

RECEIVED

By OGC/CELA at 5:12 pm, Apr 16, 2021

STEINHARDT
CAPPELLI
TIPTON &
TAYLOR LLC218 Rt. 17 North, Suite 410
Rochelle Park, NJ 07662☎ 201.843.5858
✉ 201.843.5877**Craig P. Bossong, Esq. | Partner**201-373-8933 Direct Dial
cbossong@floriolaw.com

April 16, 2021

Federal Election Commission
Office of Complaints Examination
And Legal Administration
ATTN: Trace Keeyes, Paralegal
1050 First Street, NE
Washington, DC 20463**Re: MUR 7890**

Dear Mr. Keeyes:

Please be advised that the undersigned counsel has been retained to represent the Respondent, Service Tire Truck Centers (“STTC”) in connection with MUR 7890. It is important to note that STTC did not receive a copy of the Complaint or any communication from the FEC in regards to MUR 7890. STTC was recently made aware of MUR 7890 and provided a copy of the complaint by Senate Leadership Fund (“SLF”) who STTC believes has already or will be filing a response regarding the same.

In reviewing the complaint submitted, the crux of the complaint appears to center around STTC being deemed a “federal contractor”. It is unbeknownst to STTC, how STTC could be deemed a federal contractor. STTC is a retail store and automotive service center with locations throughout the Northeast. STTC is unaware of participating in any federal procurement process or federal contract program that would qualify them as a “federal contractor” and subject them to the ban on federal contractors making contributions to a political committee. In reviewing the timeframe within the complaint, it appears that a representative or employee from the General Services Administration (“GSA”) pulled into a retail store and purchased tires and/or servicing for their vehicles, as a result of either getting a flat tire, or having low tread. Each transaction was paid for via a credit card. See Exhibit A annexed hereto.

These transactions were not only unsolicited but were not purchases made pursuant to any contract, agreement, or previously entered into price list between STTC and a federal agency or government as a result of any procurement process. They were purely random and unsolicited retail transactions. Under 11 C.F.R. § 115.1(c) a contract includes:

1. A sole source, negotiated, or advertised procurement conducted by the United States or any of its agencies;
2. A written (except as otherwise authorized) contract, between any person and the United States or any of its departments or agencies, for the furnishing of personal property, real property, or personal services; and
3. Any modification of a contract.

None of these definitions apply to what occurred in this instance. As a result, it can not be said that these unsolicited retail purchases make STTC a "federal contractor" for the purposes of 52 U.S.C. § 30119. Neither the Act nor the Commission should transfer what amounts to a storefront purchase into a federal "contract".

As a result and based upon the foregoing, the Commission should determine that STTC is not a federal contractor, has not violated the Act, and it is respectfully requested that this matter be closed and dismissed.

Respectfully Submitted,

Florio Perrucci Steinhardt Cappelli
Tipton & Taylor, LLC.



By: CRAIG P. BOSSONG

Attachments

EXHIBIT A



MICHELIN RETREADING
*24 HOUR ROAD SERVICE

2255 Avenue A
Bethlehem, PA 18017

Phone: 610-954-8473
Fax: 610-954-5985

SERVICE TIRE TRUCK CENTERS

www.sttc.com

FED EIN # 23-1689591

06-JESSUP - S.T.T.C.

1246 MID VALLEY DRIVE
JESSUP, PA 18434

Phone: 570-383-8473

INVOICE DATE	CUSTOMER	INVOICE NBR
11/17/2020	G6	817475-06

S JESSUP CASH - GDYR GOV'T

S GSA FLEET
H 2200 CRYSTAL DR
I ARLINGTON, VA 22202
P

O
L
D
T
O

T O Attn: Phone:

JOB

Attn: Phone:

Fax:

