



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

THIS IS THE BEGINNING OF MUR # 4667

DATE FILMED 3/11/98 CAMERA NO. 2

CAMERAMAN EES

98043862377



Abington - Rockledge Democratic Committee

153rd Legislative District

August 12, 1997

P.O. Box 132 • Abington, PA 19001

Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

MUR 4667

Dear Sir:

I wish to file a complaint against Citizens for Stewart Greenleaf, a political committee which supports the election of Stewart Greenleaf, a Pennsylvania state senator. I have been advised by FEC staff that your regulations prohibit contributions of more than \$1,000 to Federal candidates without registering with the FEC, and that Citizens for Stewart Greenleaf is not registered.

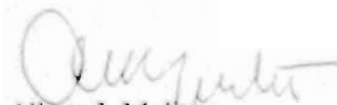
Citizens for Stewart Greenleaf reported to the Pennsylvania Department of State contributions in 1996 of \$1,600 to Greenwood for Congress (Congressman James Greenwood) and \$1,000 to Citizens for Specter (Senator Arlen Specter).

Portions of the reports filed by Citizens for Stewart Greenleaf are attached:

1. Report for the period 1/1/96 to 5/13/96, page 14 lists a donation of \$250 and page 19 lists a donation of \$750 to Greenwood for Congress. Page 20 lists a donation of \$1,000 to Citizens for Specter.
2. Report for the period 5/14/96 to 10/21/96, page 31 lists a donation of \$100 and page 37 a donation of \$500 to Greenwood for Congress.

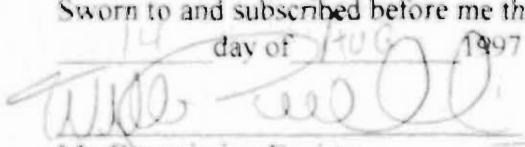
Thank you for your consideration of this complaint.

Sincerely yours,


Albert J. Molitor
Chair

Sworn to and subscribed before me this
14 day of AUG 1997

My Commission Expires


William M. ...
Upper Merion Township, Montgomery County
My Commission Expires 8/17/98
Member Pennsylvania Association of Notaries

CAMPAIGN EXPENSE REPORT
COMMONWEALTH OF PENNSYLVANIA — DEPARTMENT OF STATE
BUREAU OF COMMISSIONS, ELECTIONS AND LEGISLATION
305 NORTH OFFICE BUILDING
HARRISBURG, PA 17120

MAY 23 1996

NAME/ADDRESS INFORMATION	ELECTION DATA	REPORT FILED BY	TYPE OF REPORT
NAME OF CANDIDATE, COMMITTEE OR LOBBYIST Greenleaf, Stewart, Citizens for	ELECTION DATE 4/23/96	☐ Candidate	☐ 6th Tues. Pre-Election
8400397 CPC GREENLEAF, STEWART CITIZENS FO	OFFICE/DISTRICT 12th	☒ Committee	☐ 2nd Fri. Pre-Election
C/O TREAS: STAUFFER, P. RICHAR	COUNTY Montgomery	☐ Lobbyist	☒ 30-Day Post Election
1108 YORK ROAD			☐ Annual Report
WILLOW GROVE, PA 19090-0000			☐ Amendment Report
			☐ Termination Report

NOTE: This report *must* be typed or prepared in blue or black ink.

SUMMARY OF RECEIPTS AND EXPENDITURES FROM 1/1/96 **TO** 5/13/96

A. Cash Balance — Beginning (See instruction # 1)	\$31,373.36
B. Total Receipts (From Schedule I — This Report Only)	\$18,150.78
C. Total of Lines A and B	\$49,524.14
D. Total Expenditures (From Schedule II — This Report Only) ...	\$28,342.76
E. Cash Balance — Ending (Subtract Line D from Line C)	\$21,181.38
F. Unpaid Debts and Obligations (From Schedule III)	\$ -0-
G. In-Kind Contributions (From Schedule IV — This Report Only) ..	\$ -0-

FOR OFFICE USE ONLY

RECEIVED
 96 MAY 24 AM 9:30
 OFFICE OF
 VOTER SERVICES
 MONICA CO. PA

AFFIDAVIT SECTION

PART I — TO BE COMPLETED BY THE PERSON SUBMITTING THIS REPORT
 (Treasurer — If Filed By Committee; Candidate — If Filed By Candidate)

I swear (or affirm) that this report, accompanying schedules and statements are to the best of my knowledge and belief true, correct and complete.

Sworn to and subscribed before me this

22nd day of May 1996

Evelyn S. Bissig

Signature Notarial Seal Official Title
 Evelyn S. Bissig, Notary Public

My Commission Expires March 16, 2000

P. Richard Stauffer
 Signature of Person Submitting Report

P. Richard Stauffer
 Printed Name

Telephone Number

PART II — TO BE COMPLETED BY THE CANDIDATE IF THIS REPORT IS FILED BY THE CANDIDATE'S AUTHORIZED COMMITTEE

I swear (or affirm) that to the best of my knowledge and belief this political committee has not violated any provisions of the Act of June 3, 1937 (P.L. 1333, No. 320) as amended.

Sworn to and subscribed before me this

22nd day of May 1996

Evelyn S. Bissig

Signature Notarial Seal Official Title

Evelyn S. Bissig, Notary Public

My Commission Expires March 16, 2000

Stewart J. Greenleaf
 Signature of Candidate

Stewart J. Greenleaf
 Printed Name

Telephone Number

SCHEDULE II

SUMMARY OF EXPENDITURES

USE THIS SECTION TO ITEMIZE ALL EXPENDITURES MADE DURING THE REPORTING PERIOD.

