA. THAT'S THE WAY YOU DO POLITICS IN PHILADELPHIA: YOU RUN A DINNER FOR SOMEBODY, YOU TAKE THE EXPENSES OUT, AND HE GETS THE REST.
Q. DID YOU EVER SPEAK TO ANYONE ON HIS CAMPAIGN

7 9 8 4 0 1 4 1 6 1 2

STAFF JUST TO MAKE SURE?

A. NO. I CALLED BILL. I SAID, "CAN YOU BE THERE THE MAY 3," OR WHATEVER NIGHT.

AND HE SAYS, "OKAY." AND THEN WE HAD TO WAIT AN HOUR FOR HIM TO COME UP FROM WASHINGTON. HE WAS ON THE METROLINER LIKE YOU WERE, AND THE METROLINER WAS STOPPED, AND WE HAD ALL THE TELEVISION CAMERAS AND EVERYTHING WAITING, WAITING, WAITING, AND HE JUST ABOUT MADE THE 11 O'CLOCK NEWS.

Q. SO THEN YOU HAD ALL THE TICKETS PRINTED?

A. YES.

Q. AND HOW DID YOU GET PEOPLE TO BUY TICKETS? THROUGH THESE SEVEN BUSINESS AGENTS AGAIN?

A. YES. THEY'RE GOING AROUND THE STREETS. WHEN THEY GO IN, THEY SAID, "HEY, WE'RE HAVING THIS DINNER FOR GREEN. HOW ABOUT IT? WHO BOUGHT A TICKET? WHO BOUGHT TWO?"

Q. I HAD A FEW MORE QUESTIONS ABOUT THE FIRST DINNER. IT WAS SO SUCCESSFUL YOU HAD ANOTHER ONE IN PITTSBURGH?

A. THE TRUTH OF THE MATTER WAS, THE FELLOWS OUT IN THE WESTERN END OF THE STATE, SOME OF THEM CAME DOWN AND TALKED TO GREEN, AND THEY WANTED TO HAVE A DINNER FOR HIM THERE.

Q. OH, THEY CAME DOWN TO THE FIRST ONE?

7 8 0 4 0 - 4 1 6 1 3

A. OH, YES. SOME OF THE GUYS COME FROM ERIE AND PITTSBURGH AND STAY OVERNIGHT AND GO BACK THE NEXT DAY.

Q. THESE TICKETS -- WE ASKED YOU THIS IN THE SUBPOENA -- DO YOU HAVE ANY RECOLLECTION WHAT THE TICKET SAID?

A. IT SAID "GREEN FOR SENATE."

Q. DID IT SAY "SERVICE STATION DEALERS" ON IT AT ALL?

A. GEE, YOU KNOW, TO THE BEST OF MY KNOWLEDGE, I DON'T REMEMBER OUR NAME BEING ON IT ALL.

Q. OKAY. IF YOU SEARCH AT THE PRINTER'S, COULD YOU GET ONE?

A. SEE, WE DID IT OURSELVES. WE MADE THOSE PARTICULAR TICKETS OURSELVES. THE BROCHURES WE HAD DONE AT THE PRINTER.

Q. YOU NEVER SAVED ANY OF THESE THINGS?

A. LIKE I TOLD YOU, WE HAVE A LITTLE OFFSET PRESS. WHATEVER WE COULD DO IN OUR OFFICE, WE DO, RATHER THAN PAY SOMEBODY THREE, FOUR TIMES THE PRICE OUTSIDE.

Q. THIS IS, JUST AGAIN FOR YOUR INFORMATION, IF YOU EVER WANT TO DO THIS AGAIN --

A. NEVER.

Q. -- THE REGULATIONS ARE THAT YOU HAVE TO GIVE FOUR RECORDS OF TICKET SALES, EVEN THOUGH IT MIGHT BE LESS THAN A HUNDRED DOLLARS, EVEN UNDER 50.

7 6 0 4 0 1 4 1 6 1 4 1

A. THAT'S WHAT I MEAN; THAT'S WHY I TELL YOU NO MORE.
Q. SO YOU DIDN'T HAVE ANY EXPENSES OTHER THAN THE PRINTING EXPENSES FOR THE PAPER AND THE --
A. THAT'S ABOUT IT, I GUESS.
Q. I NOTICED THAT ONE OF THEM -- TO GO BACK HERE A SECOND -- THE ONE IN PITTSBURGH, WHERE WAS THAT HELD?
A. THAT -- SEE, THAT PROBABLY WAS ONE OF THE WORSE PROBLEMS WE HAD ALL THE TIME. IT WAS AT THE SHERATON ON THE MALL IN MONROEVILLE, YOU KNOW, WHICH IS JUST OUTSIDE OF PITTSBURGH. I'LL NEVER FORGET THAT.
Q. WHY?
A. BECAUSE WE WOULD HAVE BEEN ALL DONE WITH WHATEVER WE GAVE BILL. IF YOU NOTICE, WE DIDN'T GIVE IT TO HIM ALL IN ONE LUMP SUM, BECAUSE WE DIDN'T COLLECT IT ALL IN ONE LUMP SUM. AND THEN THERE WERE SOME GUYS IN PITTSBURGH WHO SAID, "BECAUSE HE DIDN'T SPEAK AT THE DINNER, HE SHOULDN'T GET THE MONEY."
Q. WHO SAID THAT?
A. YOU KNOW, I REALLY DON'T KNOW WHO IT WAS. THERE WAS ABOUT FIVE, SIX GUYS. YOU ALWAYS GOT A BUNCH OF RADICALS. I DON'T CARE WHAT ORGANIZATION YOU GOT. YOU GOT SOME GUYS THAT GOT COOL, CALM HEADS AND YOU GOT SOME SCREAMERS.
SO THEY DIDN'T WANT TO GIVE THEM THE MONEY, AND WE DIDN'T WANT TO HAVE A COURT ACTION. SO

7 6 0 4 0 - 4 1 6 1 5

WE WITHHELD IT FOR A WHILE AND THEN WE GAVE IT TO HIM. BUT I'LL TELL YOU WHAT HAPPENED: HE FLEW IN TO SPEAK AT THAT DINNER.

Q. "THAT DINNER" BEING THE PITTSBURGH DINNER?

A. YES. AND I FLEW IN FROM PHILADELPHIA. AND THEY PICKED ME UP AT THE AIRPORT AND WE WENT DOWN TO THE SHERATON. AND I ALMOST COMMITTED SUICIDE. THERE WAS A PICKET LINE. THE EMPLOYEES WERE ON STRIKE THE NIGHT BEFORE.

BUT WE COULDN'T DO NOTHING ABOUT IT. THE TICKETS WERE SOLD, THE PEOPLE WERE COMING. BUT BILL GREEN WOULDN'T CROSS THE PICKET LINE. SO THE NET RESULT WAS, HE DIDN'T SPEAK IN THERE THAT NIGHT.

Q. HOW WAS THE MEAL?

A. TERRIBLE. I'LL TELL YOU HOW GOOD IT WAS: WE'VE NEVER BE THERE SINCE, NEVER BEEN THERE TO EVEN STAY.

Q. WHY WERE THE TICKETS 35 INSTEAD OF 25?

A. I REALLY DON'T REMEMBER, TO TELL YOU THE TRUTH. I DIDN'T PARTICULARLY RUN THAT ONE. I'M RESPONSIBLE FOR IT.

Q. WHO RAN IT?

A. WE HAD A GROUP OF GUYS OUT IN WESTERN PENNSYLVANIA THAT SOLD THE TICKETS, AND IT WAS, YOU KNOW, THE FIELD DIRECTORS OUT THERE. NO QUESTION ABOUT IT; I JUST COULDN'T RUN BACK AND FORTH JUST TO

MAKE ARRANGEMENTS. MOST OF THE ARRANGING WAS DONE OVER THE TELEPHONE, AND THE REASON FOR IT -- AGAIN I'LL GO RIGHT BACK TO WHAT I TOLD YOU: IT AIN'T NO PALUMBO'S. THE DIFFERENCE WAS, WE HAD A SHOW, BUT WE HAD TO PAY FOR THE SHOW; WE HAD AN ORCHESTRA, BUT WE HAD TO PAY FOR THE ORCHESTRA; WE HAD TO GET ALL OF THAT, WHICH WAS TERRIFIC, YOU KNOW, BECAUSE, AS YOU SEE, THERE WASN'T -- WHEN YOU COMPARE THOSE TWO DINNERS, THERE JUST ISN'T ANY COMPARISON.

Q. LET'S GO BACK TO THAT FOR A SECOND.

WHO WERE THE PEOPLE IN THE WESTERN PART OF THE STATE WHO ORGANIZED THAT?

A. YES. HERB FEDELA AND NINO.

Q. WHEN DID YOU ASK MR. GREEN -- THE SECOND ONE WAS HELD ON MAY 23, '76?

A. THE SECOND ONE WAS HELD ON ABOUT THEN, YES, I WOULD THINK SO. WE USUALLY PAY, YOU KNOW, FOR THE DINNER THE SAME NIGHT. THE LAST COUPLE OF YEARS, IF WE'VE HAD ANY DINNERS, THEY'VE NOT BEEN POLITICAL ACTION DINNERS, YOU KNOW. WE HAVE A SCHOLARSHIP DINNER. THEY MAIL US A BILL. I GUESS WE GOT CREDIT ESTABLISHED NOW.

Q. WHEN DID YOU ASK HIM TO COME TO THE MAY 23 ONE?

A. WHEN HE WAS AT THE MAY 3 ONE.

Q. DID YOU HAVE THAT DATE SET UP AT THAT TIME?

7 6 0 4 0 1 4 1 6 1 7

A. WE HAD A COUPLE OF POTENTIAL DATES.
Q. AND HE PICKED THAT ONE?
A. WELL, YOU KNOW, IF I RECALL, I SAID, "WE CAN HAVE EITHER THIS, THIS, THIS, OR THIS." AND I DON'T KNOW WHETHER, QUITE FRANKLY -- I DON'T REMEMBER WHETHER HE COMMITTED THAT NIGHT OR THE NEXT DAY. IT MAY HAVE BEEN THE NEXT DAY OR, YOU KNOW, WITHIN -- LET'S SAY, TO GIVE ME A LITTLE BIT OF GROUND, A 72-HOUR PERIOD, BUT NO MORE THAN THAT, YOU KNOW, BECAUSE I HAD TO HAVE THAT MUCH TIME IN ORDER TO GET THE GUYS OUT SELLING THE TICKETS.
Q. ALL OF YOUR CONVERSATIONS THEN WITH REGARD TO THESE FUNDRAISERS HAD ONLY BEEN WITH MR. GREEN?
A. YES, HIM AND SOMEBODY ELSE THAT I DON'T KNOW THE GUY'S NAME. YOU KNOW, SOMEBODY WAS ALWAYS TRAVELING WITH HIM AND IT WAS HELLO, YES, YES, YES, YES, AND THAT WAS IT. I NEVER BOTHERED TO TALK TO HIM, YOU KNOW, REALLY.
Q. I SEE YOUR EXPENSES FOR THE BAND AND RESTAURANT. THEY BILLED YOU?
A. YES. WELL, THE BAND WAS A FRIEND OF ONE OF OUR MEMBERS, YOU KNOW. HE KNEW THE MONEY WAS GOOD. THEY SENT US THE BILL AND WE SENT THEM THE CHECK. I KNOW WE DIDN'T PAY THE BAND OR THE ENTERTAINMENT THE SAME NIGHT.

790-0141-6-15

Q. NOW, YOU MENTIONED THAT THERE WAS SOME SORT OF PROBLEM WITH GETTING HIM HIS MONEY, MR. GREEN. I'M TALKING ABOUT THE MONEY AS TO THE SECOND DINNER.

