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September 18, 2003

**Via Federal Express**

Daniel G. Pinegar, Esquire  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: **MUR 5020**  
**Joseph R. Jingoli, Jr.**

Dear Mr. Pinegar:

This letter will serve as a response to your letter of August 19, 2003, regarding the referenced matter, a copy of which is enclosed for your convenience.

My client is Joseph R. Jingoli, Jr., the Chief Executive Officer of Joseph Jingoli & Son, Inc., a New Jersey corporation located at 3131 Princeton Pike, Lawrenceville, New Jersey 08648. Mr. Jingoli is a resident of the state, and has over the years provided support to various candidates for political office. William L. Gormley was a candidate for the republican nomination for the United States Senate in New Jersey during the calendar years 1999-2000. The Gormley for Senate Primary Election Fund (the "Committee") was the candidate's election or political committee within the meaning of 2 U.S.C. § 431(4).

As verified in the Committee's 1999 year end report, Mr. Jingoli did, in October of 1999, contribute the maximum campaign contribution under 2 U.S.C. § 441a(a) to the Committee. In addition to the foregoing, several months thereafter on February 4, 2000, Mr. Jingoli purchased, by credit card, three airline tickets for a trip to Las Vegas, Nevada. The individuals traveling to Las Vegas included himself, William Gormley and a third person. As per the attached copy of a credit card bill, the cost per trip, including flight insurance, was \$1,615. The purpose of the trip, which took place on February 8, 2000, was to attend a fundraiser for the Committee, which fundraiser was held on February, 9, 2000 at *Le Cirque* in the Bellagio Hotel.

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2003 SEP 22 P 12:17

Daniel G. Pinegar, Esquire  
September 18, 2003  
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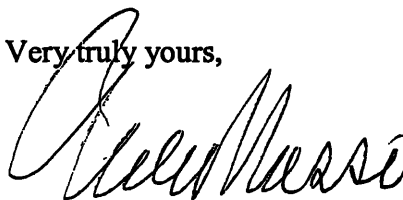
On behalf of my client, I acknowledge that the Federal Election Campaign Act of 1971, as amended (the "Act") makes it unlawful for any person to make contributions to any candidate and its authorized political committee regarding any election for Federal office, which, in the aggregate, exceeds \$1,000 per election. 2 U.S.C. §§ 441a(a)(1)(A); 431(8)(A).

On behalf of my client, I further acknowledge that Mr. Jingoli had already contributed the maximum amount per election prior to purchasing the airline tickets for the trip to Las Vegas, Nevada. In fact, my client notified the Committee of this fact immediately upon becoming aware that a violation of the Act had taken place, anticipating that a refund of the excess contribution would be refunded to him, thereby rectifying the matter.

Mr. Jingoli is not aware that a refund of the excess amount has ever been received by him. A diligent review of his financial records does not indicate receipt of a refund check from the Committee. In addition, subsequent to receiving the letter of August 19, 2003, Mr. Jingoli, through the undersigned, contacted representatives of the Committee in the hope of determining whether a refund of the excess contribution had ever been forwarded to him by the Committee. As of the date of this letter, despite persistent efforts, the undersigned has not received verification of either a refund, or lack thereof.

In light of the fact that any violation of the Act was clearly unintentional, and was disclosed immediately upon discovery, I respectfully request, on behalf of my client, that the referenced case be considered for Pre-Probable Cause Conciliation.

Very truly yours,



William R. Sasso

WRS:dv  
Attachments

Transactions Continued

Amount \$

February 2, 2000  
HERTZ CAR RENTAL SALT LAKE CTY UT

770.84

Enroll in Hertz #1 Gold®  
Gold®, courtesy of the  
Platinum Card. Call  
800-654-9998.

Location  
Rental: SALT LAKE CTY UT  
Return: SALT LAKE CTY UT  
Agreement Number: 938778451  
Renter Name: JINGOLI /JOSEPH  
Reference Number: 025211

Date  
02/02/00  
02/07/00

February 4, 2000

1,601.00

CARY TRAVEL CARY NC  
AMERICA WEST AIRLINES  
From: PHILADELPHIA PA

To:  
LAS VEGAS NV  
PHILADELPHIA PA

Carrier: Class:  
HP YU  
HP YU

Ticket Number: 40177634928421  
Passenger Name: CORCORAN/G  
Document Type: PASSENGER TICKET

Date of Departure: 02/08

February 4, 2000

1,601.00

CARY TRAVEL CARY NC  
AMERICA WEST AIRLINES  
From: PHILADELPHIA PA

To:  
LAS VEGAS NV  
PHILADELPHIA PA

Carrier: Class.  
HP YU  
HP YU

Ticket Number: 40177634928454  
Passenger Name: JINGOLI/J  
Document Type: PASSENGER TICKET

Date of Departure: 02/08

February 4, 2000

1,601.00

CARY TRAVEL CARY NC  
AMERICA WEST AIRLINES  
From: PHILADELPHIA PA

To:  
LAS VEGAS NV  
PHILADELPHIA PA

Carrier: Class:  
HP YU  
HP YU

Ticket Number: 40177634928476  
Passenger Name: GORMLEY/W  
Document Type: PASSENGER TICKET

Date of Departure: 02/08

February 4, 2000  
FLIGHT INSURANCE CURRENT \$1,601.00

14.00

February 4, 2000  
FLIGHT INSURANCE CURRENT \$1,601.00

14.00

February 4, 2000  
FLIGHT INSURANCE CURRENT \$1,601.00

14.00

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