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FIRST GENERAL COUNSEL'S REPORT

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MUR 6400

DATE COMPLAINT FILED: October 19, 2010

DATE OF NOTIFICATION: October 26, 2010

DATE OF LAST RESPONSE: December 8, 2010

DATE ACTIVATED: January 19, 2011

STATUTE OF LIMITATIONS: May 26, 2015 - June 11, 2015

COMPLAINANT:

New Jersey Republican State Committee

RESPONDENTS:

**Adler for Congress and Richard J. Sexton, in his official
capacity as treasurer**

John H. Adler¹

Geoff Mackler

Haddon Capital Ventures, LLC

**Peter DeStefano for Congress and Peter M. DeStefano,
in his official capacity as treasurer**

Camden County Democratic Committee

Matt White

Bill Moen

RELEVANT STATUTES:

2 U.S.C. § 431(2)

2 U.S.C. § 431(4)

2 U.S.C. §§ 431(8)(A)(i) and (9)(A)(i)

2 U.S.C. § 432(e)(1)

2 U.S.C. § 433

2 U.S.C. § 434(a) and (b)

2 U.S.C. § 434(a)

2 U.S.C. §§ 441a(a)(1) and (f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

¹ Mr. Adler died on April 4, 2011.

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I. INTRODUCTION

The complaint alleges that Adler for Congress and Richard Sexton, in his official capacity as treasurer ("Adler Committee"), the principal campaign committee of former Congressman John H. Adler, and the Camden County Democratic Committee ("CCDC"), a county political party committee registered with the New Jersey Election Law Enforcement Commission, made and failed to disclose excessive in-kind contributions to Peter DeStefano for Congress ("DeStefano Committee"), the principal campaign committee of Peter DeStefano. Both Adler and DeStefano were candidates in the 2010 General Election for U.S. House of Representatives in the 3rd Congressional District of New Jersey; Adler was the Democratic nominee and DeStefano, running under the slogan "NJ Tea Party," qualified for the ballot by filing a petition for direct nomination on June 8, 2010.²

Based upon two published reports (attached to the complaint), the complaint alleges that the Adler Committee and CCDC paid their respective employees and a consultant to organize and participate in the solicitation of signatures to qualify DeStefano for the ballot, thereby making excessive contributions to DeStefano that neither committee reported. In addition, the complaint alleges that the same consultant operated DeStefano's website, Twitter account, and Facebook page. According to the complaint, CCDC's alleged payments to employees to assist DeStefano were in amounts sufficient to require CCDC to register with the Commission as a political committee and report the contributions, which it failed to do. Finally, the complaint alleges that DeStefano did not properly file a complete Statement of Organization and the DeStefano Committee has not filed any disclosure reports with the Commission.

² Mr. Adler and Mr. DeStefano both lost the 2010 General Election, with 47% and 1% of the vote, respectively.

1 John H. Adler, the Committee's treasurer, and Geoff Mackler, the Adler Committee's
2 campaign manager who allegedly participated in assisting DeStefano, deny in a joint response
3 that Adler and his campaign supported or assisted the DeStefano campaign in any respect.
4 Adler Response at 2. In a response on behalf of his committee, DeStefano denies receiving any
5 assistance from Adler or anyone known to be from the Adler campaign. DeStefano Response.
6 CCDC's response contends that even if it lent support to DeStefano in his efforts to qualify for
7 the ballot, that support was not a "contribution" to "a political committee," and the value of any
8 alleged support did not rise to the level of an excessive contribution or trigger the registration
9 and reporting obligations of the Federal Election Campaign Act of 1971, as amended (the "Act").
10 CCDC Response at 2-3. The joint response of CCDC's employees Bill Moen and Matt White,
11 and of the consultant, Haddon Capital Ventures, LLC ("HCV"), whose owner, Steve Ayscue,
12 along with Moen and White, allegedly participated in DeStefano's ballot efforts, also denies that
13 there was a "contribution" under the Act even assuming CCDC paid them for their efforts.
14 Ayscue *et al.* Response at 2.

