



# FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1100

Date Filmed 4/22/81 Camera No. --- 2

Cameraman BPC

FEDERAL ELECTION COMMISSION

Materials in connection  
with Connelley removed  
pursuant to 2250 & 437g (a)(4)(B)

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

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| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
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Signed Augustine M. Lallier

date 3/23/81

FEC 9-21-77

☒ **SENDER** Complete items 1, 2, and 3.  
 Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).  
☐ Show to whom and date delivered.....  
☐ Show to whom, date and address of delivery.....  
☐ **RESTRICTED DELIVERY**  
 Show to whom and date delivered.....  
☐ **RESPECTED DELIVERY**  
 Show to whom, date, and address of delivery. \$.....  
 (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESS AD TO.**  
 1150 Ct Ave  
 Waco TX 76786

3. **ARTICLE DESCRIPTION:**  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 999514

Always obtain signature of addressee or agent.  
 I have received the article described above.  
 SIGNATURE ☐ Addressee ☒ Authorized agent  
 [Signature]

4. **DATE OF DELIVERY** **POSTMARK**

5. **ADDRESS (Complete only if requested)**  
 [Stamp: RETURN TO SENDER]

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RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ UPO : 1979-000-000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 23, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert P. Visser  
Peabody, Rivlin, Lambert & Meyers  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

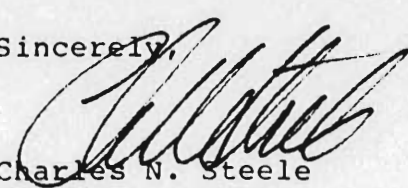
This is in response to your letter of October 29, 1980, in which you requested the Commission to dismiss the above-captioned matter.

Under the circumstances, the Commission determined on March 17, 1981, to take no further action against the Courter Committee. Accordingly, the Commission has closed its file in this matter.

The file in this matter will be made public within thirty days after the Commission takes final action with respect to all respondents. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Should you have any questions, please contact Suzanne Callahan at 523-4057.

Sincerely,

  
Charles N. Steele  
General Counsel





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert P. Visser  
Peabody, Rivlin, Lambert & Meyers  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR 1100

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This is in response to your letter of October 29, 1980, in which you requested the Commission to dismiss the above-captioned matter.

Under the circumstances, the Commission determined on March , 1981, to take no further action against the Courter Committee. Accordingly, the Commission has closed its file in this matter.

The file in this matter will be made public within thirty days after the Commission takes final action with respect to all respondents. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Should you have any questions, please contact Suzanne Callahan at 523-4057.

Sincerely,

Charles N. Steele  
General Counsel

*smc*  
*3/20*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Courter for Congress Committee )

MUR 1100

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 17, 1981, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1100:

1. Take no further action against the Courter for Congress Committee.
2. Approve and send the letter attached to the General Counsel's March 6, 1981 report.
3. CLOSE THE FILE.

Commissioners Aikens, McGarry, Thomson, and Tiernan voted affirmatively for the decision; Commissioners Harris and Reiche dissented.

Attest:

3/20/81

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 27, 1981

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth  
Sterns, Herbert & Weinroth  
186 West State Street  
Post Office Box 1298  
Trenton, New Jersey 08607

Re: MUR 1100

Dear Mr. Weinroth:

On February 25, 1981, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file, as it pertains to your client, has been closed in this matter, and it will become a part of the public record within thirty days after the entire file is closed. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure:

Conciliation Agreement

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

*CHILLAHAN 1100*

● **SENDER:** Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)  
☐ Show to whom and date delivered.....  
☐ Show to whom, date and address of delivery.....  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.....  
☐ RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.\$\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**  
*Werner K  
 186 W 4th St.  
 Tucson AZ 85707*

3. **ARTICLE DESCRIPTION:**  

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>56867</i>	

 (Always obtain signature of addressee or agent)  
 I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent  
*M. Santora*

4. **DATE OF DELIVERY**  
 \_\_\_\_\_

5. **ADDRESS (Complete only if requested)**  
 \_\_\_\_\_

6. **UNABLE TO DELIVER BECAUSE:**  
 \_\_\_\_\_

**CLERK'S INITIALS**  
 \_\_\_\_\_



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth  
Sterns, Herbert & Weinroth  
186 West State Street  
Post Office Box 1298  
Trenton, New Jersey 08607

Re: MUR 1100

Dear Mr. Weinroth:

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

*Done*  
*2/26/81*

Enclosure:

Conciliation Agreement

911911  
BEFORE THE FEDERAL ELECTION COMMISSION

600#3773  
JAN 21 11:22

In the Matter of )  
New Jersey GOP Congressional ) MUR 1100  
Victory Fund )

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (Hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that the New Jersey GOP Congressional Victory Fund ("Respondent") violated 2 U.S.C. § 441a.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent registered with the Commission as a political committee on March 5, 1979.

2. On November 3, 1978, Respondent loaned the Courter for Congress Committee \$3,000.

52:2d 12 NOV 1

3. A loan is a contribution to the extent the loan remains outstanding pursuant to the definition of a contribution set forth in 2 U.S.C. § 431(e).

4. At the time the loan was made, Respondent was limited to making contributions of \$1,000 pursuant to 2 U.S.C. § 441a(a)(1)(A).

WHEREFORE, Respondent agrees:

V. Respondent's loan of \$3,000 on November 3, 1978, to the Courter for Congress Committee constitutes a violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.


GENERAL CONDITIONS

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.


IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

27 February 1981  
Date

  
Charles N. Steele  
General Counsel  
Federal Election Commission

JAN 16 1981  
Date

  
New Jersey GOP Congressional  
Victory Fund  
By its Counsel

BY: \_\_\_\_\_

ITS: \_\_\_\_\_



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1100
New Jersey GOP Congressional	)	
Victory Fund	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 25, 1981, the Commission accepted by a vote of 4-0 the conciliation agreement, as submitted with the General Counsel's February 20, 1981 memorandum, which has been signed by Richard K. Weinroth, counsel for the New Jersey GOP Congressional Victory Fund.

Commissioners McGarry, Reiche, Thomson, and Tiernan voted affirmatively in this matter.

Attest:

2/25/81

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of the Commission Secretary:	2-20-81, 3:08
Circulated on 48 hour vote basis:	2-23-81, 11:00

February 20, 1981

MEMORANDUM TO: Marjorie M. Emmons

FROM: Elissa T. Garr

F

SUBJECT: MUR 1100

Please have the attached Memo distributed to the  
Commission on a 48 hour daily basis. Thank you.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

81 FEB 20 P 3: 08

February 20, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: MUR 1100 Conciliation Agreement

Attached is a conciliation agreement which has been signed by Richard K. Weinroth, counsel for the New Jersey GOP Congressional Victory Fund. The attached agreement includes all the provisions which the Commission determined should be included, and a check for the civil penalty imposed by the Commission has been received.

The Office of General Counsel recommends the acceptance of this agreement.

Attachments:

Conciliation Agreement  
Photocopy of civil penalty check  
Notification letter  
( 6 total pages )

BEFORE THE FEDERAL ELECTION COMMISSION

GCC# 3772  
31 JAN 21 11:22

In the Matter of )  
New Jersey GOP Congressional )  
Victory Fund )

MUR 1100

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (Hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after probable cause to believe having been found that the New Jersey GOP Congressional Victory Fund ("Respondent") violated 2 U.S.C. § 441a.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  1. Respondent registered with the Commission as a political committee on March 5, 1979.
  2. On November 3, 1978, Respondent loaned the Courter for Congress Committee \$3,000.

31 JAN 21 12:22

RECEIVED  
JAN 21 1979  
FEDERAL ELECTION COMMISSION

3. A loan is a contribution to the extent the loan remains outstanding pursuant to the definition of a contribution set forth in 2 U.S.C. § 431(e).

4. At the time the loan was made, Respondent was limited to making contributions of \$1,000 pursuant to 2 U.S.C. § 441a(a)(1)(A).

WHEREFORE, Respondent agrees:

V. Respondent's loan of \$3,000 on November 3, 1978, to the Courter for Congress Committee constitutes a violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

#### GENERAL CONDITIONS

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IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.


2

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

\_\_\_\_\_  
Date


JAN 16 1981  
Date

\_\_\_\_\_  
Charles N. Steele  
General Counsel  
Federal Election Commission

  
\_\_\_\_\_  
New Jersey GOP Congressional  
Victory Fund  
By its Counsel

BY: \_\_\_\_\_

ITS: \_\_\_\_\_



912037

6/10/12

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P.O. BOX 1298

TRENTON, NEW JERSEY 08607

(609) 392-2100

Callahan

10 NASSAU STREET  
PRINCETON, N.J. 08540  
(609) 924-2108

SUITE 600  
1150 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036  
(202) 296-3432

JOEL H. STERNS  
RICHARD K. WEINROTH  
MICHAEL J. HERBERT  
FRANK J. PETRINO  
WILLIAM J. BIGHAM  
W. S. GERALD SKEY  
JOHN H. DUMONT  
JOHN M. DONNELLY  
ANN MARIE VAURIO  
MARK D. SCHORR  
SIMON KIMMELMAN  
R. KEVIN MCGORRY  
NIELSEN V. LEWIS

February 17, 1981

OF COUNSEL  
RICHARD J. HUGHES

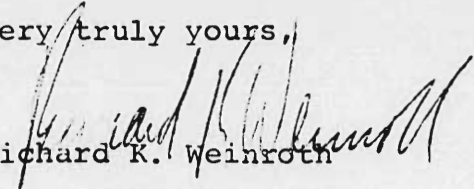
Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1100

Dear Ms. Callahan:

Pursuant to our discussion, enclosed please find a check drawn on the Republican Party of New Jersey made payable to the Treasurer of the United States in the amount of \$250.00.

Very truly yours,

  
Richard K. Weinroth

RKW/cm

enclosure

cc: H. David Earling

1 FEB 19 1981 P 1:32

RECEIVED  
FEB 19 1981  
FEDERAL ELECTION COMMISSION

4



2/13 11:51 AM 2/13 11:51 AM

Received of the United States

14-00000-31003 79860024201

5





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Richard K. Weinroth  
Sterns, Herbert & Weinroth  
186 West State Street  
Post Office Box 1298  
Trenton, New Jersey 08607

Re: MUR 1100

Dear Mr. Weinroth:

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure:

Conciliation Agreement

A large, stylized handwritten signature is located in the bottom right corner of the page.

BEFORE THE FEDERAL ELECTION COMMISSION  
August 8, 1980

In the Matter of )  
 )  
New Jersey GOP Congressional ) MUR 1100  
Victory Fund )  
Courter for Congress Committee )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978 in violation of the limitations set forth in § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

The GOP Committee did not respond to the reason to believe notification. On March 19, 1980, the GOP Committee was sent the General Counsel's Brief recommending that the Commission find probable cause to believe the GOP Committee violated § 441a; a responsive brief was filed on March 26, 1980.

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter of February 28, 1980 to David Norcross, the Republican State Chairman of New Jersey refunding \$2,000, the excessive portion of the loan. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making this amount a direct contribution to the Courter Committee.

The General Counsel's brief recommending probable cause to believe the Courter Committee violated § 441a(f) was mailed on May 12, 1980. Robert Visser, counsel for the respondent, submitted a letter requesting conciliation prior to a finding of probable cause to believe on June 13, 1980. However, after reviewing the facts of this matter and after a conciliation meeting with OGC staff on June 20th, counsel chose to file a responsive brief which he did on July 29, 1980.

## II. LEGAL ANALYSIS

(See OGC Briefs of March 19, 1980 and May 12, 1980)

The GOP Committee filed a responsive brief on March 26, 1980, stating that at the time the \$3,000 contribution was made, the GOP Committee considered itself a subordinate committee of the N.J. Republican State Committee entitled to make a \$5,000 contribution to the Courter Committee and that the contribution was a § 441a(d) expenditure.

A review of Commission records and B Index indicates that the N.J. Republican State Committee is not currently registered with the Commission nor was it registered at the time the GOP Committee made the excessive contribution to the Courter Committee; therefore, absent affiliation with a duly registered committee, the requirements set forth in § 441a for multicandidate status had not been met at the time the excessive contribution was made.

Additionally, the contribution at issue cannot be considered a § 441a(d) expenditure since the GOP Committee loaned the funds directly to the candidate rather than making expenditures on behalf of the candidate.

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.7(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a(a)(1)(A) at the time the loan was made.

The Courter Committee, through counsel, filed its responsive brief on July 29, 1980. Its counsel maintains that the Courter Committee accepted the \$3,000 loan from the GOP Committee after 1) being advised by a responsible official of the State and GOP Committee and, thus, believing that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee which itself was a qualified multicandidate party committee; 2) being advised and, thus, believing that the GOP Committee could make a loan, transfer and/or contribution to it of up to \$5,000 and 3) being advised and, thus, believing that the GOP Committee had been properly registered as a qualified multicandidate political committee with the Commission. Counsel recites that the Courter Committee, within one week after being advised that there was a question about the \$3,000 loan returned a check for \$2,000 to the GOP Committee.

Counsel maintains that the Commission's assertion as set forth in the General Counsel's brief, that it is the recipient committee's responsibility to verify the multicandidate status of donors prior to the acceptance of contributions exceeding \$1,000 "... [has] no basis in law, fact or precedent ... regarding the actions, responsibilities and duties of the Courter Committee." Counsel further contends that the statutory language and case law regarding 2 U.S.C. § 441a(f) requires that a recipient must knowingly accept

an excessive contribution and, in this case, the Courter Committee did not possess the "requisite knowledge or scienter to have violated the Act. Nor did the Courter Committee have any legal obligation or responsibility to investigate the status of the donor committee." While it is clear that the "knowingly" requirement does not make ignorance of the law a defense, it requires that the Commission prove at least constructive knowledge of the facts that made the contribution excessive. Here, the only facts that were needed to show that the \$5,000 multicandidate limit was inapplicable to the GOP Committee's contribution was 1) that the GOP Committee was not registered, and 2) the State Committee (which could be considered as an affiliate of the GOP Committee) was not registered. These facts could readily have been ascertained from public records available at the Commission and the Courter Committee had at least constructive knowledge of these negative facts.


The Courter Committee contends that the Commission cannot impose liability on the theory of constructive knowledge without a prescribed rule in accordance with the Administrative Procedure's Act. We respectfully disagree. The Commission has the responsibility of construing the provisions of the FECA in the course of a compliance proceeding. It has properly acted in imposing liability in the present case because there is a sufficient statutory basis for concluding that if a respondent has knowledge of the fact that he has accepted a contribution, he has knowingly accepted it pursuant to 2 U.S.C. § 441a(f).