HOW ABOUT THE FIRST DINNER; DID HE GET HIS MONEY STRAIGHT OFF THE TOP?

A. HE GOT HIS MONEY WHEN WE GOT IT.

Q. WHICH WAS?

A. AS WE GOT IT, HE GOT IT.

Q. COMING IN?

A. YES.

Q. I NOTICED THAT --

A. SOME GUYS BUY ON CREDIT, YOU KNOW.

Q. LET'S GO TO THE TRANSFERS FOR A SECOND. 4/21 YOU GAVE HIM A PARTIAL TRANSFER OF DINNER-DANCE PROCEEDS?

A. WHAT PAGE IS THAT?

Q. THAT'S PAGE 3 OF 8 IN THE SCHEDULE B, EXPENDITURES. I SEE $4,600 ON APRIL 21, '76; THAT WAS A PARTIAL TRANSFER.

DO YOU KNOW IF THAT'S A PARTIAL TRANSFER FROM WHAT DANCE, WHAT DINNER? THE FIRST FUNDRAISER OR THE SECOND FUNDRAISER?

BY MR. ZARWIN:

Q. THAT WAS MAY 3?

A. NO. WAIT A MINUTE. EXCUSE ME. IF I'M NOT MISTAKEN, I THINK THAT DINNER WAS IN APRIL INSTEAD OF

7 0 4 0 1 4 1 6 1 9

MAY. I'M SURE THAT THAT DINNER WAS IN APRIL INSTEAD OF MAY.

Q. WELL, IF YOU DON'T KNOW, YOU DON'T KNOW.

A. NO. I DO. I'M TRYING TO RECALL IT. WE PAID PALUMBO IN MAY -- THAT'S WHAT IT WAS -- AND THAT'S WHY HE GOT THE DATE OF MAY 3.

BY MS. VAN GELDER:

Q. DID YOU PAY PALUMBO LIKE THAT NIGHT, GIVE HIM A CHECK? BECAUSE IF YOU NOTICE ON PAGE 2 OF YOUR EXPENDITURES, YOU GAVE PALUMBO $6,307 ON MARCH 3.

A. HE BILLED US FOR THAT. WE DIDN'T PAY THAT NIGHT. NOW, LET ME SEE. WAIT A MINUTE. LET'S GO BACK HERE. YES, INDEED. I THOUGHT I WAS CORRECT. IT WAS $6,700. WHERE WAS THAT?

Q. WELL, IT'S 6,300, BUT YOU MAY HAVE MORE LATER. THAT'S MARCH 3, '76.

A. MARCH 4.

Q. WELL, IT SAYS MARCH 3 IN YOUR REPORT, PAGE 2.

A. OKAY. THAT WAS THE DEPOSIT AND THAT WAS THE BALANCE. THE DINNER WAS THAT NIGHT.

Q. IN MARCH, NOT MAY?

A. THAT'S CORRECT.

Q. NOW WE'RE REALLY CONFUSED, AREN'T WE? BUT THE SECOND DINNER THEN WAS IN MAY, THE ONE IN PITTSBURGH?

A. THE SECOND DINNER WAS IN PITTSBURGH, WAS IN MAY,

7604011620

CORRECT.

THE WITNESS: SOMEHOW OR ANOTHER -- EXCUSE ME -- IT LOOKS LIKE THE ACCOUNTANT PICKED IT UP WRONG, NORM.

MR. ZARWIN: IT LOOKS LIKE HE PICKED UP THE DATE OF THE DINNER --

THE WITNESS: SEE, HE HAS IT MAY 3, '77.

IT WASN'T NO MAY 3, 1977. ON THE BACK PAGE --

MS. VAN GELDER: RIGHT. I THOUGHT THAT WAS JUST A TYPO.

MR. ZARWIN: IT SHOULD HAVE BEEN 3/5/77?

THE WITNESS: 3/4, SO IT WAS 3/3, PROBABLY.

BY MS. VAN GELDER:

Q. "3" IS WHAT YOU HAVE LISTED ON PAGE 2, FORM B.

A. BECAUSE THERE IS A CHECK FOR PALUMBO'S AFTER THAT; I KNOW THAT. I DON'T KNOW WHERE HE GOT THAT FIGURE FROM.

MR. ZARWIN: PALUMBO'S RESTAURANT, 6307.

A. (CONTINUED) HERE IT IS RIGHT HERE: MARCH 4. WELL, I'M NOT WORRIED ABOUT A DAY.

7904041621

Q. NOW, LET'S SEE IF WE CAN SET IT STRAIGHT: YOU'VE ONLY HAD TWO FUNDRAISERS FOR GREEN; CORRECT?
A. THAT'S CORRECT.
Q. NO MORE?
A. NO.
Q. NO COFFEE CLATCH OR ANYTHING?
A. NO.
Q. AND THEY WERE WHEN? FOR THE RECORD, WHAT WERE THE DATES?
A. MARCH 3 OR MARCH 4 AND MAY 23.
Q. OKAY. MARCH 3 OR MARCH 4?
A. SEE, BECAUSE I KNOW THESE CHECKS ARE MADE OUT IN ORDER. THAT WAS FOR PALUMBO'S RESTAURANT FOR THE BALANCE OF THE PAC DINNER MARCH 4, 1977, AND THAT COINCIDES WITH THIS AND IT COINCIDES WITH THAT, BUT ON THE OTHER IT SAYS "MAY 3, '77." I DON'T KNOW WHERE THAT CAME FROM.
Q. NOW, CAN YOU REMEMBER THEN, IF IT WAS IN MARCH OF '76 WHEN YOU HAD THE ACTUAL DINNER, WHEN DID YOU ASK MR. GREEN? CAN YOU GO BACK?
A. IT WAS MAYBE THREE, FOUR WEEKS BEFORE THAT.
Q. CAN YOU REMEMBER THE CIRCUMSTANCES WHERE YOU WERE THAT YOU ASKED HIM? WERE YOU OVER HIS HOUSE? DID YOU SEE HIM IN THE STREETS?
A. WHERE IN THE HELL WAS I? I GOT TO BE FRANK ABOUT

IT: I JUST DON'T RECALL WHERE I MET HIM.
Q. OKAY. THAT'S ALL RIGHT.
A. HEY, HE PROBABLY WAS AT SOME DINNER. AS YOU CAN SEE, WE GO TO SO MANY DINNERS.
Q. YOU HAD THESE DINNERS, AND YOU ASKED MR. GREEN -- I'M CONFUSED NOW BECAUSE OF THE DATES. I JUST HAVE TO RECAP: YOU HAD THE DINNERS --
A. THAT'S WHY I'M LOOKING HERE, BECAUSE IT SEEMED TO ME I SAID MAY 3. GEES, IT WAS SO CLOSE. IT DON'T SEEM THAT IT WAS SO CLOSE.
Q. SO MAY 23 AND MAY 3 WERE THE TWO DATES AND THE EXPENSES, THE ONLY EXPENSES, YOU HAD WERE FOR THE ACTUAL DINNER, THE RESTAURANT, AT PALUMBO'S?
A. THAT'S IT.
Q. AND THE TICKETS?
A. YES. WELL, THAT WAS -- ACTUALLY, THEY WEREN'T TICKETS; THEY WERE LITTLE BOOKLETS. PUT A BOOKLET ON EVERYBODY'S TABLE. TICKETS IS NO PROBLEM; WE DO THEM.
Q. ON YOUR REPORTS HERE YOU'VE GOT -- YOU CAN CHECK YOUR OWN RECORDS -- AROUND MARCH 29 YOU HAVE TICKET PRINTING, 23.32 AND 125.61.
BY MR. ZARWIN:
Q. THAT'S IN PITTSBURGH?
A. YES, THAT ONE WAS AT PITTSBURGH.
NOW, THAT'S A PECULIAR ONE, TOO,

BECAUSE THAT WAS A RAFFLE.
BY MS. VAN GELDER:
Q. YOU HAD A RAFFLE?
A. YES, IT WAS A RAFFLE. YOU KNOW HOW THE CHURCHES ARE, A BUCK A BOOK, EVERYBODY LOSES.
Q. EVERYBODY LOST?
A. NO. SOMEBODY WALKED AWAY WITH A COLOR TV. SOMEBODY WALKED AWAY WITH A RIFLE, TOO.
Q. THE TICKETS FOR THE GREEN DINNER, THE 125, WAS A RAFFLE, ALSO?
A. YES. THAT'S PITTSBURGH. THEN SEE WE WENT BACK AND PAID ANOTHER 50.88. THE DRAWING -- YOU KNOW, THE RAFFLE TICKETS, THEY WENT BETTER THAN THE DINNER TICKETS. SEE, A GUY COULDN'T BUY A TICKET; HE'D BUY MAYBE A BUCK'S WORTH, TWO BUCKS' WORTH OF RAFFLES.
Q. YOU DON'T HAVE ANY OF THOSE RAFFLE TICKETS LEFT OVER?
A. NO.
Q. WHO BOUGHT THE COLOR TV?
A. I THINK IT WAS RUDY MOLNAR; I THINK IT WAS RUDY OR HERB. THEY GOT IT AT A WHOLESALE PLACE.
Q. AND HE DONATED IT FOR THE RAFFLE?
A. NO, HE DIDN'T DONATE IT. WE PAID FOR IT.
Q. YOU PAID FOR IT OUT OF THE RAFFLE SALES?
A. OH, YES.

760401-41621

Q. HOW MUCH DID THE RAFFLE PERSON WIN; DO YOU REMEMBER?
A. WELL, ONE GUY WON A COLOR TV. ONE GUY WON A SHOTGUN OR A 30.06.
Q. A SHOTGUN?
A. YES.
Q. I SUPPOSE THAT COMES IN HANDY IN YOUR BUSINESS?
A. NO. YOU GOT OUT WESTERN PENNSYLVANIA, THEY HUNT QUAIL, DEER, GIRLS.
Q. WELL, OKAY. NOW, YOU NEVER LISTED THIS RAFFLE AS AN EVENT, THOUGH?
A. NO. THAT ALL WENT IN WITH THE -- WELL, THAT JUST WAS ALL IN ONE BIG LUMP SUM, YOU KNOW.
Q. WHEN WAS THE DRAWING? AT THE DINNER?
A. YES, IT WAS RIGHT AT THE DINNER.
Q. WEREN'T YOU AFRAID THAT SOMEBODY WAS GOING TO TAKE THE SHOTGUN AND SHOOT MR. GREEN FOR NOT COMING?
A. NO. WE KEPT THE SHOTGUN UNTIL AFTER EVERYBODY LEFT.
Q. BUT THIS WAS A RAFFLE THAT -- LET ME GET THIS STRAIGHT -- THE MAN BOUGHT THE TV AND THEN YOU REIMBURSED HIM WHEN YOU GOT THE MONEY IN FROM THE RAFFLE TICKETS?
A. YES. NOW, HOW THEY DID THAT -- YOU KNOW, I'VE GOT TO BE FRANK ABOUT IT. I DON'T KNOW WHETHER WE

PAID HIM OR, YOU KNOW, THEY TOOK THE MONEY OUT OF THE RAFFLE TO PAY HIM. BUT, YOU KNOW, THAT'S THE WAY IT WAS. HE DIDN'T DONATE THE TELEVISION, YOU KNOW.

Q. THEN AT THIS -- WE'LL CALL IT THE -- PITTSBURGH DINNER, INSTEAD OF CONFUSING OURSELVES WITH DATES -- GREEN DIDN'T CROSS THE PICKET LINE, SO HE NEVER SPOKE?

