

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

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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR: 5025

DATE COMPLAINT FILED: June 2, 2000

DATE OF NOTIFICATION: June 8, 2000

DATE ACTIVATED: September 10, 2001

EXPIRATION OF STATUTE OF
LIMITATIONS: March 1, 2005

COMPLAINANT: Stephen Moore, President
The Club for Growth

RESPONDENTS: Representative Marge Roukema
The Committee to Re-Elect Congresswoman Marge Roukema and
Jaye L. Parsons, as treasurer
Republican Leadership Council, Inc. and Allen Raymond, as
treasurer¹

RELEVANT STATUTES: 2 U.S.C. § 434(a)(1)
2 U.S.C. § 434(b)(2)(D)
2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.23

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was initiated by a complaint filed on June 2, 2000, by Stephen Moore,
President of The Club for Growth ("Complainant"). Complainant implied that through
interactions of Members of Congress with the Republican Leadership Council, Inc. ("RLC"), the

¹ Mark L. Miller served as treasurer of this committee during the time of the activity in question. Allen Raymond was named as treasurer in a Statement of Organization filed on May 6, 2002.

RLC's issue advertisements were coordinated with The Committee to Re-Elect Congresswoman Marge Roukema ("the Roukema Committee").²

II. FACTUAL AND LEGAL ANALYSIS

A. Applicable Law

Pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"), an expenditure is generally defined as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(9)(A)(i).³ Similarly, a contribution is "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(8)(A)(i). In addition, "expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committee, or their agents, shall be considered a contribution to such candidate" 2 U.S.C. § 441a(a)(7)(B)(i); *see also Buckley v. Valeo*, 424 U.S. 1, 46 (1976) ("controlled or coordinated expenditures are treated as contributions").

Pursuant to 2 U.S.C. § 441a(a)(2)(A), no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office that, in the aggregate, exceed \$5,000. In addition, no authorized

² By letter dated June 27, 2000, and received by the Commission on July 6, 2000, the Complainant stated that it had "formally withdrawn its FEC complaint against the Marge Roukema campaign." Complainant did not state any reason for seeking to withdraw the complaint, stating only, "We wish to drop this matter and hope that you will too." By letter dated July 11, 2000, Complainant was informed that a request for withdrawal of a complaint would not prevent the Commission from taking appropriate action.

³ All citations to the Act are to the Act as it read prior to enactment of the Bipartisan Campaign Reform Act of 2002 ("BCRA"), Pub. L. 107-155, 116 Stat. 81 (2002). All citations to the Commission's regulations are, unless otherwise noted, to the 2002 edition of Title 11, Code of Federal Regulations, which was published prior to the Commission's promulgation of any regulations under BCRA.

political committee shall knowingly accept any contribution made in excess of this limitation.

2 U.S.C. § 441a(f). All contributions must be reported by the committee receiving them.

2 U.S.C. § 434(a)(1). Contributions received from qualified multicandidate committees are

reported pursuant to 2 U.S.C. § 434(b)(2)(D).

In the context of expenditures by outside groups that are not political party committees, the Commission has considered potential coordination that took place prior to the effective date of 11 C.F.R. § 100.23 under the standards set forth in *FEC v. Christian Coalition*, 52 F. Supp.2d 45 (D.D.C. 1999) ("*Christian Coalition*").⁴ In addressing the issue of what constitutes "coordination" with a candidate, the *Christian Coalition* court discussed two general ways in which coordination could occur: first, "expressive coordinated expenditures made at the request or the suggestion of the candidate or an authorized agent" would be considered coordinated; and second,

absent a request or suggestion, an expressive expenditure becomes "coordinated" where the candidate or her agents can exercise control over, or where there has been substantial discussion or negotiation between the campaign and the spender over, a communication's: (1) contents; (2) timing; (3) location, mode or intended audience (e.g., choice between newspaper or radio advertisement); or (4) "volume" (e.g., number of copies of printed materials or frequency of media spots).

52 F. Supp.2d at 92.

An "agent" is defined as

any person who has actual oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the

⁴ 11 C.F.R. § 100.23 became effective on May 9, 2001. See 66 Fed. Reg. 23,537 (May 9, 2001). BCRA repealed 11 C.F.R. § 100.23 as of December 22, 2002.

ordinary course of campaign-related activities he or she may authorize expenditures.