15 Because it appears that CCDC may have compensated Ayscue, Moen, and White to assist
16 DeStefano, CCDC may have made contributions to DeStefano, which the DeStefano Committee
17 may have accepted and should have disclosed. Alternatively, CCDC may have made
18 independent expenditures which should have been disclosed. However, any such
19 contributions/expenditures appear to have been relatively low in value and not worth pursuing to
20 conciliation. The individuals and HCV would not have liability since they themselves did not
21 allegedly make any payments and were working for the Adler Committee and/or CCDC.
22 Although the Adler Committee would have to disclose any contribution to the DeStefano
23 Committee, it is not clear that such a contribution would be excessive, and it does not warrant the

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resources necessary to investigate. Accordingly, we recommend that the Commission find no reason to believe that John H. Adler, Geoff Mackler, Bill Moen, Matt White, or Haddon Capital Ventures, LLC violated the Act by making excessive contributions, dismiss the allegations with respect to the Adler Committee and CCDC, and dismiss the allegations that the DeStefano Committee received excessive contributions. Because the DeStefano Committee amended its Statement of Organization and also filed disclosure reports, albeit untimely, covering the time period in question, we also recommend that the Commission dismiss the allegations related to these activities. *See Heckler v. Chaney*, 470 U.S. 821 (1985). Finally, we recommend that the Commission close the file as to all respondents.

II. FACTUAL AND LEGAL ANALYSIS

A. Allegations of Excessive Contributions and Failure to Disclose

Under the Act, no person may make a contribution to a candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceeds \$2,400 during the 2010 election cycle, and no candidate or authorized political committee may knowingly accept such a contribution. 2 U.S.C. §§ 441a(a)(1) and (f).³ The Act defines "contribution" as the provision of something of value "for the purpose of influencing any election for Federal office," and includes the "payment by any person of compensation for the personal services of another person which are rendered to a political committee without charge for any purpose." 2 U.S.C. §§ 431(8)(A)(i) and (ii). *See also* 11 C.F.R. § 100.52(d). Treasurers of political committees are required to disclose all contributions. 2 U.S.C. § 434(b).

³ Any contribution from the Adler Committee to DeStefano would be subject to the \$2,000 limit in 2 U.S.C. § 432(e)(3)(B).

1 Based on two attached published reports, the complaint alleges that consultant
2 HCV/Steve Ayscue, the Adler Committee's campaign manager, Geoff Mackler, and CCDC's
3 employees, Bill Moen and Matt White, were each compensated by either the Adler Committee or
4 CCDC to assist DeStefano's petition drive. As a result, according to the complaint, the Adler
5 Committee and CCDC made unreported contributions to the DeStefano campaign pursuant to
6 2 U.S.C. § 431(8)(A)(ii) that the DeStefano Committee accepted but did not report.

7 One published report states that "Steve Ayscue—a paid CCDC consultant and Geoff Mackler,
8 dispatched from the Democratic Congressional Campaign Committee to lead freshman
9 Rep. John H. Adler's re-election campaign," appeared at an evening meeting in May 2010 with
10 members of the South Jersey Young Democrats at CCDC's headquarters. *See Dems Picked*
11 *Spoiler Candidate*, www.CourierPostOnline.com, October 8, 2010. According to the report,
12 "Ayscue and Mackler had a plan to ensure Adler's victory. They just needed volunteers." *Id.*
13 The report states that Ayscue had recruited a then unidentified man (later identified as
14 DeStefano) to act as a "conservative spoiler" to pull votes from Adler's Republican opponent,
15 but needed volunteers to collect petition signatures to place the third party candidate on the
16 ballot. *Id.*

17 The second published report states that the previous report came from "Democratic
18 operatives speaking on the condition of anonymity," and that although Adler and DeStefano had
19 previously denied the accusations that Democrats were responsible for placing DeStefano on the
20 ballot, neither had responded to emails or calls from the Associated Press following the earlier
21 article. According to the second published report, "[t]he operatives said a county Democratic
22 employee is running at least the web elements of DeStefano's campaign." *See Report:*
23 *Democrats Planted Candidate in NJ Race*, October 8, 2010, available at

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1 <http://abclocal.go.com/wjrt/story?section=news/politics&id=7714298>. See also Complaint,
2 Exhibits 1 and 2. While neither published report attached to the complaint mentions CCDC
3 employees Bill Moen or Matt White, other published reports state that they participated in
4 collecting signatures for DeStefano's ballot petition, see, e.g., *Candidate "Plant" Insult To*
5 *Voters*, www.app.com, October 9, 2010, and their responses do not specifically deny they did so.
6 The Adler and CCDC responses maintain that the complaint is insufficient because it relies on
7 published reports that cite only anonymous sources. See Adler Response at 2; CCDC Response
8 at 2. Their responses, however, do not specifically contradict the reports that appear to rely on
9 persons, albeit anonymous, with first-hand knowledge with respect to the May 2010 meeting that
10 Ayscue and Mackler reportedly attended. The Adler Committee and CCDC disclosed no
11 contributions to the DeStefano Committee, and the DeStefano Committee did not disclose the
12 receipt of any contributions from them, or from any of the individuals allegedly working to
13 support or assist DeStefano in ballot efforts.