### III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

#### IV. RECOMMENDATIONS

1. Find probable cause to believe that the NJ GOP Congressional Victory Fund has violated 2 U.S.C. § 441a.
2. Find probable cause to believe that the Courter for Congress Committee has violated 2 U.S.C. § 441a(f).
3. Approve the attached conciliation agreement for the NJ GOP Congressional Victory Fund.
4. Approve the attached conciliation agreement for the Courter for Congress Committee.
5. Send attached notification letters.

14 August 1980  
Date

  
Charles N. Steele  
General Counsel

#### Attachments

1. Proposed Conciliation Agreements (2)
2. Letters to Respondents (2)
3. Briefs of OGC (2)
4. Briefs of Respondents (2)

BEFORE THE FEDERAL ELECTION COMMISSION  
March 31, 1980

In the Matter of	)	
	)	MUR 1100
New Jersey GOP Congressional	)	
Victory Fund	)	
Courter for Congress Committee	)	

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).



Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan to David Norcross, the Republican State Chairman of New Jersey. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

## II. Legal Analysis

As set forth in 2 U.S.C. §441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. §441a (a)(1)(A) at the time the loan was made.

It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee's status under §441a.

Therefore, the Courter for Congress Committee violated 2 U.S.C. §441a at the time it accepted the subject loan even though it refunded the excessive portion as soon as it discovered the GOP Committee was not a multicandidate committee.

III. General Counsel's Recommendation

Find probable cause to believe that the Courter for Congress Committee violated 2 U.S.C. §441a(f).

Date

12 May 1980

  
Charles N. Steele  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION  
March 10, 1980

In the Matter of	)	
	)	
New Jersey GOP Congressional	)	MUR 1100
Victory Fund	)	
Courter for Congress Committee	)	

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan, to David Norcross, the Republican State Chairman of New Jersey. (Attachment I). The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

## II. Legal Analysis

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000, per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

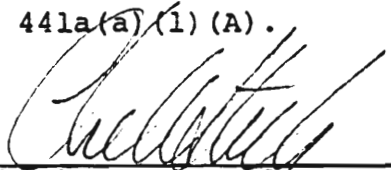
Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a (a)(1)(A) at the time the loan was made.

The GOP Committee did not provide additional information in response to the Commission's reason to believe notification. Therefore, absent evidence which refutes the Commission's earlier determination, the Office of General Counsel recommends the Commission find probable cause to believe the GOP Committee has violated 2 U.S.C. § 441a(a)(1)(A).

### III. General Counsel's Recommendation

Find probable cause to believe the New Jersey GOP Congressional Victory Fund has violated 2 U.S.C. § 441a(a)(1)(A).

17 March 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

RICHARD K. WEINROTH  
MICHAEL J. HERBERT  
FRANK J. PETRINO  
WILLIAM J. BIGHAM  
W. S. GERALD SKEY  
JOHN H. DUMONT  
JOHN M. DONNELLY  
ANN MARIE VAIRIO  
MARK D. SCHORR  
SIMON KIMMELMAN  
R. KEVIN MCGHORY

OF COUNSEL  
RICHARD J. HUGHES

TRENTON, NEW JERSEY 08607

609 392-2100

(609) 924-2108

SUITE 600  
1150 SEVENTEENTH STREET N.W.  
WASHINGTON, D.C. 20036  
(202) 296 3432

March 26, 1980

ATTACHMENT 4 (17 pgs)

Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

Re: MUR 1100

Dear Ms. Callahan:

As counsel to the New Jersey Republican State Committee, I have been asked to review your correspondence and brief of March 19, 1980 relative to the New Jersey GOP Congressional Victory Fund ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"). At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman

10 MAR 31 12:52

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GENERAL COUNSEL

007217

ATTACHMENT

None

STERN, HERBERT A. WEINROTH  
Ms. Suzanne Callahan

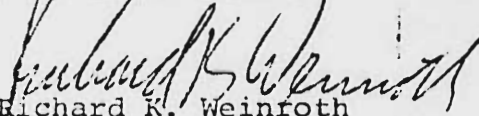
-2-

March 26, 1980

Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979.

Should there be a finding that a technical violation of 2 U.S.C. Article a (a) (1) be found to have occurred, it is respectfully submitted that said violation was inadvertent and that with the return of the aforementioned \$2,000.00 has been made moot. I will await your response with respect to this matter.

Very truly yours,

  
Richard K. Weinroth

RKW/cc

Enclosure

cc: Honorable James Courter  
Mr. David Norcross  
Mr. David Earling

RETURN RECEIPT REQUESTED

*Callahan*

LAW OFFICES

2047 409293

ABODY, RIVLIN, LAMBERT & MOERS

RECEIVED

WASHINGTON, D. C. 20036

TWELFTH FLOOR  
CONNECTICUT BUILDING  
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000  
CABLE ADDRESS "EXCELSIOR"  
TELEX 887413

July 28, 1980

NATHALIE P. GILFOYLE  
LAWRENCE WHITE  
SANDRA M. KAYDEN  
JEANNE A. CARPENTER  
JOHN MARK JANSEN  
SUSAN M. LISS  
NANCY MARIE STILES  
MICHAEL W. SEASLEY  
ROBERT J. MILLER  
GLENN R. REICHARDT  
JOEL S. WINNIK  
WILLIAM O. COSTON  
RALPH A. SIMMONS  
JEFFREY N. MARTIN  
ROBERT A. HAZEL

OF COUNSEL  
TIMOTHY L. HARKER

WRITER'S DIRECT DIAL NUMBER  
(202) 457-1019

ENDICOTT PEABODY  
LEWIS A. RIVLIN  
JEREMIAH O. LAMBERT  
TEOSON J. MEYERS  
CHARLES T. GUNCAN  
JORGE L. CORDOVA, JR.  
DAVID J. TAYLOR  
MICHAEL W. FASER  
TIMOTHY J. WATERS  
JOHN T. SCHELL  
PETER B. ARCHIE  
CHARLES R. WORK  
JOHN A. HODGES  
ROBERT M. MORSE  
ROBERT A. WARREN  
ROBERT N. JENSEN  
COLLISTER JOHNSON, JR.  
JOHN LOCKIE  
ROBERT P. VISSER

BY HAND DELIVERY

Ms. Marjorie W. Emmons  
Secretary  
Federal Election Commission  
1325 K Street NW  
Washington DC 20463

Re: MUR-1100

Dear Ms. Emmons,

This brief is being submitted on behalf of the Courter for Congress Committee ("Courter Committee") in response to the brief of the General Counsel of the Federal Election Commission ("Commission"), dated May 12, 1980, recommending that the Commission find probable cause to believe that the Courter Committee violated Section 441a(f), Title 2, United States Code, with regard to the above-referenced Matter Under Review.

I. SUMMARY OF FACTS

A thorough review of the chronological and factual background is essential to a complete understanding and analysis of this matter. In fact, the following review of the facts and circumstances of this case mandate that the General Counsel's recommendation be rejected as without any foundation in law or fact and that this proceeding be dismissed in its entirety forthwith.

On November 3, 1978, the Courter Committee received a three thousand Dollar (\$3,000) loan from the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee"). At the time of the loan, the Courter Committee was advised by a responsible official of the State and GOP Committees and believed that



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the GOP Committee was a subordinate committee of the New Jersey Republican State Committee ("State Committee") which was a qualified multicandidate party committee. At the time the Courter Committee was similarly advised and believed that the GOP Committee could make a loan, transfer and/or contribution to it of up to five thousand Dollars (\$5,000). Moreover, the Courter Committee was also advised and believed that the GOP Committee had been properly registered as a qualified multicandidate political committee with the Commission.

On February 21, 1979, the GOP Committee was apparently contacted by the Reports and Analysis Division of the Commission and advised that the Commission believed that the GOP Committee's three thousand Dollar (\$3,000) loan "may" violate 2 U.S.C. §441a(a)(1)(A). Mr. Walter Peters, then Executive Director of the State Committee, immediately advised the Courter Committee of the Commission's allegations and again advised the Courter Committee at that time that (a) the State Committee believed that it had acted properly, (b) the GOP Committee was a properly organized and qualified subordinate committee of the State Committee, and (c) that it would defend its actions before the Commission.

Within one week, on February 28, 1979, Congressman Courter wrote a letter to David Norcross, Chairman of the State Committee, noting that there "seems to be some question concerning the loan that the [GOP Committee] made to my campaign" and returned a check from the Courter Committee in the amount of two thousand Dollars (\$2,000) to the GOP Committee.

On February 22, 1980, over fifteen (15) months after the initial loan transaction, the Commission notified the Courter Committee for the first time of its "Reason to Believe Finding" that the Courter Committee's acceptance of the loan "appears" to violate 2 U.S.C. §441(a)(f). It should be noted that this notification was sent by the Commission fully one year after it had initiated compliance proceedings against the GOP Committee.

Again, within one week of the Commission's notification, on February 29, 1980, Congressman Courter personally wrote to Commissioner Tiernan reviewing the facts of the loan and stating that the Courter Committee did not "knowingly" accept this contribution in violation of the law. The Congressman stated that, in fact, the Committee assumed that "the [GOP Committee] was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to five thousand Dollars (\$5,000) per candidate in the general election of 1978". Apparently assuming that the Commission must have

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some basis for its allegation, he continued that, as this "[o]bviously was not the case", his Committee would not have accepted any such loan if it had known that the GOP Committee was not properly registered with the Federal Election Commission.

In fact, the facts establish that Congressman Courter and his campaign committee had done more than just "assume" such proper qualification and registration of the GOP Committee. As set forth above, the Courter Committee received the affirmative representation of an appropriate officer of the State Committee that this loan was appropriate and had been "approved by the [Commission].

Moreover, it is my understanding that the "GOP Committee" has denied the Commission's allegations that said committee did not attain multicandidate committee status pursuant to §441a(a)(4) during the time it was registered. To the contrary, as late as March 26, 1980, counsel for the GOP Committee defended that Committee's actions and stated that the GOP Committee had properly registered with the Commission and, moreover, that the GOP Committee was a subordinate committee of the State Committee and entitled to make a loan of up to five thousand Dollars (\$5,000) at that time.

In particular, on March 26, 1980, Richard K. Weinroth, as Counsel to the State Committee, responded to the March 19, 1980, Brief of the Commission with regard to the GOP Committee and the Courter Committee. Mr. Weinroth stated that:

At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979. (Emphasis supplied.)

On May 12, 1980, despite the clear and convincing evidence that the Courter Committee had acted properly and acted upon the representations and advice of the State and GOP Committees, the Commission advised Ray Mark, Treasurer of the Courter Committee, that "after considering all of the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violation had occurred." Enclosed with that letter was a copy of the General Counsel's Brief, dated May 12, 1980, which summarized certain of the facts regarding this matter and concluded that:

(a) the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status and was therefore limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000; and,

(b) [i]t is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of the contributions exceeding \$1,000," and, accordingly, "the Courter Committee should have contacted the FEC to ascertain the GOP's Committee status under §441(a).

Simply stated, there is absolutely no basis in law, fact or precedent to support this incredulous conclusion regarding the actions, responsibilities and duties of the Courter Committee. It is clear from reading the statutory language and the applicable case law regarding the "knowingly accept" provision, that the Committee did not possess the requisite knowledge

or scienter to have violated the Act. Nor did the Courter Committee have any legal obligation or responsibility to investigate the status of the donor committee.

In addition, the imposition of a new rule of strict liability by the Commission regarding such "constructive knowledge" or duties of investigation, without the necessary steps contained within the Commission's own enabling statute concerning the promulgation of rules, goes beyond the scope of its authority. Such action also violates applicable provisions of the Administrative Procedure Act regarding rulemaking procedures, as well as fundamental constitutional guarantees of due process of law.

The Courter Committee has demonstrated complete good faith in this matter. In the face of the unconscionable delay on the part of the Commission in this proceeding and the fact that the issue is moot, this matter should be dismissed at once. Any other result would work grave injustice and constitute unconstitutional behavior by the Commission.

## II. ARGUMENT

### A. The Courter Committee Did Not Knowingly Accept Any Contribution In Violation of the Act.

Section 441(a)(f) of the Federal Election Campaign Act of 1971, as amended, 1/ provides:

No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section. (Emphasis supplied.)

The very plain and unambiguous language of this Act reflects Congress's concern with the requirement of knowledge as a key and fundamental element in any violation thereof. Clearly

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1/ 2 U.S.C. §441a(f).

the legislative intent was to limit liability to those individuals or groups that accept monies with the full knowledge and understanding that they are in violation of the provisions of the Act. This is not only the common meaning interpretation of the Act's statutory language, it is also the only reasonable interpretation which furthers the legitimate legislative and public interests of the Act.

This interpretation is further supported by the legislative history of the Act. The qualification of knowing acceptance did not appear in the original Senate bill, but was added by amendment on the Senate floor. 2/ This demonstrates the importance attached to the knowledge requirement and is further supported by colloquy during the Senate floor debates. Senator Scott expressed concern about the possibility of criminal penalties without the requirement of knowledge in stating:

So, Mr. President, you can go to jail without meaning to do so, or you can go to jail without violating the law, or you can go to jail because somebody takes part of your contribution and applies it in a way you did not know about or did not intend. 3/ (Emphasis supplied.)

Senators Prouty, Griffin, Baker, Cook and Stevens expressed similar concerns:

In view of this we would urge the Committee on Rules and Administration to carefully examine such provisions so as to insure that contributors are clearly on notice concerning the law. This is essential in order to avoid placing individuals in jeopardy or inadvertently in violation of the law without this knowledge. 4/ (Emphasis supplied.)

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2/ See, S.Rep. No. 96, 92d Cong., 1st Sess. (1971); and Amendment introduced by Mr. Mathias on August 4, 1971, 117 Cong. Rec. 29296 (1971).

3/ 117 Cong. Rec. 29296 (1971).

4/ S.Rep. No. 96, 92d Cong., 1st Sess. (1971) at 88.



The applicable case law confirms and amplifies this interpretation. In In Re Federal Election Campaign Act Litigation, 474 F.Supp. 1044 (D.D.C. 1979) the D.C. District Court spoke to the issue of knowing acceptance. The complaint was brought by a citizen alleging violations by numerous candidates of Section 441(a)(f) of the Act. In dismissing the complaint, the court held that it failed to allege all of the elements necessary to constitute a violation. It found that "as part of this violation, the candidates must have been aware of the illegal nature of the contributions." 5/ The court went on to note:

[The Plaintiff] has not stated that any of the candidates or their committees knowingly accepted donations from separate political action committees which were subject to the same control. Moreover, he has not presented the slightest evidence that the accused parties possessed knowledge of the illicit control. His silence on this critical point is, by itself, sufficient reason not to investigate the allegation. 6/ (Emphasis supplied.)