NAME OF CANDIDATE, COMMITTEE OR LOBBYIST		REPORTING PERIOD	
Citizens for Greenleaf		FROM: 1/01/95 TO: 5/13/96	
DATE (S)	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT	DESCRIPTION OF EXPENDITURE	AMOUNT
2/07/96	Mrs. Thomas R. Rorer, IV 112 School St North Wales, PA 19454	Tickets	\$ 160.00
2/07/96	Keystone United Overseas Travel Team c/o Jason Karasow 324 Arionne Drive, Hatboro, PA 19040	Donation	20.00
2/14/96	Philip Levin Co 321 N. 2nd Street Harrisburg, PA 17101	Campaign Supplies	94.56
2/16/96	American Express P. O. Box 114 Newark, N. J. 07101	Food & Misc. expense	55.21
2/16/96	Wolf, Block, Schorr & Solis-Cohen 12th Floor Packard Bldg., S.E. Corner 15th & Chestnut Sts. Phila., PA 19102-2678	Printing, postage, & misc. expense	1,231.84
2/20/96	People to People c/o Brendan Surrusco 1421 Long Pond Drive, Warrington, PA 18976	Donation	25.00
2/20/96	Delaware Valley College A-Day 700 East Butler Avenue Doylestown, PA 18901-2697	Ad	35.00
2/20/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	13.70
2/21/96	Greenwood for Congress P. O. Box 2358 Doylestown, PA 18901	Ticket	250.00
2/22/96	MBNA America P. O. Box 15019 Wilmington, DE 19866-5408	Food, Office Equipment, & misc. expense	1,342.27
2/26/96	Fulbright Association c/o Jo-Ann Flora 1908 Green Street, Phila., PA 19130	Tickets	80.00
2/26/96	Striped Bass 1500 Walnut Street Phila., PA 19102	Deposit for fundraiser	340.00
Subtotal This Page (Optional)			> \$ 3,647.58
Total This Period - Enter on Page 1 (Face Sheet) - Item D			>

SCHEDULE II

SUMMARY OF EXPENDITURES

USE THIS SECTION TO ITEMIZE ALL EXPENDITURES MADE DURING THE REPORTING PERIOD.

NAME OF CANDIDATE, COMMITTEE OR LOBBYIST		REPORTING PERIOD	
Citizens for Greenleaf		FROM: 1/01/95 TO: 5/13/96	
DATE (S)	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT	DESCRIPTION OF EXPENDITURE	AMOUNT
4/11/96	Upper Moreland High School 3000 Terwood Road Willow Grove, PA 19090	Ad	\$ 35.00
4/12/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	87.34
4/12/96	Republican Association of Upper Moreland Township P. O. Box 391 Willow Grove, PA 19090	Tickets	80.00
4/12/96	Philip Levin Co. 321 N. 2nd Street Harrisburg, PA 17101	Supplies	113.28
4/13/96	Vincent Abbate 3022 Hale Street Phila., PA 19149	Campaign office repairs & renovation	725.00
4/15/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	14.58
4/15/96	Vincent Abbate 3022 Hale Street Phila., PA 19149	Campaign office repairs & renovation	725.00
4/15/96	First USA Bank P. O. Box 740085 Atlanta, GA 30374-0085	Food & Beverage, Misc. Expenses	105.65
4/16/96	Greenwood for Congress P. O. Box 2358 Doylestown, PA 18901	Contribution	750.00
4/18/96	Eleanor Martin 800 Packard Bldg., 15th & Chestnut St. Phila., PA 19102-2678	Work on Campaign	1,104.59
4/18/96	Eleanor Martin 800 Packard Bldg., 15th & Chestnut St. Phila., PA 19102-2678	Reimburse for expenses	54.50
4/19/96	Stewart J. Greenleaf 27 N. York Road Willow Grove, PA 19090	Auto expenses	100.00
Subtotal This Page (Optional)			> \$ 3,894.94
Total This Period - Enter on Page 1 (Face Sheet) - Item D			>

SCHEDULE II

SUMMARY OF EXPENDITURES

USE THIS SECTION TO ITEMIZE ALL EXPENDITURES MADE DURING THE REPORTING PERIOD.

NAME OF CANDIDATE, COMMITTEE OR LOBBYIST		REPORTING PERIOD	
Citizens for Greenleaf		FROM: 1/01/95 TO: 5/13/96	
DATE (S)	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT	DESCRIPTION OF EXPENDITURE	AMOUNT
4/19/96	Citizens for Specter Packard Bldg., 115 S. 15th St. Phila., PA 19107	Contribution	\$ 1,000.00
4/22/96	Cradle of Liberty Council, BSA P. O. Box 806 Valley Forge, PA 19482	Tickets	195.00
4/22/96	Evelyn S. Bissig P. O. Box 3115 Maple Glen, PA 19002	Reimburse for out-of-pocket expenses	11.45
4/23/96	Postmaster Willow Grove Easton Road Willow Grove, PA 19090	Postage	1.24
4/23/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	14.62
4/24/96	Rockledge Community Services, Inc. 121 Huntingdon Pike Rockledge, PA 19046	Tickets	10.00
4/24/96	American Express P. O. Box 114 Newark, N. J. 07101	Food & Beverage, Lodging, Misc. Expenses	2,464.11
4/25/96	Vincent Abbate 3022 Hale Street Phila., PA 19149	Campaign office repairs & renovation	145.00
4/26/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	3.15
4/30/96	Bell Atlantic-PA P. O. Box 8585 Phila., PA 19173-0001	Campaign phone expense	200.01
5/02/96	Miller Windows 47 N. York Road Hatboro, PA 19040	Campaign office supplies	35.00
5/03/96	Smith-Edwards-Dunlap Co. P. O. Box 8500-S5560 Phila., PA 19178	Printing	829.25
Subtotal This Page (Optional)			> \$ 4,908.83
Total This Period - Enter on Page 1 (Face Sheet) - Item D			>

U.S. POSTAGE
PAID
WILLOW GROVE, PA
19090
OCT 24 1996
00041628-01
19404

CAMPAIGN EXPENSE REPORT
COMMONWEALTH OF PENNSYLVANIA — DEPARTMENT OF STATE
BUREAU OF COMMISSIONS, ELECTIONS AND LEGISLATION
305 NORTH OFFICE BUILDING
HARRISBURG, PA 17120