CUST P. O.	ORDERED BY	W/O #	TECH ID	SALES ID	INVOICE		
C0544268	KEVIN		T0682	060			
VEHICLE /FLEET NO	LICENSE	MILEAGE	SHIP VIA	TERMS			
ALL	G710145S	85,426	CPU	CASH			
Item Number / Description	QTY	Unit Price	EXCISE TAX	Extension			
744830900 L22575R16 115Q GOODYEAR WRANGLER HT E BW PLEASE REGISTER YOUR TIRES @	2	\$119.46	\$0.00	\$238.92 N			
748748572 L22575R16 115R GOODYEAR WRL AT ADVENTURE E PLEASE REGISTER YOUR TIRES @	4	\$153.53	\$0.00	\$614.12 N			
http://register.cimstireregistration.com/index.cfm?id=tires-easy							
DILB DSMT/MT COMPUTER SPIN BALANCE ON/OFF VEHICLE	6	\$15.95	\$0.00	\$95.70 N			
LHPV LT HI PRESSURE VALVE	6	\$5.00	\$0.00	\$30.00 N			
LS SCRAP TIRE DISPOSAL LIGHT TRUCK TIRE	6	\$3.00	\$0.00	\$18.00 N			
Requirement Name	Requirement Value						
P.O. NUMBER	C0544268						
GS/AN # 1	G0007185						

DRIVE IN SERVICE 11/17
INSTALLED NEW TIRES ON ALL
COF- LOW TREAD
SCRAP OFF TIRES

STTC #06 JESSUP
1246 MID VALLEY DRIVE
JESSUP, PA 18434

SALE

MD: 2770 Store: 4616 Term: 2201
REF#: 00000002
Batch #: 230 RRN: 032219400833
11/17/20
INS MUST WITH
Ded ONE JP
Invoice #: 81747506
Trans ID: 1110MCFRFXRRJ
PO#: 81747506
APPR CODE: 001897
MASTERCARD
*****5351
Manual CNP

AMOUNT \$996.74

APPROVED

I AGREE TO PAY ABOVE DATES MOUNT
IN ACCORDANCE WITH CARD ISSUER'S
AGREEMENT
(MEMORANDUM AGREEMENT IF CREDIT VERIFIED)
OBTAIN THIS COPY FOR STATEMENT
VERIFICATION

MERCHANT COPY

MISC/SUPPLIES	FREIGHT	EXCISE TAX	MERCHANDISE	LABOR	TAXABLE TOTAL	NON-TAX TOTAL
\$0.00	\$0.00	\$0.00	\$883.04	\$113.70	\$0.00	\$996.74

NOTICE - PER VEHICLE SPECS, RETIGHTEN
LUG NUTS AFTER 50-100 MILES.

REMIT TO SERVICE TIRE TRUCK CENTERS
2255 AVENUE A BETHLEHEM, PA 18017-2165 PA

Subtotal: \$996.74
0% Sales Tax: \$0.00

X SIGNATURE

X KEVIN JONES *****5351
PRINT NAME

Payment: \$996.74
TOTAL \$0.00

THE FINANCE CHARGE ADDED TO ALL BALANCES 30 DAYS PAST DUE IS COMPUTED BY A PERIODIC RATE NOT TO EXCEED THE HIGHEST RATE ALLOWED BY LAW. PLEASE SEE YOUR MONTHLY STATEMENT FOR THE CURRENT RATE.

ALL RETURNED GOOD MUST BE ACCOMPANIED BY INVOICES AND ARE SUBJECT TO A 10% HANDLING CHARGE. WE ASSUME NO RESPONSIBILITY FOR LOSS OF MERCHANDISE AFTER 30 DAYS



SERVICE TIRE TRUCK CENTERS, INC.

MICHELIN RETREADING

WWW.STTC.COM

STTC LOCATION APP

24 HOUR ROAD SERVICE

Visit any of our locations in: PA, NJ, NY, MD, DE, VA, MA, CT
 Nationwide Service with STTC Road Assist 800-584-8473

Corporate Office:
 FED EIN # 23-1689591
2255 Avenue A
Bethlehem, PA 18017
610-954-8473
Fax: 610-954-5985