A. THAT'S CORRECT. BUT THE DINNER WAS FOR HIM.

Q. AND THEN HOW MUCH MONEY DID YOU GET FOR THAT ONE? DO YOU HAPPEN TO REMEMBER HOW MUCH MONEY YOU TRANSFERRED? YOU COLLECTED $7,000, I GUESS?

A. I DON'T KNOW. WAIT A MINUTE.

Q. I THINK YOU'VE GOT IT $35 A PIECE, 200 TICKETS?

A. THAT'S ABOUT IT, YES.

Q. AND YOU SAID THAT THAT WAS HELD UP FOR A WHILE? YOU DIDN'T PASS IT RIGHT OVER TO GREEN?

A. NO, HE DIDN'T GET IT RIGHT AWAY. I CONVINCED THE GUYS TO GIVE IT TO HIM LATER. I SAID, "HEY, LOOK, HE MADE THE TRIP ALL THE WAY FROM WASHINGTON. YOU KNOW, IT WASN'T HIS FAULT IT WAS A PICKET LINE." I SAID, "IF IT HAD BEEN ANY OTHER DAY, I WOULDN'T HAVE CROSSED IT."

Q. WHO PAID FOR MR. GREEN'S TRANSPORTATION TO GO TO THE DINNER FROM WASHINGTON TO PHILADELPHIA, WASHINGTON TO PITTSBURGH?

A. HAVEN'T GOT THE FAINTEST IDEA. ALL I KNOW, IT

7 6 0 1 0 - 4 1 6 2 6

WASN'T ME. WE DIDN'T GIVE HIM A NICKEL FOR THAT.
Q. "WE" MEANING THE SERVICE STATION DEALERS PAC?
A. NOR ANYBODY I KNOW OF.
Q. I NOTICE, IF YOU LOOK AT YOUR TRANSFERS TO MR. GREEN THAT ARE CONTAINED IN THE REPORTS --
A. WHAT PAGE ARE YOU ON?
Q. WE'LL START OFF AT EXPENSES, PAGE 3 OF 8.
A. 3 OF 8, RIGHT.
Q. YOU'VE GOT 4,000.
A. 4,600.
Q. YOU'VE GOT 4,600 IN APRIL.
A. RIGHT.
Q. AND THEN YOU DON'T GIVE HIM ANY MORE MONEY UNTIL AUGUST, AUGUST 3, I THINK. YOU GAVE HIM --
A. YES, THAT'S CORRECT.
Q. YOU GAVE HIM A THOUSAND. WHY? WHY WAS THE REST OF IT HELD UP, AND THEN IN SEPTEMBER AND OCTOBER YOU GAVE HIM THE REST?
A. BECAUSE OUR FIELD GUYS -- SEE, WHAT HAPPENS, THE GUY SAYS, "OKAY. LEAVE ME TWO TICKETS. I'LL GO." HE LEAVES HIM TWO TICKETS. IT MAY NOT BE THREE MONTHS BEFORE HE GETS BACK TO COLLECT IT. I GOT NEWS FOR YOU: THERE IS NO WAY I'M GOING TO PAY THAT MONEY OUT IF IT DON'T COME IN. IT'S SIMPLE, YOU KNOW.
Q. SO WHEN DID YOU DECIDE TO MAKE ALL THESE

7 9 0 4 0 1 4 1 6 2 7

TRANSFERS?
A. WHEN WE GET THE MONEY, WE TRANSFERRED IT. BUT I DON'T WANT TO TRANSFER A HUNDRED, 200, 300. I PILED IT UP, YOU KNOW.
Q. TO THE BEST OF YOUR KNOWLEDGE -- AND I REALIZE THAT THIS PROBABLY IS -- YOU DON'T HAVE TO ANSWER IF YOU DON'T WANT TO -- BUT WHEN, YOU KNOW, JOHN Q. EXXON WANTS TO BUY A TICKET, DID HE THINK HE WAS MAKING A CONTRIBUTION TO THE SERVICE STATION DEALERS OR TO GREEN?
A. I DON'T KNOW REALLY HOW I COULD ANSWER IT, YOU KNOW. WE TOLD HIM THAT IT WAS FOR GREEN; THERE WAS NO QUESTION ABOUT IT. AS I SAID BEFORE, I WOULD THINK THAT HE WAS PROBABLY MAKING IT BECAUSE OF US, BUT HE KNEW HE WAS MAKING IT TO GREEN. BECAUSE, LIKE I SAID, THIS GUY'S VOTING RECORD FOR US ALWAYS WAS 100%.
Q. IN YOUR CONVERSATIONS WITH MR. GREEN AND IN SETTING UP THE DINNER, EITHER BEFORE OR AFTER THE DINNER, DID ANYONE EVER TELL YOU THAT IF IT WAS A FUNDRAISER AND THAT YOU WERE COLLECTING MONEY FOR SOMEBODY ELSE THAT YOU HAD CERTAIN OTHER REQUIREMENTS UNDER THE ACT?
A. NO.
Q. ARE YOU FAMILIAR NOW WITH THOSE REQUIREMENTS?

7604011623

A. NO. I DON'T THINK SO, ANYHOW.
Q. IF YOU'RE GOING TO MAKE -- HOW WOULD YOU CHARACTERIZE YOUR ROLE? AS A SERVICE STATION DEALER? YOU USED AN ADJECTIVE BEFORE. YOU SAID THAT YOU WERE A CONDUIT.
A. WELL, THE CHECKING ACCOUNT. WE JUST USE THAT, YOU KNOW, AS SOMEPLACE TO DEPOSIT THE FUNDS.
Q. BUT MR. GREEN OR NO ONE ELSE EVER TOLD YOU THAT CONDUITS HAVE TO MAKE SPECIAL REPORTS TO THE COMMISSION LISTING THE INDIVIDUAL CONTRIBUTOR'S NAME REGARDLESS OF THE SIZE OF THE CONTRIBUTION?
A. NO.
Q. AND THAT HE HAS TO FILE ANOTHER FORM?
A. WELL, I DON'T REMEMBER HIM EVER TELLING ME, NO. SEE, THE THING I CAN'T UNDERSTAND IS THAT, OKAY, IF WE DID THIS AND IF WE DID IT WRONG, YOU KNOW, I DON'T THINK ANYBODY WAS REALLY TRYING TO HIDE ANYTHING, BECAUSE IT WINDS UP, IT WAS PUBLISHED RIGHT IN HIS REPORT; SO HE WASN'T TRYING TO HIDE NOTHING. WHAT WE DID, MAYBE WE DIDN'T DO IT ACCORDING TO THE WAY THE RULE SAID TO DO IT. BUT, YOU KNOW, NOBODY -- I'M CONVINCED THAT NOBODY WAS TRYING TO MAKE A SHAM OUT OF THE RULES OR REGULATIONS.
Q. OKAY.
A. YOU KNOW, OF COURSE, I GUESS HINDSIGHT IS BETTER

THAN FORESIGHT.
Q. BUT MR. GREEN NEVER TOLD YOU ABOUT ANY SPECIFIC OR NO ONE EVER TOLD YOU AND YOU NEVER LOOKED AT THE ACT AT WHATEVER REQUIREMENTS --
A. I DIDN'T EVEN KNOW THE DAMN THING WAS THERE.
Q. EVEN THOUGH YOU GOT NOTICES AROUND THIS TIME?
A. AROUND WHAT TIME?
Q. YOU GOT NOTICES -- OKAY. I'M AT THE WRONG YEAR.
A. YOU'RE THE RIGHT YEAR. YOU'RE JUST A LITTLE BIT LATER IN THE YEAR.
Q. RIGHT. MR. GREEN'S ATTORNEY AT ONE POINT HAD STATED THAT YOU'RE A REGISTERED COMMITTEE. DID YOU EVER TELL HIM THAT OR DID HE JUST --
A. I TOLD HIM THAT WE HAVE ONE. OUR NATIONAL IS A REGISTERED COMMITTEE.
Q. YOUR NATIONAL WHAT?
A. OUR NATIONAL CO`GRESS OF PETROLEUM RETAILERS. SEE, YOU KNOW, THE FUNNY PART ABOUT ALL THIS IS THAT I COULD HAVE SAVED ALL THIS PROBLEM. I'LL TAKE THE MONEY OUT OF NATIONAL, THEY WOULD HAVE FILED IT, AND EVERYTHING WOULD HAVE BEEN FINE. BUT I KNEW NOTHING ABOUT THIS THING.
Q. WE'LL GET BACK TO THE NATIONAL IN A SECOND. I JUST WANT TO CLEAR UP A COUPLE OF QUESTIONS ON THE FUNDRAISER.

7 8 0 4 0 1 4 1 6 3 0

FOR INSTANCE, YOU ENDED UP WITH $4,600 IN TRANSFERS FROM THE DINNERS, THE TWO DINNERS, AND THEN YOU BOUGHT, IF YOU LOOK IN YOUR RECORDS, AROUND MARCH 3 AND MARCH 24 $400 WORTH OF DINNER TICKETS. WERE THOSE FOR YOUR GREEN DINNER OR ANOTHER GREEN DINNER?

A. NO. THEY'RE FOR ANOTHER GREEN DINNER. WE HAD TWO.

Q. AND YOUR TICKET SALES FOR THESE DINNERS CAME UP TO ABOUT $25,700, THE $18,750 FOR YOUR PALUMBO ONE AND 7,000 FOR YOUR PITTSBURGH ONE?

A. YES.

Q. AND YOUR EXPENSES CAME UP TO 11,000, INCLUDING YOUR RAFFLE TICKETS, YOUR DINNERS AND RESTAURANTS, BANDS. AND ON THE BAND, HERB FEDEL?

A. THAT'S ONE OF OUR BUSINESS AGENTS -- HE'S ON THE RECORD -- FROM PITTSBURGH.

Q. AND YOU REIMBURSED HIM?

A. THAT'S RIGHT.

Q. WELL, IF YOU TAKE YOUR --

A. SEE, I TOLD YOU HE WAS -- THE GUY FROM THE BAND WAS RELATED TO HIM; YOU KNOW, NEPHEW, UNCLE, WHATEVER.

Q. IF I TAKE YOUR SALES AND I SUBTRACT YOUR EXPENSES, I GET $14,001, SO YOU MUST HAVE GIVEN HIM A LITTLE EXTRA?

A. YES. WE GAVE HIM THE THOUSAND DOLLARS THAT WE THOUGHT WE COULD GIVE HIM.
Q. FORTUNATELY YOU GAVE HIM 999. SO IT'S EVEN BETTER FOR YOU.
A. WHATEVER, YOU KNOW. IF I GET THAT CLOSE, I'M HAPPY.
Q. BUT THAT 15,000 IS ALL THE MONEY YOU EVER GAVE GREEN?
MR. ZARWIN: I DON'T THINK HE GAVE HIM 15,000.
A. YES, 15,000.
BY MR. ZARWIN:
Q. YOU GAVE HIM 15,000?
A. YES. I KNEW WHAT HE GOT.
BY MS. VAN GELDER:
Q. AND THAT'S ALL THE MONEY YOU GAVE GREEN, RIGHT, DURING 1976?
A. THAT'S ALL WE EVER GAVE HIM, PERIOD.
Q. OKAY.
A. SEE, WE NEVER MADE ANY CAMPAIGN CONTRIBUTIONS TO BILL WHEN HE RUN FOR CONGRESS, YOU KNOW, BECAUSE HE WAS FROM A SAFE SEAT TO START WITH AND HE NEVER TOOK CONTRIBUTIONS.
Q. OKAY. HOW WOULD YOU CHARACTERIZE THAT $999 EXTRA?
A. DONATION, CONTRIBUTION.