14 The Adler Response submitted jointly by former Congressman John H. Adler, the Adler
15 Committee's treasurer, and Geoff Mackler, the Adler Committee's campaign manager, contains
16 general denials to the effect that neither Adler nor his campaign supported or assisted the
17 DeStefano campaign in any way, that neither made any in-kind contributions to DeStefano, and
18 that there was no coordination between the Adler and DeStefano campaigns. Adler Response
19 at 2. However, the emphasis is on what Congressman Adler did or knew. For example, the
20 response states that "Congressman Adler emphatically denies that he or his campaign was
21 involved in supporting the candidacy of Peter DeStefano," "Congressman Adler had no
22 knowledge of any support provided to the DeStefano campaign by any Democratic Party
23 personnel," and "Congressman Adler emphatically denies the principal legal claims made in the"

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1 complaint. *Id.* Neither of the published reports directly implicate former Congressman Adler or
2 the Adler Committee apart from the alleged presence of the Committee's campaign manager,
3 Geoff Mackler, at the May 2010 evening meeting. That the Adler Committee paid Mackler, as
4 alleged in the complaint, both before and after that meeting, is not particularly probative, since
5 Mackler was then employed as its campaign manager.

6 DeStefano's one-page response, submitted on behalf of his campaign, states "I have not
7 received assistance of any kind from Mr. Adler, nor any person who I know to be connected with
8 Mr. Adler's campaign. Neither Mr. Ayscue nor Mr. Mackler, nor any other person connected
9 with Mr. Adler's campaign have worked on my campaign, contributed money, or anything else,
10 or in any way assisted my campaign." Ayscue's alleged involvement, according to the published
11 reports, was in recruiting DeStefano to run and appearing at a meeting with Mackler, where both
12 allegedly supported the idea of volunteers assisting with soliciting signatures for DeStefano's
13 ballot petition. DeStefano is not alleged to have been at that meeting, and there is no information
14 available to contradict his statements that he was not aware of any assistance from them with the
15 pre-campaign petition effort. Thus, there is an insufficient basis to conclude that either
16 DeStefano or his campaign committee, of which he was the treasurer, knowingly accepted
17 contributions from these sources.

18 Based on the available information, including that neither of the alleged participants,
19 Messrs. Mackler and Ayscue, have denied their involvement in efforts supporting the DeStefano
20 campaign, it appears that there may have been an in-kind contribution from the Adler Committee
21 to the DeStefano campaign. *See* 2 U.S.C. § 431(8)(A)(i); 11 C.F.R. § 100.52(d). However, the
22 available information indicates that Messrs. Mackler and Ayscue were seeking volunteers at one
23 event to assist with the DeStefano campaign, and thus the value of the alleged in-kind

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1 contribution from the Adler Committee, as payor of these individuals' salary and consulting fees,
2 is both difficult to measure and would not appear to have been substantial, although it would be
3 subject to the Act's disclosure requirement. *See* 2 U.S.C. § 434(b). As for Geoff Mackler, he
4 does not appear to have personally made a contribution to the DeStefano Committee since he is
5 not alleged to have made any payments and he conducted his activity as the Adler campaign
6 manager.

7 DeStefano does not address any assistance he may have received from the CCDC through
8 the alleged involvement of CCDC employees Moen and White in collecting signatures for his
9 ballot petition. In the joint response submitted on behalf of Steve Ayscue, Bill Moen and
10 Matt White, they contend that their alleged work on behalf of DeStefano does not constitute "the
11 payment by any person of compensation for the personal services of another person which are
12 rendered to a political committee without charge for any purpose" because the benefits they
13 conferred "were indisputedly done in exchange for compensation." Ayscue *et al.* Response at 2.
14 What these respondents may be suggesting is that any contribution to DeStefano would come not
15 from the individuals but rather from the individuals' employers who paid the individuals for the
16 work. *See* 2 U.S.C. § 431(8)(a)(ii). For this reason and because Messrs. Moen and White are not
17 alleged to have made any payments, they do not appear to have made contributions to the
18 DeStefano Committee.