11 C.F.R. § 109.1(b)(5).

B. The Complaint

The Complainant stated that his purpose was to notify the Commission "of potential serious violations of law" by the Roukema Committee. According to the complaint, "[A]n editorial in the June 1[, 2000] issue of *The Wall Street Journal*" stated that Representatives Mark Foley and Jim Greenwood approached the Republican Leadership Council "to run 'issue advocacy' advertisements against Scott Garrett, Rep. Marge Roukema's opponent in the New Jersey's 6th primary." Complainant asserted, "We have first hand knowledge that Mrs. Roukema solicited the support of Mr. Foley and Mr. Greenwood to help her campaign."⁵ Complainant noted, "Rep. Greenwood, coincidentally, serves with Mrs. Roukema on the House Committee on Education and the Workforce, while Rep. Foley serves on the board of Republican Leadership Council." Complainant stated, "[I]t is against FEC rules for campaign organizations to coordinate issue advocacy campaigns with outside groups." Following this statement, Complainant asserted that the Republican Leadership Council "only became involved in the Roukema-Garrett race when they were approached by Members of Congress who were looking out for Mrs. Roukema's interests." Complainant contended, "[T]here can be little doubt that Rep. Roukema and her re-election campaign were kept apprised of these actions and gave tacit approval of them."

⁵ Complainant does not include in the complaint the basis for his alleged first hand knowledge. According to a June 3, 2000 press article, Club for Growth President Stephen Moore reportedly said, "Greenwood told him this spring that Roukema had asked the two congressmen [Representatives Greenwood and Foley] to work on her behalf." Adam Geller, Lobby Group Backing Garrett Questions Roukema Funding, *The Record (Northern New Jersey)*, p. A03 (June 3, 2000).

C. Responses

1. Republican Leadership Council, Inc.

The RLC, through its counsel, responded to the complaint, and included a sworn affidavit from the RLC's then Executive Director, Mark Miller.⁶ According to the affidavit, the RLC's Steering Committee first authorized Mr. Miller and his staff to produce and air the issue advertisement in question—"comparing the records of U.S. Representative Marge Roukema and New Jersey Assemblyman Scott Garret on the issue of tax relief"—on May 10, 2000, "or possibly earlier." Mr. Miller further stated, "Pursuant to that authorization," he and his staff "immediately began to work with Kiernan Mahoney and Greg Strimple to produce the Issue Ad. These vendors were not and are not shared with Rep. Roukema's campaign." Mr. Miller additionally stated, "The script for the Issue Ad was finalized early on May 16, 2000, and the vendor responsible for recording the ad informed me that the script was 'voiced over' on that same date" prior to 4:30 p.m.

Mr. Miller averred, "I have never had any discussions concerning the Issue Ad with Rep. Roukema, her campaign, or anyone who I suspected was working in coordination with her campaign." Further, Mr. Miller stated, "[P]rior to the airing of the Issue Ad, I did not communicate with anyone, other than RLC's staff, Steering Committee, and vendors, regarding the Issue Ad." Mr. Miller also averred that it was his practice, before any RLC issue advertisement aired, to instruct his "staff not to have any communications with any campaign regarding those advertisements," and, Mr. Miller stated, "my staff has confirmed to me that they had no communications with Rep. Roukema or her campaign or any other third party, except for

⁶ RLC's website states that Allen Raymond was appointed as Executive Director of the RLC in 2002.

RLC vendors." "To the best of my knowledge," Mr. Miller stated, the RLC vendors who worked on the subject issue advertisement "did not have any communications with Rep. Roukema or her campaign, either directly or through an intermediary, regarding the Issue Ad."

Although averring that his only communications about the advertisement prior to its airing were with RLC staff, its Steering Committee, and vendors, Mr. Miller acknowledged contacts with the two Congressmen named in the complaint concerning the Roukema re-election campaign in the relevant time period. However, he stated that these contacts did not include discussions of the issue advertisement that RLC was planning to run. According to Mr. Miller, he met at 4:30 on May 16, 2000, with "various individuals, including Rep. Foley and Rep. Greenwood's chief of staff," where he "generally discussed the Roukema election in an attempt to educate the attendees as to RLC's activities and to encourage them to support the RLC."