7 6 0 4 0 - 4 1 6 1 2

Q. BUT YOU JUST ADDED IT INTO THE TRANSFERS, NOT AS A SEPARATE CONTRIBUTION?
A. RIGHT.
Q. IF WE CAN TAKE A SECOND, STILL LOOKING AT YOUR REPORTS, YOU MENTIONED SOMETHING ABOUT A -- ON PAGE 1 OF 3 -- THIS IS SCHEDULE B -- YOU'VE GOT SOMETHING THAT SAYS "PSSDA - ERIE CHAPTER." WHAT IS THAT?
A. YES, THAT'S RIGHT. THEY HAVE A LITTLE --
Q. WHO ARE "THEY," FIRST OF ALL?
A. WHAT CAN I SAY TO YOU? THEY'RE -- THEY HAVE A LITTLE GROUP OF FELLOWS UP THERE IN ERIE COUNTY. RIGHT.
Q. YES.
A. AND I WISH THE REST OF THEM WERE AS GOOD AS THEM. THEY'RE RATHER POLITICALLY ACTIVE. ONE OF THEM'S A LEGISLATOR, TWO OF THEM ARE ON CITY COUNCIL, AND THEY FORMED A LITTLE CHAPTER FOR THEMSELVES UP THERE, AND THEY RAN A DINNER. OKAY.
Q. YES.
A. AND WE BOUGHT THREE TICKETS OFF OF THEM -- THE PAC BOUGHT THREE TICKETS OFF OF THEM. BUT THEY'RE JUST A LITTLE CHAPTER AND THEY --
Q. A LITTLE CHAPTER OF THE SERVICE STATION DEALERS ASSOCIATION?
A. ASSOCIATION, YES. AND WE BOUGHT THE THREE

7604-1463

DINNERS. THEY WERE SELLING TICKETS AND THEY NEEDED THREE MORE TO BE A SELLOUT, YOU KNOW.

Q. SO YOU BOUGHT THEM?

A. SO WE BOUGHT THEM. TOOK A VOTE AND WE BOUGHT THEM.

Q. A VOTE OF THE SEVEN AGENTS?

A. NO, NO. THE GUYS ON THE PAC. THE ONE GUY WAS FROM -- LIKE I SAID, HE'S FROM WESTERN PENNSYLVANIA. HE SAYS, "HEY, THEY ONLY GOT THREE MORE TICKETS TO BUY, AND THE DINNER'S TOMORROW NIGHT." THERE WAS A CHANCE; I THINK YOU WIN $1,500 OR SOMETHING. SO WE BOUGHT THREE, AND WE LOST AGAIN.

Q. WHO PAYS FOR THE PAC'S POSTAGE, PHONES, RENT, AND ADMINISTRATIVE COSTS?

A. THE PAC.

Q. HOW COME I DON'T SEE ANY EXPENDITURES FOR THAT? I SEE A FEW FOR FOOD AND FOR TICKETS.

A. IT SAYS "POSTAGE" OVER HERE, AND THEN HERE'S THE ADDRESS --

Q. THAT'S THE ONLY ONE YOU HAVE. THAT'S IN 11 --

A. RIGHT, 11/12/76.

Q. BUT IN '74, '75, AND UP UNTIL NOVEMBER 12, '76, YOU NEVER MAILED A THING OUT?

A. NO.

Q. WHAT WAS THIS MAILING FOR?

F6040-41634

A. WE -- QUITE FRANKLY, THIS WAS A GUESS. WE HAD USE OF POSTAGE TO MAIL TO LIKE OUR DIFFERENT FIELD MEN. WE FIGURE SO MANY PIECES, SO MUCH, AND WE GUESSED AND THEN ADDED ABOUT $20, BECAUSE I RENTED ME OVER AND THEN UNDER. BECAUSE WE DON'T PAY NO RENT OR ANYTHING LIKE THAT.

Q. WHAT WAS THE PURPOSE OF THE MAILING?

A. OH, THIS WAS JUST TO MAIL THESE LITTLE PAMPHLETS OUT TO OUR FIELD MEN.

Q. OKAY.

A. SEE, WE HAVE A MAILING MACHINE IN OUR OFFICE.

Q. YOUR OFFICE BEING THE ASSOCIATION?

A. THE ASSOCIATION OFFICE. SO I'M GOING TO MAKE THESE THINGS UP, PUT THEM IN A PACKAGE. MAYBE POSTAGE IS $2.50. WE PUT THE LABEL ON THERE.

Q. IS THAT AN AGGREGATE?

A. OH, YES THAT'S AN AGGREGATE FOR THE WHOLE YEAR AND A HALF.

Q. THE ADDRESS PLATE. OBVIOUSLY YOU HAD TO HAVE ADDRESSES FOR AN ADDRESS PLATE.

A. WELL, THEY'RE MADE UP -- REALLY WHAT IT WAS, IT WAS A -- LET'S SEE IF WE CAN GET DOWN TO BRASS TACKS ON THIS. IT WAS A LETTER FROM JIMMY CARTER TO -- WHO? -- IT WAS A LETTER TO JIMMY CARTER -- I DON'T REMEMBER TO WHOM IT WAS ADDRESSED, BUT IT WAS A COPY

OF HIS STAND ON SOME ENERGY QUESTION. BUT WE TOOK THIS -- SEE, LIKE THIS HAS A PICTURE OVER HERE.

Q. A PICTURE OF WHOM?

A. IT HAD A PICTURE OF JIMMY CARTER, AND THEN IT HAD SOME WRITING OVER HERE. THIS WAS HIS POSITION ON THIS. SO WHAT WE DID, WE TOOK THIS DOWN TO THIS MASTER GRAPHICS AND I SAID TO THEM, "COULD YOU ETCH ME A PLATE OF THIS?" OKAY. AND TOGETHER WITH THAT WENT A COPY OF SOMEBODY'S PERMISSION TO USE IT, WHATEVER -- I DON'T REMEMBER THE NAME, BUT IT WAS SOMEBODY. AND I TOOK IT BACK AND I RUN OFF A COUPLE THOUSAND, AND THEN I GIVE THEM TO THE FIELD MEN AND, YOU KNOW, THEY HANDED THEM OUT AS THEY WENT AROUND.

Q. DID IT HAVE "SERVICE STATION DEALERS PAC" ON IT?

A. NO. IT WAS A COPY OF A LETTER, YOU KNOW, THAT WAS WRITTEN BY OR AT LEAST SIGNED BY JIMMY CARTER; HAD HIS PICTURE OVER THERE.

Q. HOW DID YOU GET IT; DO YOU KNOW?

A. DAMNED IF I REMEMBER. I FORGET HOW I GOT MY HANDS ON IT.

Q. AND --

A. IT COULD HAVE COME -- MAYBE IT COULD HAVE COME FROM OUR NATIONAL OFFICE. I REALLY DON'T KNOW.

Q. BUT YOUR MAILINGS DON'T GO TO INDIVIDUAL SERVICE STATION DEALERS?

FPPC 141636

A. NO.
Q. THEY GO TO WHOM?
A. THEY GO TO OUR FIELD PEOPLE; WELL, OUR BUSINESS AGENT. IF YOU'RE A BUSINESS AGENT -- YOU KNOW, I HAVE 500 OF THESE MADE UP, PUT THEM IN BROWN PAPER, OKAY, GO OVER, GET THE POSTAGE, PUT IT ON THERE. I MAIL IT TO YOU AT YOUR HOUSE IN MAYBE ERIE OR PITTSBURGH OR GREENSBURG, AND YOU HAND THEM OUT AS YOU GO AROUND.
Q. AND DO YOU KNOW AS THE HEAD OF THE SERVICE STATION DEALERS PAC WHOM THEY GIVE THEM TO?
A. THEY GIVE THEM TO OUR MEMBERS, I'M SURE OF THAT. THEY MAY GIVE THEM TO SOME NONMEMBERS TRYING TO SOLICIT THEIR MEMBERSHIP.
Q. WHEN YOU TALK ABOUT YOUR MEMBERS, WHOSE MEMBERS ARE YOU TALKING ABOUT? YOU SAID WE GIVE THEM TO "OUR MEMBERS."
A. YES.
Q. WHOSE MEMBERS? THE SERVICE STATION DEALERS?
A. THE SERVICE STATION DEALERS ASSOCIATION.
Q. AND THOSE MEMBERS ARE JUST PEOPLE WHO PAY THE $20 A MONTH TO JOIN THE PENNSYLVANIA-DELAWARE SERVICE STATION DEALERS ASSOCIATION?
A. YES, THE DUES IS $20 A MONTH, RIGHT.
Q. AND IF I OWNED A SERVICE STATION AND IF I WAS A

7 6 0 4 0 1 4 1 6 3 7

MEMBER OF THE SERVICE STATION DEALERS ASSOCIATION, THEN I'D HAVE A BUSINESS AGENT?

A. YES, THAT'S RIGHT. YOU WOULDN'T. YOU KNOW, WE HAVE THE BUSINESS AGENT.

Q. THAT COMES OUT TO ME?

A. TO YOU, RIGHT.

Q. AND I CAN YELL AT HIM ABOUT MY PENSION OR MY LIFE INSURANCE PROGRAMS, WHATEVER THE TRADE ASSOCIATION HAS?

A. YES, BUT YOU REALLY DON'T HAVE TO DO THAT. WE HAVE A WATS LINE. YOU CAN CALL US DIRECT ON THE WATS LINE.

Q. BUT THAT BUSINESS AGENT WILL OCCASIONALLY ASK ME FOR MONEY FOR THESE DINNERS?

A. YES.

Q. AND HE'LL ALSO EVERY ONCE IN A WHILE GIVE ME SOMETHING LIKE THIS?

A. YES.

Q. AND I CAN CALL YOU IF I WANT TO YELL AT YOU DIRECTLY? FOR INSTANCE, I CAN SAY, "WHAT ARE YOU HAVING ANOTHER GREEN DINNER FOR?" I CAN CALL YOU ON THE WATS LINE?

A. YES.

Q. WHO PAYS FOR THE WATS LINE?

A. THE ASSOCIATION DOES.

7 8 0 4 0 1 - 4 1 6 3 8

Q. AND THEY ALSO PAY FOR -- ARE YOU THE ONLY PERSON THAT DOES THE WORK FOR THE PAC?
A. YES, I'M THE ONLY ONE THAT DOES THE WORK.
Q. DO YOU HAVE A SECRETARY?
A. YES.
Q. DOES SHE SOMETIMES TYPE THINGS OUT FOR YOU, GIVE YOU A HAND?
A. YES.
Q. AND YOU PAY THEM FOR THE POSTAGE OVER THE YEAR FOR '76?
A. YES, FOR ABOUT FOUR, FIVE, SIX REAMS OF PAPER, TOO, YOU KNOW.
Q. AND THE PHONE AND THE RENT, THEY SORT OF JUST LET YOU DO IT?
A. YES.
Q. YOU ALSO MENTIONED --
A. WHAT RENT? YOU KNOW, MY DESK IS THERE. I GOT ONE LITTLE THING IN THE DRAWER ABOUT THAT WIDE, YOU KNOW. HOW MUCH RENT COULD YOU CHARGE FOR THAT?
Q. OKAY. AND I NOTICE THAT OCCASIONALLY YOU USE SERVICE STATION DEALERS ASSOCIATION PAPER. YOU WROTE ME ONCE, YOU WROTE SUZANNE ONCE.
A. YES.
Q. HERE IT IS.
A. OKAY.

