

# BRAND LAW GROUP

A PROFESSIONAL CORPORATION  
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October 12, 2012

## **HAND DELIVERED**

Kathleen Guith, Esq.  
Deputy Associate General Counsel for Enforcement  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: **MUR 6511**

Dear Ms. Guith:

We are writing on behalf of our clients, Congressman Rob Andrews and Maureen Doherty, Treasurer of Rob Andrews U.S. House Committee, (collectively referred to as the "Respondents") in response to the FEC's September 19, 2012 letter providing us with an opportunity to supplement our clients' response in light of the Office of Congressional Ethics ("OCE") Board report, published on August 31. Thank you for the opportunity to respond to your letter and for the extension allowing us to respond today.

### **The OCE Report Misrepresents Both the Facts and the Law Relating to Congressman Andrews's Campaign Activities**

The OCE Report stems from a complaint made by the Republican Party Chairman of Camden County. As the Ethics Committee clearly stated when it released the OCE report, the Committee has made no determination as to whether the allegations are true or false. In fact, the Committee has yet to even decide whether to conduct a formal inquiry. However, irrespective of the House Ethics Committee's ultimate actions, a review of the facts and the law affirms that Rep. Andrews has followed all applicable FEC rules and standards.

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FEDERAL ELECTION COMMISSION

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## BRAND LAW GROUP

Kathleen Guith, Esq.

October 12, 2012

Page 2

### *(1) Scotland Trip Details and Explanation*

The trip to Scotland was a campaign expenditure to attend a political consultant's wedding. The consultant has served as an opposition research director for at least one Presidential campaign, and has engaged in similar work for other high-profile efforts. The individual performed substantial work on a *volunteer* basis for Rep. Andrews's 2008 U.S. Senate campaign and, since then, they have maintained a strong relationship. Rep. Andrews determined that the value of maintaining a continuing relationship with this former presidential opposition researcher who had volunteered for his campaign would tremendously benefit both his Leadership PAC and his own campaigns for re-election. Despite the legality of the expenses, Rep. Andrews made a political judgment to repay all funds in any way related to the Scotland trip. On November 30, 2011—*prior to the filing of any complaint with either the OCE or the FEC*—Rep. Andrews remitted \$13,539.70 to Andrews for Congress ("AFC") and \$16,574.88 to his leadership PAC, fully refunding all expenditures related to the Scotland trip.

Though the individual has been a minor donor to the Member's campaign (once giving \$250 to the re-election committee, see Exhibit 1), as Rep. Andrews explained to the OCE, he concluded that the consultant's value as a volunteer consultant was exceptionally high and that the trip to the wedding strengthened this relationship.

It is clear that the expenses associated with the trip would not have occurred irrespective of Rep. Andrews's campaign or position as a Member of Congress. Under the relevant FEC Advisory Opinions, Decisions, and Rules, a Member has wide discretion in making expenditures to influence his or her election, as long as such campaign funds are not converted to personal use. See 2 U.S.C. §439a; 11 C.F.R. §§ 113.1(g). FEC regulations define personal use as "any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a Federal officeholder." 11 C.F.R. § 113.1(g). In accordance with these standards, the Member exercised his best judgment and concluded that attending the wedding would foster an important relationship that could help his re-election Committee and his political agenda for his PACs.

But for the campaign-related activity, the Scotland trip would not have occurred. The purpose of the trip was to maintain this contact and foster goodwill with an extremely bright and well-regarded individual, who had performed such services for at least one Presidential campaign, and who supported the Member's campaign by providing important volunteer opposition research and political advice. The OCE report ignores the factual record and inaccurately applies the law. The OCE report itself states that the volunteer consultant had worked for a presidential campaign and other high-level political organizations; that he had performed substantial work for Rep. Andrews's Senate campaign; that the work was totally voluntary in nature; and that the consultant

14044354190

## BRAND LAW GROUP

Kathleen Guith, Esq.