NAME/ADDRESS INFORMATION	ELECTION DATA	REPORT FILED BY	TYPE OF REPORT
NAME OF CANDIDATE, COMMITTEE OR LOBBYIST	ELECTION DATE	☐ Candidate ☒ Committee ☐ Lobbyist	☐ 6th Tues. Pre-Election ☒ 2nd Fri. Pre-Election ☐ 30 Day Post Election ☐ Annual Report ☐ Amendment Report ☐ Termination Report
CITIZENS FOR GREENLEAF C/O P. RICHARD STAUFFER, TREASURER 1108 YORK ROAD WILLOW GROVE, PA 19090	OFFICE/DISTRICT Senator/12th		
	COUNTY Montgomery		

NOTE: This report *must* be typed or prepared in blue or black ink.

SUMMARY OF RECEIPTS AND EXPENDITURES FROM 5/14/96 TO 10/21/96

A. Cash Balance — Beginning (See instruction # 1)	\$ 19,875.38
B. Total Receipts (From Schedule I — This Report Only)	\$ 107,271.44
C. Total of Lines A and B	\$ 127,146.82
D. Total Expenditures (From Schedule II — This Report Only)	\$ 33,474.10
E. Cash Balance — Ending (Subtract Line D from Line C)	\$ 93,672.72
F. Unpaid Debts and Obligations (From Schedule III)	\$ 0
G. In-Kind Contributions (From Schedule IV — This Report Only)	\$ 3,704.22

FOR OFFICE USE ONLY

AFFIDAVIT SECTION

PART I — TO BE COMPLETED BY THE PERSON SUBMITTING THIS REPORT
(Treasurer — If Filed By Committee; Candidate — If Filed By Candidate)

I swear (or affirm) that this report, accompanying schedules and statements are to the best of my knowledge and belief true, correct and complete.

Sworn to and subscribed before me this

23rd day of October 1996

Carlton J. Bissig
Signature _____
Official Title _____

P. Richard Stauffer
Signature of Person Submitting Report

P. Richard Stauffer
Printed Name

My Commission Expires _____

Notarial Seal

Evolve S. Bissig, Notary Public

Telephone Number _____

PART II — TO BE COMPLETED BY THE CANDIDATE IF THIS REPORT IS FILED BY THE CANDIDATE'S AUTHORIZED COMMITTEE

I swear (or affirm) that to the best of my knowledge and belief this political committee has not violated any provisions of the Act of June 3, 1937 (P.L. 1333, No. 320) as amended.

Sworn to and subscribed before me this

23rd day of October 1996

Carlton J. Bissig
Signature _____
Official Title _____

Stewart J. Greenleaf
Signature of Candidate

Stewart J. Greenleaf
Printed Name

My Commission Expires _____

Notarial Seal

Evolve S. Bissig, Notary Public
Upper Merion Township, Montgomery County
My Commission Expires March 16, 2000

Telephone Number _____

SCHEDULE II

SUMMARY OF EXPENDITURES

USE THIS SECTION TO ITEMIZE ALL EXPENDITURES MADE DURING THE REPORTING PERIOD.

NAME OF CANDIDATE, COMMITTEE OR LOBBYIST		REPORTING PERIOD	
Citizens for Greenleaf		FROM: 5/14/96 TO: 10/21/96	
DATE (S)	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT	DESCRIPTION OF EXPENDITURE	AMOUNT
5/31/96	George H. Thomas 250 Westbury Drive Warminster, PA 18974	Electrical work on campaign office	\$ 120.00
5/31/96	Bucks County Republican Century Club 115 North Broad Street Doylestown, PA 18901	Contribution	500.00
5/31/96	Greenwood for Congress P. O. Box 2358 Doylestown, PA 18901	Contribution	100.00
6/03/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	69.32
6/04/96	Stewart J. Greenleaf 27 N. York Road Willow Grove, PA 19090	Auto expenses	33.39
6/06/96	Jenkintown Regular Republican Organization c/o Robert O'Shea 130 Summit Avenue Jenkintown, PA 19046	Ticket - Fundraiser	10.00
6/07/96	Lansdale Florist Inc. 861 W. Main Street Lansdale, PA 19446	Flowers - constituent	34.98
6/07/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	10.00
6/10/96	Bell Atlantic - PA P. O. Box 8585 Phila., PA 19173-0001	Campaign phone expense	47.30
6/10/96	Bell Atlantic - PA P. O. Box 8585 Phila., PA 19173-0001	Campaign phone expense	134.99
6/10/96	Casani Candy Inc. 145 N. 2nd Street Phila., PA 19106	Supplies	414.00
6/10/96	Upper Merland Soccer Club c/o Tim Lloyd 513 Evans Avenue Willow Grove, PA 19090	Sponsorship	175.00
Subtotal This Page (Optional)			> \$ 1,648.98
Total This Period - Enter on Page 1 (Face Sheet) - Item D			>