7 0 4 0 1 4 1 6 3 6

Q. SO IT DOESN'T COST MUCH FOR PAPER, EITHER?
A. NO. YOU CAN SEE YOU SURE WOULDN'T CALL THAT EXPENSIVE WRITING PAPER. THAT'S PHOTOSTATED ON THERE. THAT'S WHY WE HAD TO GET A NEW PHOTOSTAT MACHINE.
Q. YOU ALSO SAID SOMETHING ABOUT THE NATIONAL CONGRESS OF PETROLEUM RETAILERS POLITICAL ACTION.
A. RIGHT.
Q. HOW IS SERVICE STATION DEALERS PAC -- LET ME GO BACK FOR A SECOND.

HOW IS THE NATIONAL CONGRESS OF PETROLEUM RETAILERS CONNECTED WITH THE SERVICE STATION DEALERS?
A. ALL RIGHT. THE NATIONAL CONGRESS OF PETROLEUM RETAILERS IS AN ORGANIZATION OF ORGANIZATIONS. OKAY?
Q. YES.
A. MAYBE COULD BE A CITY, COULD BE A MULTI-STATE ORGANIZATION, COULD BELONG TO THE NATIONAL. ALL RIGHT. THE NATIONAL CONGRESS OF PETROLEUM RETAILERS ONLY HAS MAYBE ABOUT, I THINK, 43 MEMBERS, BUT EACH ONE OF THOSE MEMBERS ARE AN ASSOCIATION. YOU CAN'T JOIN THAT AS AN INDIVIDUAL.
Q. CAN PENNSYLVANIA OR DELAWARE SERVICE STATION DEALERS --
A. OH, YES, WE BELONG TO THAT.
Q. AND YOU MENTIONED THAT TO AVOID ALL THE HASSLES

7904041640

THAT YOU'RE GETTING NOW WITH THE FEDERAL ELECTION COMMISSION THAT YOU COULD HAVE SAVED YOURSELF ALL THE TROUBLE AND JUST SENT --

A. IF WE HAD KNOWN.

Q. WHAT WERE YOU GOING TO DO TO SAVE YOURSELF THE TROUBLE?

A. WELL, I COULD THINK OF A THOUSAND WAYS. FIRST, THE BEST WAY IS TELL THEM BUG OFF. YOU GO TO WASHINGTON --

Q. NO. YOU MENTIONED SOMETHING ABOUT SENDING IT TO --

A. YES. 1420 K STREET. YOU GUYS ARE IN WASHINGTON ALL THE TIME. TELL THEM THAT I SENT YOU OVER FOR A COUPLE BUCKS. BECAUSE, AS YOU CAN SEE, WE CONTRIBUTED TO THAT PAC, TOO.

Q. DID YOU MENTION ABOUT SENDING SOME MONEY UP TO THAT PAC, TOO?

A. WE COULD HAVE THAT WAY. WHAT'S TO STOP THEM FROM DONATING $10,000 OR WHATEVER? AND THEN THEY DONATE IT TO HIM. YOU WOULD HAVE GOT ALL THE REPORTS ON IT RIGHT WHERE IT CAME FROM AND WHERE IT WENT.

Q. UNLESS YOU SAY THAT YOU'RE CONNECTED WITH THESE FELLOWS, THE NATIONAL ASSOCIATION OF PETROLEUM RETAILERS POLITICAL ACTION COMMITTEE.

MR. ZARWIN: BUT THEY'RE A MEMBER.

7 0 4 0 1 4 1 6 4 1 --

THEY'RE A DUES-PAYING MEMBER.

A. WAIT A MINUTE. WE'RE NOT A DUES-PAYING MEMBER OF THE PAC. WE DONATE TO THE MEMBER. WE'RE A DUES-PAYING MEMBER TO NCPR, BUT NOT THE NCPR PAC.

Q. I'M JUST TRYING TO GET THIS RECORD, BECAUSE IF, YOU KNOW, YOU'RE CONFUSED BY OUR LAW, WE'RE CONFUSED BY YOUR REPORTS.

A. THEN WHAT THE HELL? WE'RE MUTUALLY CONFUSED.

Q. SO IT SEEMS TO ME YOU'VE GOT SORT OF TWO LINES. YOU'VE GOT SERVICE STATION DEALERS TRADE ASSOCIATION.

A. YES.

Q. AND THEY'RE A MEMBER OF THE NATIONAL CONGRESS OF RETAILERS?

A. PETROLEUM RETAILERS.

Q. AND THEN YOU'VE GOT THE SERVICE STATION DEALERS PAC AND THEY CONTRIBUTE TO THAT PAC?

A. YES, WE GIVE TO THAT PAC. IT'S LISTED RIGHT THERE: $500.

Q. HAVE THEY EVER GIVEN YOU ANY MONEY, THE NATIONAL RETAILERS?

A. NO. WE COULD RAISE MORE ONE IN ONE DAY THAN THEY CAN IN A YEAR.

Q. OKAY.

A. IF IT WASN'T FOR US AND A COUPLE OTHER STATES, THEY WOULD NEVER HAVE A NICKEL.

7004011416442

Q. OKAY. GOING BACK FOR A SECOND, YOU PUT ALL THE MONEY THAT YOU MADE FOR GREEN IN YOUR OWN ACCOUNTS AND THEN YOU GAVE HIM A CHECK?
A. YES.
Q. THOSE ACCOUNTS ARE WITH THE FIDELITY BANK?
A. YES. WE DON'T HAVE ANY ACCOUNT WITH ANY OTHER BANK, ANYHOW.
Q. AND THAT'S A SEPARATE ACCOUNT FROM THE SERVICE STATION DEALERS ASSOCIATION?
A. OH, YES.
Q. OKAY. AND WHAT DID YOU DO WITH THE INTEREST? I WAS JUST WONDERING ABOUT THAT. DID IT EARN ANY INTEREST WHILE IT WAS SITTING THERE WAITING?
A. NO, YOU DON'T EARN ANY INTEREST IN A CHECKING ACCOUNT.
Q. OH, IT WAS IN A CHECKING ACCOUNT?
A. YES. WAIT A MINUTE. WAIT A MINUTE. WE EARN INTEREST BECAUSE WE GOT MONEY TO THE CREDIT UNION.
Q. WELL, WAS IT IN A CHECKING OCTOBER OR SAVINGS ACCOUNT?
A. NO, NO. SAVINGS ACCOUNT.
Q. OH, I THOUGHT YOU SAID CHECKING ACCOUNT.
A. WE HAVE IT IN A CHECKING ACCOUNT AND THEN WE HAVE SOME ALSO IN A CREDIT UNION. SEE, WE HAVE OUR OWN CREDIT UNION FOR OUR OWN PEOPLE.

7804014116413

Q. THE PAC HAS?
A. NO, NO. THE ASSOCIATION HAS.
Q. OKAY.
A. LET'S STICK WITH PAC.
Q. YOU PUT THE MONEY IN A CHECKING ACCOUNT?
A. PAC HAS A CHECKING ACCOUNT AND A SAVINGS ACCOUNT.
Q. AND YOU PUT THE MONEY THAT YOU GOT FROM GREEN IN THE CHECKING OR SAVINGS ACCOUNT?
A. CHECKING.
Q. SO IT WOULDN'T HAVE INTEREST?
A. NO, THAT WOULDN'T HAVE ANY INTEREST AT ALL.
Q. AND BACK TO THE STATEMENT OF ORGANIZATION HERE -- THIS IS RIGHT AT THE BEGINNING -- YOU FILED THIS SEPTEMBER 2, THIS THING RIGHT HERE. OKAY.

JUST TO WRAP IT UP HERE, I GUESS THIS IS WHAT CONFUSES ME: YOU HAVE THE SAME ADDRESS AND USE OF STATIONERY AND USE THE SAME MEMBERS AS THE SERVICE STATION DEALERS ASSOCIATION, BUT YOU SAY YOU'RE NOT CONNECTED WITH THEM.

A. IT'S SEPARATE.

MR. ZARWIN: OKAY. WELL, WE TALKED ABOUT THAT, AS A MATTER OF FACT, TODAY COMING OVER HERE, AND THE QUESTION WAS IN TOM'S MIND, "WHAT'S IT MEAN BY AFFILIATION OR CONNECTED."

MS. VAN GELDER: OKAY.

2904014116441

Q. BASICALLY IF YOU'RE AN AFFILIATED ORGANIZATION, YOU TAKE THOSE MEMBERS AS YOUR MEMBERS, AND THAT MEANS THAT YOU CAN MAKE PARTISAN COMMUNICATIONS TO YOUR MEMBERS. YOU CAN SAY, "SUPPORT JIMMY CARTER." YOU CAN SAY, "SUPPORT BILL GREEN." AND YOU CAN HAVE JIMMY CARTER COME AND SPEAK TO YOUR MEMBERS WITHOUT IT BEING A CONTRIBUTION IN KIND TO THE CANDIDATE. YOU'RE BETTER OFF IF YOU'RE AFFILIATED, BASICALLY.

A. WAIT A MINUTE. RUN THAT PAST AGAIN. IN OTHER WORDS, IF ALL THE MEMBERS OF THE ASSOCIATION ARE MEMBERS OF THE PAC --

Q. RIGHT.

A. -- THEN WE COULD INVITE, LET'S SAY, GREEN TO A DINNER. ARE YOU SAYING THAT WE COULD GIVE HIM MONEY?

Q. OKAY. UNDER THE REGULATIONS, WELL, YOU CAN ALWAYS GIVE GREEN MONEY. YOU CAN ONLY GIVE HIM A THOUSAND DOLLARS UNLESS YOU GIVE TO MORE THAN FIVE CANDIDATES, AND IF YOU HAVE MORE THAN 50 MEMBERS AND GIVE TO MORE THAN FIVE CANDIDATES, THEN YOU CAN GIVE THEM 5,000.

OKAY. RIGHT NOW THE SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE IS A COMMITTEE AND THEY CAN ONLY GIVE A FEDERAL CANDIDATE A THOUSAND DOLLARS A CANDIDATE. IF IT QUALIFIES AS A MULTI-CANDIDATE COMMITTEE, YOU CAN GIVE $5,000. IF

790401-4163

YOU HAVE MORE THAN --
A. WHAT THE HELL? EVERYBODY THAT'S A MEMBER OF THE ASSOCIATION IS A MEMBER OF PAC.
Q. AND IN SIX MONTHS, WHICH IS AFTER MARCH, YOU'LL BE ABLE TO GIVE THEM -- YOU HAVE TO BE REGISTERED WITH THE COMMISSION FOR SIX MONTHS. SO SIX MONTHS FROM SEPTEMBER. OH, YOU'VE TERMINATED. IF YOU DIDN'T TERMINATE, OKAY, SIX MONTHS. $5,000 FOR FIVE CANDIDATES, 50 MEMBERS.
A. THE RECORDS SHOW WE GIVE TO MORE THAN FIVE CANDIDATES. YOU MEAN FIVE CANDIDATES?
Q. FIVE FEDERAL CANDIDATES.
MR. ZARWIN: HE WASN'T SURE WHAT "CONNECTED" OR "AFFILIATED" MEANT.
A. I DIDN'T KNOW WHAT THAT MEANT.
MS. VAN GELDER: OKAY.
Q. YOU MIGHT WANT TO AMEND YOUR REPORTS, BECAUSE IT LOOKS AS IF YOU HAVE ALL THE ISSUES THAT WILL GET YOU FOR AFFILIATION. UNDER THE REGULATIONS, WHICH YOU HAVE THERE, ALSO --
MS. VAN GELDER: OFF THE RECORD.
(DISCUSSION OFF THE RECORD.)
Q. (CONTINUED) "ALL COMMITTEES INCLUDING SEPARATE, SEGREGATED FUND ESTABLISHED, FINANCED, MAINTAINED, OR CONTROLLED BY THE SAME ORGANIZATION, LABOR

7 6 0 4 0 1 4 1 6 4 5

ORGANIZATION, PERSON, GROUP OF PERSONS, INCLUDING ANY PARENTS OR SUBSIDIARY BRANCH DIVISION, LOCAL OR UNITS THEREOF, ARE AFFILIATED," AND THEN IT ALSO TALKS ABOUT ALL POLITICAL BODIES, INCLUDING A TRADE ASSOCIATION OR PROFESSIONAL ASSOCIATION AND/OR BY RELATED STATE OR LOCAL ENTITIES ARE AFFILIATED, WHICH MEANS THAT IF SERVICE STATION DEALERS SET UP A SEPARATE, SEGREGATED FUND AND USE BASICALLY THE SAME OFFICE SPACE, PERSONNEL, THEN THEY'RE AFFILIATED, WHICH MEANS NOW THE BENEFITS OF AFFILIATION ARE THAT YOU CAN COMMUNICATE TO YOUR MEMBERS, AND THOSE COMMUNICATIONS ARE EXEMPT FROM THE STATUTE.