October 12, 2012

Page 3

regarded the Member as the "Member of Congress with whom he had the best relationship." The OCE then misapplied the relevant legal FEC standard – whether the expenditure would have occurred "irrespective of the candidate's campaign or duties as a Federal officeholder" – and invented a new standard that erroneously ignores the precedent that Members are afforded "broad discretion" in determining expenses that benefit their campaigns. Such expenses are *not* limited merely to traditional political expenditures (see House Ethics Manual at 154 (recognizing applicable FEC precedent on this paramount issue)).

Based on his prior efforts in providing substantial volunteer services, Rep. Andrews reasonably anticipated that this volunteer consultant would provide such advice in future campaigns, as well as provide counsel on other areas that would help the Member's campaign and leadership PAC's goals. Rep. Andrews's considered his family's attendance to be important to generate this goodwill as part of their regular practice of campaigning with him and attending campaign events.

In accordance with the Federal Election Campaign Act and FEC regulations, Rep. Andrews's Committee paid only the aspects of the trip related to the wedding in Scotland. His family paid for all other expenses. Moreover, excluding travel days, the family was in Scotland only two full days – both of which were days on which wedding events were held – and Rep. Andrews was in Scotland for less than 24 hours.

### *(2) Travel Details of Scotland Trip*

It is undisputed that the Andrews family visited Scotland for two days, excluding travel days; both days included wedding events. It is also undisputed that Rep. Andrews stayed in Scotland less than 24-hours because of a late voting schedule. He departed Washington on a "red eye" on Friday night, attended the Saturday wedding, and departed Scotland with his family early Sunday morning. In accordance with the Federal Election Campaign Act and FEC regulations, the Committee paid only the aspects of the trip related to the wedding in Scotland. When a candidate's family is attending campaign-related events, the Act, FEC regulations and advisory opinions have expressly recognized that such expenditures are proper and not personal use. See FEC AO 1981-25 (recognizing that wife's travel that advances political purposes is proper expenditure); FEC AO 1995-20 (authorizing travel of children with parents to campaign-related events). Rep. Andrews's family often campaigns together, and the family appears in brochures and advertising. They are an integral part of his re-election campaign, and regularly participate in campaign-related events. As such, the costs of the trip fall within the statutory definition of campaign expenses.<sup>1</sup>

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<sup>1</sup> The section of the OCE Report addressing meals during the trip applies the wrong part of the law (See House Ethics Manual at 159).

14044354191

## BRAND LAW GROUP

Kathleen Guith, Esq.  
October 12, 2012  
Page 4

With respect to petty cash, the OCE erroneously infers that Respondents did not provide supporting documentation. Exhibit 2 contains three separate documents—all of which were produced—setting out the exact expenditures used for petty cash and the amounts returned to the Campaign. See Andrews\_062012\_30 (total petty cash 260£, returned envelope with 400£.); Andrews\_062012\_33 (noting "sent envelope back with all money"); Andrews\_062012\_34 (noting "returned unused pounds in envelope"); Camille Andrews Testimony Andrews\_062012\_34-35. Contradicting the express documentation and testimony that all petty cash was used for campaign-related purposes, the OCE implies otherwise by stating that some of the petty cash was used in London and America. However, Exhibit 2 and the testimony expressly establish that this petty cash was used in the airports at New York City and London during travel. See Andrews\_062012\_31-32.

### (3) Repayments related to the Scotland trip

Despite the fact that there was no personal use and all FEC rules were followed, in order to enable his campaign to focus on the issues of concern to his constituents Rep. Andrews made a political judgment to refund all expenses in any way associated with the trip prior to the filing of any complaint with this Commission or the OCE. On November 30, 2012, the Member personally reimbursed all funds in any way related to the Scotland trip. See Exhibit 3. A portion thereof (\$13,539.70) was donated to the Volunteers of America South Jersey Chapter, a group devoted to homeless veterans and other homeless persons. See Exhibit 4.