SCHEDULE II

SUMMARY OF EXPENDITURES

USE THIS SECTION TO ITEMIZE ALL EXPENDITURES MADE DURING THE REPORTING PERIOD

NAME OF CANDIDATE, COMMITTEE OR LOBBYIST		REPORTING PERIOD	
Citizens for Greenleaf		FROM: 5/14/96 TO: 10/21/96	
DATE (S)	FULL NAME, MAILING ADDRESS AND ZIP CODE OF RECIPIENT	DESCRIPTION OF EXPENDITURE	AMOUNT
8/30/96	Greenwood for Congress P. O. Box 2358 Doylestown, PA 18901	Contribution	\$ 500.00
9/04/96	Peter Marinari 1419 Spruce Street, Apt. 3F Phila., PA 19102	Reimburse for expenses	26.86
9/06/96	ATRO P. O. Box 615 Abington, PA 19001	Ticket - Reception	20.00
9/06/96	Hatboro Rotary Club c/o 227 Cedar Avenue Horsham, PA 19044	Tickets - Reception	50.00
9/10/96	Bell Atlantic-PA P. O. Box 8585 Phila., PA 19173-0001	Campaign phone expense	199.22
9/10/96	Warminster Twp. Republican Club c/o Dolores R. Metzger 493 Norwood Avenue Warminster, PA 18974	Ad	60.00
9/10/96	Willow Grove NAACP c/o Nivas H. Travis 1747 Summit Avenue Willow Grove, PA 19090	Ad	35.00
9/10/96	Cash (SJG) 1555 Terwood Road Huntingdon Valley, PA 19006	Reimburse for out-of-pocket expenses	26.00
9/11/96	Larmon Photo Inc. 966 Old York Road Abington, PA 19001	Photo	12.61
9/11/96	Radio Shack Willow Grove Park Willow Grove, PA 19090	Car phone accessory	31.79
9/11/96	Stewart J. Greenleaf 27 N. York Road Willow Grove, PA 19090	Auto Expenses	84.73
9/12/96	H & R Auto Radio Service 155 York Road Warminster, PA 18974	Car phone accessory	57.03
Subtotal This Page (Optional)			> \$ 1,103.24
Total This Period - Enter on Page 1 (Face Sheet) - Item D			>



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 22, 1997

Albert J. Molitor, Chairman
Abington-Rockledge Democratic Committee
PO Box 132
Abington, PA 19001

RE: MUR 4667

Dear Mr. Molitor:

This letter acknowledges receipt on August 18, 1997, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended. The respondent(s) will be notified of this complaint within five business days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be notarized and sworn to in the same manner as the original complaint. We have numbered this matter MUR 4667. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosure
Procedures

98043862311



FEDERAL ELECTION COMMISSION

Washington, DC 20463

August 22, 1997

Stephen J. Harmelin, Esq., Treasurer
Citizens for Arlen Specter-1998
111 South 15th Street
Philadelphia, PA 19102

RE: MUR 4667

Dear Mr. Harmelin:

The Federal Election Commission received a complaint which indicates that Citizens for Arlen Specter-1998 ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4667. Please refer to this number in all future correspondence.

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

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

If you have any questions, please contact Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley by JH
F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

cc: Senator Arlen Specter

98043862343



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 22, 1997

Robert O. Baldi, Esq., Treasurer
Greenwood for Congress
115 North Broad Street
Doylestown, PA 18901

RE: MUR 4667

Dear Mr. Baldi:

The Federal Election Commission received a complaint which indicates that Greenwood for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4667. Please refer to this number in all future correspondence.

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

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

If you have any questions, please contact Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley by JH
F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

cc: Representative James C. Greenwood

98043362150



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 22, 1997

P. Richard Stauffer, Treasurer
Citizens for Stewart Greenleaf
1108 York Road
Willow Grove, PA 19090

RE: MUR 4667

Dear Mr. Stauffer:

The Federal Election Commission received a complaint which indicates that Citizens for Stewart Greenleaf ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4667. Please refer to this number in all future correspondence.

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

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

If you have any questions, please contact Jennifer Henry at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

F. Andrew Turley by JH
F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

cc: Senator Stewart Greenleaf

2304386235

1555 Terwood Road
Huntingdon Valley, PA 19006
(215) 657-8155
(215) 830-9638 FAX



Senator Stewart J. Greenleaf

September 3, 1997

COMMITTEES

Judiciary, Chairman
Law and Justice, Vice Chairman
Appropriations
Banking and Insurance
Consumer Protection and
Professional Licensure
Environmental Resources and Energy

F. Andrew Turley, Esq.
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
BY FACSIMILE: (202) 219-3923

⁴⁶⁶⁷
**RE: MUR ~~4624~~ REQUEST FOR EXTENSION OF TIME
TO FILE A RESPONSE TO THE COMPLAINT**

SEP 8 2 08 PM '97

Dear Mr. Turley:

On August 24, 1997, Senator Stewart J. Greenleaf's state committee received your letter dated August 22 regarding an administrative complaint filed by Albert J. Molitor, Chairman of the Abington-Rockledge Democratic Committee. You have advised us that, pursuant to Commission rules, this Committee has 15 days in which to respond to Mr. Molitor's allegations, which means by September 8, 1997.

By this letter the Citizens for Greenleaf Committee requests a 30-day extension in which to file its response to MUR 4667. With this time the Committee hopes to finish its own internal investigation so as to provide complete and accurate information to the Commission. We understand that such extensions are routinely granted, and we expect that this request will be approved in this case as well.

Your favorable response would be greatly appreciated. Thank you very much.

Sincerely,

P. Richard Stauffer
P. Richard Stauffer
Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

P. Richard Stauffer, Treasurer
Citizens for Stewart Greenleaf
1108 York Road
Willow Grove, PA 19090

September 9, 1997

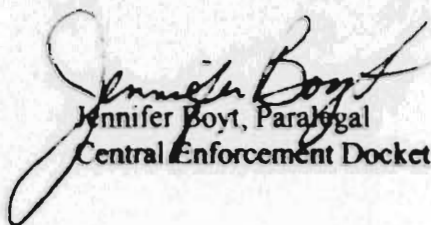
RE: MUR 4667

Dear Mr. Stauffer

This is in response to your letter dated September 3, 1997, which we received on September 8, requesting a 30 day extension to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on October 8, 1997.

If you have any questions, please contact me on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 219-3400.