The language demonstrates that the court interpreted "knowing acceptance" to mean that the candidate must not only know of the acceptance of the monies, but also of its illegal nature. Only this complete knowledge can qualify as a knowing acceptance.

Moreover, in a recent decision by the District of Columbia Court of Appeals in AFL-CIO v. Federal Election Commission 7/, decided April 1, 1980, the Court held that (a) there must be found that there was "clear and convincing" evidence that a violation of the Act was "knowing and willful" as well as (b) a finding that the respondent's belief in the legitimacy of its actions were "unreasonable", in order for a civil penalty to be imposed under the Act. In that case, the court also concluded that the actions of respondent were properly characterized as the "correction of a mistake" and did not constitute knowing and willful violations of the Act.

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5/ 474 F.Supp. 1044, 1047, n. 3.

6/ 474 F.Supp. 1044, 1047.

7/ 48 U.S. Law Week 2684 (4/22/80).

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Similarly, in the instant case, the clear and convincing evidence is that the Courter Committee not only did not know that the Commission belatedly believed that the GOP Committee was not a qualified multicandidate committee, but that it believed and relied upon the affirmative representations from both the State and GOP Committees that they were so qualified. In fact, it has not yet been established that they were not so qualified and counsel for the State and GOP Committees currently maintain that they were and are so qualified.

Second, it is perfectly clear that the Courter Committee relied and acted upon such representations and belief in a reasonable manner. When a qualified representative of a State party committee advises a candidate that it, along with its properly qualified subordinate committee, can make a contribution of the nature and amount which the GOP Committee did make, it is unreasonable to ask or require a candidate committee to launch an investigation into the accuracy of such representations.

Finally, the Courter Committee has acted in total good faith by both returning the alleged excessive contribution as soon as it was advised there may be a question as to the status of the donor committee and by openly and candidly responding to the belated Commission inquiry. Such activity reflects the Courter Committee's intention to correct any mistake that may inadvertently have been made by the State and GOP Committees. No mistake of any kind, inadvertent or otherwise, has been made by the Courter Committee requiring any corrective action on its part.

Clearly the Courter Committee did not violate this section of the Act. Not only was the Committee of the reasonable belief that the contributing organization was authorized to loan \$3,000, but it was further assured of this fact by the Executive Director of the State Committee. Since the Courter Committee's actions are not proscribed by the Act, this action must be dismissed.

B. The Commission's Actions Are Arbitrary,  
Capricious, and Have No Foundation in  
Either Law or Fact.

1. The Commission's Imposition of a  
Standard of Strict Liability is  
Without Precedent or Basis in Law.

A review of the formal determinations of the Commission in this proceeding are quite startling.

In the Notification of Reason to Believe Findings, dated February 5, 1980, the Commission noted that the "Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee." Without setting forth any factual basis for its bald conclusion, the Commission concluded that it "appears" the GOP Committee's \$3,000 loan "may" violate the Act and "the Courter Committee's acceptance of the loan appears to violate" the Act. (Emphasis supplied.) Three months later, the Brief of the General Counsel recommending a finding of probable cause to believe that the Courter Committee violated the Act, for the first time, sets forth the unsubstantiated and unsustainable basis on which the Commission is attempting to prosecute this matter.

After asserting, again without any factual basis or substantiation whatsoever, that the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, the Commission concludes that the Courter Committee violated 2 U.S.C. §441(a) at the time it accepted the subject loan even though it refunded the excessive portion as soon as it was advised the GOP may not be a multicandidate committee. The rickety bridge on which the Commission seeks to support its conclusion is set forth in the last page of the Brief of the General Counsel wherein it sets forth the following original doctrine of strict liability:

It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee status under §441(a).



This simple statement is startling to anyone who has practiced before the Commission and to any attorney or other person familiar with the Act as it has evolved since 1971. There is no provision in the Act, no regulation and simply no precedent before any court of law or before the Commission itself, wherein such a doctrine of strict liability on the part of any candidate or candidate committee has ever before been publicly espoused, promulgated, or adopted. The Commission apparently is attempting through administrative compliance procedures to create a doctrine of "constructive knowledge" resulting in strict liability for any candidate who does not fully investigate the source of a contribution to determine whether or not it is being made in violation of the Act or regulations promulgated thereunder. There is simply no such law, requirement or obligation on the part of any candidate or candidate committee extant in the law today.

Such a proposition flies in the face of the Act itself which requires a knowing acceptance of such an illegal contribution. Such a proposition flies in the face of the Administrative Procedure Act and the Commission's rulemaking requirements. Such a proposition flies in the face of the United States Constitution in that it seeks to impose civil and criminal penalties and to deprive a candidate and/or his committee of valuable rights and property without due process of law. Such a proposition, as a practical matter, is unenforceable, untenable, and preposterous on its face and, in all probability, would certainly not be accepted by the United States Congress if proposed in the requisite and appropriate procedure. Such a proposition does fundamental violence to the good will and voluntary compliance necessary by those subject to the Act in order to make the Act work effectively within today's political process.

As an attorney who has practiced before the Commission for a number of years, I know of no proposal, requirement, or rule of law that would suggest that candidates and their committees must be advised to make absolutely certain that donors are properly qualified to give contributions in the amount and nature that are sought to be made. That is not to say, arguendo, that if facts are brought to the attention of a candidate or his committee which would lead a reasonable person to believe that such a contribution may be illegal or in violation of the Act, either intentionally or inadvertently, one may not have some responsibility to make an appropriate inquiry under all of the facts and circumstances. Such a case may occur if a candidate were to receive a contribution written on a corporate account

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without any indication as to whether or not it was actually the personal and individual contribution of a corporate executive or the contribution of a corporate political action committee as opposed to an inadvertent illegal corporate contribution from an incorporated entity unfamiliar with the Act. Under such circumstances, it may be appropriate for the candidate committee to make a reasonable inquiry in order to resolve the question prior to its acceptance. The Commission has set forth certain guidelines as to the acceptance of such corporate contributions and the manner in which they should be handled until the matter is clarified.

Contrast that situation, however, with the matter at hand. In the instant case, if the Courter Committee had asked whether or not the GOP Committee was a properly qualified multi-candidate committee or subordinate committee of a properly qualified state committee, it would have then, as now, received an affirmative response. In fact, these representations were affirmatively made by the State and GOP Committees' Executive Director and it was perfectly reasonable for the Courter Committee to rely upon such official statements. Moreover, counsel for the State and GOP Committees currently maintains that said committees were properly qualified and capable of making such a contribution. There was no inquiry of the State and GOP Committees at the time which could have been made that would have enabled the Courter Committee to learn of the Commission's position with regard to the qualification of said committee. It is true that the Courter Committee could have made an inquiry of the Commission, but there is no requirement that it do so, nor would it appear even remotely reasonable that it should unilaterally have taken such action under the facts and circumstances of this case.

2. The Arbitrary Imposition of a New Rule or Obligation is Beyond the Scope of the Commission's Authority.

The Courter Committee expressly did not "knowingly accept" any illegal contribution or act in violation of the Act. To interpret its activity in any other way, the Commission would have to impose a new duty upon candidates to affirmatively investigate all potential contributors regardless of the circumstances. This obligation is cited in the General Counsel's Brief without any supporting authority. Not only is this duty not contained within the Act, as noted above, but its imposition is, in effect, the promulgation of a new and unprecedented rule. It is beyond the scope of the Commission's authority to arbitrarily enact new

rules or regulations without following the explicit procedures mandated by its own enabling statute.

Section 438(d)(1) of the Act provides:

Before prescribing any rule, regulation, or form under this section or any other provision of this Act, the Commission shall transmit a statement with respect to such rule, regulation, or form to the Senate and the House of Representatives, in accordance with this subsection. Such statement shall set forth the proposed rule, regulation, or form, and shall contain a detailed explanation and justification of it. 8/

This provision evidences the Legislature's intent to maintain a firm hand on the powers of the Commission and to review its proposed regulations carefully. To disregard these parameters would be to usurp powers that the Legislature has appropriately reserved for itself. Such an ultra vires act would be unconstitutional.

The procedures required in rulemaking are laid out for agencies generally in Section 553 of the Administrative Procedure Act which provides:

General notice of proposed rule making shall be published in the Federal Register, unless persons subject thereto are named and either personally served or otherwise have actual notice thereof in accordance with law. The notice shall include:

- (1) a statement of the time, place and nature of public rulemaking proceedings;
- (2) reference to the legal authority under which the rule is proposed; and
- (3) either the terms or substance of the proposed rule or a description of the subjects and issues involved. 9/ (Emphasis supplied.)

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8/ 2 U.S.C. §438(d)(1).

9/ 5 U.S.C. §553(b).

The law is clear that the Commission may not promulgate new rules without complying with explicit procedures provided for in its own statute and in the Administrative Procedure Act. The justifications for these procedures are to prevent the agencies from working injustice against those who would be without "actual notice" of its rules and regulations. To operate outside of these legislatively established bounds is an unconstitutional encroachment upon the sphere legitimately reserved for the Legislature.

C. The Federal Election Commission  
Has Effected an Unconscionable  
Period of Delay.

The loan in issue was received by the Courter Committee on November 3, 1979. The Committee was first advised of the alleged violation on February 21 of that year. Within one week the excess monies were promptly returned by the Courter Committee to the GOP Committee. The Commission did not formally begin compliance proceedings until fifteen months after the loan transaction occurred and fully one year after it had initiated compliance proceedings against the GOP Committee. No justification or explanation has been offered by the Commission in regard to this unreasonable and unconscionable delay.

Moreover, the Courter Committee has demonstrated complete good faith by its actions in this matter. Within one week of notice of the possible improper nature of the contribution, that money was returned. The intent of possible violators is important, and the Courter Committee certainly demonstrated every intention of following, and did follow, both the letter and spirit of the law.10/

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10/ The D.C. Court recently discussed a related state of mind issue in Common Cause v. National Archives and Records Services, (April 30, 1980). D.C. Civil Action No. 77-0297; Slip Opinion No. 79-1637. In a matter dealing with the reporting provisions of the F.E.C.A., the court states on page 10, note 11: "The penalties prescribed by law do vary with the state of mind of the recipient." In addition, the Court of Appeals in Pennsylvania in United States v. Hankin, reversed a conviction for violation of the Act stating, the Act "is to be liberally interpreted in favor of the accused." 607 F.2d 611, 615 (3rd Cir. 1979).

### III. CONCLUSION

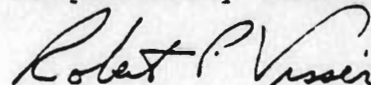
This Matter Under Review must be dismissed. There has been no violation of any provision of the Act by the Courter Committee and certainly no "knowing violation" of any provision of the Act or regulations promulgated thereunder. The Courter Committee acted in good faith in accepting the loan and, furthermore, acted upon the explicit representation of an appropriate official of the State and GOP Committees that it could make such a loan. Any other interpretation of this provision of the Act would amount to the promulgation of a new rule by the Commission and cannot be effected without compliance with express statutory procedures and with the Administrative Procedure Act.

In particular, the shocking proposal by the Commission in this case of requiring imposition of a new rule of strict liability on the part of a candidate's committee regarding their "constructive knowledge" or duties of investigation, is without any basis in law or precedent. Such action on the part of the Commission would constitute arbitrary and capricious action beyond the scope of its authority. In addition, such action would violate fundamental constitutional guarantees of due process of law.

Contrasted with the prompt response of the Courter Committee, the actions of the Commission in seeking to institute compliance proceedings a full year after the facts of this incident were known to the Commission, and fully a year after it had already initiated compliance proceedings against the State and GOP Committees, is unconscionable. To balance the equities in this case requires that the recommendation of the General Counsel be totally rejected and that this Matter Under Review be dismissed at once. To do otherwise would be to work a grave injustice and constitute arbitrary, capricious and unconstitutional action by the Commission.

Finally, in considering the importance of voluntary compliance under the Act and the importance of the public interests to be served in instituting compliance actions, there are clearly no legitimate goals nor public interests to be served by continuing this investigation against the Courter Committee. Accordingly, this proceeding should be dismissed at once by the Commission.

Respectfully submitted,



Robert P. Visser



Ms. Marjorie W. Emmons  
July 28, 1980  
Page Fifteen

cc: By Hand Delivery  
Charles N. Steele, Esq.  
Thomas J. Whitehead, Esq.  
Suzanne Callahan, Esq.

cc: Hon. James A. Courter  
Mr. Ray Mark



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: AUGUST 5, 1980  
SUBJECT: MUR 1100 - Interim Investigative Report #1  
dated 8-1-80; Signed 8-4-80; Received  
in OCS 8-4-80, 11:52

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, August 4, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

August 4, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1100

Please have the attached Interim Invest Report distributed to the Commission. Thank you.



BEFORE THE FEDERAL ELECTION COMMISSION  
August 1, 1980

In the Matter of )  
 )  
 ) MUR 1100  
New Jersey GOP Congressional )  
Victory Fund )  
Courter for Congress Committee )

Interim Investigative Report #1

The General Counsel's Brief recommending probable cause to believe that the Courter for Congress Committee violated 2 U.S.C. §441a(f) was mailed to the respondent on May 12, 1980.

Robert Visser, counsel for the respondent, submitted a letter requesting conciliation prior to a finding of probable cause to believe on June 13, 1980. However, after reviewing the facts of this matter and meeting with OGC staff on June 20th, counsel decided to file a responsive brief; he did so on July 29, 1980.

The Office of General Counsel is currently preparing a final General Counsel's Report in connection with this matter. We expect to forward our report to the Commission within ten days.

Date:

4 August 1980

  
Charles N. Steele..  
General Counsel

80 AUG 14 52

LAW OFFICES  
PEABODY, RIVLIN, LAMBERT & MEYERS  
WASHINGTON, D. C. 20036

ENDICOTT PEABODY  
LEWIS A. RIVLIN  
JEREMIAH D. LAMBERT  
TEDSON J. MEYERS  
CHARLES T. DUNCAN  
JORGE L. CORDOVA, JR.  
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ROBERT H. MORSE  
ROBERT A. WARDEN  
ROBERT N. JENSEN  
COLLISTER JOHNSON, JR.  
JOHN LOCKIE  
ROBERT P. VISSER

TWELFTH FLOOR  
CONNECTICUT BUILDING  
1150 CONNECTICUT AVENUE, N. W.