1/2 HARRISBURG - S.I.C.
 4000 FENTON AVENUE
 HARRISBURG, PA 17109
 717-561-8473

INVOICE DATE	CUST. NO.	PAGE	INVOICE NUMBER
11/18/2020	301099		819377-02

GSA-FLEET MANAGEMENT
 VENDOR #VI9420160
 819 TAYLOR STREET ROOM 6A00
 FORT WORTH, TX 76102
 Phone: 866-400-0411

GSA-FLEET MANAGEMENT
 VENDOR #VI9420160
 819 TAYLOR STREET ROOM 6A00
 FORT WORTH, TX 76102
 Phone: 866-400-0411

CUSTOMER P.O.	ORDERED BY	WORK ORDER #	TECH I.D.	SALES I.D.	
20541608	ED BECHDEL		T0200	195	Standard Order
VEHICLE/FLEET NO.	LICENSE	MILEAGE	SHIP VIA	TERMS	
/	G82 0863V PA	135121	CUSTOMER PICK UP	Net 10th	

ITEM NO.	DESCRIPTION	QTY.	UNIT PRICE	EXCISE TAX	NET EXTENSION
JIMDM	DISMOUNT/MOUNT ON/OFF WHEEL & VEHICLE	10	\$19.50		\$195.00N
WV	VALVE STEM STEEL MEDIUM TRUCK	10	\$3.95		\$39.50N
MS	SCRAP TIRE DISPOSAL MEDIUM TRUCK TIRE	10	\$13.00		\$130.00N
00000026377	M11R225 ROADMASTER 234 H RIB23	2	\$303.61	\$29.39	\$666.00N
0000007270	M11R225 ROADMASTER 254 H LUG26	8	\$292.86	\$29.39	\$2,578.00N

MISC.	EXCISE TAX	MERCHANDISE	LABOR	TAXABLE TOTAL	NON-TAX TOTAL
\$0.00	\$293.90	\$3,283.50	\$325.00	\$0.00	\$3,608.50

NOTICE - PER VEHICLE SPECS, RETIGHTEN LUG NUTS AFTER 50 - 100 MILES. SIGNATURE:	REMIT TO: SERVICE TIRE TRUCK CENTERS 2255 AVENUE A BETHLEHEM, PA 18017-2165	SUB-TOTAL: \$3,608.50 SALES TAX: \$0.00
	PRINT NAME: RAY N. NINGSARD	INVOICE TOTAL \$3,608.50

IF FINANCE CHARGE ADDED TO ALL BALANCES 30 DAYS PAST DUE IS COMPUTED BY PERIODIC RATE NOT TO EXCEED THE HIGHEST RATE ALLOWED BY LAW. PLEASE SEE OUR MONTHLY STATEMENT FOR THE CURRENT RATE.
 FORM # 80-4-60 (9/7/10)

STTC COPY

ALL RETURNED GOODS MUST BE ACCOMPANIED BY INVOICES AND ARE SUBJECT TO HANDLING CHARGE. WE ASSUME NO RESPONSIBILITY FOR LOSS OF MERCHANDISE AFTER 30



MICHELIN RETREADING
24 HOUR ROAD SERVICE

SERVICE TIRE TRUCK CENTERS

www.stc.com

FED EIN # 23-1689591

2255 Avenue A
Bethlehem, PA 18017

Phone: 610-954-8473

Fax: 610-954-5985

19-BALTIMORE - S.T.T.C.

4771 HOLLINS FERRY ROAD
BALTIMORE, MD 21227

Phone: 410-247-4464

INVOICE DATE	CUSTOMER	INVOICE NBR
11/19/2020	309100	819703-19

S GSA-WOLF CREEK
O 7545 GENERAL AVIATION DRIVE
L FORT MEADE, MD 20755
D

S GSA-WOLF CREEK
H 7545 GENERAL AVIATION DRIVE
I FORT MEADE, MD 20755
P

T
O Attn: DAVE HANSEL
Phone: 301-247-4731

T
O Attn: DAVE HANSEL
Phone: 301-247-4731

Fax: 301-688-1407

JOB

CUST P. O.	ORDERED BY	W/O #	TECH I D	SALES I D	INVOICE
C0544499	RODGER		T1935	195	
VEHICLE /FLEET NO	LICENSE	MILEAGE	SHIP VIA	TERMS	NET 10TH
BUS 6648	G320424P	75,480	1248		