Sincerely,


Jennifer Boyt, Paralegal
Central Enforcement Docket

CITIZENS FOR ARLEN SPECTER

September 12, 1997

Mr. F. Andrew Turley
Supervisory Attorney
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

SEP 15 1 23 PM '97

Dear Mr. Turley:

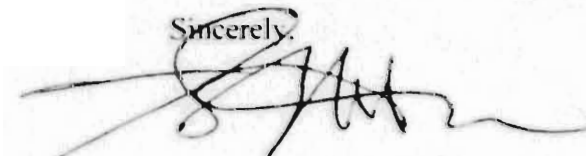
To respond to MUR 4667, which was received August 25 1997, Citizens For Arlen Specter would like to note the following:

- 1) The contribution received (\$1,000.00 on 4/22/96) from Citizens for Stewart Greenleaf, did not violate any federal primary or general election limits.
- 2) We were unaware that Citizens for Stewart Greenleaf was not registered or that they had given contributions to other federal campaign organizations.

Therefore, we have contacted the Greenleaf Committee and agreed to refund the contribution.

If you have any additional information regarding MUR 4667 call (215) 751-1998.

Sincerely,



Stephen J. Harmelin, Esq.
Treasurer

Enclosure: copy of original check

100-150401

DATE

6011449 : cgm'8

0900

CURRENCY

CON

CHECKS

Kerzweil

17-18

12/11/2017

24-2

CITIZENS FOR ARLEN SPECTER
1998 ACCOUNT



Meridian
Bank

ggmsc

batch 10

105 -

$$\frac{3.9}{3.0} \times 100$$
TOTAL
ITEMS

Changes and other reports are reviewed by
the Board of Directors of the University of the
South. The University of the South is a
private, non-profit corporation.

DEPOSITS MAY NOT BE AVAILABLE
FOR IMMEDIATE WITHDRAWAL.

2005 -

CITIZENS FOR GREENLEAF 8-84

3645

820
310
1407041712

PAY TO THE
ORDER OF

PAY TO THE ORDER OF Citizens for Specter
Nine thousand

\$ 1,000.00

MIDLANTIC

MODERN BANK N.A.

20 Eastern Road Willow Grove, PA 19090-2200

MEMO *Contributions*

Richard Taylor

June 3rd
PA104

GREENWOOD for CONGRESS

P.O. Box 2358 ■ Doylestown, Pennsylvania 18901 ■ (215) 230-7556

September 8, 1997

MUR 4667

SEP 15 12 51 PM '97

F. Andrew Turley, Esquire
Supervisory Attorney
Center Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

RE: Greenwood for Congress

Dear Mr. Turley:

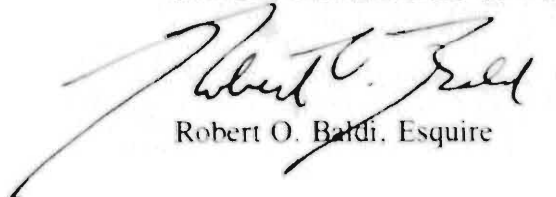
I have received your letter of August 22, 1997, which has been responded to by Mike Walsh, Campaign Manager for Greenwood for Congress. I was out of town for a week and this transmission has therefore been delayed. I apologize for the delay.

I am enclosing with this letter, a copy of your letter of August 22, 1997 as well as Mr. Walsh's response, memo directed to me dated August 28, 1997 along with the enclosure he refers to.

I trust and assume that our interpretation of the law is accurate with respect to elections cycle versus calendar years. If we are wrong, please advise promptly so that we can take appropriate steps to prevent any further incidents. Not hearing from you to the contrary, I will assume that you agree with our interpretation.

Very truly yours,

BALDI, CEPPARULO & WILLIAMS, P.C.



Robert O. Baldi, Esquire

ROB:ers

cc: Mike Walsh

SEP - 2 1997

GREENWOOD for CONGRESS

P.O. Box 2358 ■ Doylestown, Pennsylvania 18901 ■ (215) 230-7556

To: Rob Baldi
Re: FEC Complaint MUR 4667
Date: August 28, 1997

MEMORANDUM

On August 26, 1997, Greenwood for Congress received the attached notice of complaint from the Federal Election Commission. The complaint was filed against Citizens for Greenleaf by Albert J. Molitor, the Chairman of the Abington Democratic Committee, for allegedly exceeding the maximum contribution limits to Greenwood for Congress in 1996.

Initial conversations with the FEC lead me to believe that this allegation is unfounded.

As you will see from the enclosed, Senator Greenleaf's campaign committee contributed \$1,000 to Greenwood for Congress in the Primary 1996 cycle and \$600 in the General Election cycle. It does not appear that either Greenwood for Congress (for accepting the contributions) or Citizens for Greenleaf (for making the contributions) violated any federal laws. It appears as though Mr. Molitor does not understand that the \$1,000 limit applies to election cycles, not calendar years.

I spoke with F. Andrew Turley (the supervisory attorney at the FEC) on August 27, 1997, and he confirmed that "it sounds like your interpretation is correct -- many people confuse the year versus election cycle limits." However, he indicated that a decision by the FEC would be made at a later date after reviewing the information we provide and the information provided by Senator Greenleaf's campaign.

Even though the FEC has copies of our reports which will reflect that Greenwood for Congress has never violated the Federal Election Campaign Act of 1971, as amended, by accepting contributions in excess of the legal limit from Citizens for Greenleaf, I have attached a complete donor history for Citizens for Greenleaf. As you will note, Senator Greenleaf's committee contributed a total of \$1,850 to Greenwood for Congress broken down into election cycles as follows:

\$1,000	Primary 1996
\$600	General 1996
\$250	Primary 1997

Please advise on how you think we should proceed from here.

Thank you.

Mike

Paid for by Greenwood for Congress, Robert O. Baldi, Esq., Treasurer

From the desk of...