THAT'S SOMETHING THAT MR. ZARWIN CAN GIVE YOU MORE OF.

A. YES, BUT WOULDN'T WE LOSE THE NONPROFIT STATUS THAT WAY?

Q. NO. THE FEDERAL ELECTION CAMPAIGN ACT ALSO INCLUDES PARTS OF EXEMPT ORGANIZATIONS.

A. I'LL TELL YOU THE TRUTH: THAT'S REALLY WHY WE SEPARATED THEM, BECAUSE WE DIDN'T WANT TO LOSE OUR TEX-EXEMPT STATUS.

Q. I SEE. WELL, MAYBE YOU COULD TALK TO YOUR POLITICAL PEOPLE. BUT SEPARATE, SEGREGATED FUNDS ARE STILL CALLED EXEMPT ORGANIZATIONS WITHIN THE MEANING OF THE INTERNAL REVENUE CODE; IT'S TAKEN CARE OF BY

7 5 0 4 0 1 4 1 6 4 7

THAT.

BUT YOU MIGHT THINK OF AMENDING YOUR REPORTS TO SAY THAT YOU'RE AFFILIATED, IF IN FACT ALL YOUR MEMBERS ARE THE SAME MEMBERS AS THE SERVICE STATION DEALERS AND ALL OF YOUR CONTRIBUTIONS COME FROM MEMBERS OF THE SERVICE STATION DEALERS AND YOU USE THEIR FACILITIES RENT FREE.

BUT THAT'S MORE OF AN EDUCATION THAN A DEPOSITION. I WAS JUST WONDERING, WHAT WAS YOUR REASON FOR NOT SAYING THAT YOU WERE AFFILIATED?

A. WELL, WE SET THIS UP BECAUSE WE DIDN'T WANT TO LOSE NONPROFIT STATUS. WE JUST WANT TO PUT THIS OVER HERE AND KEEP IT SEPARATE SO THAT ONE DIDN'T INTERFERE WITH THE OTHER.

Q. WHO'S "WE"?

A. YOU KNOW, THE ASSOCIATION, PAC. WE SAID, "HEY, IF THE ASSOCIATION HAS A PAC, THEN WE COULD WE STAND A CHANCE TO LOSE OUR NONPROFIT STATUS."

Q. DID YOU SPEAK TO A LAWYER OR ANYONE ABOUT THAT?

A. YES. I THINK IT WAS ONE OF THEM DODOS THAT CAME DOWN THE NCPR MEETING.

Q. NATIONAL CONGRESS OF PETROLEUM RETAILERS?

A. YES. HE WASN'T OUR ATTORNEY. HE'S SMARTER THAN THAT.

Q. YOU SPOKE TO A GUY IN OUR OFFICE, MR. SHELTON,

7 9 8 4 0 - 0 4 6

AND HE CALLED YOU UP A COUPLE TIMES LAST MAY, AND YOU STATED THAT YOU HAD TWO FUNDRAISERS AND THAT YOU TOOK CARE OF ALL THE ARRANGEMENTS, AND THEN YOU SAID YOU'D COME IN TO SEE HIM AROUND MAY 13. CAN YOU REMEMBER WHY?

A. YES. HE SAID TO ME, "I DON'T KNOW WHETHER THAT WOULD BE NECESSARY."

I SAID, "OKAY." NOW, IF IT'S NECESSARY, FINE. BUT HE NEVER COME BACK TO ME AFTER THAT.

Q. OKAY. ON SEPTEMBER 12, '77, YOU GAVE $200 TO ED MITCHELL.

A. YES.

Q. ARE YOU NOW AWARE THAT IF YOU GIVE OVER A THOUSAND DOLLARS, YOU HAVE TO REREGISTER WITH THE COMMISSION?

A. NOW, GIVE ME THIS AGAIN.

Q. IF YOU MAKE CONTRIBUTIONS IN EXCESS OF A THOUSAND DOLLARS IN THE AGGREGATE --

A. FOR '77?

Q. ANY TIME. YES, '77.

A. I DON'T THINK WE GAVE IN '77.

Q. NO, NO. I'M JUST SAYING, YOU'VE TERMINATED YOUR REPORTS WITH THE COMMISSION AND YOU'RE STILL MAKING FEDERAL CONTRIBUTIONS.

7904011649

A. I THINK THAT WAS THE ONLY ONE, THOUGH, RIGHT.
Q. RIGHT. FOR THE RECORD I'M TELLING YOU, IF YOU MAKE OVER A THOUSAND DOLLARS IN CONTRIBUTIONS, YOU HAVE TO REPORT AGAIN.
A. YOU MEAN OVER A PERIOD OF A YEAR OR SEVEN YEARS?
Q. NO. PER YEAR.
A. RIGHT. THAT'S WHY I GIVE IT TO HIM: BECAUSE I KNEW WE DIDN'T GET UP THAT HIGH. THAT WAS TO HELP HIM PAY OFF A CAMPAIGN DEBT.
Q. CAMPAIGN DEBT FROM HIS LAST ELECTION?
A. YES.

MS. VAN GELDER: MR. ZARWIN, I'D BE MORE THAN HAPPY TO LET YOU CROSS-EXAMINE HIM IF YOU WANT.

MR. ZARWIN: NO, I REALLY DON'T.

(WITNESS EXCUSED.)

(WHEREUPON THE STATEMENT ADJOURNED AT 3:10 P.M.)

2004041650

I HEREBY CERTIFY THAT I HAVE READ THE FOREGOING TRANSCRIPT OF MY TESTIMONY IN THE ABOVE MATTER AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Thomas Anderson

THOMAS ANDERSON

DATE:

5-21-18

7204141651

STREET
A. 19107

7 9 0 4 0 1 4 1 3 5 2

Biz Van Gelder, Esquire

Federal Election Commission
1328 "K" Street N.W.
Washington, D.C. 20463

'77 MAR 8 AM 8:48

n 3
76
al Election Commission
K Street, N.W.
ington, D.C. 20463

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

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

1(a) Name of Candidate or Committee (in full) ☐ Check if name or address is changed
Service Station Dealers Political Action Committee

2 Identification Number
None

(b) Address (number and street)
425 Commerce Drive

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No For Year

(c) City, State and ZIP code
Yeadon, Pa. 19050

(b) If "Yes," for which election? _____ (general, primary, runoff) on _____ (date)
1975

4 Type of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For _____ (Which report?)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (Month)
(g) ☒ Termination Report Year 1975

(h) ☐ Tenth day report preceding _____ (primary, general or convention) election on _____ (date) in the State of _____

(i) ☐ Thirtieth day report following _____ (primary, general or convention) election on _____ (date) in the State of _____

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1/1/75 Through 12/31/75

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19		$ 3,902.94
7 Cash on hand at beginning of reporting period	$	
8 Total receipts (from line 19)	$	$ 6,205.00
(a) Subtotal (Add lines 7 and 8)	$	$ 10,107.94
9 Total expenditures (From line 25)	$	$ 10,034.25
10 Cash on hand at close of reporting period (Subtract line 9 from line 8) 12/31/75	$	$ 73.69
11 Contributed items on hand to be liquidated (attach itemized list) $ _____		

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	$	$
13 Refunds and Rebates (from line 17)	$	$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	$	$
(b) Expenditures from prior years subject to limitation		$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		$

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

[illegible] Treasurer 9-30-77

(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or §441j (See reverse side of form)

For further information Contact: Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

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

...tion Commission
...reet, N.W.
...ton, D.C. 20463

Detailed Summary Schedule of Receipts and Expenditures
(Page 2)

Name of Candidate or Committee
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

REPORT COVERING THE PERIOD FROM: 1/1/75 TO: 12/31/75

PART I - RECEIPTS	Column A This Period	Column B Calendar year-to-date
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$ 6,205.00	
(c) Sales and Collections Included Above: List by event on memo Schedule D ($)		
(d) Subtotal of contributions and other income	$	$ 6,205.00
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments received	$	$ -0-
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of refunds, rebates, returns	$	$ -0-
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	$	
(c) Subtotal of transfers in	$	$ -0-
19 Total Receipts	$	$ 6,205.00
PART II - EXPENDITURES		
20 Operating Expenditures (Committees *Not* Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	$	
(b) Unitemized ... Committee Expenses	$ 769.25	
(c) Subtotal of operating expenditures	$	$ 769.25
21 Independent Expenditures (use Schedule E)	$	$ -0-
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments made and contribution refunds	$	$ -0-
23 For Use Only By Presidential Campaigns Receiving Federal Funds. Exempt Fundraising, Legal and Accounting Expenditures		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of fundraising expenditures	$	$ -0-
24 Transfers Out		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	$ 9,265.00	
(c) Subtotal of transfers out	$	$ 9,265.00
25 Total Expenditures	$	$10,034.25
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	$ -0-	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	$ -0-	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	$ 6,205.00	
29 Transfers In (from line 18(a))	$ -0-	
30 Net Receipts (Subtract line 29 from line 28)	$ 6,205.00	
31 Total Expenditures (from line 25)	$ 10,034.25	
32 Transfers out (from line 24 (a))	$ -0-	
33 Net Expenditures (Subtract line 32 from line 31)	$ 10,034.25	

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 1 of 1 for 1975

LINE NUMBER 24

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
State & Local Dandidates, Political Committees and Politicel Parties	State & Local purchase of tickets, adds and donations	1975	9,265.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (optional) ▶			$ 9,265.00
Total expenditures this page (required) ▶			$ 9,265.00

7901011655

Form 3
1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

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

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

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

2 Identification Number
NONE

(b) Address (number and street)
425 Commerce Drive

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No for Year

(c) City, State and ZIP code
Yeadon, Pa. 19050

(b) If "Yes," for which election? 1974
(general, primary, runoff) on (date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For _____ (Which report)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (Month)
(g) ☒ Termination Report Year 1974

(h) ☐ Tenth day report preceding _____ (primary, general or convention) election on _____ (date) in the State of _____

(i) ☐ Thirtieth day report following _____ (primary, general or convention) election on _____ (date) in the State of _____

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1/1/74 Through 12/31/74

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 19 74		$ -0-
7 Cash on hand at beginning of reporting period	$	
8 Total receipts (from line 19)	$	$ 47,740.50
(a) Subtotal (Add lines 7 and 8)	$	$ 47,740.50
9 Total expenditures (From line 25)	$	$ 43,837.56
10 Cash on hand at close of reporting period (Subtract line 9 from line 8) 12/31/74	$	$ 3,902.94
11 Contributed items on hand to be liquidated (attach itemized list) $		
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	$	$
13 Refunds and Rebates (from line 17)	$	$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	$	$
(b) Expenditures from prior years subject to limitation		$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		$

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

[illegible] Treasurer 1-6-77
(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or §441j (See reverse side of form)