TELEPHONE (202) 457-1000  
CABLE ADDRESS "EXCELSIOR"  
TELEX 897413

June 13, 1980

RECEIVED  
JUN 16 11 12 02  
NATHALIE P. GILFOYLE  
LAWRENCE WHITE  
SANDA M. KAYDEN  
JEANNE A. CARPENTER  
JOHN MARK JANSEN  
SUSAN M. LISS  
NANCY MARIE STILES  
MICHAEL W. BEASLEY  
ROBERT J. MILLER  
GLENN R. REICHARDT  
JOEL S. WINNIK  
WILLIAM D. COSTON  
RALPH A. SIMMONS  
JEFFREY N. MARTIN  
ROBERT A. HAZEL  
OF COUNSEL  
TIMOTHY L. HARKER

WRITER'S DIRECT DIAL NUMBER

(202) 457-1019

BY HAND DELIVERY

Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street NW  
Washington DC 20463

Dear Ms. Callahan,

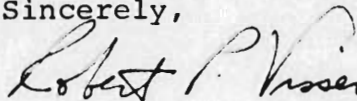
Re: MUR 1100

Reference is made to Mr. Steele's letter dated June 6, 1980, extending the time of the Courter for Congress Committee until today in which to file a responsive brief in connection with the above-referenced matter.

As we discussed, following a review of the factual background of this matter, I have requested a meeting with you and Mr. Whitehead for the purposes of informal conciliation of this matter. That meeting has been set for 11 o'clock on next Friday, June 20th, at your office. In view of the approved request, I respectfully reserve my right to file any such responsive brief dependent upon the outcome of such informal conciliation.

I thank you for your consideration in this matter and look forward to seeing you next week.

Sincerely,



Robert P. Visser

cc: Hon. James A. Courter



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 6, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert P. Visser  
Peabody, Rinlin, Lambert & Meyers  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

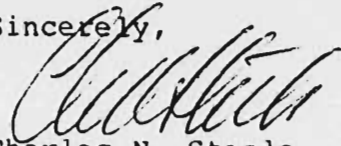
Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June 5, 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

Sincerely,

  
Charles N. Steele  
General Counsel

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one): Show to whom and date delivered _____ Show to whom, date, and address of delivery _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESS TO: <i>Robert P. Visser Peabody, Rinlin, Lambert &amp; Meyers 1150 Connecticut Ave., N.W. Washington, D.C. 20036</i>	
REGISTERED NO. <i>945081</i>	INSURED NO. _____
3. ARTICLE DESCRIPTION: _____	
4. I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>S. Callahan</i>	
5. ADDRESS (Complete only if requested) _____	
6. UNABLE TO DELIVER BECAUSE: _____	

DATE OF DELIVERY \_\_\_\_\_

INITIALS \_\_\_\_\_

*MUR-1100 Callahan*



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert P. Visser  
Peabody, Rinlin, Lambert & Méyers  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June , 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

*Signature*  
Sincerely,

Charles N. Steele  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1100  
Courter for Congress Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 5, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1100:

1. Approve counsel's request for an extension of time in which to file a responsive brief until June 13, 1980.
2. Send the notification letter, as attached to the Memorandum to the Commission dated June 4, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

6/5/80

Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of the Commission Secretary: 6-4-80, 11:04  
Circulated on 48 hour vote basis: 6-4-80, 4:00

June 4, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1100

Please have the attached Memo distributed to the  
Commission on a 48 hour tally basis. Thank you.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE  
COMMISSIONER  
JUN 4 1980

80 JUN 4 11:04

June 4, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel *CNS*

SUBJECT: Extension request - MUR 1100

On May 30, 1980, the Office of General Counsel received a request from Robert Visser, counsel to the Courter for Congress Committee, for an extension of time in which to file a responsive brief in connection with MUR 1100.

Mr. Visser's letter indicates that he has just been retained by the Courter Committee and would like an opportunity to respond to our brief; Visser has requested an extension until June 13, 1980.

Under the circumstances, the Office of General Counsel recommends that Mr. Visser be granted an extension until June 13th.

Recommendation

1. Approve counsel's request for an extension of time in which to file a responsive brief until June 13, 1980.
2. Send attached notification letter.

Attachments

1. Counsel's letter of May 28, 1980
2. Proposed Notification Letter

Callahan

PEABODY, RIVLIN, LAMBERT & MEYERS  
WASHINGTON, D.C. 20036

ENDICOTT PEABODY  
LEWIS A. RIVLIN  
JEREMIAH D. LAMBERT  
TEDSON J. MEYERS  
CHARLES T. DUNCAN  
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ROBERT A. WARDEN  
ROBERT N. JENSEN  
COLLISTER JOHNSON, JR.  
JOHN LOCKIE  
ROBERT P. VISSER

MAY 30 P 1:15  
TWELFTH FLOOR  
CONNECTICUT BUILDING  
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000  
CABLE ADDRESS "EXCELSIOR"  
TELEX 897413

May 28, 1980

NATHALIE P. GILFOYLE  
LAWRENCE WHITE  
SANDA M. KATDEN  
JEANNE A. CARPENTER  
JOHN MARK JANSEN  
SUSAN M. LISS  
NANCY MARIE STILES  
MICHAEL W. BEASLEY  
ROBERT J. MILLER  
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JOEL S. WINNIK  
WILLIAM D. COSTON  
RALPH A. SIMMONS  
JEFFREY N. MARTIN  
ROBERT A. HAZEL  
OF COUNSEL  
TIMOTHY L. HARKER

WRITERS DIRECT DIAL NUMBER

By Hand Delivery

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1100

Dear Mr. Steele:

Pursuant to my telephone conversation today with Mr. Whitehead of your office, this is to confirm that I have this date been retained as Counsel to the Courter for Congress Committee in connection with the above-referenced Matter Under Review.

By letter, dated May 12, 1980 from you to Ray Mark, Treasurer for the Courter for Congress Committee, you stated that the Federal Election Committee, on February 20, 1980, has found reason to believe that the Courter for Congress Committee has violated Section 441(a) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. In accordance with FEC regulations, the Committee was accorded fifteen days in which to submit a reply brief stating its position on the issues and replying to the brief of the General Counsel. In view of the fact that I have just been retained as counsel in connection with this matter, and in order to fully familiarize myself with the facts and circumstances regarding this situation, I hereby respectfully request that the Committee be granted a two week extension through Friday, June 13 during which it may formally respond to your notice. Following such factual review, I would also appreciate the opportunity to meet with Ms. Callahan to discuss this matter preparatory to requesting informal conciliation.

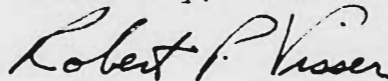


PEABODY, RIVLIN, LAMBERT & MEYERS

Charles N. Steele, Esq.  
May 28, 1980  
Page Two

Thank you for your consideration of this matter. In view of the brief time available in which to respond, I would appreciate it if you would please notify me of such extension by telephone.

Sincerely,



Robert P. Visser

RPV/dbk

cc: Mr. Ray Mark

cc: By Hand Delivery

Marjorie W. Emmons  
Thomas J. Whitehead, Esq.  
Suzanne Callahan, Esq.  
Roger A. Bodman



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert P. Visser  
Peabody, Rinlin, Lambert & Méyers  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: MUR 1100

Dear Mr. Visser:

This is in response to your letter of May 28, 1980, in which you request an extension of time in which to file a responsive brief in connection with the above-referenced matter.

On June , 1980, the Commission voted to approve your request for an extension until June 13, 1980. If you have any questions, please contact Suzanne Callahan at 523-5071.

Sincerely,

Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 12, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer  
Courter for Congress Committee  
121 Shelly Drive, Suite 2B  
Hackettstown, NJ 07840

Re: MUR 1100

Dear Mr. Mark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the Courter for Congress Committee violated section 441a of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel." The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Ray Mark, Treasurer  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,

*Charles N. Steele*  
Charles N. Steele  
General Counsel

Enclosure  
Brief

SENDER: Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on REVERSE.

1. The following service is requested (check one).  
☐ Show to whom and date delivered  
☐ Show to whom, date, and address of delivery  
☐ RESTRICTED DELIVERY  
Show to whom and date delivered  
☐ RESTRICTED DELIVERY  
Show to whom, date, and address of delivery.  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
Ray Mark, Treasurer  
121 Shelly Drive, Suite 2B  
Hackensack, NJ 07840

3. ARTICLE DESCRIPTION:  
REGISTERED NO. CERTIFIED NO. INSURED NO.  
944767

4. (Always obtain signature of addressee or agent)  
I have received the article described above.  
SIGNATURE ☐ Addressee ☐ Authorized agent  
*K. Carl*

5. DATE OF DELIVERY  
5-15-80

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

HACKENSACK, NJ  
POSTMARK  
MAY 15 1980  
CN

mue-1100 Callahan-  
☆ PO: 878-278-288

May 12, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1100

Please have the attached Memo and brief distributed  
to the Commission for their information. Thank you.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 12, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel *CS*

SUBJECT: MUR 1100

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 12, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

BEFORE THE FEDERAL ELECTION COMMISSION  
March 31, 1980

In the Matter of	)	
	)	MUR 1100
New Jersey GOP Congressional	)	
Victory Fund	)	
Courter for Congress Committee	)	

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan to David Norcross, the Republican State Chairman of New Jersey. The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

## II. Legal Analysis

As set forth in 2 U.S.C. §441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000 per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. §441a (a)(1)(A) at the time the loan was made.




It is the recipient committee's responsibility to verify the multicandidate committee status of donors prior to the acceptance of contributions exceeding \$1,000; the Courter Committee should have contacted the FEC to ascertain the GOP Committee's status under §441a.

Therefore, the Courter for Congress Committee violated 2 U.S.C. §441a at the time it accepted the subject loan even though it refunded the excessive portion as soon as it discovered the GOP Committee was not a multicandidate committee.

III. General Counsel's Recommendation

Find probable cause to believe that the Courter for Congress Committee violated 2 U.S.C. §441a(f).

12 May 1980  
Date

  
Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 12, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer  
Courter for Congress Committee  
121 Shelly Drive, Suite 2B  
Hackettstown, NJ 07840

Re: MUR 1100

Dear Mr. Mark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the Courter for Congress Committee violated section 441a of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

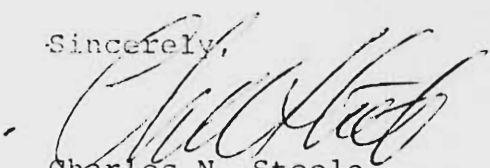
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel." The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Ray Mark, Treasurer  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer  
New Jersey GOP Congressional  
Victory Fund  
28 West State Street, Suite 612  
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the New Jersey GOP Congressional Victory Fund violated section 441a of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

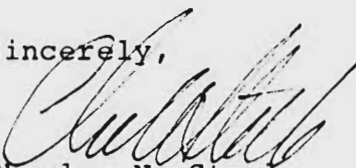
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

Walter T. Peters  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure  
Brief

● SENDER. Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery. (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO:  Walter T. Peters, Jr.,	
3. ARTICLE DESCRIPTION: REGISTERED NO. 941209	CERTIFIED NO. INSURED NO.
1. (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent E. Martin	
4. DATE OF DELIVERY MAR 24 1980	5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE:	

PS Form 3811, Aug. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

★ 690: 1978-472-302

MUR 1100 (Callahan)

RECEIVED  
GCC# 1506  
MAY 29 PM 1:05

LAW OFFICES  
PEABODY, RIVLIN, LAMBERT & MEYERS  
WASHINGTON, D.C. 20036

ENDICOTT PEABODY  
LEWIS A. RIVLIN  
JEREMIAH D. LAMBERT  
TEDSON J. MEYERS  
CHARLES T. DUNCAN  
JORGE L. CORDOVA, JR.  
DAVID J. TAYLOR  
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ROBERT H. MORSE  
ROBERT A. WARDEN  
ROBERT N. JENSEN  
COLLISTER JOHNSON, JR.  
JOHN LOCKIE  
ROBERT P. VISSER

TWELFTH FLOOR  
CONNECTICUT BUILDING  
1150 CONNECTICUT AVENUE, N.W.

TELEPHONE (202) 457-1000  
CABLE ADDRESS "EXCELSIOR"  
TELEX 897413

May 28, 1980

308228

NATHALIE P. GILFOYLE  
LAWRENCE WHITE  
SANDA M. KAYDEN  
JEANNE A. CARPENTER  
JOHN MARK JANSEN  
SUSAN M. LISS  
NANCY MARIE STILES  
MICHAEL W. BEASLEY  
ROBERT J. MILLER  
GLENN R. REICHARDT  
JOEL S. WINNIK  
WILLIAM D. COSTON  
RALPH A. SIMMONS  
JEFFREY N. MARTIN  
ROBERT A. HAZEL  
OF COUNSEL  
TIMOTHY L. HARKER

WRITERS DIRECT DIAL NUMBER

By Hand Delivery

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 1100

Dear Mr. Steele:

Pursuant to my telephone conversation today with Mr. Whitehead of your office, this is to confirm that I have this date been retained as Counsel to the Courter for Congress Committee in connection with the above-referenced Matter Under Review.

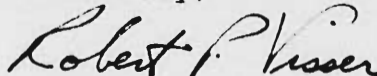
By letter, dated May 12, 1980 from you to Ray Mark, Treasurer for the Courter for Congress Committee, you stated that the Federal Election Committee, on February 20, 1980, has found reason to believe that the Courter for Congress Committee has violated Section 441(a) of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter. In accordance with FEC regulations, the Committee was accorded fifteen days in which to submit a reply brief stating its position on the issues and replying to the brief of the General Counsel. In view of the fact that I have just been retained as counsel in connection with this matter, and in order to fully familiarize myself with the facts and circumstances regarding this situation, I hereby respectfully request that the Committee be granted a two week extension through Friday, June 13 during which it may formally respond to your notice. Following such factual review, I would also appreciate the opportunity to meet with Ms. Callahan to discuss this matter preparatory to requesting informal conciliation.

PEABODY, RIVLIN, LAMBERT & MEYERS

Charles N. Steele, Esq.  
May 28, 1980  
Page Two

Thank you for your consideration of this matter. In view of the brief time available in which to respond, I would appreciate it if you would please notify me of such extension by telephone.

Sincerely,



Robert P. Visser

RPV/dbk

cc: Mr. Ray Mark

cc: By Hand Delivery

Marjorie W. Emmons  
Thomas J. Whitehead, Esq.  
Suzanne Callahan, Esq.  
Roger A. Bodman



PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

RECEIVED

00 MAY 29 PM 1:1

By Hand Delivery

Charles N. Steele, Esq.