According to the affidavit, neither Representative Roukema nor anyone from her campaign was there, and Mr. Miller stated, "I did not, and do not, have any reason to believe that any attendee at the May 16, 2000 meeting had any dealings with Rep. Roukema or her campaign, beyond dealings that are customary between Congressional colleagues." Mr. Miller averred, "To the best of my knowledge, there was no discussion of any issue ad during that meeting and at no time did any of the attendees at the meeting, or anyone else other than RLC staff and vendors, have any direct or indirect input into the production or airing of the Issue Ad." Furthermore, "No one at the meeting requested that I or RLC help Rep. Roukema in connection with her election."⁷

Based on the Miller affidavit, RLC counsel's cover letter stated, "[G]iven that the development of the ad involved no input from Rep. Roukema, her campaign or any other person,

⁷ Mr. Miller stated that although "the Issue Ad was not discussed during the May 16, 2000 meeting," he "sent a videotape of the Issue Ad as a follow up to all attendees of that meeting on June 6, 2000, the day on which Rep. Roukema's election occurred and after the Issue Ad had been airing for two weeks."

1 other than RLC staff or vendors, this case would not satisfy any coordinated speech standard, let
2 alone the coordinated speech standard established by the court in the *Christian Coalition* case.”

3 Further, counsel stated that even if Representatives Foley and Greenwood were involved in
4 developing the issue advertisement, which he stated they were not, that would not be
5 coordination with Representative Roukema. Counsel concluded that the complaint is without
6 merit and the Commission should find there is no reason to believe the RLC violated the Act.⁸

7 The RLC provided a copy of the text of the television advertisement in question. The
8 advertisement states:

9 Taxes are too high.
10 And records show Assemblyman Scott Garrett voted to raise taxes
11 and fees higher.
12 Higher parking fees, bank fees, fishing license fees and DMV fees.
13 Even a new tax on phone calls.
14 Marge Roukema is a proven tax fighter.
15 She cut income taxes, estate taxes and gas taxes.
We're the Republican Leadership Council. Join us in telling
Marge Roukema to keep fighting for lower taxes by voting for HR 3916.

18
19 **2. The Roukema Respondents**

20
21 Jaye L. Parsons, treasurer of The Committee to Re-Elect Congresswoman Marge

22 Roukema, responded:

23 Representative Marge Roukema, The Committee to Re-Elect
24 Congresswoman Marge Roukema and I, Treasurer, categorically reject the
25 charge that “Rep. Roukema and her re-election ca[m]paign . . . were kept
26 apprised of these actions and gave their tacit approval of them.”

27
28 The Committee and the candidate had nothing to do whatsoever with the
29 conception, planning or execution of the [RLC's] mail and advertising
30 campaign. In fact, we only became aware of it when the first letters hit the
31 mailboxes and the first ads hit the airwaves. To date, we have no specific

⁸ Although he argued that there was no coordination in this matter, counsel for the RLC maintained that coordination is not the proper standard and that under the First Amendment, because the advertisement in question did not contain express advocacy, the advertisement falls outside of FECA's restrictions.

knowledge of the extent to which the RLC produced mailings or broadcast advertisements in May and June in northern New Jersey. In fact, had our campaign been even remotely involved in the RLC effort, the RLC's efforts would have been much more effective. Several of the mail pieces and advertisements were at variance with our campaign's messages and goals.

Ms. Parsons also stated that the Complainant's organization, "Club for Growth," met with Representative Roukema's opponent in February, and thereafter endorsed his candidacy, raised significant amounts of contributions for him, and "later conducted an aggressive direct mail and broadcast attack program for him."⁹ Ms. Parsons further stated that "[c]learly, this complaint amounts to nothing more than a gimmick by the Club for Growth to gain a predictable 'press hit' on the eve of the June 6 Primary election."¹⁰

D. Analysis

For the reasons discussed below, this Office recommends that the Commission find no reason to believe that any violations of the Act occurred in connection with this MUR. In their Statement of Reasons in MUR 4960 (Hillary Rodham Clinton for U.S. Senate Exploratory Committee, issued December 21, 2000), four Commissioners stated, "Absent personal knowledge, the Complainant, at a minimum, should have made a sufficiently specific allegation . . . so as to warrant a focused investigation that can prove or disprove the charge." In their Statement of Reasons in MUR 5141 (Moran for Congress, issued March 11, 2002), all six

⁹ According to Ms. Parsons, Club for Growth's mail and broadcast advertisements contained many of the same themes as contained in Mr. Garrett's own campaign literature, and "it is clear to many observers in New Jersey that the Club for Growth was part and parcel of the Garrett for Congress campaign."