### (4) California Trips

On March 6, 2012 – the last day of the OCE's permissible review period – the OCE raised for the first time, during its interview with Rep. Andrews, a question as to whether campaign funds were used to pay for one of his daughter's travel to Los Angeles for the purposes of her show business career in 2011. Despite the fact that during the entire time period of review had *never* raised the issue or made any request for evidentiary support, the OCE concluded:

*115. ... On each of the [California] trips, his daughters' airfare, meals, lodging, and other potential expenses were all paid for by his congressional campaign committee. Representative Andrews provided testimony that his daughters acted in a volunteer campaign staff role while there, a claim not supported by the evidence obtained.*

As set forth below, the purpose of the 2011 California trips was to pursue campaign activities, including fundraisers, speeches, and prospecting meetings. As has been reported on Rep. Andrews's FEC reports, the Member has typically raised approximately seven percent of his contributions from California donors, and has

14044354192

## BRAND LAW GROUP

Kathleen Guith, Esq.

October 12, 2012

Page 5

expended approximately two percent of his Committees' resources on such trips. For example, the Committee's July 15, 2011 FEC report alone lists over 30 donors located in California.

The purpose of and details the campaign-related events associated with each such trip are stated below. The dates below are not fully inclusive of the 2011 events held on the California trips. Events were sometimes added as the day went on. For example, if a fundraising prospect invited Rep. Andrews to meet other prospects, that event would not appear on the schedule. Also, the schedule does not always reflect whether a family member also attended the event. Unlike scheduled items that inform a paid campaign staffer of their obligations to attend events, family members are of course volunteers and would be more informally asked to attend by the Member.

The purposes of such trips were as follows:

### 2011:

#### February Trip

02/19/11 Member travel to CA, minor daughter accompanied him  
02/20/11 Prospecting Brunch (donor)  
02/21/11 Prospecting Dinner (became donor)—minor daughter attended  
02/22/11 Travel from LA to SF, minor daughter accompanied him  
Prospecting meeting, minor daughter accompanied him  
Fundraiser Lunch Event, minor daughter accompanied him  
Fundraiser Dinner Event, minor daughter accompanied him  
02/22/11 Member and minor daughter travel back to LA  
02/23/11 Fundraiser Event  
02/24/11 Cancelled event; fundraising call-time  
02/25/11 Travel day

#### April Trip

04/07/11 Member travel to CA, minor daughter accompanied him  
04/08-09 Events cancelled (did not cancel trip because flights already paid and other fundraising event/mtgs scheduled)  
04/10/11 Fundraising Event  
04/11/11 Prospecting Meeting and Travel day—minor daughter attended

#### June Trip

06/03/11 Member travel to CA; minor daughter accompanied him  
06/04/11 Prospecting Event (became donor)—minor daughter attended  
06/05/11 Prospecting Meeting (became donor)  
06/06/11 Prospecting Meeting (became donor) and Travel day

14044354193

## **BRAND LAW GROUP**

Kathleen Guith, Esq.  
October 12, 2012  
Page 8

### **July Trip**

7/15/11 Member travel to CA; minor daughter accompanied him  
7/16 & 7/17 Cancelled events (since tickets already purchased and Fundraiser scheduled; did not cancel trip; used as call day)  
7/18: Prospecting meeting—minor daughter attended Fundraiser Event in Bel Air, CA

### **August Trip**

8/15/11 Member travel to CA, minor daughter accompanied him  
8/16/11 Prospecting Meeting (donor made contribution)  
08/17/11 Fundraising Breakfast  
Fundraising Event Dinner—minor daughter attended  
08/18/11 Cancelled  
08/19/11 Travel day

### **November Trip**

11/09/11 Member travel to CA, minor daughter accompanied him  
11/10/11 Prospecting Meeting (donor made contribution)  
11/11/11 Prospecting Meeting (donor made contribution)—minor daughter attended  
Political Lunch  
Prospecting Dinner—minor daughter attended  
11/12/11 Prospecting lunch (donor made contribution)  
11/13/11 Travel day

Like most members and candidates, Rep. Andrews usually has a campaign staffer accompany him to fundraising and prospecting meetings. On some occasions, in lieu of a staffer he has been accompanied by members of his family who have volunteered to perform campaign tasks, such as taking notes for follow-up, getting lists of attendees, collecting checks and so forth.