For further information Contact: Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463

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

FEC 76 041163

...lection Commission
...Street, N.W.
...ington, D.C. 20463

Detailed Summary Schedule of Receipts and Expenditures
(Page 2)

Name of Candidate or Committee
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

REPORT COVERING THE PERIOD
FROM: 1/1/74 TO: 12/31/74

PART I - RECEIPTS	Column A This Period	Column B Calendar year-to-date
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$ 18,040.50	
(c) Sales and Collections Included Above: List by event on memo Schedule D ($ 29,700.00)		
(d) Subtotal of contributions and other income	$ 29,700.00	$ 47,740.50
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments received	$	$ -0-
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of refunds, rebates, returns	$	$ -0-
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	$	
(c) Subtotal of transfers in	$	$ -0-
19 Total Receipts	$	$ 47,740.50
PART II - EXPENDITURES		
20 Operating Expenditures (Committees *Not* Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	$ 12,388.56	
(b) Unitemized	$	
(c) Subtotal of operating expenditures	$	$ 12,388.56
21 Independent Expenditures (use Schedule E)	$	$ -0-
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments made and contribution refunds	$	$ -0-
23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal and Accounting Expenditures		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of fundraising expenditures	$	$ -0-
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	$ 31,449.00	
(c) Subtotal of transfers out	$	$ 31,449.00
25 Total Expenditures	$	$ 43,837.56
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	$ -0-	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	$ -0-	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	$ 47,740.50	
29 Transfers In (from line 18(a))	$ -0-	
30 Net Receipts (Subtract line 29 from line 28)	$ 47,740.50	
31 Total Expenditures (from line 25)	$ 43,837.56	
32 Transfers out (from line 24(a))	$ -0-	
33 Net Expenditures (Subtract line 32 from line 31)	$ 43,837.56	

7 9 4 0 1 1 6 5 7

Schedule B

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

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 1 of 1 for 1974

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Various Expenses, Pennsylvania	Committee Expenses	1974	542.84
The Falcon House, Inc. Delaware County, Pa.	Thomas Anderson Testimonial Dinner	10/22/74	11,475.72
Charles Dee Delaware County, Pa.	Orchestra Testimonial Dinner	10/15/74	370.00
Subtotal of expenditures this page (optional) ▶			$ 12,388.56
Total this period (last page this line number only) ▶			$ 12,388.56

7604011663

Schedule B
(Rev. 1976)
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See Instructions on back)

Page 1 of [illegible]

LINE NUMBER

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
State & Local Candidates, Political Committees and Political Parties	State and Local purchase of tickets, adds and donations	1974	$9,293.00
Friends of Taubert MacDonald Committee Mass.	2 tickets @ $100 dinner, U.S.Congressman Taubert McDonald (D)	4/22/74	200.00
Democratic National Committee Washington, D.C.	Donation - 1974 telethon	7/16/74	100.00
Citizens for Schultze Delaware County, Pa.	Primary & Federal election-U.S.Congressman Richard Schutz(R)	9/26/74	1,000.00
L.G. Williams for Congress Committee Delaware County, Pa.	10 tickets @ $50. dinner-U.S.Contressman Larry Williams (R)	9/25/74	500.00
National Democratic Club Washington, D.C.	Initiation fee and dues	10/15/74	[illegible]
Rooney for Congress Allentown, Pa.	General Election U.S. Contressman Fred Rooney (D)	10/24/74	300.00
Subtotal of expenditures this page (optional) ▶			$ 31,449.00
Total this period (last page this line number only) ▶			$ 31,449.00

7901416

Schedule D
1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts Sales and Collections For Line Number 15C Only of FEC Form 3

(see Instructions on back)

Page 2 of 3 for 15C

LINE NUMBER 15C

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)* ▶ $ 29,700.00

2 Mass collections (List by event below)** ▶ $

3 Sale of Items ▶ $

4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) ▶ $ 29,700.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period**
The Falcon House, Delaware County, Pa.	10/15/74	$ 29,700.00	$
Thomas Anderson Testimonial Dinner			
990 @ $30.00			

Thomas Anderson
5 Commerce Dr.
Yardley Pa. 19067

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

F. 7 MUR 409
Suzanne Callahan

P001411661
P00002711

EC Form 1
uly 1976
ederal Election Commission
325 K Street, N.W.
Washington, D.C. 20463

Statement of Organization For a Political Committee

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

(See Reverse Side For Instructions.)

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

1(a) Name of Committee (in full) ☐ Check if name or address is changed	2 Identification Number
Service Station Dealers Political Action Committee	None
(b) Address (number and street) 425 Commerce Drive	3 Date September 2, 1977
(c) City, State and ZIP code Yeadon, Pa. 19050	4 Is this an amended statement ☐ Yes ☒ No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

☐ (a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)

a candidate for _____ (Federal office sought) in the _____ (Year of election) Election

to be held in the State of _____ (State in which election is held)

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

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

to receive contributions and make expenditures with respect to the _____ (General, Primary, Runoff, etc) Election(s)

held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)

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

☐ (c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

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

☐ (e) This committee is a _____ (National, State, county, city) committee of the _____ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
None		

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

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

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

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

Statement of Organization for a Committee

(Page 2)

Name of Committee
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

7 Area, Scope and Jurisdiction of Committee:

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

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

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

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

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

9 If this committee is supporting the entire ticket of a party, give name of party ▶ No

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

Full name	Mailing address and ZIP code	Title or position
Thomas Anderson	425 Commerce Drive Yeadon, Pa. 19050	Chairman/Treasurer

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

7900116

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

Statement of Organization For a Committee

(Page 3)

Name of Committee
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

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

Full name	Mailing address and ZIP code	Title or position
NONE		

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

13 In the event of dissolution, what disposition will be made of residual funds?

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

Name of bank, repository, etc.	Mailing address and ZIP code
The Fidelity Bank	Broad & Walnut Streets Philadelphia, Pa. 19109

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

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
None			

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

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

[signature] (Signature of Treasurer)

9-13-77 (Date)

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

For further information contact: ▶ Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEC Form 3
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

FINAL RETURN

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

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

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

(b) Address (number and street)
425 Commerce Drive

(c) City, State and ZIP code
Yeadon, Pa. 19050

2 Identification Number
None

3(a) Is this a report of receipts and expenditures for only one election? ☐ Yes ☒ No for year

(b) If "Yes," for which election? _____ on _____
(general, primary, runoff) (date)

4 Type of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For _____ (Which report)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (Month)
(g) ☒ Termination Report Year 1976

(h) ☐ Tenth day report preceding _____ election on _____ in the State of _____
(primary, general or convention) (date)

(i) ☐ Thirtieth day report following _____ election on _____ in the State of _____
(primary, general or convention) (date)

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From 1/1/76 Through 12/31/76

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1976		$ 73.69
7 Cash on hand at beginning of reporting period	$	
8 Total receipts (from line 19)	$	$ 55,770.90
(a) Subtotal (Add lines 7 and 8)	$	$ 55,844.59
9 Total expenditures (From line 25)	$	$ 53,214.50
10 Cash on hand at close of reporting period (Subtract line 9 from line 8) 12/31/76	$	$ 2,630.09
11 Contributed items on hand to be liquidated (attach itemized list) $ _____		
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	$	$
13 Refunds and Rebates (from line 17)	$	$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	$	$
(b) Expenditures from prior years subject to limitation		$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		$

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

[redacted] Treasurer 2/13/77
(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (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 or §441j (See reverse side of form)

For further information Contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463

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

FEC Form 3
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Detailed Summary Schedule of Receipts and Expenditures
(Page 2)

Name of Candidate or Committee: SERVICE STATIONS DEALERS POLITICAL ACTION COMMITTEE

REPORT COVERING THE PERIOD FROM: 1/1/76 TO: 12/31/76

	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other income:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$ 20,020.90	
(c) Sales and Collections Included Above: List by event on memo Schedule D ($ 35,750.00)		
(d) Subtotal of contributions and other income	$ 35,750.00	$ 55,770.90
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments received	$	$ -0-
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	$	
(b) Unitemized	$	
(c) Subtotal of refunds, rebates, returns	$	$ -0-
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	$	
(c) Subtotal of transfers in	$	$ -0-
19 Total Receipts	$	$ 55,770.90
PART II - EXPENDITURES		
20 Operating Expenditures (Committees *Not* Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	$ 17,874.50	
(b) Unitemized	$	
(c) Subtotal of operating expenditures	$	$ 17,874.50
21 Independent Expenditures (use Schedule E)	$	$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of loans and loan repayments made and contribution refunds	$	$
23 For Use Only By Presidential Campaigns Receiving Federal Funds: Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	$	
(b) Unitemized	$	
(c) Subtotal of fundraising expenditures	$	$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	$ 35,340.00	
(c) Subtotal of transfers out	$	$ 35,340.00
25 Total Expenditures	$	$ 53,214.50
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	$ -0-	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	$ -0-	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	$ 55,770.90	
29 Transfers In (from line 18(a))	$ -0-	
30 Net Receipts (Subtract line 29 from line 28)	$ 55,770.90	
31 Total Expenditures (from line 25)	$ 53,214.50	
32 Transfers out (from line 24(a))	$ -0-	
33 Net Expenditures (Subtract line 32 from line 31)	$ 53,214.50	

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

Itemized Receipts Sales and Collections For Line Number 15C Only of FEC Form 3

(see Instructions on back)

Page 1 of 1 for
LINE NUMBER 15C

Name of Candidate or Committee in full
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Total Proceeds during the Reporting Period:

1 Sale of tickets (List by event below)* ▶ $ 35,750.00
2 Mass collections (List by event below)** ▶ $
3 Sale of Items ▶ $
4 Total (Carry forward to Line 15C of Detailed Summary Schedule Page 2, FEC Form 3) ▶ $ 35,750.00

List of Sales and Collections by Event

Location (Site, City and State) and Type of Event	Date of Event (month, day, year)	Amount from Sale of Tickets this Period*	Amount from Mass Collections this Period **
Green for Senate Dinner, Phila., Pa.	5/3/77	$ 18,750.00	$
(750 @ $25.00)			
Green for Senate Dinner, Pittsburg, Pa.	5/23/76	7,000.00	
(200 @ $35.00)			
Service Station Dealers Political Action Comm.	10/12/76	10,000.00	
(499 x $25) Dinner, Phila., Pa.			
Subtotal this period this page (optional) ▶		$ 35,750.00	$
Total this period (last page this line number only) ▶		$ 35,750.00	$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 1 of 3 for
LINE NUMBER 20
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
National Democratic Club Washington, D.C.	Food	4/21/76	113.09
Master Graphics Phila., Pa.	Address plate	11/12/76	6.50
Postage Phila., Pa.	postage- mailing	11/12/76	244.53
Senior Citizens Action Alliance Committee Phila., Pa.	10 tickets @ $15.00 dinner - Senior citizens	4/21/76	150.00
Monsignior DiGiacomo Dinner Phila., Pa.	10 tickets @ $25 25th anniversary dinner	4/23/76	250.00
PSSDA - Erie Chapter Erie, Pa.	3 tickets @ $50 dinner	10/1/76	150.00
NCPR PAC Washington, D.C.	National Congress of Petroleum Retailers Political Action Committee	7/13/76	500.00
Committee for John Cerulli Dinner Harrisburg, Pa.	10 tickets @ $25-Penna. Turnpike Commissioner Cerulli Testimonial Dinner	10/25/76	250.00
Subtotal of expenditures this page (optional) ▶			$ 1,664.12
Total this period (last page this line number only) ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