¹⁰ On June 2, 2000, the press reported Club for Growth's announced intention to file a complaint with the Commission against Representative Roukema's campaign for coordinating with the RLC. *Pot Calling the Kettle Black? House Race Hotline* (June 2, 2000). The Roukema Respondents also noted that *The Wall Street Journal* editorial on which the complaint relied "was filled with half-truths, complete fabrications and misrepresentations of Representative Roukema's voting record." On June 5, 2000, *The Wall Street Journal* ran a letter from Representative Roukema complaining of the paper's "continuing insistence in distorting my record in Congress."

Commissioners stated that a complaint may provide a basis for reason to believe findings if it alleges "sufficient specific facts" that, if proven, would constitute a violation of the Act. The six Commissioners also stated, however, that "[u]nwarranted legal conclusions from asserted facts . . . or mere speculation, . . . will not be accepted as true," and that "a complaint may be dismissed if it consists of factual allegations that are refuted by sufficiently compelling evidence produced in responses to the complaint." *Id.* Under these criteria, there is an insufficient basis upon which to recommend a finding of reason to believe that the Respondents made or accepted excessive contributions, or otherwise violated the Act or regulations, based on a coordination theory. *See also* 11 C.F.R. § 111.4 (standards governing complaints).

First, the complaint does not allege "sufficient specific facts" that, if proven, would constitute coordination. The complaint does not allege that Representative Roukema, her campaign, or any agent thereof, requested that any Member of Congress approach the RLC to run issue advertisements on her behalf, nor that anyone connected to the Roukema campaign could exercise control over, or had engaged in substantial discussion or negotiation over, the RLC's issue advertisement's contents, timing, location, mode, intended audience, or volume. *See Christian Coalition*, 52 F. Supp. 2d at 92. Instead, the complaint merely claims knowledge that Representative Roukema had asked Congressional colleagues for "help" with her campaign and speculates that the Roukema campaign must have been "kept apprised" that Members of Congress, looking out for her interests, had approached the RLC; and the Roukema campaign gave "tacit approval" to those actions. The speculation in the complaint is not a "sufficiently specific allegation" warranting a focused investigation that can prove or disprove the charge. *See* Statement of Reasons in MUR 4960. Additionally, the Roukema campaign has directly denied any such appraisal and approval, but even if it had not, mere knowledge and tacit acceptance that

others may be acting favorably to one's interests does not rise to the level of coordination under the *Christian Coalition* standard.

Moreover, *The Wall Street Journal* article that purportedly triggered the complaint does not state that Representatives Foley and Greenwood approached the RLC "to run 'issue advocacy' advertisements" against Representative Roukema's opponent, as Complainant suggests. Rather, the editorial, which took the point of view that the Roukema-Garrett race was about "incumbent protection," not ideology, stated, "And, indeed, RLC executive director Mark Miller tells us he was lobbied to rescue Ms. Roukema by her fellow safe-seat Representatives, Mark Foley of Florida and Jim Greenwood of Pennsylvania." Club for Incumbency, *The Wall Street Journal* (June 1, 2000). See Attachment 1. Thus, the article does not quote Mr. Miller as saying that the two Congressmen approached him to run issue advertisements against Representative Roukema's opponent, suggest that the two Congressmen were acting as agents of the Roukema campaign, or that the Roukema campaign was aware of their activities. Moreover, even if Complainant's claim that he knew that Representative Roukema asked Representatives Foley and Greenwood to "help" her re-election campaign is accurate,¹¹ a request by an