Although both of the Member's daughters frequently performed volunteer campaign activities such as those outlined above, even if they performed no such activities, FEC advisory opinions do not require a minor child accompanying a candidate on travel to participate actively in the political events. Instead, these opinions recognize that adult members do not give up their responsibilities as parents just because they serve in Congress and that their minor children sometimes accompany a parent when such parent must travel to events.

In such a circumstance, travel costs attributed to a member's minor child are clearly payable by the campaign committee. See FEC AO 1995-20 ("travel by children accompanying their parents [for campaign purposes] would not constitute the personal use of campaign funds provided that the parents are traveling for campaign purposes,

14044354194

## BRAND LAW GROUP

Kathleen Guith, Esq.  
October 12, 2012  
Page 7

and the children are minors"). Accord FEC AO 1996-34 (authorizing campaign funds to be used for travel, related meals and lodging expenses of family attending a trip related to political receptions and fundraising events when children would be present at event); FEC AO 2005-09 ("the Committee may use campaign funds to pay for the travel expenses of [the Member's] minor children to accompany the [Member] when the purpose of the travel is to attend or participate in events officially connected to the [the Member]"). See also FEC AO 1997-2 (recognizing that House stresses importance of participation of full family members at bipartisan retreat, and children may accompany parents). Rep. Andrews daughter, Josephine Carolyn ("Josie"), is a minor. Her date of birth is 10/28/1994.

When Rep. Andrews's minor daughter travelled with him, she often attended California campaign events and sometimes acted in place of a campaign aide at the events, collecting checks and business cards for her father. Because his daughter is a minor, the schedules would not typically reflect whether or not his daughter attended the events.

Since the expenditures are for travel in connection with Rep. Andrews's campaign for Federal office, such expenditures are clearly proper under applicable rules. The OCE Report's claim that Rep Andrews "provided no evidence" to sustain this claim is incorrect. The first time the OCE raised the question about the November 2011 trip was at the Member's interview on the last day of the OCE's permitted review period. Had the OCE made a timely and specific request for the records regarding the California trips, we would have promptly provided them with the information attached hereto.

### *(5) California Trips: Tasks performed by family members.*

Like most members and candidates, Rep. Andrews usually has a campaign staffer accompany him to fundraising and prospecting meetings. On some occasions, he has been accompanied by members of his family who have volunteered to perform campaign tasks, such as collecting business cards, taking notes for follow-up, getting lists of attendees collecting checks, being present to help represent the Member, and so forth.

As stated above, although the Member's daughter frequently performed volunteer campaign activities such as those outlined above, even if she performed no such activities, the applicable FEC advisory opinions do not appear to require a minor child accompanying a candidate on travel to participate actively in the political events, although such minor children may sometimes accompany them to events. In such instances, travel costs attributed to a member's minor child are clearly payable by the campaign committee. See FEC AO 1995-20 ("travel by children accompanying their parents [for campaign purposes] would not constitute the personal use of campaign

14044354195

## BRAND LAW GROUP

Kathleen Guith, Esq.  
October 12, 2012  
Page 8

funds provided that the parents are traveling for campaign purposes, and the children are minors"). *Accond*, FEC AO 1996-34 (authorizing campaign funds to be used for travel, related meals and lodging expenses of family attending a trip related to political receptions and fundraising events when children would be present at event); FEC AO 2005-09 ("the Committee may use campaign funds to pay for the travel expenses of [the Member's] minor children to accompany the [Member] when the purpose of the travel is to attend or participate in events officially connected to the [the Member].") See also FEC AO 1997-2 (recognizing that House stresses importance of participation of full family members at bipartisan retreat, and children may accompany parents).

### (6) *Twentieth Anniversary Celebration.*

The OCE also examined the Camden County Republican Chairman's allegation that Rep. Andrews's Committee used campaign funds to pay for a high school graduation party for his daughter. Absolutely no campaign funds were used for such activity. To the contrary, campaign funds were used to pay the expenses for a celebration of the Member's 20 years as a Member of Congress. Because this event related to his service, it was not for "personal use" and was properly payable with campaign funds under the regulations.