19 In its separate response, CCDC contends that the alleged support that it rendered
20 DeStefano occurred before DeStefano created a principal campaign committee. CCDC
21 Response at 2. Therefore, according to CCDC, there was no existing "political committee" to
22 which the alleged services could have been provided. *Id.* This begs the question of whether the
23 true recipient of the services was the DeStefano Committee or the Adler Committee, the latter of

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1 which existed at the time of the services. Even if the conduct did not fall within 2 U.S.C.
2 § 431(8)(a)(ii) as to the DeStefano Committee, however, it fell within the definition of
3 contribution, as "anything of value" given for the purpose of influencing any election for Federal
4 Office. See 2 U.S.C. § 431(8)(A)(i).

5 Moreover, if it paid its employees to collect signatures for DeStefano's campaign, CCDC
6 made expenditures within the meaning of 2 U.S.C. § 431(9)(A)(i). See Advisory Opinion
7 1994-05 (White) (expenses incurred in gathering signatures to qualify for a ballot are
8 expenditures); Advisory Opinion 2006-20 (Unity 08) (payments to obtain ballot access through
9 petition drives are expenditures) (vacated on other grounds by *Unity08 v. F.E.C.*,
10 596 F.3d 61 (D.C. Cir. 2010)); MUR 5581 (Nader for President 2004), Factual and Legal
11 Analysis at 4 n.6 (amounts spent on obtaining signatures for candidate to appear on general
12 election ballot are expenditures). If CCDC coordinated its activities with DeStefano, then these
13 expenditures were in-kind contributions to his campaign and should have been reported by the
14 DeStefano Committee. See MUR 5783 (Carl Romanelli for U.S. Senate) (payments made for
15 ballot petitioning efforts that were coordinated with candidate constituted in-kind contributions).
16 Even if CCDC did not coordinate its activities with DeStefano, CCDC would still have an
17 obligation to report the independent expenditures if they were greater than \$250. See 2 U.S.C.
18 § 434(c). However, as discussed below, we do not recommend that the Commission make
19 reason to believe findings as to CCDC.

20 CCDC appears to meet the definition of a "local committee of a political party," that is,
21 an organization that by virtue of the by-laws of a political party or the operation of State law is
22 part of the official party structure, and is responsible for the day-to-day operation of the political
23 party at the level of city, county, neighborhood, ward, district, precinct, or any other subdivision

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1 of a State. See 11 C.F.R. § 100.14(b). CCDC's name and the activities reflected on its state
2 disclosure reports appear to support this conclusion. Any local committee of a political party
3 that makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year
4 meets the definition of a political committee. 2 U.S.C. § 431(4)(C). Political committees must
5 file a Statement of Organization with the Commission within 10 days of meeting the threshold
6 definition found in 2 U.S.C. § 431(4)(C), and must file reports that comply with 2 U.S.C. § 434.
7 2 U.S.C. §§ 433(a), 434(a)(1).

8 CCDC's state disclosure reports show that it paid Moen and White together a total of
9 \$2,017.44 for the two-week period between May 26, 2010, the date of the May 2010 meeting
10 referenced in the published reports attached to the complaint, and June 8, 2010, the date stated in
11 the complaint that DeStefano qualified for the ballot, thereby no longer requiring Moen and
12 White's alleged assistance with a petition drive. The payroll amounts paid to Moen and White
13 during this time period were consistent with the amounts they received both before and after
14 their alleged assistance to the DeStefano campaign. It appears that CCDC paid them on a
15 straight salary basis, which may complicate establishing a discrete increment exceeding \$1,000
16 attributable to the petition-gathering services. Moreover, New Jersey law requires only 100
17 petition signatures to place a candidate such as DeStefano, running as an independent, on the
18 ballot, which may not have taken a significant amount of time to gather. See N.J.S.A. § 19:13-5
19 (1986). While it is unknown how much time Messrs. White and Moen may have spent gathering
20 signatures, it appears unlikely that it required the full \$2,017.44 in salary, or even a substantial
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1 portion thereof, that CCDC paid them during the signature-gathering period.⁴ While we could
2 investigate whether CCDC's payments for these efforts exceeded the \$1,000 threshold for
3 political committee status under the circumstances, where the alleged conduct appears to have
4 involved a limited amount of work over a short period of time, it does not appear that such an
5 investigation would be a good use of the Commission's resources. For the same reason, it does
6 not appear that it would be a good use of the Commission's resources to determine whether
7 CCDC coordinated its activities with the DeStefano Committee and, if so, the amount of
8 CCDC's contribution that the DeStefano Committee should have disclosed.