General Counsel

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

STERNS, HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P O. BOX 1298

TRENTON, NEW JERSEY 08607

609 392-2100

RECEIVED

007888

80 MAR 31 P 1:27

10 NASSAU STREET  
PRINCETON, N J 08540  
(609) 924 2108

SUITE 600  
1150 SEVENTEENTH STREET, N W  
WASHINGTON, D C 20036  
(202) 296 3432

JOEL H STERNS  
RICHARD K WEINROTH  
MICHAEL J. HERBERT  
FRANK J. PETRINO  
WILLIAM J BIGHAM  
W S GERALD SKEY  
JOHN H. DUMONT  
JOHN M. DONNELLY  
ANN MARIE VAURIO  
MARK D. SCHORR  
SIMON KIMMELMAN  
R. KEVIN McGRORY

OF COUNSEL  
RICHARD J. HUGHES

March 26, 1980

Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

007217

007217 P2:52

Re: MUR 1100

Dear Ms. Callahan:

As counsel to the New Jersey Republican State Committee, I have been asked to review your correspondence and brief of March 19, 1980 relative to the New Jersey GOP Congressional Victory Fund ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"). At the time the GOP Committee transferred the \$3,000.00 to the Courter Committee, it was of the opinion that 2 U.S.C. Article A D was controlling and that the GOP Committee was a subordinate committee of the New Jersey Republican State Committee and was entitled to make a transfer to the Courter Committee of up to \$5,000.00. Furthermore, the GOP Committee had been registered under Article 433 as a "multicandidate political committee". It is my opinion, therefore, that there was no violation of 2 U.S.C. Article 441 a (f).

You have indicated that the GOP Committee "did not attain multicandidate Committee status pursuant to Article 441 a (a) (4)", as noted above, we believe that said GOP Committee was a subordinate committee of State Committee as that term is used in the same article.

While the New Jersey Republican State Committee and its subordinate, the GOP Committee, believe that they have, at all times, conformed with the letter and spirit of the law relative to this matter, and further believe that the Courter Committee acted lawfully and properly in accepting the representations of the GOP Committee that the \$3,000.00 transfer was within the ambit of the law, nevertheless, Congressman

STERNS, HERBERT & WEINROTH

Ms. Suzanne Callahan

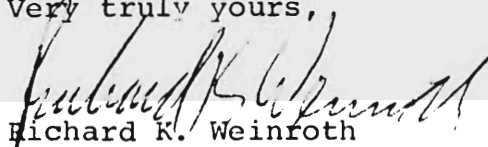
-2-

March 26, 1980

Courter, upon receipt of the Commission's notification on February 21, 1979, refunded the sum of \$2,000.00 to David Norcross, the Republican State Chairman, on February 29, 1979.

Should there be a finding that a technical violation of 2 U.S.C. Article a (a) (1) be found to have occurred, it is respectfully submitted that said violation was inadvertent and that with the return of the aforementioned \$2,000.00 has been made moot. I will await your response with respect to this matter.

Very truly yours,

  
Richard K. Weinroth

RKW/cc

Enclosure

cc: Honorable James Courter  
Mr. David Norcross  
Mr. David Earling

RETURN RECEIPT REQUESTED

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D. C. 20036

50 MAY 29 AM 11 04

By Hand Delivery

Marjorie W. Emmons

Secretary

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

RECEIVED  
MAY 29 PM 1

By Hand Delivery

Thomas J. Whitehead, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

PEABODY, RIVLIN, LAMBERT & MEYERS

ATTORNEYS AT LAW

CONNECTICUT BUILDING TWELFTH FLOOR

1150 CONNECTICUT AVENUE, N.W.

WASHINGTON, D.C. 20036

RECEIVED

30 MAY 29 PM 1 7

By Hand Delivery

Suzanne Callahan, Esq.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**STERNS, HERBERT & WEINROTH**

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW

196 WEST STATE STREET

P. O. BOX 1298

TRENTON, NEW JERSEY 08607

**CERTIFIED**

No. 662447

**MAIL**

Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street N.W.  
Washington, D.C. 20463

RETURN RECEIPT REQUESTED

10 MAR 31 P 1:27

RL  
ED





# FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

MEMORANDUM TO : THE COMMISSION  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY  
DATE: March 19, 1980  
SUBJECT: MUR 1100

The attached documents are circulated for your information.

## ATTACHMENTS:

1) Memo; 2) Brief; 3) Letter

March 19, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1100

Please have the attached Memo and Brief distributed  
to the Commission on an informational basis. Thank you.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 19, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CNS*  
General Counsel

SUBJECT: MUR 1100

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on March 19, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

BEFORE THE FEDERAL ELECTION COMMISSION  
March 10, 1980

In the Matter of	)	
	)	MUR 1100
New Jersey GOP Congressional	)	
Victory Fund	)	
Courter for Congress Committee	)	

GENERAL COUNSEL'S BRIEF

I. Statement of Case

On December 10, 1979, the Reports Analysis Division ("RAD") referred to the Office of General Counsel, the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee") in connection with violations of 2 U.S.C. § 441a.

During the normal course of reports review, RAD discovered that the GOP Committee, a political committee which did not attain multicandidate committee status pursuant to § 441a(a)(4) during the time it was registered, loaned \$3,000 to the Courter Committee on November 3, 1978; it terminated as a political committee on November 7, 1979. The GOP Committee was advised by RAD on February 21, 1979, that the subject loan appeared to exceed the limitations of § 441a; the Courter Committee repaid the excessive portion of the loan on February 28, 1979.

On February 20, 1980, the Commission approved the recommendation of the General Counsel to find reason to believe that the GOP Committee violated 2 U.S.C. § 441a and reason to believe that the Courter Committee violated 2 U.S.C. § 441a(f).

Congressman Courter responded to the Commission's reason to believe notification on February 29, 1980, by stating that his committee accepted the \$3,000 loan "[assuming] that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multicandidate committee legally able to contribute up to \$5,000 per candidate in the General Election of 1978." According to his letter, had his staff been aware that the GOP Committee was not a multicandidate committee, they would not have accepted the check. Attached to Congressman Courter's letter was a photocopy of his letter refunding \$2,000, the excessive portion of the loan, to David Norcross, the Republican State Chairman of New Jersey. (Attachment I). The remaining \$1,000 portion of the original loan was forgiven by the GOP Committee on November 7, 1979, thereby making a direct contribution to the Courter Committee.

## II. Legal Analysis

As set forth in 2 U.S.C. § 441a, political committees, other than multicandidate committees, are prohibited from contributing in excess of \$1,000, per election, to any candidate and his authorized political committees. Since the GOP Committee did not meet the criteria set forth in the Act for multicandidate committee status, it was limited to a contribution of \$1,000 at the time it loaned the Courter Committee \$3,000.

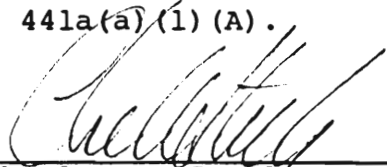
Since a loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. 110.4(a)(1)), the GOP Committee violated the contribution limitation of 2 U.S.C. § 441a (a)(1)(A) at the time the loan was made.

The GOP Committee did not provide additional information in response to the Commission's reason to believe notification. Therefore, absent evidence which refutes the Commission's earlier determination, the Office of General Counsel recommends the Commission find probable cause to believe the GOP Committee has violated 2 U.S.C. § 441a(a)(1)(A).

III. General Counsel's Recommendation

Find probable cause to believe the New Jersey GOP Congressional Victory Fund has violated 2 U.S.C. § 441a(a)(1)(A).

17 March 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer  
New Jersey GOP Congressional  
Victory Fund  
28 West State Street, Suite 612  
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1980, found reason to believe that the New Jersey GOP Congressional Victory Fund violated section 441a of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

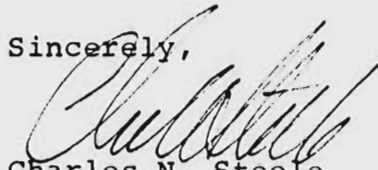


Walter T. Peters  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Suzanne Callahan at (202) 523-5071.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", written over the typed name.

Charles N. Steele  
General Counsel

Enclosure  
Brief



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer  
New Jersey GOP Congressional  
Victory Fund  
28 West State Street, Suite 612  
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on February 20, 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.  
Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-5071.

Sincerely,

*Robert O. Tiernan*  
ROBERT O. TIERNAN  
Chairman

Enclosures

Notification of reason to believe finding  
Procedures

PS Form 3811, Aug. 1976

1. The following service is requested (check one):  
☐ Show to whom and date delivered  
☐ Show to whom, date, and address of delivery  
☐ RESTRICTED DELIVERY  
Show to whom and date delivered  
☐ RESTRICTED DELIVERY  
Show to whom, date, and address of delivery \$  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
Walter T. Peters, Jr.  
Treasurer  
N.J. GOP Cong. Victory Fund

3. ARTICLE DESCRIPTION:  
REGISTERED NO. 944018 CERTIFIED NO. INSURED NO.

4. I have received the article described above.  
SIGNATURE *Chapman* ☐ Addressee ☐ Authorized agent

5. ADDRESS (Complete only if requested)  
DATE OF DELIVERY FEB 26 1980  
FEB 26 1980  
6. UNABLE TO DELIVER BECAUSE  
CLERK'S INITIALS

MUR 1100  
Callahan

RENTON, NH  
DOWNTOWN STA  
FEB 26 1980  
USPO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE February 5, 1980

MUR NO. 1100

RESPONDENT New Jersey GOP Congressional  
Victory Fund

STAFF MEMBER(S) & TEL. NO.  
Donaldson (202) 523-4057

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees. 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. The GOP Committee's \$3,000 loan to the Courter Committee, which remained outstanding for three months, appears to violate 2 U.S.C. § 441a(a)(1)(A).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the GOP Committee violated 2 U.S.C. § 441a(a)(1)(A) in connection with an excessive loan to the Courter Committee.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 22, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer  
Courter for Congress Committee  
121 Shelly Drive, Suite 2B  
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

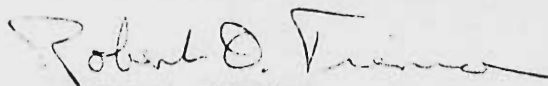
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer  
Page 2

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

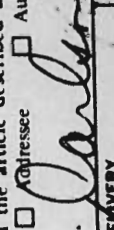
Sincerely,

  
ROBERT O. TIERNAN  
Chairman

Enclosures

1. Summary of reason to believe finding
2. Procedures

PS Form 3811, Aug. 1978

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery. \$_____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO:  Ray Mark Treasurer Courter for Congress Committee	
3. ARTICLE DESCRIPTION: REGISTERED NO. 944041	INSURED NO.
I (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE  <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
4. DATE OF DELIVERY 2/5/80	5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE: _____ CLERK'S INITIALS	

MUR 1100 Callahan

☆ (950) 1978-574-900

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE February 5, 1980

MUR NO. 1100  
STAFF MEMBER(S) & TEL. NO.  
Donaldson (202) 523-4057

RESPONDENT Courter for Congress Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C. § 441a (a)(1)(A). 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. Therefore, it appears that the GOP Committee's \$3,000 loan, made in November 1978, may violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. § 441a(f).



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
New Jersey GOP Congressional ) MUR 1100  
Victory Fund )  
Courter for Congress )

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 20, 1980, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1100:

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. §441a and send the letter attached to the General Counsel's first report in this matter.
2. Find reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. §441a(f) and send the letter attached to the General Counsel's first report in this matter.

Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan voted affirmatively for these actions; Commissioner Aikens dissented.

Attest:

2/21/80

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, DC 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY  
DATE: FEBRUARY 19, 1980  
SUBJECT: OBJECTION - MUR 1100, First General Counsel's  
Report dated 2-13-80; Received in OCS  
2-13-80, 1:28

The above-named document was circulated on a 48 hour  
vote basis at 4:00, February 13, 1980.

Commissioner Aikens submitted an objection at  
4:47, February 15, 1980, thereby placing MUR 1100 on the  
Amended Agenda for February 20, 1980.

February 13, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1100

Please have the attached Memo and First GC Report  
distributed to the Commission on a 48 hour tally basis.

Thank you.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 13, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*  
General Counsel

SUBJECT: MUR 1100 - First General Counsel's Report

Attached is the First General Counsel's Report for MUR 1100 which was discussed by the Commission in Executive Session on February 5, 1980. At that meeting, the Commission postponed consideration of the recommendations pending review by the General Counsel's office of the use of the term "unqualified multicandidate committee." This office has reconsidered and redrafted the report and has substituted "political committee supporting more than one Federal candidate" in the report as well as in the Respondents' notifications.

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL FEB 13 1980  
BY OGC TO THE COMMISSION \_\_\_\_\_

MUR # 1100

STAFF MEMBER(S) \_\_\_\_\_  
Donaldson \_\_\_\_\_

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund  
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund  
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

#### RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.
2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

#### Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.

Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL FEB 13 1980  
BY OGC TO THE COMMISSION \_\_\_\_\_

MUR # 1100

STAFF MEMBER(S) \_\_\_\_\_  
Donaldson \_\_\_\_\_

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund  
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund  
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that on November 3, 1978, the GOP Committee, a political committee supporting more than one Federal candidate, loaned \$3,000 to the Courter Committee, an authorized single candidate committee. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

#### RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.
2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

#### Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee



REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Dug Greevy  
TO: Office of General Counsel TEAM CHIEF Roberta Werfel  
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CE/RS  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund

TREASURER: Walter T. Peters, Jr.

ADDRESS: Suite 612 - 28 W. State Street  
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Excessive Contribution to Candidate	2 U.S.C. 441a	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review AND DATE: 2/21/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 9/15/78 TO 4/10/79  
TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704  
CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

Letter received from committee indicating repayment of excessive amount  
of loan prior to mailing of SV notification by RAD.