The campaign held an event celebrating Rep. Andrews's twentieth anniversary of service in the House on June 11, 2011. Of the more than 300 guests who attended, only about 14 people (fewer than five percent) were the invitees of the Member's daughter. The Andrews family, in an abundance of caution, personally paid \$7,343.29 of the \$20,159.09 cost of the event – approximately 35 percent of the total cost. See Exhibit 5. Approximately 163 of the invitations were mailed to the AFC list and approximately 150 additional invitations were distributed by hand (CA\_OCE\_173-196; see also Exhibit 5). The cost of the invitation, including mailing, was \$660.14 (Andrews\_062012\_288; see also Exhibit 5). Rep. Andrews's daughter invited approximately 14 guests to the event ((Andrews\_062012\_312) and Exhibit 5), and created a separate computer invitation for her friends (see Andrews\_062012\_289), and none of the Member's daughter's personal guests received the Committee's invitation.

Rep. Andrews took scrupulous care to segregate the costs attributable to his daughter's guests. As Exhibit 5 shows, despite the fact that only a tiny percentage of guests were attributable to their daughter (5%), the family personally paid approximately 35 percent of the total costs of the event (\$7,343.29 of the \$20,159.09 total cost, including invitation). The family's disproportionately large contribution to the event's overall cost, including the cost of the invitation, is demonstrated by Exhibit 5, showing almost 300 known Committee guests (it was an open house and there were a number of additional Committee guests) versus the list of his small number of daughter's guests. As such, even though the *pro rata* cost of any arguably attributable share of the invitation would have been only about \$30.80, the Member's excess payment for the

14044354196



## **BRAND LAW GROUP**

Kathleen Guith, Esq.  
October 12, 2012  
Page 9

costs attributable to the entire event clearly covered in full the entire cost of the invitation and mailing.

Because this event related to his service as a Member of Congress, it was not a "personal use" and was payable with campaign funds under the regulations. See House Ethics Manual at 160 (campaign funds can pay costs of [social activities or social events]); 11 C.F.R. § 113.2(e); see also FEC AO 1978-85 (authorizing use of campaign funds for celebration commemorating representative's service). No regulation or FEC advisory opinion sets forth who may be invited to a celebration of congressional service. Nor is there any reason a member necessarily would be prohibited from inviting guests associated with his or her daughter (or any other person) or from recognizing their child's accomplishments at the celebration. However, even if there are no restriction on invitees, the Committee paid no personal costs for her guests and no funds were used improperly.

In conclusion, the facts and applicable law demonstrate clearly that Rep. Andrews followed all applicable FEC standards. He engaged in a permissible exercise of discretion in attending the wedding of a high-quality professional researcher who had volunteered in his previous campaigns. Even though these expenditures were fully appropriate and legal, he made a political judgment to return all funds from the wedding event to his committees before any complaint was filed. The Reception celebrating his anniversary of service in the Congress was completely appropriate. Fewer than five percent of the guests at the event were invitees of his daughter to celebrate her graduation, but the record shows that the family paid for nearly 35 percent of the cost of the event out of their personal funds. The California trips were part of a effort that saw the campaign raise seven percent of its funds in that state while expending approximately two percent of its resources there. The July 15, 2011 FEC report alone shows over 30 donations from California residents. The rules specifically permit and authorize the participation of his minor daughter in these trips.

This Commission is the proper body to interpret its own Regulations and Rules. We believe that an accurate review of the record and a proper application of the law by this Commission (and the House) will demonstrate the falsehood of the politically-motivated allegations made in this matter.

14044354197

**BRAND LAW GROUP**

Kathleen Guith, Esq.  
October 12, 2012  
Page 10

Sincerely,

A handwritten signature in black ink, appearing to be "ADH", followed by a horizontal line.

