



THE PENNSYLVANIA DEMOCRATIC PARTY

510 North Third Street, Harrisburg, Pennsylvania 17101

Phone: (717) 238-9381

Fax: (717) 233-3472

Email: democrats@padems.com

Website: www.padems.com

Senator Allen G. Kukovich
State Chair

Peggy Grove
Vice Chair

James Byrnes
Treasurer

Lawrence H. Norton, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

February 3, 2003

Re: MUR 5347

Dear Mr. Norton:

The Pennsylvania Democratic Party' has complied with all applicable rules and regulations regarding federal election law in regard to the Hoeffel for Congress Committee and denies any and all charges made by Deirdre Barnes in this matter. The only funds spent by the Pennsylvania Democratic Party on behalf of the Hoeffel for Congress Campaign amounted to \$60,000 which was paid entirely to the Campaign Group Inc. for the production and airing of one television commercial.

Attached you will find:

A letter from the DCCC to the Pennsylvania Democratic Party (PDP) delegating its 441a(d) authority to the PDP, effectively doubling its ability to spend money in direct support of Hoeffel campaign.


A letter from the Campaign Group stating that it received only \$60,000 from the PDP for which it produced and aired one ad on one station. A copy of the wire transfer as received by the Campaign Group has been provided.

A letter from KYW-TV confirming the buy on the station.

The Pennsylvania Democratic Party has filed an amended report indicating that this \$60,000 expenditure was made pursuant to section 441a(d). There is an on-going and as yet unsolved problem with Gnossos software in filing such expenditures (no doubt we are not the only ones with this problem) and as a result the expenditure has been mislabeled.

Finally, I note as an aside that post-election newspaper articles and editorials criticized Mr. Hoeffel's opponent for manufacturing charges that went well beyond the truth during the campaign. For our part, we are content to rely on the facts.

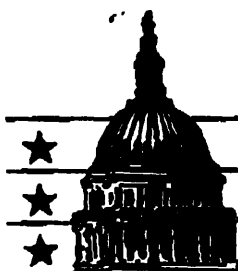
Sincerely,


James Byrnes, Treasurer
Pennsylvania Democratic Party

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2003 FEB 10 A 10:19

ST-04-244-43



DEMOCRATIC
CONGRESSIONAL
CAMPAIGN COMMITTEE

Hon. Nita M. Lowey, NY
Chair

October 24, 2002

Bob Barnett, Executive Director
Pennsylvania Democratic Party
510 North Third Street
Harrisburg, PA 17101

Dear Bob:

This letter sets forth in full the agreement between the Democratic Congressional Campaign Committee (DCCC) and the Pennsylvania Democratic Party concerning 441a(d) expenditures on behalf of the nominee in the 13th Congressional District of Pennsylvania for the 2002 general election.

1. The Democratic Congressional Campaign Committee hereby designates the Pennsylvania Democratic Party as the agent of the DCCC for the exclusive purpose of making expenditures pursuant to 2 USC 441a(d) on behalf of the above nominee up to \$35,609.07. The Pennsylvania Democratic Party hereby accepts such agency.
2. In exercising its authority pursuant to this agreement the DCCC will comply with the above-mentioned limitations and other reporting requirements of the Federal Elections Campaign Act of 1971, as amended and the regulations promulgated thereunder.

Please confirm your agreement with the foregoing by signing and returning this letter to Ann Marie Habershaw, Chief Financial Office at the DCCC.

Yours truly,
Democratic Congressional Campaign
Committee

By: Ann Marie Habershaw
Ann Marie Habershaw, CFO

Accepted and Agreed:
Pennsylvania Democratic Party

By: Robert Barnett
Bob Barnett, Chair Ex Director



January 30, 2003

1600 Locust Street

Mr. Robert Barnett
Pennsylvania Democratic State Committee
510 N. 3rd Street
Harrisburg, PA 17101

Philadelphia

Dear Mr. Barnett:

Enclosed please find information regarding the television buys of the Hoeffel for Congress Campaign.

Pennsylvania

First is a copy of a wire transfer from The Pennsylvania Democratic Party to The Campaign Group, Inc. This was for the amount of \$60,000.00. This was the only money we recieved from the Pennsylvania Democratic Party for the Hoeffel campaign.

19103

Next is a copy of a letter from Carolyn Tyson of KYW-TV in Philadelphia. This says that The Campaign Group spent \$55,641.00 net on her television station running an ad for Hoeffel for Congress with the disclaimer "Paid for by the Pennsylvania Democratic Party and Authorized by Hoeffel for Congress."

This was the only television station which received this commercial with this disclaimer. All other stations ran commercials with only one disclaimer on all other spots. That disclaimer read "Paid for by Hoeffel for Congress."

The rest of the \$60,000 that was sent from the Pennsylvania Democratic Party - \$4,359 - was spent on production for the Hoeffel for Congress Campaign.

If you need any other information please give me a call.

Sincerely,

Neil Oxman

(215) 732 8200

Fax (215) 790 9969

Dear: THE CAMPAIGN GROUP INC

This facsimile serves as notification of the following Incoming Wire Transfer credited to your account number on 2002-10-25. If you have any questions, please contact your nearest Commerce Branch or call 800-YES-2000.

~~~~~ Incoming Wire Transfer Information ~~~~~

Amount: \$60000.00

Beneficiary: THE CAMPAIGN GROUP INC

Account Number:

Address:

Sender:

Bank Name: FIRST UNION NJNYPA

ABA Number:

Reference Number:

Originator Bank:

Address:

By Order Of: PENNSYLVANIA DEMOCRATIC PARTY

Address: 510 NORTH THIRD STREET HARRISBURG PA 17101

Receiver Bank Name: COMMERCE BK PHILA

ABA Number:

FRB Incoming Confirmation Number:

Reference for Beneficiary:

Originator to Beneficiary:

Bank to Bank Information:

Miscellaneous Information:

~~~~~ END Wire Transfer Information ~~~~~

THANK YOU FOR CHOOSING COMMERCE BANK.

10/25/02



KYW-TV
101 SOUTH INDEPENDENCE MALL EAST
PHILADELPHIA, PA 19106

Neil Oxman
The Campaign Group
1600 Locust Street
Philadelphia, PA 19103

Dear Neil,

This is to confirm that the we did air a political campaign spot on behalf of "Hoeffel For Congress" as follows:

| | |
|-------------|---|
| Dates: | October 28 - November 5, 2002 |
| Spot Name: | Wrong - #5 |
| Disclaimer: | Paid For by Pennsylvania Democratic Party
Authorized by Hoeffel for Congress |
| Net Cost: | \$55,641.00 |
| Invoice #s: | 1041-479390 and 1041-479471 |

Please give a call with any questions you may have.

Sincerely,

Carolyn Tyson
Account Executive &
Political Advertising Coordinator