Item Number / Description	QTY	Unit Price	EXCISE TAX	Extension
DRS ROAD SERVICE MON-FRI REGULAR HOURS	2	\$102.00	\$0.00	\$204.00 N
DRSMILE MILEAGE - PORTAL TO PORTAL	26	\$0.90	\$0.00	\$23.40 N
DRSDM DISMOUNT/MOUNT DAY ROAD SERVICE	2	\$0.00	\$0.00	\$0.00 N
90000039346 M26570R195 ROADMASTER 170+ G RIB17	2	\$267.00	\$14.84	\$563.68 N
DRSME DSMT/MT EQUAL BALANCE - ON/OFF VEHICLE-ROAD SER	2	\$28.00	\$0.00	\$56.00 N
MTT MD TIRE RECYCLING FEE	2	\$0.80	\$0.00	\$1.60 N
MV VALVE STEM STEEL MEDIUM TRUCK	2	\$5.95	\$0.00	\$11.90 N
ALLI DOUBLE SEAL VALVE CAP	2	\$1.50	\$0.00	\$3.00 N
MS SCRAP TIRE DISPOSAL MEDIUM TRUCK TIRE	2	\$14.50	\$0.00	\$29.00 N

ROAD SERVICE CALLED IN BY GEORGE 443 867 7433 SERVICE IS FOR THUR
AMB BUS # 6648 REPLACE LF AND RRO 26570195 7545 GENERAL AVIATION
DR FORT MEAD CALL GEORGE 443 867 7433 HE WILL THE BUS OUT
NOTE: C/O/F: LOW TREAD FLAT SPOTS O/T/SCRAP

STTC #19 BALTIMORE
4771 HOLLINS FERRY RD
ARLINGTON, MD 21227

SALE

MD: 4000 Store: 4616 Term: 2401
REF#: 00000003
Batch #: 732 RRN: 032419201603 12-17-56
11/19/20
Trans ID: 115MCFSC0ALX
APPR CODE: 042346
MASTERCARD Manual CP
*****968

AMOUNT \$892.58

APPROVED

I AGREE TO PAY ABOVE TOTAL AMOUNT
IN ACCORDANCE WITH CARD ISSUER'S
POLICY
(MERCHANT AGREEMENT BY CHECK/ CREDIT CARD/ VISA)
RETURN THIS COPY FOR STATEMENT
VERIFICATION

MERCHANT COPY

MISC/SUPPLIES	FREIGHT	EXCISE TAX	MERCHANDISE	LABOR	TAXABLE TOTAL	NON-TAX TOTAL
\$0.00	\$0.00	\$29.68	\$580.18	\$312.40	\$0.00	\$892.58

NOTICE - PER VEHICLE SPECS, RETIGHTEN LUG NUTS AFTER 50-100 MILES.

REMIT TO SERVICE TIRE TRUCK CENTERS
2255 AVENUE A BETHLEHEM, PA 18017-2165 MD

Subtotal: \$892.58
0% Sales Tax: \$0.00

*****9168

X _____
SIGNATURE

X _____
PRINT NAME

Payment: \$892.58
TOTAL \$0.00

THE FINANCE CHARGE ADDED TO ALL BALANCES 30 DAYS PAST DUE IS COMPUTED BY A PERIODIC RATE NOT TO EXCEED THE HIGHEST RATE ALLOWED BY LAW. PLEASE SEE YOUR MONTHLY STATEMENT FOR THE CURRENT RATE.

ALL RETURNED GOOD MUST BE ACCOMPANIED BY INVOICES AND ARE SUBJECT TO A 10% HANDLING CHARGE. WE ASSUME NO RESPONSIBILITY FOR LOSS OF MERCHANDISE AFTER 30 DAYS



SERVICE TIRE TRUCK CENTERS, INC.

MICHELIN RETREADING

WWW.STTC.COM

STTC LOCATION APP

24 HOUR ROAD SERVICE

Visit any of our locations in: PA, NJ, NY, MD, DE, VA, MA, CT

Nationwide Service with STTC Road Assist 800-684-8473

Corporate Office:
FED EIN # 23-1689591

2255 Avenue A
Bethlehem, PA 18017

610-954-8473
Fax: 610-954-5985

HARRISBURG, PA
4000 FENTON AVENUE
HARRISBURG, PA 17109
Phone: 717-561-8473

INVOICE DATE	CUST. NO.	PAGE	INVOICE NUMBER
11/20/2020	301099		819377-02

Page 1 of 1

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GSA-FLEET MANAGEMENT
VENDOR #VI9420160
819 TAYLOR STREET ROOM 6A00
FORT WORTH, TX 76102
Phone: 866-400-0411 Fax:

S
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T
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GSA-FLEET MANAGEMENT
VENDOR #VI9420160
819 TAYLOR STREET ROOM 6A00
FORT WORTH, TX 76102
Phone: 866-400-0411

Ris Mc
JOB

CUSTOMER P.O.	ORDERED BY	WORK ORDER #	TECH I.D.	SALES I.D.	INVOICE
C0544608	ED BECHDEL		T0200	195	

VEHICLE/FLEET NO.	LICENSE	MILEAGE	SHIP VIA	TERMS
/	G82 0863V PA	135121	CUSTOMER PICK UP	Net 10th

ITEM NO.	DESCRIPTION	QTY.	UNIT PRICE	EXCISE TAX	NET EXTENSION
DIMDM	DISMOUNT/MOUNT ON/OFF WHEEL & VEHICLE	10	\$19.50		\$195.00 N
MV	VALVE STEM STEEL MEDIUM TRUCK	10	\$3.95		\$39.50 N
MS	SCRAP TIRE DISPOSAL MEDIUM TRUCK TIRE	10	\$13.00		\$130.00 N
90000026377	M11R225 ROADMASTER 234 H RIB23	2	\$303.61	\$29.39	\$866.00 N
90000007270	M11R225 ROADMASTER 254 H LUG26	8	\$292.66	\$29.39	\$2,578.00 N
THANK YOU FOR YOUR BUSINESS!					

STTC #02 HARRISBURG
4000 FENTON AVE
HARRISBURG, PA 17109

SALE

MD: 2360 Store: 4616 Term: 2201
REF#: 00000003
Batch #: 010 RRN: 032545609753 10-53-18 (K: 1)

Invoice #: 81937702
Trans ID: 1120MCFE59NTHM
APPR CODE: 056056
MASTERCARD *****7179 Manual CNP

AMOUNT \$3,608.50

APPROVED

I AGREE TO PAY ABOVE TOTAL AMOUNT IN ACCORDANCE WITH CARD ISSUER'S AGREEMENT
(WHICH MAY VARY BY STATE) RETURN THIS COPY FOR STATEMENT VERIFICATION

MERCHANT COPY

AMOUNT \$3,608.50

MISC.	EXCISE TAX	MERCHANDISE	LABOR	TAXABLE TOTAL	NON-TAX TOTAL
\$0.00	\$293.90	\$3,283.50	\$325.00	\$0.00	\$3,608.50

NOTICE - PER VEHICLE SPECS, RETIGHTEN LUG NUTS AFTER 50 - 100 MILES.

REMIT TO SERVICE TIRE TRUCK CENTERS
2255 AVENUE A
BETHLEHEM, PA 18017-2165 PA 0%

SUB-TOTAL:	\$3,608.50
SALES TAX:	\$0.00
MCPaid:	\$3,608.50

SIGNATURE PRINT NAME

INVOICE TOTAL \$0.00

IF FINANCE CHARGE ADDED TO ALL BALANCES 30 DAYS PAST DUE IS COMPUTED BY PERIODIC RATE NOT TO EXCEED THE HIGHEST RATE ALLOWED BY LAW. PLEASE SEE YOUR MONTHLY STATEMENT FOR THE CURRENT RATE.
FORM # 60-4-00 (07/10) Page 10 of 14

STTC COPY

ALL RETURNED GOODS MUST BE ACCOMPANIED BY INVOICES AND ARE SUBJECT TO HANDLING CHARGE. WE ASSUME NO RESPONSIBILITY FOR LOSS OF MERCHANDISE AFTER 30



SERVICE TIRE TRUCK CENTERS, INC.