Stanley M. Brand  
Andrew D. Herman

Counsel to Congressman Rob Andrews and  
Maureen Doherty, Treasurer of Rob Andrews  
U.S. House Committee

ADH:mob

Enclosures

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## EXHIBIT 1

**SCHEDULE A (FEC Form 3 )  
ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER: **PAGE 89 / 300**  
(check only one)  
☒ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)  
**Rob Andrews U.S. House Committee**

<b>A.</b>	Full Name (Last, First, Middle Initial) <b>Reese Stockman</b>	Date of Receipt <b>09 / 30 / 2010</b>
	Mailing Address <b>750 N. Ocean Blvd.</b>	Transaction ID: <b>C2772529</b>
	City <b>Pompano Beach</b> State <b>FL</b> Zip Code <b>33062</b>	Amount of Each Receipt this Period: <b>250.00</b>
	FEC ID number of contributing federal political committee: <b>C</b>	
	Name of Employer Information Requested <b>Occupation Information Requested</b>	
	Receipt For: <b>2010</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Election Cycle-to-Date ▼ <b>250.00</b>
<b>B.</b>	Full Name (Last, First, Middle Initial) <b>Scott Street</b>	Date of Receipt <b>09 / 27 / 2010</b>
	Mailing Address <b>5000 S Cantinela Ave Apt 240</b>	Transaction ID: <b>C2753509</b>
	City <b>Los Angeles</b> State <b>CA</b> Zip Code <b>90065-6919</b>	Amount of Each Receipt this Period: <b>250.00</b>
	FEC ID number of contributing federal political committee: <b>C</b>	
	Name of Employer <b>Akin Gump Strauss Hauer &amp; Feld LLP</b> <b>Occupation Attorney</b>	
	Receipt For: <b>2010</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Election Cycle-to-Date ▼ <b>250.00</b>
<b>C.</b>	Full Name (Last, First, Middle Initial) <b>Byung Sam Sung</b>	Date of Receipt <b>09 / 17 / 2010</b>
	Mailing Address <b>200 Amanda Dr</b>	Transaction ID: <b>C2761787</b>
	City <b>Media</b> State <b>PA</b> Zip Code <b>19063-4041</b>	Amount of Each Receipt this Period: <b>500.00</b>
	FEC ID number of contributing federal political committee: <b>C</b>	
	Name of Employer Information Requested <b>Occupation Information Requested</b>	
	Receipt For: <b>2010</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Election Cycle-to-Date ▼ <b>500.00</b>
SUBTOTAL of Receipts This Page (optional)		<b>1000.00</b>
TOTAL This Period (last page this line number only)		

FEC Schedule A ( Form 3 ) (Revised 02/2009)

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## EXHIBIT 4

**SCHEDULE B (FEC Form 3)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

FOR LINE NUMBER:  
(check only one)

PAGE 194 OF 198

☐ 17 ☐ 18 ☐ 19a ☐ 19b  
☐ 20a ☐ 20b ☐ 20c ☒ 21

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NAME OF COMMITTEE (in Full)

Andrews for Congress

Full Name (Last, First, Middle Initial)

**A. Volunteers of America Delaware Valley**

Mailing Address 235 White Horse Pike

City State Zip Code  
Oaklyn NJ 08107

Purpose of Disbursement  
donation

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President  
Disbursement For: 2012  
☒ Primary ☐ General  
☐ Other (specify)

State: District:

Date of Disbursement

11 30 2011

Amount of Each Disbursement this Period

13539.70

Transaction ID : D388873

Category/  
Type

Full Name (Last, First, Middle Initial)

**B. Alex's Lemonade Stand**

Mailing Address online

City State Zip Code  
Philadelphia PA 19112

Purpose of Disbursement  
donation- only date 9/14

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President  
Disbursement For: 2012  
☒ Primary ☐ General  
☐ Other (specify)

State: District:

Date of Disbursement

10 14 2011

Amount of Each Disbursement this Period

100.00

Transaction ID : D414260

[MEMO ITEM]

Category/  
Type

Full Name (Last, First, Middle Initial)

**C. BJ Wholesale Club**

Mailing Address Lenola Road

City State Zip Code  
Maple Shade NJ 08055

Purpose of Disbursement  
In store donation- Safe Halloween

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President  
Disbursement For: 2012  
☒ Primary ☐ General  
☐ Other (specify)

State: District:

Date of Disbursement

10 23 2011

Amount of Each Disbursement this Period

263.18

Transaction ID : D414815

[MEMO ITEM]

Category/  
Type

SUBTOTAL of Disbursements This Page (optional)

13539.70

TOTAL This Period (last page this line number only)