LINE NUMBER 20

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Palumbo's Restaurant Phila., Pa.	Deposit-Green for Senate Dinner Phila., Pa.	2/22/76	1,000.00
Palumbo's Restaurant Phila., Pa.	Green for Senate Dinner, Phila., Pa.	3/3/76	6,307.00
William Dammion Phila., Pa.	Refund for Tickets-Green Dinner, Phila,Pa.	3/29/76	250.00
Terminal Press Phila., Pa.	Tickets for Green Dinner, Phila., Pa.	3/29/76	23.32
Herman Pinting & Litho Inc. Pittsburg, Pa.	Tickets for Green Dinner, Pittsburg,Pa.	3/29/76	125.61
Herman Printing & Litho Inc. Pittsburg, Pa.	Drawing tickets for Dinner-Pittsburg,Pa.	4/23/76	50.88
Sheraton Sun on the Mall Pittsburg, Pa.	Green for Senate Dinner (5/23/76)Pittsburg,Pa.	6/7/76	3,767.57
Herb Fedel Pittsburg, Pa.	Reimburse for Band for Green dinner Dance (5/23/76),Pittsburg,Pa.	6/14/76	225.00
		Subtotal of expenditures this page (optional) ▶	$11,749.38
		Total this period (last page this line number only) ▶	$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 3 of 3 for
LINE NUMBER 20
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Palumbo's Restaurant Phila., Pa.	Service Station Dealers Political Action Committee-Dinner	10/12/76	4,261.00
Friends for Bradley Committee Phila., Pa.	10 tickets @ $20 - Senior Citizens Testimonial Dinner for Frank Bradley	10/25/76	200.00
Subtotal of expenditures this page (optional). ▶			$ 4,461.00
Total this period (last page this line number only). ▶			$17,874.50

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

LINE NUMBER 24

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full
SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DEMOCRATIC PARTY OF ERIE Erie, Pa.	Dinner tickets and add book	1/19/76	460.00
Democratic Party of Allentown Allentown, Pa.	dinner tickets	1/29/76	215.00
Democratic Party of Erie Erie, Pa.	dinner tickets	1/29/76	175.00
Committee to ReElect Stapleton Delaware County, Pa.	2 tickets @ $25 cocktail party, Pa. State Tom Stapleton (D)	2/22/76	50.00
Committee to ReElect Gov. Tribett State of Delaware	10 tickets @ 12- Gov. Tribett (D), State of Delaware	2/22/76	120.00
Green for Senate Committee Phila., Pa.	3 tickets @ $100 - Dinner-Sen. Candidate Wm. Green (D)	3/3/76	300.00
Green for Senate Committee Phila., Pa.	1 ticket @ $100 - Dinner-Sen. Candidate William Green (D)	3/24/76	100.00
Delco Republican Dinner Committee Delaware County, Pa.	3 tickets @ $100 - Del. County Republican Dinner	3/24/76	300.00
Subtotal of expenditures this page (optional). ▶			$1,720.00
Total this period (last page this line number only). ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 2 of 8 for
LINE NUMBER 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Pa. State Sen. Paul McKinney Phila., Pa.	5 tickets @ $100-Phila. Dem. City Comm.-Jefferson-Jackson Day Dinner	3/29/76	500.00
Pa. State Repr. Frank Oliver Phila., Pa.	5 tickets @ $100-Phila. Dem.City Comm.-Jefferson-Jackson Day Dinner	3/29/76	500.00
Pa. State Repr. Sam Ross Phila., Pa.	25 chances @ $1-Phila. Phila.,Dem.City Comm Jefferson-Jackson Day Dinner	3/29/76	25.00
Comm. To ReElect Jim Romanelli Allegheny County, Pa.	6 tickets @ $50-cocktail party - Pa. State Sen. Romanelli (D)	3/29/76	300.00
Comm. to Elect Joe Smith Allegheny County, Pa.	Pa. State Treasurer Candidate Joe Smith (D)	3/29/76	1,000.00
Republican State Committee Harrisburg, Pa.	1 ticket @ $100 - Republican Brunch, Harrisburg, Pa.	3/29/76	100.00
Committee to ReElect Frank Oliver Phila., Pa.	P. State Repr. Frank Oliver	3/31/76	200.00
Friends of Freeman Hankin Phila., Pa.	Pa. State Senator Freeman Hankin (d)	4/1/76	350.00
Subtotal of expenditures this page (optional). ▶			$ 2,975.00
Total this period (last page this line number only). ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 3 of 8 for
LINE NUMBER 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Al Benedict Committee Phila., Pa.	P.a. Auditor General Al Benedict (D)	4/1/76	500.00
Montgomery County Republican Dinner Dance Committee, Montgomery Co., Pa.	10 tickets @ 125 - dinner dance	4/9/76	1,250.00
Ted Doyle Campsign Committee Delaware County, Pa.	10 tickets @ $7 - Pa. State Rep. Ted Doyle(D)	4/9/76	70.00
Green for U.S. Senate Phila., Pa.	Partial Transfer of Dinner Dance proceeds	4/21/76	4,600.00
Lederer for Congress Comm. Phila., Pa.	U.S. Congressman Reymond Lederer (D)	4/21/76	500.00
ReElect Burns Comm. Bucks Co., Pa.	5 tickets @ $20 - cocktail party Pa.State Rep. Edward Burns (R)	4/21/76	100.00
Friends for Salvatore Phila., Pa.	50 tickets @ $25 - Pa. State Rep. Frank Salvatore (D)	7/13/76	1,250.00
Committee to ReElect Matt Ryan Delaware Co., Pa.	Pa. State Rep. Mathew Ryan (R)	8/3/76	500.00
Subtotal of expenditures this page (optional). ▶			$ 8,770.00
Total this period (last page this line number only). ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 4 of 8 for
LINE NUMBER 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Green for Senate Committee Philadelphia, Pa.	partial transfer of Dinner Dance proceeds	8/3/76	1,000.00
Committee to ReElect Edgar Delaware County, Pa.	U.S. Congressman Robert Edgar (D)	8/3/76	200.00
Class of 74 - Demo. Congressman Washington, D.C.	1 ticket Demo. Dinner 8/9/76 Washington, D.C.	8/9/76	250.00
Friends of Mathew Ciarciulli Phila. , Pa.	2 tickets @ $100 - Pa. State Rep. Mathew Ciarciulli (D)	8/18/76	200.00
Friends of Rooney Committee Allentown, Pa.	U.S. Congressman Fred Rooney	9/24/76	500.00
Garcia Committee Delaware Co., Pa.	10 tickets @ $10 - Pa. Pa. State Rep. Ralph Garcia, (D)	9/15/76	100.00
Republican Legislative Campaign Comm Harrisburg, Pa.	State Republican Comm.	9/15/76	200.00
Green for Senate Committee Phila., Pa.	Partial transfer of dinner dance proceeds	9/15/76	4,000.00
Subtotal of expenditures this page (optional). ▶			$ 6,450.00
Total this period (last page this line number only). ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

LINE NUMBER 24

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Pa. Senate Democratic Campaign Com. Harrisburg, Pa.	2 tickets State Campaign Dinner	9/15/76	200.00
H. Sheldon/Dinner Campaign Fund Parker Pittsburg, Pa.	Pa. State Rep. H. Sheldon Parker (R)	8/17/76	200.00
Friends of Ron Vespa Bethlehem, Pa.	Pa. State Legislature Candidate Ron Vespa(R)	8/22/76	275.00
Phila. Republican City Committee Phila., Pa.	1 ticket @ $100 - dinner	10/1/76	100.00
Democratic One Hundred Dollar Club Dinner, Phila., Pa.	5 tickets @ $100 - dinner	10/1/76	500.00
Committee for Worrilow Chester, Pa.	Pa. State Legislative Candidate - Tom Worrilow (R)	10/1/76	500.00
ReElect O'Keefe Committee Delaware County, Pa.	Pa. State Rep. Peter O'Keefe (D)	10/1/76	500.00
Citizens for Benedict Phila., Pa.	Pa. Auditor General Al Benedict (D)	10/18/76	300.00
Subtotal of expenditures this page (optional) ▶			$ 2,575.00
Total this period (last page this line number only) ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

LINE NUMBER 24

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Democratic Legislative Committee Harrisburg, Pa.	Pa. State Committee	10/25/76	1,000.00
Bellemoni Committee Erie, Pa.	Pa. State Rep. Bellemoni (D)	10/25/76	200.00
Green for Senate Comm. Phila., Pa.	Final Transfer of Dinner Dance proceeds	10/25/76	5,000.00
ReElect Cohell Committee Allegheny County, Pa.	Pa. State Rep. Ronald Cohell (D)	10/25/76	200.00
ReElect Kernick Committee Allegheny County, Pa.	Pa. State Rep. Phyllis Kernick (D)	10/25/76	200.00
Citizens for Benedict Bucks Co., Pa.	8 tickets @ $25 cocktail party Pa. Auditor General Al Benedict (D)	10/29/76	200.00
Phila., Democratic City Comm. Phila., Pa.	2 tickets @ $100 dinner	12/10/76	200.00
Phila. Democratic City Comm. Phila., Pa.	2 tickets @ $100 dinner	12/10/76	200.00
Subtotal of expenditures this page (optional). ▶			$ 7,200.00
Total this period (last page this line number only). ▶			$ 35,340.00

Schedule B
July 1976
Federal Election Commission,
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 7 of 8 for
LINE NUMBER 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gillespie for Legislature Delaware County, Pa.	Pa. State Rep. Pat Gillespie (D)	10/21/76	500.00
Doyle for Legislature Delaware County, Pa.	Pa. State Rep. Ted Doyle (D)	10/25/76	250.00
Garcia for Legislature Delaware County, Pa.	Pa. State Rep. Ralph Garcia (D)	10/25/76	100.00
ReElect Salvatore Committee Phila., Pa.	Pa. State Rep. Frank Salvatore (R)	10/25/76	300.00
Robert Burns Committee Bucks Co., Pa.	Pa. State Rep. Robert Burns (R)	10//25/76	200.00
Orlando for Senate Erie, Pa.	Pa. State Sen. Orlando (D)	10/25/76	300.00
Dougherty for Senate Phila., Pa.	Pa. State Sen. Edward Dougherty (R)	10/25/76	300.00
Committee to Elect Dennis O'Brien Phila., Pa.	Pa. State Rep. Dennis O'Brien (R)	10/25/76	200.00
Subtotal of expenditures this page (optional). ▶			$2,150.00
Total this period (last page this line number only). ▶			$

Schedule B
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 6 of 8 for
LINE NUMBER 24
(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

SERVICE STATION DEALERS POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Montgomery County Republican Committee Montgomery County, Pa.	5 tickets @ $100 dinner	10/18/76	$500.00
McGinness for Legislature Montgomery County, Pa.	Pa. State Rep. Patrick J. MCGinness (R)	10/18/76	500.00
Citizens to ReElect Sam Morris Chester County, Pa.	Pa. State Rep. Samuel Morris (D)	10/18/76	200.00
Murtha for Congress Committee Johnstown, Pa.	U.S. Congressman John Murtha (D)	10/18/76	300.00
Ed Mitchell for Congress Scranton, Pa.	U.S. Congressman candidate Edward Mitchell (D)	10/11/76	500.00
Ozzie Meyers for Congress Phila., Pa.	U.S. Congressman Michael Meyers (D)	10/18/76	500.00
Murphy for Congress Comm. Uniontown, Pa.	U.S. Congressman Austin J. Murphy (D)	10/18/76	500.00
Lederer for Congress Phila., Pa.	U.S. Congressman Raymond Lederer (D)	10/21/76	500.00
Subtotal of expenditures this page (optional). . . . . ▶			$3,500.00
Total this period (last page this line number only). . . . . ▶			$

Page