5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Earling, 2/21/79

3

Telecon: Greevy with Peters, 6/11/79

4

REASON(S) FOR REFERRAL:

ATTACHMENT

Excessive contribution (loan) meets RAD threshold for OGC Review

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

Letter from Peters, 3/26/79

6

Partial Copy of Committee's April 10, 1979 report

7

RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 3/27/78.  
However, this apparently was not received by Commission. The six month requirement  
for qualified status would have been on 2/27/79 had that document been received.  
RAD Form 1  
SEE REFERRAL FOR RECIPIENT COMMITTEE. COURTESY FOR CONGRESS

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11 JUN 79  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
NEW JERSEY OUR LONG VICTORY FUND								ID: C00105676
1979	STATEMENT OF ORGANIZATION- AMENDMENT					5MAR79	4	79FEC/121/1841
	MISCELLANEOUS TRANSACTION TO F.E.C.					16MAR79	2	79FEC/121/5384
1978	10 DAY PRE-GENERAL		13,537	4,500		15SEP78 -28OCT78	6	78FEC/095/1440
	REQUEST FOR ADDITIONAL INFORMATION					15SEP78 -28OCT78	2	79FEC/122/0494
	10 DAY PRE-GENERAL - AMENDMENT					10CT78 -23OCT78	1	79FEC/122/4458
	30 DAY POST-GENERAL		1,159	9,000		29OCT78 -20NOV78	8	78FEC/096/2541
	REQUEST FOR ADDITIONAL INFORMATION					29OCT78 -20NOV78	1	79FEC/122/0496
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	3	79FEC/122/3619
	YEAR END REPORT					27AUG78 -31JAN79	3	79FEC/121/1845
	TERMINATION REPORT - TERMINATED	57		1,254		21NOV78 -12DEC78	8	78FEC/116/0820
1979	APRIL 10 QUARTERLY		2,000		1,950	10APR79	6	79FEC/126/0867
	TOTAL	57	16,696	1,254	15,450		44	TOTAL PAGES

*All reports reviewed*

**SCHEDULE B  
REVISED**

January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

(Operating, Transfers Out, Contributions In-Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1 for  
Line Number 22A

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

New Jersey G.O.P. congressional Victory Fund

Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Full Name, Mailing Address and ZIP Code Courter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan  Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
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Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period

Telecon:

Dug Greevy to Dave Earling  
NJGOP Congressional Victory Fund  
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

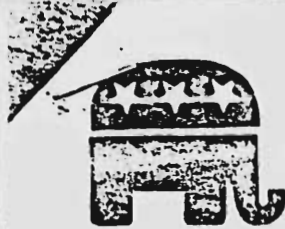
I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~it~~ had ~~not~~ been sent in in August, but that he would send a copy with an original signature in case it had been lost in the mail.

I stated further that the committee had loaned the Courter for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.



# NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION  
COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

March 12, 1979

001328

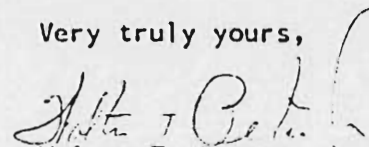
Mr. David Greevy  
Federal Election Commission  
1325 K Street NW  
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

We wish that this notification be made a part of our official file.

Very truly yours,

  
Walter T. Peters, Jr.  
Executive Director

WTP:rp

*"Because We Care"*



# NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED  
FEDERAL ELECTION  
COMMISSION

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

'79 MAR 28 PM 1:36

March 26, 1979

Federal Election Commission  
Attn: David Greeny  
1325 K. Street, N.W.  
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund  
#C00105676

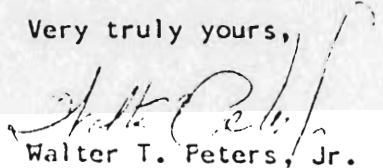
Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
  - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
  - (a) For missing or incorrect signature, see above.
  - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been received by the Quarter Committee.

Very truly yours,



Walter T. Peters, Jr.  
attachment

*"Because We Care"*



RECEIVED  
FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20543

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

New Jersey GOP Congressional Victory Fund, Inc. C0015476

Name of Candidate or Committee (in full)

Candidate/Committee

SUITE 612 - 28 W. STATE ST

U.S. CONGRESS

Address (number and street)

Office Sought, State/District (if applicable)

TRENTON, NEW JERSEY 08608

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election 1978

4 Type of Report (check appropriate boxes)

☒ April 10 Quarterly Report

☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)

☐ Termination Report

☐ July 10 Quarterly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)

☐ Amendment for \_\_\_\_\_  
(attach report)

☐ October 10 Quarterly Report

☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)

☐ January 31 Annual Report

☐ Monthly Report

(month)

on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures must be recorded in nearest dollar.)

6 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through APR 10, 1978		
6 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1978  
(Date)

WALTER T. PETEES, JR.

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form).

For further  
information,  
Contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
B-187620 (R01/01)  
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

RECEIVED  
FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND 2. I.D. No. C0015676  
3. U.S. CONGRESS  
4. SUITE 612 - 28 W. STATE ST  
5. TRANTON, NEW JERSEY 08608  
6. 1978

4. Type of Report (check appropriate boxes)

- ☒ April 10 Quarterly Report  
☐ July 10 Quarterly Report  
☐ October 10 Quarterly Report  
☐ January 31 Annual Report  
☐ Monthly Report
- ☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)
- ☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)
- ☐ Termination Report  
☐ Amendment for \_\_\_\_\_  
(which report)
- This is a report for ☐ Primary Election ☒ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES  
(Figures must be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through <u>APR 10, 1979</u>		
6. Cash on hand January 1, 19		\$
7. Cash on hand at beginning of reporting period	\$ - 0 -	
8. Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9. Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C1)	\$ 1,000.00	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C1)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1979  
(Date)

WALTER T. PETERS, JR.  
(Typed Name of Treasurer or Candidate)

[Signature]  
(Signature of Treasurer or Candidate)

Notes: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form).

For further  
information,  
Contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
B-187620 (R0506)  
Expires 3-31-81

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**SCHEDULE A  
REVISED**  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**ITEMIZED RECEIPTS**  
(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)  
Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for  
Line Number 17A-

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND

Full Name, Mailing Address and ZIP Code

COURTNEY FOR CONGRESS COMMITTEE

Principal Place of Business

CARL

Date (month,  
day, year)

3/8/79

Amount of each Receipt  
this Period

\$ 2,000.00

Receipt for LOAN REPAYMENT

☐ Primary ☐ General ☒ Other

Occupation  
POLITICAL COMM.

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

**SUBTOTAL** of receipts this page (optional) \$ 2,000.00

**TOTAL** this period (list page this line number only) \$ 2,000.00

70031157851

Telecon:

Greevy with Walter Peters  
NJ GOP Congressional Victory Fund  
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

SCHEDULE C  
REVISED  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

DEBTS AND OBLIGATIONS  
Supporting Line Numbers 12 and 13  
OF FORM 700

Page 1 of 1 for  
Line Number 12

(Use Separate Schedules for  
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full				
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
COURTNEY FOR CONGRESS COMMITTEE 256 MAIN ST HACKETTSTOWN, N.J. 07930		\$3,000.00	\$2,000.00	\$1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
SUBTOTALS (the period this page (optional))		\$	\$	\$
TOTAL (the period (last page the line number only))		\$ 3,000-	\$ 2,000-	\$ 1,000-

1  
7  
8  
6  
5  
4  
3  
2  
1

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/70 ANALYST Mary Jo Mesner mjm  
 TO: Office of General Counsel TEAM CHIEF Suzanne Wilson su  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Carroll Bowen CB/B  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13  
 TREASURER: Ray Mark  
 ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Accepted an excessive loan from a non-qualified committee 2 U.S.C. 441a 2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:  
☒ Normal Review Other: ATTACHMENT  
☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10/24/73 TO 11/27/73  
 TOTAL RECEIPTS \$ 61,753 TOTAL EXPENDITURES \$ 58,365  
 CASH ON HAND \$ 3,273 DEBTS \$ 104,750 (owed by committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT  
 Excessive loan disclosed on 30 Day Post-General report 2  
 Amount in excess was repaid by committee on April 10 report 3  
 prior to RAD notification of surface violation.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
 None

REASON(S) FOR REFERRAL: ATTACHMENT  
 Loan received by committee was \$2,000 in excess of limit for non-qualified committees

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
 Surface violation notice being processed for 30 Day Post General report  
 for an excessive in-kind contribution received from a non-qualified committee. These contributions were received prior to the General Election.

OTHER RELEVANT INFORMATION: ATTACHMENT  
 Committee received excessive loan on 11/5/73 - one day prior to general election. Candidate won general election with 52% of vote.

See companion referral of New Jersey GOP Congressional Victory Fund

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:  
 None

PREVIOUS MURS:  
 MUR 905, closed 3/6/79 (Candidate)

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) 1977-1978

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURIER FOR CONGRESS COMMITTEE								
1978	STATEMENT OF ORGANIZATION					3JAN78	3	111 800084259
	STATEMENT OF ORGANIZATION AMENDMENT					11JAN78	3	78HSE/127/3508
	STATEMENT OF ORGANIZATION AMENDMENT					22JAN78	4	78HSE/127/4500
	40 HOUR CONTRIBUTION NOTICE					2JUN78	1	78HSE/129/1343
	40 HOUR CONTRIBUTION NOTICE					8JUN78	1	78HSE/137/3622
	STATEMENT OF ORGANIZATION AMENDMENT					31AUG78	1	78HSE/137/4093
	40 HOUR CONTRIBUTION NOTICE					30CT78	1	78HSE/144/0325
	40 HOUR CONTRIBUTION NOTICE					24OCT78	1	78HSE/154/4300
	40 HOUR CONTRIBUTION NOTICE					26OCT78	1	78HSE/151/2244
	40 HOUR CONTRIBUTION NOTICE					27OCT78	1	78HSE/151/3109
	40 HOUR CONTRIBUTION NOTICE					28OCT78	1	78HSE/152/0081
	40 HOUR CONTRIBUTION NOTICE					28OCT78	1	78HSE/152/0787
	40 HOUR CONTRIBUTION NOTICE					28OCT78	1	78HSE/152/0814
	40 HOUR CONTRIBUTION NOTICE					29OCT78	1	78HSE/152/3405
	40 HOUR CONTRIBUTION NOTICE					30OCT78	1	78HSE/154/4246
	40 HOUR CONTRIBUTION NOTICE					30OCT78	1	78HSE/155/0190
	40 HOUR CONTRIBUTION NOTICE					30OCT78	1	78HSE/155/0293
	40 HOUR CONTRIBUTION NOTICE					30OCT78	1	78HSE/155/1415
1977	YEAR END REPORT		400			01DEC77 - 31DEC77	2	78HSE/127/4110
	YEAR END REPORT						1	78HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29DEC77 - 31DEC77	2	78FEC/083/5002
1978	APRIL 10 QUARTERLY	27,252		26,872		1JAN78 - 31MAR78	10	78HSE/132/5123
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 - 31MAR78	2	78FEC/083/5005
	10 DAY PRE-PRIMARY	36,565		28,492		1APR78 - 22MAY78	12	78HSE/136/3041
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 - 22MAY78	1	78FEC/083/5000
	30 DAY POST-PRIMARY	17,230		19,441		23MAY78 - 26JUN78	12	78HSE/139/3772
	30 DAY POST-PRIMARY AMENDMENT					23MAY78 - 26JUN78	1	78HSE/151/0187
	JULY 10 QUARTERLY				5,465	22JUN78 - 30JUN78	6	78HSE/140/4471
	OCTOBER 10 QUARTERLY		130,988		110,894	1JUL78 - 30SEP78	46	78HSE/148/2910
	10 DAY PRE-GENERAL		51,675		72,061	1OCT78 - 23OCT78	36	78HSE/152/0105
	30 DAY POST-GENERAL		61,550		58,065	24OCT78 - 27NOV78	42	78HSE/157/3813
	YEAR END REPORT		6,268		8,574	28NOV78 - 31DEC78	19	78HSE/161/1994
	REQUEST FOR ADDITIONAL INFO 2ND						1	78FEC/099/2895
	TOTAL	31,148	250,882	30,274	250,414		230	TOTAL PAGES

All reports reviewed

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURIER FOR CONGRESS COMMITTEE								124 000004265
	1979 STATEMENT OF ORGANIZATION- AMENDMENT					JUL79	1	79HSE/165/1118
	STATEMENT OF ORGANIZATION- AMENDMENT					2 SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					NOV79	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		7,259	JAN79 -31MAR79	19	79HSE/184/2093
	JULY 10 QUARTERLY		5,025		4,753	APR79 -30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		25,770		24,071	JUL79 -30SEP79	19	79HSE/189/1716
	TOTAL	0	39,999	0	36,083		63	TOTAL PAGES

All reports reviewed



**SCHEDULE A**

**REVISED**

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**Day Post - General**

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for

Line Number 17 a

(Use Separate Schedule for  
each numbered line)

Name of Candidate or Committee in Full

**COURTIER FOR CONGRESS**

Full Name, Mailing Address and ZIP Code:

James A. Courtier  
Hatchery Road  
Hackettstown, NJ 07840

Principal Place of Business

Courtier, Robert & Hare  
Hackettstown, NJ 07840

Date (month,  
day, year)

11/1/78

Amount of each  
this Period

\$5,000.00

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 70,000.00

Full Name, Mailing Address and ZIP Code

NJ GOP Congressional Victory Fund  
28 West State St., Suite 612  
Trenton, NJ 08608

Principal Place of Business

Occupation

Date (month,  
day, year)

11/6/78

Amount of each Rec  
this Period

\$3,000.00

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 3,000.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Rec  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Rec  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Rec  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Rec  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Rec  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

SUBTOTAL of receipts this page (optional) .....

\$ 8,000.00

TOTAL this period (last page this line number only) .....