MICHELIN RETREADING

WWW.STTC.COM

STTC LOCATION APP

24 HOUR ROAD SERVICE

Visit any of our locations in: PA, NJ, NY, MD, DE, VA, MA, CT
 Nationwide Service with STTC Road Assist 800-684-8473

Corporate Office:
 FED EIN # 23-1689591

2255 Avenue A
 Bethlehem, PA 18017

610-954-8473
 Fax: 610-954-5985

INVOICE DATE	CUST. NO.	PAGE	INVOICE NUMBER
12/2/2020	301099		829846-02

HARRISBURG, PA
 4000 FENTON AVENUE
 HARRISBURG, PA 17109
 Phone: 717-561-8473

S O L
GSA-FLEET MANAGEMENT
 VENDOR #V19420160
 819 TAYLOR STREET ROOM 6A00
 FORT WORTH, TX 76102
 Phone: 866-400-0411 Fax:

S H I P T O
GSA-FLEET MANAGEMENT
 VENDOR #V19420160
 819 TAYLOR STREET ROOM 6A00
 FORT WORTH, TX 76102
 Phone: 866-400-0411

Page 1 of 1

PAID MC
 JOB

CUSTOMER P.O.	ORDERED BY	WORK ORDER #	TECH I.D.	SALES I.D.	INVOICE
C0545052			T0200	195	
VEHICLE/FLEET NO.	LICENSE	MILEAGE	SHIP VIA	TERMS	
BLUE FRTL /	G82 0252U PA	60122	1068 SALES	Net 10th	

ITEM NO.	DESCRIPTION	QTY.	UNIT PRICE	EXCISE TAX	NET EXTENSIC
90000029726	M29575R225 ROADMASTER 234 H RIB23	2	\$315.41	\$34.59	\$700.00 N
DIMDM	DISMOUNT/MOUNT ON/OFF WHEEL & VEHICLE	10	\$19.50		\$195.00 N
MV	VALVE STEM STEEL MEDIUM TRUCK	10	\$3.95		\$39.50 N
MS	SCRAP TIRE DISPOSAL MEDIUM TRUCK TIRE	10	\$13.00		\$130.00 N
90000007271	M29575R225 ROADMASTER 254 G LUG26	8	\$292.77	\$25.23	\$2,544.00 N

THANK YOU FOR YOUR BUSINESS!

STTC #02 HARRISBURG
 4000 FENTON AVE.
 HARRISBURG, PA 17109

SALE

MD: 2360 Store: 4616 Terr: 2201
 REF#: 00000005
 Batch #: 017 RRN: 033720402401 \$233.32
 Invoice #: 029946
 Trans ID: 1202MCF0TMZX
 APPR CODE: 079649
 MASTERCARD Manual CAP
 *****2994

AMOUNT \$3,608.50

APPROVED

I AGREE TO PAY ABOVE TOTAL AMOUNT
 IN ACCORDANCE WITH CARD ISSUER'S
 AGREEMENT
 (MERCHANT AGREEMENT BY CREDIT HOLDER)
 RETAIN THIS COPY FOR STATEMENT
 VERIFICATION

MERCHANT COPY

MISC.	EXCISE TAX	MERCHANDISE	LABOR	TAXABLE TOTAL	NON-TAX TOTAL
\$0.00	\$271.02	\$3,283.50	\$325.00	\$0.00	\$3,608.50

NOTICE - PER VEHICLE SPECS, RETIGHTEN
 LUG NUTS AFTER 50 - 100 MILES.

REMIT TO SERVICE TIRE TRUCK CENTERS
 2255 AVENUE A
 BETHLEHEM, PA 18017-2165 MD 0%

SUB-TOTAL: \$3,608.50

SALES TAX: \$0.00

VIPaid: \$3,608.50

INVOICE TOTAL \$0.00

SIGNATURE

PRINT NAME

THE FINANCE CHARGE ADDED TO ALL BALANCES 30 DAYS PAST DUE IS COMPUTED BY PERIODIC RATE NOT TO EXCEED THE HIGHEST RATE ALLOWED BY LAW. PLEASE SEE OUR MONTHLY STATEMENT FOR THE CURRENT RATE.
 FORM # 60-4-50 (07/16)

STTC COPY

ALL RETURNED GOODS MUST BE ACCOMPANIED BY INVOICES AND ARE SUBJECT TO A HANDLING CHARGE. WE ASSUME NO RESPONSIBILITY FOR LOSS OF MERCHANDISE AFTER 30