Michael J. Walsh
Campaign Manager
Greenwood for Congress
P.O. Box 2358
Doylestown, PA 18901

(215) 230-7556
Fax: (215) 230-7555

Mail name

Home Address

Work Address

Mail Address

Greenleaf, Stewart

Citizens for Greenleaf

Salutation: Stewart

State Senator Stewart Greenleaf

1555 Terwood Road

Huntingdon Valley, PA 19006-

Home Phone: [REDACTED] Work Phone: 215-657-7700 Fax Phone: 215-560-6052 Alt. Phone:

Affil.: [REDACTED] Sex: Employer: Commonwealth of Penna

Occupation: State Senator

Origin:

Contribution Information

Date	Amount	Type	Source	Acct. Chk.	Note
03/11/96	\$250.00	Receipt	Fawkes 96	0.00	3579
04/10/96	\$750.00	Receipt	Freedom Team	0.00	3641
08/11/96	\$500.00	Receipt	Ridge Cocktail Party	0.00	3755
06/26/96	\$100.00	Receipt	Hbg. 6/3/96	0.00	3683
03/31/97	\$250.00	Receipt	Roast with Newt '97	0.00	224
Total	\$1850.00				
Balance	\$1850.00				

1555 Terwood Road
Huntingdon Valley, PA 19006
(215) 657-8155
(215) 830-9638 FAX



Senator Stewart J. Greenleaf

September 22, 1997

COMMITTEES

Judiciary, Chairman
Law and Justice, Vice Chairman
Appropriations
Banking and Insurance
Consumer Protection and
Professional Licensure
Environmental Resources and Energy

F. Andrew Turley, Esq.
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: FEC COMPLAINT MUR ~~4624~~ 4667

Dear Mr. Turley:

Please accept this letter as a response to your letter dated August 22, 1997 regarding an administrative complaint filed by Albert J. Molitor, chairman of the Abington-Rockledge Democratic Committee.

As you can see from the complaint, Mr. Molitor is an active political leader in the 12th Senatorial District and has been reviewing Citizens for Greenleaf Committee campaign reports and Senator Greenleaf's state expense reports for the last few years. During that time - on 3/10/97 to be exact - he made an unfounded allegation to the state Election Commission that the committee had received and deposited checks issued by corporations as campaign contributions. The Pennsylvania Election Code prohibits candidates from receiving any campaign contributions written on corporate checks. This allegation turned out to be completely unfounded and none of the checks which he cited were, in fact, corporate checks. Regardless, Mr. Molitor has continued to review our campaign records and has now made this frivolous and partisan complaint against the Citizens for Greenleaf Committee.

The Federal Election Commission should be aware that the committee has not violated any state election laws and I believe that a review of this allegation will indicate that it has never given more than \$1,000 to any federal candidate in any one election cycle. This conforms to the federal election laws and is, obviously, one of the main concerns of the election law. We do not intend to make any future contributions over \$1,000 in any

one election cycle in aggregate and, as you can see from our campaign reports, and as I am sure Mr. Molitor can see, we have abided in every instance by the Pennsylvania Election and Campaign Reporting Laws in raising the monies for the Citizens for Greenleaf Committee.

It is not our intention to be registered as a federal committee since we seldom give money to federal candidates. As a result, to avoid the necessity of registering, I have requested and received a refund to the Citizens for Greenleaf Committee of \$600.00 from the Greenwood for Congress Committee and \$1,000 from the Citizens for Specter Committee. A copy of each check is attached. These refunds put the committee within the prescribed limits for the calendar year of 1996.

I believe this should resolve the matter with regard to the Citizens for Greenleaf Committee. Should you have any questions, I would certainly be happy to provide additional information.

Sincerely,


P. Richard Stauffer

Treasurer

encls.

DEPOSIT TICKET

CITIZENS FOR GREENLEAF
1555 TERWOOD ROAD
HUNTINGDON VALLEY PA 19006

DATE 10-3-97
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

SIGN HERE FOR CASH RECEIVED IF REQUIRED



**Willow
Grove
Bank**

9 Liberty Road
Willow Grove, PA 19080-3207

☒ CASH

60-7557/2310

310104300793

60-287

60000

SUB TOTAL

LESS CASH
RECEIVED

\$ 600.00

GREENWOOD FOR CONGRESS 10-96
P.O. BOX 2358
DOYLESTOWN PA 18901

60-287/315
021302169

1869

DATE Sept 11, 1997

PAY TO THE
ORDER OF

Citizens for Greenleaf

\$ 600.00

Six hundred and

00 / 100 DOLLARS



FirstService Bank
Doylestown PA 18901

MEMO

Stephanne & Fisher

DEPOSIT TICKET

CITIZENS FOR GREENLEAF
1555 TERWOOD ROAD
HUNTINGDON VALLEY, PA 19006

DATE 10-1-97
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

SIGN HERE FOR CASH RECEIVED IF REQUIRED



**Willow
Grove
Bank**

8 Easton Road
Huntingdon Valley, PA 19006-3207

☒ CASH

60-7557 / 2313
310104300793

3-1

1000 00

SUB TOTAL

LESS CASH
RECEIVED

\$ 1000.00

CITIZENS FOR ARLEN SPECTER-1998
111 S 15TH STREET, 21ST FLOOR
PHILADELPHIA, PA 19102

CORESTATES
BANK
3-1310

DATE

09/25/97

AMOUNT

\$1000 00

One thousand dollars and 00 cents

Citizens for Greenleaf
1555 Terwood Road
Huntingdon Valley, PA 19006

MEMO: Refund of Contribution

L.A. Osh

7744

PAY
TO THE
ORDER OF

Copyright © 1997 CoreStates Bank, N.A. All rights reserved.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)
)
)
)

CASE CLOSURES UNDER
ENFORCEMENT PRIORITY

FEB 17 3 21 PM '93

GENERAL COUNSEL'S REPORT

I. INTRODUCTION.

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing cases permits the

Commission to focus its limited resources on more important cases presently

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pending before it. Based upon this review, we have identified 16 cases that do not warrant further action relative to other pending matters.¹ The attachment to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more difficult to develop as it ages. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community. In recognition of this fact, EPS provides us with the means to identify those cases which remained unassigned for a significant period due to a lack of staff resources for effective investigation. The utility of commencing an investigation declines as these cases age, until they reach a point when activation of a case would not be an efficient use of the Commission's resources.