\$ 8,000.00

730115739

April 10 Quarterly

## COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	Repayment of Loan C00105676	2/28/79	\$2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).			\$ 2,000.00
TOTAL this period (last page this line number only).			\$ 2,000.00



**SCHEDULE A  
REVISED**  
January, 1978  
Federal Election Commission  
125 K Street, N.W.  
Washington, D.C. 20543

### ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 page  
Line Number 15 c

Also See Schedule for  
each numbered line

Name of Candidate or Committee in Full

Warren County Republican Campaign Finance Committee

*Donor: [Signature]*

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Warren County Republican Campaign Finance Committee Backettstown, NJ 07840	Share of Billboard Advertising Occupation	11/78	\$1,200.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	Share of Billboard Advertising Occupation	11/78	\$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	Share of Billboard Advertising Occupation	11/78	\$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	Share of Expenses Occupation	11/78	
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
National Chamber Alliance for Politics Box 1728 Washington, DC 20013	Bernard K. Allanson - Organizing Occupation	10/12/78	\$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

78011573932

FORM 1000-A

January, 1978  
Federal Election Commission  
1225 K Street, N.W.  
Washington, D.C. 20543

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1

Line Number 15 c

Use Separate Schedules for  
each numbered line

Name of Candidate or Committee on Full

COURTNEY FOR CONGRESS

30 Day Post Gen. 1

Full Name, Mailing Address and ZIP Code

Warren County Republican Campaign  
Finance Committee  
Buckelstown, NJ 07840

Principal Place of Business

Share of Billboard  
Advertising

Date (month,  
day, year)  
11/78

Amount of each Receipt  
this Period  
\$1,238.00

Receipt for:  
☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Sussex County Republican Comm.  
P.O. Box 425  
Newton, NJ 07860

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business  
Share of Billboard  
Advertising

Date (month,  
day, year)  
11/78

Amount of each Receipt  
this Period  
\$1,385.24

Receipt for:  
☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Morris County Republican Comm.  
11 Washington Street  
Morristown, NJ 07960

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business  
Share of Billboard  
Advertising

Date (month,  
day, year)  
11/78

Amount of each Receipt  
this Period  
\$302.64

Receipt for:  
☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

Morris County Women's Club  
Fernside Avenue  
Chatham, NJ 07928

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business  
Share of Expenses

Date (month,  
day, year)  
11/78

Amount of each Receipt  
this Period  
\$37.12

Receipt for:  
☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

National Chamber Alliance for  
Box 1728 Politics  
Washington, DC 20013

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business  
Bernard K. Allanson -  
Organizing

Date (month,  
day, year)  
10/12/78

Amount of each Receipt  
this Period  
\$2.26

Receipt for:  
☐ Primary ☒ General ☐ Other

Full Name, Mailing Address and ZIP Code

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:  
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:  
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

☐ Check if Contributor is self-employed  
Aggregate Year To Date \$

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

SUBTOTAL of receipts this page (optional):

\$ 2,965.26

TOTAL this period (last page this line number only):

\$ 2,965.26

78011573932

**SCHEDULE A**

**DTVGTB**

January, 1970

Federal Election Commission

1175 K Street, N.W.

Washington, D.C. 20543

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Losses, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 15a, 17a, and/or 17b  
of FEC FORM 3

Page 1 of 1 for  
Line Number 15 c

(See Separate Schedule for  
each numbered line)

Name of Candidate or Committee in Full		COURTESY FOR CONGRESS		Date (month, day, year)	Amount of each Receipt this Period
<b>Warren County Republican Finance Campaign Committee</b> <b>Hackettstown, NJ 07840</b>		<b>Share of Billboard Advertising</b> Occupation		10-78	331.82
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Full Name, Mailing Address and ZIP Code		Principal Place of Business Occupation		Date (month, day, year)	Amount of each Receipt this Period
<b>SUBTOTAL of receipts this page (optional)</b>					\$ 331.82
<b>TOTAL this period last page (this line number only)</b>					\$ 331.82



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer  
Courter for Congress Committee  
121 Shelly Drive, Suite 2B  
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer  
Page 2

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Enclosures

1. Summary of reason to believe finding
2. Procedures



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Walter T. Peters, Jr., Treasurer  
New Jersey GOP Congressional  
Victory Fund  
28 West State Street, Suite 612  
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on , 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.  
Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Enclosures

Notification of reason to believe finding  
Procedures



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *[signature]*  
FROM: MARJORIE W. FMMONS/MARGARET CHANEY *[signature]*  
DATE: FEBRUARY 1, 1980  
SUBJECT: ADDITIONAL OBJECTION TO MUR 1100

Your office was notified at 10:45 this date  
that Commissioner Aikens had submitted an objection  
to MUR 1100.

At 2:15, February 1, 1980, Commissioner Friedersdorf  
submitted an objection to MUR 1100.





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE ✓  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: FEBRUARY 1, 1980  
SUBJECT: OBJECTION - MUR 1100 - First General  
Counsel's Report dated 1-30-80: Received  
in OCS 1-30-80, 12:25

The above-named document was circulated on a 48  
hour vote basis at 4:00, January 30, 1980.

Commissioner Aikens submitted an objection at close  
of business, January 31, 1980, thereby placing MUR 1100  
on the Executive Session Agenda for February 5, 1980.

January 30, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Jane Colgrove  
SUBJECT: MUR 1100

Please have the attached First General Counsel's  
Report on MUR 1100 distributed to the Commission on a  
48 hour tally basis.

Thank you.

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20003

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION JAN 30 1980

1100

MUR # 5

STAFF MEMBER (S)  
Donaldson

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Jersey GOP Congressional Victory Fund  
Courter for Congress

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 100.4(a)(1)

INTERNAL REPORTS CHECKED: New Jersey GOP Congressional Victory Fund  
Courter for Congress

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multicandidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution ... in violation of 2 U.S.C. § 441a(a)(1)(A). A loan is a contribution to the extent that the obligation remains outstanding (11 C.F.R. § 100.4(a)(1)). Therefore, the GOP Committee's \$3,000 loan, made in November 1978, appears to violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f). Congressman Courter won the general election for U.S. House of Representatives from the 13th District of New Jersey with 52% of the vote in November 1978.

It appears that the Commission should find reason to believe that the GOP Committee may have violated 2 U.S.C. § 441a(a)(1)(A); and reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f).

#### RECOMMENDATIONS

1. Find reason to believe that the New Jersey GOP Congressional Victory Fund may have violated 2 U.S.C. § 441a. Send the attached letter.

2. Find reason to believe that the Courter Committee may have violated 2 U.S.C. § 441a(f). Send the attached letter.

#### Attachments

1. Referral from RAD
2. Proposed letter to GOP Committee
3. Proposed letter to Courter Committee

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

## REPORTS ANALYSIS REFERRAL SHEET

DATE

12/10/79

ANALYST Dug Greevy

not for pub

TO: Office of General Counsel

TEAM CHIEF

Roberta Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW

CB/ps

FROM:

ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE:

New Jersey G.O.P. Congressional Victory Fund

TREASURER:

Walter T. Peters, Jr.

ADDRESS:

Suite 612 - 28 W. State Street  
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Excessive Contribution  
to Candidate

2 U.S.C. 441a

2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 2/21/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM 9/15/78 TO 4/10/79

TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704

CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

### HISTORY:

#### RESULTS OF REVIEW:

ATTACHMENT

Letter received from committee indicating repayment of excessive amount of loan prior to mailing of SV notification by RAD.

5

#### COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Greevy with Earling, 2/21/79

3

Telecon: Greevy with Peters, 6/11/79

4

#### REASON(S) FOR REFERRAL:

ATTACHMENT

Excessive contribution (loan) meets RAD threshold for OGC Review

#### OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

#### OTHER RELEVANT INFORMATION:

Letter from Peters, 3/26/79

Partial Copy of Committee's April 10, 1979 report

RE: Multicandidate Status of Committee--Committee sent Statement of Organization However, this apparently was not received by Commission. The six month re for qualified status would have been on 2/27/79 had that document R been received. SEE REFERRAL FOR RECIPIENT COMMITTEE. COURTER FOR C

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

RAD

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79

ANALYST Mary Jo Mesner mjm

TO: Office of General Counsel

TEAM CHIEF Suzanne Wilson SW

THROUGH: STAFF DIRECTOR *JP.*

COMPLIANCE REVIEW Carroll Bowen CB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13

TREASURER: Ray Mark

ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Accepted an excessive loan from  
a non-qualified committee

2 U.S.C. 441a

2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

Other:

☐ Special Project:

ATTACHMENT

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10/24/78 TO 11/27/78

TOTAL RECEIPTS \$ 61,558 TOTAL EXPENDITURES \$ 58,865

CASH ON HAND \$ 3,273 DEBTS \$ 104,760 (owed by committee)

**HISTORY:**

**RESULTS OF REVIEW:**

**ATTACHMENT**

Excessive loan disclosed on 30 Day Post-General report  
Amount in excess was repaid by committee on April 10 report  
prior to RAD notification of surface violation.

2  
3

**COMMUNICATIONS WITH CANDIDATE/COMMITTEE:**

**ATTACHMENT**

None

**REASON(S) FOR REFERRAL:**

**ATTACHMENT**

Loan received by committee was \$2,000 in excess of limit  
for non-qualified committees

**OTHER PENDING ACTIONS INITIATED BY RAD:**

**ATTACHMENT**

Surface violation notice being processed for 30 Day Post General report  
for two excessive in-kind contributions received from two  
non-qualified committees. These contributions were received prior to  
the General Election.

4

**OTHER RELEVANT INFORMATION:**

**ATTACHMENT**

Committee received excessive loan on 11/6/78 - one day prior to  
general election. Candidate won general election with 52% of  
vote.

See companion referral of New Jersey GOP Congressional  
Victory Fund

**PREVIOUS OGC/AUDIT REFERRALS FROM RAD:**

None

**PREVIOUS MURS:**

MUR 905, closed 3/6/79 (Candidate)



REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/1/79 ANALYST Dug Greevy  
TO: Office of General Counsel TEAM CHIEF Roberta Werfel  
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW CE/RS  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund

TREASURER: Walter T. Peters, Jr.

ADDRESS: Suite 612 - 28 W. State Street  
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Excessive Contribution to Candidate	2 U.S.C. 441a	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review. AND DATE: 2/21/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM 9/15/78 TO 4/10/79

TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704

CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

Letter received from committee indicating repayment of excessive amount  
of loan prior to mailing of SV notification by RAD. 5

COMMUNICATIONS WITH CANDIDATE COMMITTEE: ATTACHMENT

Telecon: Greevy with Earling, 2/21/79 3  
Telecon: Greevy with Peters, 6/11/79 4

REASON(S) FOR REFERRAL: ATTACHMENT

Excessive contribution (loan) exceeds RAD threshold for VCC Review

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION

Letter from Peters, 5/25/79  
Partial copy of Committee's April 13, 1979 report  
RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 3/27/78.  
However, this apparently was not received by Commission. The six month requirement  
for qualified status would have been on 3/27/79 had that document RAD Form 1  
been received. SEE ATTACHMENT FOR RECIPIENT COMMITTEE, COURTESY FOR COMMITTEE

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11 JUN 79  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		DATE	# OF PAGES	MICROFILM LOCATION
		Primary	General	Primary	General			
NEW JERSEY GOV. CONVENTION FUND								ID# C00105576
1979	STATEMENT OF ORGANIZATION - AMENDMENT					58NOV79	4	79FEC/121/1841
	MISCELLANEOUS DISBURSATION TO F.E.C.					16NOV79	2	79FEC/121/1894
1978	10 DAY PRE-GENERAL		13,537	4,500		15NOV78 - 21OCT78	6	78FEC/093/1440
	REQUEST FOR ADDITIONAL INFORMATION					15NOV78 - 21OCT78	2	79FEC/122/0494
	10 DAY PRE-GENERAL - AMENDMENT					10OCT78 - 21OCT78	1	79FEC/122/4458
	30 DAY POST-GENERAL		1,159	9,000		29OCT78 - 20NOV78	8	78FEC/096/2541
	REQUEST FOR ADDITIONAL INFORMATION					29OCT78 - 20NOV78	1	79FEC/122/0496
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 - 27NOV78	3	79FEC/122/3619
	YEAR END REPORT					27AUG78 - 31JAN79	3	79FEC/121/1845
	TERMINATION REPORT - TERMINATED	57		1,254		21NOV78 - 12DEC78	8	78FEC/116/0820
1979	APRIL 10 QUARTERLY		2,000		1,950	10APR79	6	79FEC/126/0867
	TOTAL	57	16,696	1,254	15,450		44	TOTAL PAGES

*All reports reviewed*

**SCHEDULE B**

**REVISED**

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

(Operating, Transfers Out, Contributions In-Kind,  
Loans, Loan Repayments and Refunds Made)

Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1 for  
Line Number 22A

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full			
New Jersey G.O.P. congressional Victory Fund			
Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Full Name, Mailing Address and ZIP Code Courter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan  Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure  Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expendi- ture this period

Telecon:

Dug Greevy to Dave Earling  
NJGOP Congressional Victory Fund  
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

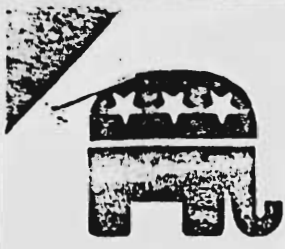
I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~he~~ had ~~not~~ been sent ~~in~~ in August, but that he would send a copy with an original signature in case it had been lost in the mail.

I stated further that the committee had loaned the Courier for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.



# NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION  
COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

March 12, 1979

001008

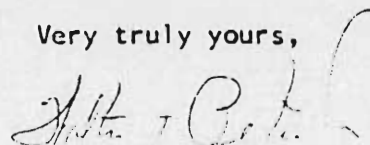
Mr. David Greevy  
Federal Election Commission  
1325 K Street NW  
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

We wish that this notification be made a part of our official file.

Very truly yours,

  
Walter T. Peters, Jr.  
Executive Director

WTP:rp

*"Because We Care"*



# NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED  
FEDERAL ELECTION  
COMMISSION

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

'79 MAR 28 PM 1:36

March 26, 1979

Federal Election Commission  
Attn: David Greeny  
1325 K. Street, N.W.  
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund  
#C00105676

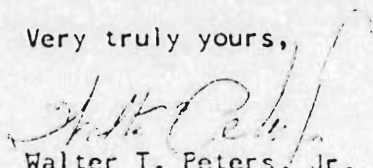
Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
  - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
  - (a) For missing or incorrect signature, see above.
  - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been

Very truly yours,



Walter T. Peters, Jr.  
attachment

"Because We Care"



RECEIVED  
FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20043

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE

RECEIVED  
FEDERAL ELECTION  
COMMISSION

(Except for Candidates or Committees Receiving Federal Matching Funds)

170 APR 16 AM 01

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

NEW JERSEY GOP CONGRESSIONAL VICTORY FUND CO015476

Name of Candidate or Committee (in full)

Candidate/Committee

SUITE 612-28 W. STATE ST

U.S. CONGRESS

Address (number and street)

Office Sought, State/District (if applicable)

TRENTON, NEW JERSEY 08608

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election 1978

4 Type of Report (check appropriate boxes)

☒ April 10 Quarterly Report

☐ Tenth day report preceding \_\_\_\_\_ election on \_\_\_\_\_ (primary, general or convention)

☐ Termination Report

☐ July 10 Quarterly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_ (date)

☐ Amendment for \_\_\_\_\_ (attach report)

☐ October 10 Quarterly Report

☐ Thirtieth day report following \_\_\_\_\_ election (primary, general or convention)

☐ January 31 Annual Report

☐ Monthly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_ (month) (date)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES  
(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through APR 10, 1979		
6 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1979  
(Date)

WALTER T. PETERS, JR.  
(Typed Name of Treasurer or Candidate)

*Walter T. Peters, Jr.*  
(Signature of Treasurer or Candidate)

Notes: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441, (see reverse side of form).

For further information, contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20043

or call 800/424-9530

Approved by GAO  
B-187820 (R050K)  
Expires 2-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.