¹¹ According to a press article, Club for Growth President Stephen Moore reportedly said, "Greenwood told him this spring that Roukema had asked the two congressmen to work on her behalf." Adam Geller, Lobby Group Backing Garrett Questions Roukema Funding, *The Record (Northern New Jersey)*, p. A03 (June 3, 2000). The same article also states, "Moore says he is troubled by an editorial in Thursday's Wall Street Journal that says the two congressmen lobbied to the RLC to help Roukema. That appears to show they acted as her intermediaries, Moore said." The article quotes Moore as stating, "This contact between Foley and the RLC appears to be on behalf and request of the Roukema campaign and it is also a sign of her desperation at this stage of the race." *Id.* According to the article, Representative Roukema and the RLC denied the allegations. The article quotes Representative Roukema as stating, "Those are independent expenditures. We have nothing to do with them and no knowledge of them at all." *Id.* An RLC official, Matt Well, is quoted as stating, "There was no coordination whatsoever. We don't coordinate with candidates." *Id.*

1 incumbent to her Congressional colleagues for help does not support an inference that she has
requested them to impermissibly coordinate issue advertisements on her behalf.¹²

3 Complainant also alleged that the RLC only became involved in the Roukema-Garrett
4 race when approached by Members of Congress looking out for Representative Roukema's
5 interests. Complainant provided no support for this allegation, *see* 11 C.F.R. § 111.4(d)(2), but
6 even if it is true, it also does not support an inference that the Roukema campaign asked anyone
7 to approach the RLC to run issue advertisements on Roukema's behalf. Moreover, according to
8 press reports, there were reasons that transcended the Roukema race that may have motivated
9 Members of Congress to approach the RLC; the Club for Growth reportedly intended to make the
10 Roukema-Garrett race a testing ground for its ability to successfully challenge other moderate
11 Republican incumbents in the future. Matthew Vita, Roukema's Tough GOP Fight;
12 Conservative PAC Spending \$100,000 on Primary Ads Assailing N.J. Moderate, *The*
Washington Post, P. A08 (June 4, 2000).¹³ The Complainant, when announcing an advertising
14 campaign to assist Representative Roukema's opponent, reportedly stated, "We want to send a
15 message not just to Roukema but to the 15 or 20 most liberal Republicans that someone is
16 looking over their shoulder and there are no free votes." Robert Cohen, Rich Bloc of GOPers
17 Challenge Moderates—As Club Steers Cash, Party Leaders Worry, *The Star-Ledger (Newark,*

¹² For example, with respect to this very election, several congressional colleagues "helped" Representative Roukema. The press reported that Speaker Hastert and Majority Leader Arney both had publicly endorsed Roukema, and that the Speaker planned to attend a fundraiser for her in New Jersey. John Bresnahan, Speaker, Moderates Patch Things Up, *Roll Call* (March 20, 2000). On June 5, 2000, the press reported that Majority Whip Tom DeLay also endorsed Roukema, and that Hastert's and Arney's leadership PACs each donated \$5,000 to Roukema's campaign. Veterans to Watch (59R, 34D)—New Jersey 05: Don't Bet the Bank(ing Cmte Chair Post) on This One?, *House Race Hotline* (June 5, 2000).

¹³ According to the same article, "[F]or the GOP, no battle is greater this election cycle than in New Jersey's 5th District The outcome also will help determine whether conservative groups such as Club for Growth choose to aggressively target other Republican moderates, in this and future campaigns."

1 *NJ* (May 7, 2000). According to the article, although Roukema was the only incumbent then
2 being targeted by the Club for Growth, five other House Republican moderates, including
3 Representative Greenwood, "have been mentioned as future possibilities." *Id.*¹⁴ Under these
4 circumstances, if Members of Congress approached the RLC, no inference should be drawn that
5 they did so at the behest of the Roukema campaign; such actions could equally have been
6 motivated by their own desires to limit Club for Growth's impact in future races involving
7 Republican moderate incumbents.

8 In sum, Complainant has failed to allege the essential elements of coordination. *See*
9 Statement of Reasons in MUR 5141. Complainant also failed to make "a sufficiently specific
10 allegation . . . so as to warrant a focused investigation that can prove or disprove the charge."
11 *See* Statement of Reason in MUR 4960. Instead, Complainant asserts a legal conclusion (that
12 coordination occurred) that rests on mere speculation and unsupported inferences ("little doubt"
13 that the Roukema campaign was kept apprised of these actions and tacitly approved of them).
14 However, even if proven, these facts and speculations would not constitute coordination under
15 *Christian Coalition*. Accordingly, the complaint does not meet the threshold for finding reason
16 to believe that the RLC made, and the Roukema Committee accepted, excessive contributions in
17 violation of 2 U.S.C. §§ 441a(a)(2)(A) and 441a(f), based on a coordination theory.