9 CCDC also used the consulting services of HCV, Steve Ayscue's company. The first
10 published report the complaint relies on identifies Ayscue as a "paid CCDC consultant," and in
11 responding to the complaint, HCV/Ayscue joined with CCDC employees Moen and White.
12 See Complaint, Exhibit 1, and Ayscue *et al.* Response. CCDC's state disclosure reports show a
13 \$132.02 "reimbursement" payment for "meetings/means exp" to HCV's Steve Ayscue on
14 June 18, 2010, which may represent the payment for Ayscue's efforts pertaining to seeking
15 volunteers for the petition project.⁵ Even if this amount corresponds to the May 2010 meeting, it
16 would not constitute an excessive contribution, see 2 U.S.C. § 441a(a), or add enough to warrant
17 investigating the political committee status allegation.

18 The complaint also alleges that Ayscue operated DeStefano's website, Twitter account,
19 and Facebook page; the second published report upon which the complaint relies, however,

⁴ The CCDC Response to the complaint references \$4,344.80 that Messrs. Moen and White were paid in total by CCDC on May 28 and June 11, 2010, recognizing that the latter payments were made after the June 8 date that DeStefano became a candidate according to the complaint. CCDC Response at 2. CCDC asserts that even if the entire \$4,344.80 were applied to Moen and White's signature-gathering efforts, it would fall short of the \$5,000 political committee status threshold for exempt activity. *Id.* at 2-3; see 2 U.S.C. § 431(4)(C). However, the political committee status threshold is \$1,000 in expenditures. 2 U.S.C. § 431(4)(C).

⁵ CCDC also disclosed "consulting services expenses" payments to HCV, Mr. Ayscue's firm, starting on October 5, 2010 in the amount of \$5,000, several months after DeStefano qualified for the ballot.

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1 states only that an unidentified "county Democratic employee is running at least the Web
2 elements of DeStefano's campaign." See Complaint, Exhibit 2. The responses did not address
3 this allegation. Even if Ayscue ran the DeStefano campaign's web activities, however, the sites
4 themselves do not suggest activity that would constitute any more than a *de minimis* in-kind
5 contribution on the part of whichever entity – CCDC or the Adler Committee – was paying
6 Ayscue or his firm, HCV, and not on the part of HCV itself. DeStefano's current website
7 consists of two rotating images of America-inspired themes with no actual text, and does not
8 contain links enabling the user to obtain additional information.

9 See <http://destefanoforcongress.com/default.htm>. Similarly, his Facebook page details his goals
10 and his focus for the campaign, but it contains no discussions with potential campaign
11 supporters, nor does it provide information about DeStefano's activities during the campaign; it
12 is written in the present tense, so it appears to be unchanged since his campaign.

13 See <https://www.facebook.com/pages/Peter-DeStefano/144436528936928>. It appears that once
14 someone created the Facebook page, no one spent any time and effort to monitor or update it.

15 In view of the above, we recommend that the Commission exercise its prosecutorial
16 discretion and dismiss the allegation that Adler for Congress and Richard J. Sexton, in his
17 official capacity as treasurer, violated 2 U.S.C. §§ 441a(a) and 434(b). See *Heckler v. Chaney*,
18 470 U.S. 821 (1985). We also recommend that the Commission find no reason to believe that
19 John H. Adler, Haddon Capital Ventures, LLC, Geoff Mackler, Matt White, or Bill Moen
20 violated 2 U.S.C. § 441a(a). We further recommend that the Commission exercise its
21 prosecutorial discretion and dismiss the allegations that Camden County Democratic Committee
22 violated 2 U.S.C. §§ 433, 434(a) and (b) and 441a(a). See *Heckler v. Chaney*, 470 U.S. 821
23 (1985). Additionally, we recommend that the Commission exercise its prosecutorial discretion

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1 and dismiss the allegations that Peter DeStefano for Congress and Peter M. DeStefano, in his
2 official capacity as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b). *See id.*

3 **B. Allegations that the DeStefano Committee's Statement of Organization was**
4 **Incomplete and that the Committee Failed to File Disclosure Reports**
5

6 Political committees must file a Statement of Organization with the Commission within
7 10 days of meeting the threshold definition found in 2 U.S.C. § 431(4)(C), and must file reports
8 that comply with 2 U.S.C. § 434. 2 U.S.C. §§ 433(a), 434(a)(1). The complaint alleges that the
9 DeStefano Committee has not properly filed a complete Statement of Organization with the
10 Commission and has failed to file any disclosure reports. Complaint at 3 and Exhibits 8 and 9.