¹ These cases are: MUR 4631 (*Perot/M. Clure*), MUR 4661 (*Cox and Amplicon, Inc.*), MUR 4667 (*Specter & Greenwood*), MUR 4668 (*Schakowsky for Congress*), MUR 4672 (*Friends of John O'Toole*), MUR 4673 (*Papan for Assembly*), MUR 4676 (*Warren County Democratic Committee*), MUR 4677 (*Patrick Kennedy*), MUR 4681 (*Jack Block*), MUR 4683 (*Janice Schakowsky for Congress*), MUR 4684 (*Spartanburg County Republicans*), MUR 4694 (*Jan Schakowsky for Congress*), MUR 4695 (*Schakowsky for Congress*), MUR 4696 (*Janice Schakowsky for Congress*), MUR 4703 (*Dumont Institute / Robert M. Gee*), and Pre-MUR 356 (*Pritzker for Congress*).

We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale. We recommend 27 of these cases be closed.³ Nine of these cases were part of the so-called "Major 96" cases that have not been able to be activated due to a lack of resources to effectively pursue them in a timely fashion.⁴ Since the time period rendering them stale has now passed, we recommend their closure at this time.

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective February 24, 1998. Closing

³ These cases are: MUR 4350 (Republican Party of Minnesota), MUR 4355 (Aqua-Leisure Industries, Inc.), MUR 4372 (Nebraska Democratic Party), MUR 4394 (Americans for Term Limits), MUR 4472 (Committee to Elect Winston), MUR 4483 (Nebraska Democratic State Central Committee), MUR 4504 (NH Democratic State Party Committee), MUR 4507 (People for Boschowitz), MUR 4509 (Wellstone for Senate), MUR 4565 (Bell for Congress), MUR 4570 (Congresswoman Andrea Seastrand), MUR 4571 (Subert for Congress Committee), MUR 4572 (Friends of Dick B. Durkin), MUR 4575 (Dana Corrington), MUR 4585 (Hughes for Congress Committee), MUR 4589 (Congressman Bart Gordon), MUR 4592 (Iowa Public Television), MUR 4593 (Public Interest Institute), MUR 4599 (Bruce W. Hapanowicz), MUR 4601 (Choctaw Nation of Oklahoma), MUR 4602 (BFSB-TV Channel 3), MUR 4604 (Dana Corrington), MUR 4605 (Christian Coalition), Pre-MUR 346 (Coalition of Politically Active Christians), RAD 96NF-09 (O'Sullivan for Congress), RAD 96L-12 (Alaska Democratic Party), and RAD 97NF-02 (Zien for Congress).

⁴ These cases are: MUR 4350 (Republican Party of Minnesota), MUR 4372 (Nebraska Democratic Party), MUR 4394 (Americans for Term Limits), MUR 4472 (Committee to Elect Winston), MUR 4483 (Nebraska Democratic State Central Committee), MUR 4504 (NH Democratic State Party Committee), MUR 4507 (People for Boschowitz), MUR 4509 (Wellstone for Senate), and MUR 4565 (Bell for Congress).

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these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective February 24, 1998, and approve the appropriate letters in the following matters:

- | | | |
|----------------|----------------|----------------|
| 1. RAD 96NF-09 | 3. RAD 97NF-02 | 5. Pre-MUR 356 |
| 2. RAD 96L-12 | 4. Pre-MUR 346 | |

B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4350 | 14. MUR 4575 | 27. MUR 4668 |
| 2. MUR 4355 | 15. MUR 4585 | 28. MUR 4672 |
| 3. MUR 4372 | 16. MUR 4589 | 29. MUR 4673 |
| 4. MUR 4394 | 17. MUR 4592 | 30. MUR 4676 |
| 5. MUR 4472 | 18. MUR 4593 | 31. MUR 4677 |
| 6. MUR 4483 | 19. MUR 4599 | 32. MUR 4681 |
| 7. MUR 4504 | 20. MUR 4601 | 33. MUR 4683 |
| 8. MUR 4507 | 21. MUR 4602 | 34. MUR 4684 |
| 9. MUR 4509 | 22. MUR 4604 | 35. MUR 4694 |
| 10. MUR 4565 | 23. MUR 4605 | 36. MUR 4695 |
| 11. MUR 4570 | 24. MUR 4631 | 37. MUR 4696 |
| 12. MUR 4571 | 25. MUR 4661 | 38. MUR 4703 |
| 13. MUR 4572 | 26. MUR 4667 | |

2/1/98
Date

Lawrence M. Noble
General Counsel

93043862367

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document
Case Closures Under) No. X98-13
Enforcement Priority)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on February 24, 1998, do hereby certify that the Commission took the following actions with respect to Agenda Document No. X98-13:

1. Failed in a vote of 3-2 to pass a motion to approve the General Counsel's recommendations, subject to amendment of the closing date in recommendation A to read March 2, 1998, and subject to deletion of those cases listed in footnote 4 on Page 3 of the staff report.

Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion. Commissioners Aikens and Elliott dissented.

2. Decided by a vote of 5-0 to

A. Decline to open a MUR, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

- | | |
|----------------|----------------|
| 1. RAD 96NF-09 | 4. Pre-MUR 346 |
| 2. RAD 96L-12 | 5. Pre-MUR 356 |
| 3. RAD 97NF-02 | |

(continued)

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- B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

1. MUR 4350	20. MUR 4601
2. MUR 4355	21. MUR 4602
3. MUR 4372	22. MUR 4604
4. MUR 4394	23. MUR 4605
5. MUR 4472	24. MUR 4631
6. MUR 4483	25. MUR 4661
7. MUR 4504	26. MUR 4667
8. MUR 4507	27. MUR 4668
9. MUR 4509	28. MUR 4672
10. MUR 4565	29. MUR 4673
11. MUR 4570	30. MUR 4676
12. MUR 4571	31. MUR 4677
13. MUR 4572	32. MUR 4681
14. MUR 4575	33. MUR 4683
15. MUR 4585	34. MUR 4684
16. MUR 4589	35. MUR 4694
17. MUR 4592	36. MUR 4695
18. MUR 4593	37. MUR 4696
19. MUR 4599	38. MUR 4703