18 Further, the responses specifically refute the factual allegations in the complaint. *See*
19 Statement of Reasons in MUR 5141. The Roukema Respondents asserted, "[T]he Committee
20 and the candidate had nothing to do whatsoever with the conception, planning or execution" of
21 the RLC's advertising campaign, denied the allegation that the candidate or the campaign were

¹⁴ Reportedly, Representative Greenwood was also in a delegation of several Representatives who spoke to the Club for Growth about its "counterproductive" activities. GOP Moderates Voice Election Frustrations, *CongressDaily/A.M.* (March 16, 2000).

1 kept apprised or gave tacit approval, and stated that they had no knowledge of the advertisement
before it was broadcast.

3 RLC Executive Director Mark Miller's sworn affidavit stated that he had no discussions
4 regarding the advertisement with Representative Roukema, her campaign, or anyone whom he
5 believed to be working for her campaign, and that prior to the airing of the advertisement, he
6 discussed it only with RLC's staff, its Steering Committee, and vendors. Although
7 acknowledging he had a meeting on May 16, 2000, which Representative Foley and
8 Representative Greenwood's chief of staff, among others, attended, Mr. Miller averred, "To the
9 best of my knowledge, there was no discussion of any issue ad during that meeting and at no time
10 did any of the attendees at the meeting, or anyone else other than RLC staff and vendors, have
11 any direct or indirect input into the production or airing of the Issue Ad." Thus, Mr. Miller
12 asserted, in a sworn affidavit, that RLC's pre-broadcast discussions concerning the advertisement
were confined to RLC's staff, its Steering Committee, and vendors, and he specifically denied
14 ever discussing the advertisement with Representative Roukema, her campaign, or any known
15 agents of her campaign.¹⁵

16 Based on the above, there is an insufficient basis supporting a reason to believe finding
17 that the RLC coordinated its production and broadcast of the advertisement in question with the
18 Roukema Committee.¹⁶ Accordingly, this Office recommends that the Commission find no
19 reason to believe that the Republican Leadership Council, Inc. and Allen Raymond, as treasurer,

¹⁵ The Complainant did not allege, nor is there any information to show that either Representative Greenwood or Representative Foley had, or were in a position to have, authority to make or authorize expenditures on behalf of the Roukema campaign. See 11 C.F.R. § 109.1(b)(5) (defining "agent").

¹⁶ To the extent that RLC counsel's position that the lack of express advocacy in the subject advertisement removes this matter from the Act's coverage has any bearing on the analysis, the Commission need not reach this issue since the complaint is not otherwise sufficient to trigger a reason to believe finding.

violated 2 U.S.C. § 441a(a)(2)(A) by making an excessive contribution to the Roukema

Committee. This Office further recommends that the Commission find no reason believe that

The Committee to Re-Elect Congresswoman Marge Roukema and Jaye L. Parsons, as treasurer,

violated 2 U.S.C. § 441a(f) by accepting an excessive contribution, or violated 2 U.S.C.

§ 434(b)(2)(D) by failing to report a contribution from the RLC. Moreover, there is no

information of any activity by Representative Roukema personally that would support reason to

believe findings. Accordingly, this Office recommends that the Commission find no reason to

believe that Representative Marge Roukema violated the Act in connection with this matter.

Finally, this Office recommends that the Commission close the file in this matter.

III. RECOMMENDATIONS


1. Find no reason to believe that the Republican Leadership Council, Inc. and Allen Raymond, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
2. Find no reason to believe that The Committee to Re-Elect Congresswoman Marge Roukema and Jaye L. Parsons, as treasurer, violated 2 U.S.C. §§ 434(b)(2)(D) and 441a(f).
3. Find no reason to believe that Representative Marge Roukema violated the Federal Election Campaign Act of 1971, as amended, in connection with this matter.
4. Approve the appropriate letters.
5. Close the file.

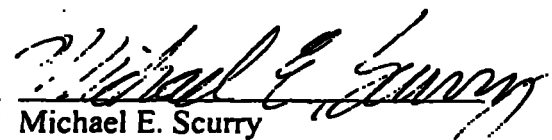
3/5/03

Date

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Attachment:
1. Press Article

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