11 Following the complaint, the DeStefano Committee twice amended its Statement of
12 Organization, which now appears complete.⁶ Since the complaint, the DeStefano Committee
13 also has filed two disclosure reports with the Commission. On October 27, 2010, it filed a report
14 styled as a 2010 October Quarterly Report covering April 5 through October 18, 2010, disclosing
15 total contributions of \$3,361 and total expenditures of \$3,286. Subsequently, on November 3,
16 2010, the DeStefano Committee filed a second report, covering April 5 through October 30,
17 2010, disclosing the same \$3,361 in contributions and \$3,286 in expenditures. *See* DeStefano
18 Response attaching the 2010 October Quarterly Report. The reports show that \$2,386 came from
19 DeStefano's own funds, and his response reiterates that fact and states that the remainder came
20 from family and friends. *Id.* The reports and his response also show a debt of \$557 for printing;
21 his response states he will probably pay the debt from his own funds. *Id.* While the DeStefano

⁶ The complaint based its allegation on a September 16, 2010 Request for Additional Information ("RFAI") sent to the DeStefano Committee because the original Statement of Organization filed August 30, 2010 did not include information about the candidate, any connected or affiliated committees, the treasurer and any designated agents, or a bank depository. The DeStefano Committee filed an amended Statement of Organization on October 25, 2010. A second RFAI followed on December 23, 2010, because the amended Statement of Organization filed October 25, 2010 was not signed by DeStefano in his official capacity as treasurer. DeStefano filed a signed Statement of Organization on January 19, 2011.

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1 Committee has not yet filed a 2010 Post-General or Year-End Report, the available information
2 does not suggest that the Committee engaged in substantial, if any, additional activity during
3 these reporting periods.

4 Due to the DeStefano Committee's filing of amended Statements of Organization and
5 disclosure reports, albeit untimely, and the low dollar amount of the DeStefano Committee's
6 disclosed activity, we do not believe pursuit of these registration and reporting allegations merit
7 the further use of Commission resources. Therefore, we recommend that the Commission
8 exercise its prosecutorial discretion and dismiss the allegations that Peter DeStefano for
9 Congress and Peter M. DeStefano, in his official capacity as treasurer, failed to properly file a
10 complete Statement of Organization and file disclosure reports in violation of 2 U.S.C.
11 §§ 432(e)(1) and 434(a), respectively. *See Heckler v. Chaney*, 470 U.S. 821 (1985). Finally, we
12 recommend that the Commission close the file as to all respondents in this matter.

13 **III. RECOMMENDATIONS**

- 14 1. Dismiss the allegations that Adler for Congress and Richard J. Sexton, in his official
15 capacity as treasurer, violated 2 U.S.C. §§ 441a(a) and 434(b).
16
- 17 2. Find no reason to believe that John H. Adler violated 2 U.S.C. § 441a(a).
18
- 19 3. Find no reason to believe that Geoff Mackler violated 2 U.S.C. § 441a(a).
20
- 21 4. Find no reason to believe that Matt White violated 2 U.S.C. § 441a(a).
22
- 23 5. Find no reason to believe that Bill Moen violated 2 U.S.C. § 441a(a).
24
- 25 6. Dismiss the allegations that Camden County Democratic Committee violated
26 2 U.S.C. §§ 433, 434(a) and (b), and 441a(a).
27
- 28 7. Find no reason to believe that Haddon Capital Ventures, LLC violated 2 U.S.C.
29 § 441a(a).
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8. Dismiss the allegations that Peter DeStefano for Congress and Peter M. DeStefano, in his official capacity as treasurer, violated 2 U.S.C. §§ 432(e)(1), 434(a) and (b), and 441a(f).
9. Approve the attached Factual and Legal Analyses.
10. Approve the appropriate letters.
11. Close the file as to all respondents.

Christopher Hughey
Acting General Counsel

April 19, 2011
Date

BY:

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