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

Attest:

2-25-98
Date

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

93043862362



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Albert J. Molitor, Chairman
Abington-Rockledge Democratic Committee
P.O. Box 132
Abington, PA 19001

RE: MUR 4667

Dear Mr. Molitor

On August 18, 1997, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

98043862370

23043962371
MUR 4667

SPECTER & GREENWOOD

Mr. Albert Molitor of the Abington-Rockledge Democratic Committee alleges that the Citizens for Stewart Greenleaf Committee ("Greenleaf"), a political committee for a Pennsylvania state senator, contributed \$1,000 to Citizens for Specter ("Specter Committee") and \$1,600 to Greenwood for Congress ("Greenwood Committee"), both of which involved federal campaigns. Mr. Molitor alleges that Greenleaf is not registered with the FEC as a political committee and is therefore ineligible to contribute to federal campaigns.

Responding on behalf of Greenleaf, Treasurer P. Richard Stauffer acknowledges that Greenleaf contributed the amounts in the complaint to these two committees. He asserts, however, that he does not believe such activity violate the FECA, based on his view that an unregistered committee can give \$1000 per election cycle per federal candidate. Nevertheless, to avoid the need to register as a political committee, Mr. Stauffer advises that Greenleaf requested and received refunds of \$600 from Greenwood and \$1,000 from Specter. Copies of the refund checks were attached to the response.

Respondent Specter Committee, through Treasurer Stephen Harmelin, asserts that it did not know Greenleaf was an unregistered committee or that it had given contributions to other federal committees. Upon receipt of this complaint, Mr. Harmelin advised that the Specter Committee contacted Greenleaf and agreed to refund the contribution.

Respondent Greenwood Committee denies any violation occurred in this case, resting on its belief that committees must be registered only when they make contributions of more than \$1,000 per election cycle, rather than per year.

This matter is less significant than other matters pending before the Commission.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Robert O. Baldi, Esq., Treasurer
Greenwood for Congress
P.O. Box 2358
Doylestown, PA 18901

RE: MUR 4667

Dear Mr. Baldi:

On August 22, 1997, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Greenwood for Congress and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley", is written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

93043363372

MUR 4667

SPECTER & GREENWOOD

Mr. Albert Molitor of the Abington-Rockledge Democratic Committee alleges that the Citizens for Stewart Greenleaf Committee ("Greenleaf"), a political committee for a Pennsylvania state senator, contributed \$1,000 to Citizens for Specter ("Specter Committee") and \$1,600 to Greenwood for Congress ("Greenwood Committee"), both of which involved federal campaigns. Mr. Molitor alleges that Greenleaf is not registered with the FEC as a political committee and is therefore ineligible to contribute to federal campaigns.

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Respondent Greenwood Committee denies any violation occurred in this case, resting on its belief that committees must be registered only when they make contributions of more than \$1,000 per election cycle, rather than per year.

This matter is less significant than other matters pending before the Commission.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

P. Richard Stauffer, Treasurer
Citizens for Stewart Greenleaf
1108 York Road
Willow Grove, PA 19090

RE: MUR 4667

Dear Mr. Stauffer:

On August 22, 1997, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Citizens for Stewart Greenleaf and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

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Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

93043862374

93043837
MUR 4667

SPECTER & GREENWOOD

Mr. Albert Molitor of the Abington-Rockledge Democratic Committee alleges that the Citizens for Stewart Greenleaf Committee ("Greenleaf"), a political committee for a Pennsylvania state senator, contributed \$1,000 to Citizens for Specter ("Specter Committee") and \$1,600 to Greenwood for Congress ("Greenwood Committee"), both of which involved federal campaigns. Mr. Molitor alleges that Greenleaf is not registered with the FEC as a political committee and is therefore ineligible to contribute to federal campaigns.

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This matter is less significant than other matters pending before the Commission.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Stephen J. Harmelin, Esq., Treasurer
Citizens for Arlen Specter - 1998
111 South 15th Street
Philadelphia, PA 19102

RE: MUR 4667

Dear Mr. Harmelin:

On August 22, 1997, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Citizens for Arlen Specter - 1998 and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on March 2, 1998.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley", is written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Attachment
Narrative

93043862876

MUR 4667

SPECTER & GREENWOOD

Mr. Albert Molitor of the Abington-Rockledge Democratic Committee alleges that the Citizens for Stewart Greenleaf Committee ("Greenleaf"), a political committee for a Pennsylvania state senator, contributed \$1,000 to Citizens for Specter ("Specter Committee") and \$1,600 to Greenwood for Congress ("Greenwood Committee"), both of which involved federal campaigns. Mr. Molitor alleges that Greenleaf is not registered with the FEC as a political committee and is therefore ineligible to contribute to federal campaigns.

Responding on behalf of Greenleaf, Treasurer P. Richard Stauffer acknowledges that Greenleaf contributed the amounts in the complaint to these two committees. He asserts, however, that he does not believe such activity violate the FECA, based on his view that an unregistered committee can give \$1000 per election cycle per federal candidate. Nevertheless, to avoid the need to register as a political committee, Mr. Stauffer advises that Greenleaf requested and received refunds of \$600 from Greenwood and \$1,000 from Specter. Copies of the refund checks were attached to the response.

Respondent Specter Committee, through Treasurer Stephen Harmelin, asserts that it did not know Greenleaf was an unregistered committee or that it had given contributions to other federal committees. Upon receipt of this complaint, Mr. Harmelin advised that the Specter Committee contacted Greenleaf and agreed to refund the contribution.

Respondent Greenwood Committee denies any violation occurred in this case, resting on its belief that committees must be registered only when they make contributions of more than \$1,000 per election cycle, rather than per year.

This matter is less significant than other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4667

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