RECEIVED  
FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463  
JAN 10 1979

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND 2. I.D. No. C0015676  
Name of Candidate or Committee (in full)  
SUITE 612 - 28 W. STATE ST  
Address (number and street)  
TRENTON, NEW JERSEY 08608  
City, State and ZIP Code  
☐ Check if address is different than previously reported.  
3. U.S. CONGRESS  
Office Sought, State/District (if applicable)  
Year of Election 1978

4. Type of Report (check appropriate boxes)

☒ April 10 Quarterly Report

☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)

☐ Termination Report

☐ July 10 Quarterly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)

☐ Amendment for \_\_\_\_\_  
(attach report)

☐ October 10 Quarterly Report

☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)

☐ January 31 Annual Report

☐ Monthly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_  
(month) (date)

This is a report for

☐ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5. Covering Period	Column A This Period	Column B Calendar Year-To-Date
Through <u>APR 10, 1979</u>		
6. Cash on hand January 1, 19		\$
7. Cash on hand at beginning of reporting period	\$ - 0 -	
8. Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9. Total expenditures (from line 20)	\$ 1,950.00	\$ 1,950.00
10. Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11. Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12. Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13. Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

4/10/1979  
(Date)

WALTER T. PETERS, JR.  
(Typed Name of Treasurer or Candidate)

[Signature]  
(Signature of Treasurer or Candidate)

Notes: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g or Section 441; (see reverse side of form).

For further  
information,  
Contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
8-187620 (R0506)  
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

**SCHEDULE A  
REVISED**  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20453

**ITEMIZED RECEIPTS**  
(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)  
Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for  
Line Number 17A-

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND

Full Name, Mailing Address and ZIP Code

COURTNEY FOR CONGRESS COMMITTEE

Principal Place of Business

CAMP

Date (month,  
day, year)

3/8/79

Amount of each Receipt  
this Period

\$ 2,000.00

Receipt for LOAN REPAYMENT

☐ Primary ☐ General ☒ Other

Occupation

POLITICAL COMM.

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

**SUBTOTAL** of receipts this page (optional):

\$ 2,000.00

**TOTAL** this period (fill page this line number only):

\$ 2,000.00

70031357851

Telecon:

Greevy with Walter Peters  
NJ GOP Congressional Victory Fund  
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

**SCHEDULE C**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20463

**DEBTS AND OBLIGATIONS**  
 Supporting Line Numbers 12 and 13  
 DEBTS AND OBLIGATIONS

Page 1 of 1 for  
 Line Number 12

(Use Separate Schedules for  
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

*NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND*

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

*COURTNEY FOR CONGRESS COMMITTEE  
 256 MAIN ST  
 HACKETTSTOWN, N.J. 07930*

Date (month,  
 day, year)

Amount of Original  
 Debt, Contract,  
 Agreement or  
 Promise

Cumulative  
 Payment  
 To Date

Outstanding  
 Balance at  
 Close of  
 This Period

☐ Primary ☒ General ☐ Other

\$ 3,000.00

\$ 2,000.00

\$ 1,000.00

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,  
 day, year)

Amount of Original  
 Debt, Contract,  
 Agreement or  
 Promise

Cumulative  
 Payment  
 To Date

Outstanding  
 Balance at  
 Close of  
 This Period

☐ Primary ☐ General ☐ Other

\$

\$

\$

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,  
 day, year)

Amount of Original  
 Debt, Contract,  
 Agreement or  
 Promise

Cumulative  
 Payment  
 To Date

Outstanding  
 Balance at  
 Close of  
 This Period

☐ Primary ☐ General ☐ Other

\$

\$

\$

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional) . . . . .

\$

\$

\$

TOTAL this period (last page this line number only) . . . . .

\$ 3,000 -

\$ 2,000 -

\$ 1,000 -

9031157871

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Mary Jo Mesner mjm  
 TO: Office of General Counsel TEAM CHIEF Suzanne Wilson su  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Carroll Bowen CB/RS  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13  
 TREASURER: Ray Mark  
 ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Accepted an excessive loan from 2 U.S.C. 441a 2  
 a non-qualified committee

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:  
☒ Normal Review Other:  
☐ Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10/24/78 TO 11/27/78

TOTAL RECEIPTS \$ 61,568 TOTAL EXPENDITURES \$ 60,865

CASH ON HAND \$ 3,273 DEBTS \$ 104,750 (owed by committee)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

Excessive loan disclosed on 10 Day Post-General report 2  
 Amount in excess was repaid by committee on April 10 report 3  
 prior to RAD notification of surface violation.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

None

REASON(S) FOR REFERRAL: ATTACHMENT

Loan received by committee was \$2,000 in excess of limit for non-qualified committees

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

Surface violation notice being processed for 10 Day Post-General report  
 regarding excessive loan received by committee prior to general election.  
 non-qualified committees. These contributions were received prior to  
 the general election.

OTHER RELEVANT INFORMATION: ATTACHMENT

Committee received excessive loan on 11/5/78 - see pay prior to  
 general election. Candidate won general election with 12,171  
 votes.

See report on referral of New Jersey MCP Congressional

PREVIOUS OCC/AUDIT REFERRALS FROM RAD:

None

PREVIOUS MURS:

MUR 305, closed 3/6/79 (Candidate)

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) 1977-1978

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXP.	DISBURS		COVERAGE DATES	4 OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL		PRIM	Y GENERAL			
COURTIER FOR CONGRESS COMM TEL									
1978	STATEMENT OF DISBURSEMENTS					10JAN78		3	78HSE/127/3608
	STATEMENT OF DISBURSEMENTS AMENDMENT					11JAN78		3	78HSE/127/4500
	STATEMENT OF DISBURSEMENTS AMENDMENT					22JAN78		1	78HSE/129/1343
	40 HOUR CONTRIBUTION (OTI)					2JUN78		1	78HSE/137/3622
	40 HOUR CONTRIBUTION (OTI)					8JUN78		1	78HSE/137/4093
	STATEMENT OF DISBURSEMENTS AMENDMENT					31AUG78		1	78HSE/141/0329
	40 HOUR CONTRIBUTION (OTI)					30CT78		1	78HSE/154/4300
	40 HOUR CONTRIBUTION (OTI)					24DEC78		1	78HSE/151/2244
	40 HOUR CONTRIBUTION (OTI)					24DEC78		1	78HSE/151/3109
	40 HOUR CONTRIBUTION (OTI)					27DEC78		1	78HSE/152/0081
	40 HOUR CONTRIBUTION (OTI)					26DEC78		1	78HSE/152/0787
	40 HOUR CONTRIBUTION (OTI)					28DEC78		1	78HSE/152/0814
	40 HOUR CONTRIBUTION (OTI)					29DEC78		1	78HSE/152/3405
	40 HOUR CONTRIBUTION (OTI)					31DEC78		1	78HSE/154/4246
	40 HOUR CONTRIBUTION (OTI)					31DEC78		1	78HSE/155/0190
	40 HOUR CONTRIBUTION (OTI)					31DEC78		1	78HSE/155/0293
	40 HOUR CONTRIBUTION (OTI)					31DEC78		1	78HSE/155/1415
1977	YEAR END REPORT		400			01DEC77	-31DEC77	2	78HSE/127/4110
	YEAR END REPORT					01DEC77	-31DEC77	1	78HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29DEC77	-31DEC77	2	78FEC/083/5002
1978	APPEAL TO QUARTERLY	27,250		26,87		1JAN78	-31MAR78	10	78HSE/132/5123
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78	-31MAR78	2	78FEC/083/5005
	10 DAY PRE-PRIMARY	36,361		28,492		1APR78	-22MAY78	12	78HSE/136/3041
	REQUEST FOR ADDITIONAL INFORMATION					1APR78	-22MAY78	1	78FEC/083/5000
	30 DAY POST-PRIMARY	17,230		19,44		23MAY78	-26JUN78	12	78HSE/139/3772
	30 DAY POST-PRIMARY AMENDMENT					23MAY78	-26JUN78	1	78HSE/151/0187
	JULY 10 QUARTERLY			5,46		27JUN78	-30JUN78	6	78HSE/140/4471
	OCTOBER 10 QUARTERLY		130,988		110,894	1JUL78	-30SEP78	46	78HSE/148/2918
	10 DAY PRE-GENERAL		51,673		72,061	1OCT78	-23OCT78	33	78HSE/152/0105
	30 DAY POST-GENERAL		21,550		50,865	24OCT78	-27NOV78	42	78HSE/157/3813
	YEAR END REPORT		6,268		8,594	28NOV78	-31DEC78	17	79HSE/161/1994
	REQUEST FOR ADDITIONAL INFORMATION 2ND							1	78FEC/099/2895
	TOTAL	91,148	250,887	80,274	250,414			230	TOTAL PAGES

All reports reviewed



FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURIER FOR CONGRESS COMMITTEE								
	1979 STATEMENT OF ORGANIZATION - AMENDMENT					JUL79	1	ID# C000084269
	STATEMENT OF ORGANIZATION - AMENDMENT					SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					OCT79	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		7,259	JAN79 - 31MAR79	19	79HSE/164/2093
	JULY 10 QUARTERLY		5,025		6,253	APR79 - 30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		26,770		24,071	JUL79 - 30SEP79	19	79HSE/169/1916
	TOTAL	0	39,999	0	38,083		63	TOTAL PAGES

All reports viewed



**SCHEDULE A**

**REVISED**

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

30 Day Post-General

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for  
Line Number 17 a

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

**COURTIER FOR CONGRESS**

Full Name, Mailing Address and ZIP Code

James A. Courter  
Hatchery Road  
Hackettstown, NJ 07840

Principal Place of Business

Courter, Robert & Hare  
Hackettstown, NJ 07840

Date (month,  
day, year)

11/1/78

Amount of each  
this Period

\$5,000.00

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 70,000.00

Full Name, Mailing Address and ZIP Code

NJ GOP Congressional Victory Fund  
28 West State St., Suite 612  
Trenton, NJ 08608

Principal Place of Business

Date (month,  
day, year)

11/6/78

Amount of each Rec  
this Period

\$3,000.00

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 3,000.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

Occupation

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

Occupation

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

Occupation

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

Occupation

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

Occupation

Receipt for:

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Rec  
this Period

SUBTOTAL of receipts this page (optional)

\$ 8,000.00

TOTAL this period (last page this line number only)

\$ 8,000.00

73015733

April 10 Quarterly

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	Repayment of Loan C00105670 Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	2/28/79	\$2,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (additions):			\$ 2,000.00
TOTAL this period (last page this line number only):			\$ 2,000.00

**SCHEDULE A  
REVISED**  
January, 1978  
Federal Election Commission  
125 K Street, N.W.  
Washington, D.C. 20543

### ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Line Number 15 c

Also Submit Schedule for  
each numbered line

Name of Candidate or Committee in Full

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Warren County Republican Campaign Finance Committee Backettstown, NJ 07840	Share of Billboard Advertising	11/78	\$1,230.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	Share of Billboard Advertising	11/78	\$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	Share of Billboard Advertising	11/78	\$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Morris County Women's Club Windale Avenue Chatham, NJ 07928	Share of Expenses		
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
National Chamber Alliance for Box 1728 Politics	Bernard K. Allanson - Organizing	10/12/78	\$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$			
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

79011573032

**FORM 3**

January, 1978  
Federal Election Commission  
1225 K Street, N.W.  
Washington, D.C. 20543

**TRANSFER RECEIPT**

(Contributions, Transfers, Contribution in Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1

Line Number 15 c

Blue Separable Schedules for  
each numbered line

Name of Candidate or Committee on File

COURTIER FOR CONGRESS

30 Day Post Card

Receipt for	Check if Contributor is self-employed	Date (month, day, year)	Amount of each Receipt this Period
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Hackettstown, NJ 07840	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$1,238.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$1,385.24
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	11/78	\$302.64
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation	11/78	\$37.12
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Politics Box 1728 Washington, DC 20013	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	10/12/78	\$2.26
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation		
SUBTOTAL of receipts this page (optional).....			\$ 2,965.26
TOTAL this period (last page this line number only).....			\$ 2,965.26

78011573932

**SCHEDULE A  
REVISED**

January, 1970  
Federal Election Commission  
1125 K Street, N.W.  
Washington, D.C. 20540

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution in-Kind,  
Other Income, Losses, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 15d, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for  
Line Number 15 c

(See Separate Schedule for  
each numbered line)

Name of Candidate or Committee in Full

COURTNEY FOR CONGRESS

10 Day Pre Paid

Full Name, Mailing Address and ZIP Code

Warren County Republican Finance  
Campaign Committee  
Buckettstown, NJ 07840

Principal Place of Business

Share of Billboard  
Advertising

Date (month,  
day, year)

10 18

Amount of each Receipt  
this Period

331.82

Receipt for

☐ Primary ☒ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Date (month,  
day, year)

Amount of each Receipt  
this Period

Occupation

Receipt for

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Appropriate Year To Date \$

SUBTOTAL of receipts this page (optional) .....

\$ 331.82

TOTAL this period (last page this line number only) .....

\$ 331.82





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Walter W. Peters, Jr., Treasurer  
New Jersey GOP Congressional  
Victory Fund  
28 West State Street, Suite 612  
Trenton, New Jersey 08608

Re: MUR 1100

Dear Mr. Peters:

The Federal Election Commission, on February 21, 1979, notified Dave Earling that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appeared that your committee violated 2 U.S.C. § 441a by making an excessive loan to the Courter for Congress Committee in November 1978.

Upon further review of the allegations and the reports filed by your committee, the Commission, on , 1980, determined that there is reason to believe that your committee may have violated 2 U.S.C. § 441a(a)(1)(A).

We acknowledge receipt of your letter dated March 12, 1979, stating that \$2,000 of the \$3,000 loan was repaid; however, it appears that your committee was in violation of the Act during the three months time when the full \$3,000 loan remained outstanding. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

Walter T. Peters, Jr.

Page 2

Attached for your information is a report on the Commission's reason to believe finding, and a copy of the Commission's procedures for handling possible violations.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Robert O. Tiernan  
Chairman

Max L. Friedersdorf  
Vice Chairman

Enclosures

Notification of reason to believe finding  
Procedures



FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE January 18, 1980

MUR NO. 1100  
STAFF MEMBER(S) & TEL. NO.  
Donaldson (202) 523-4057

RESPONDENT New Jersey GOP Congressional  
Victory Fund

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multicandidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

2 U.S.C. § 441a(a)(1)(A) prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees. 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. The GOP Committee's \$3,000 loan to the Courter Committee, which remained outstanding for three months, was to violate 2 U.S.C. § 441a(a)(1)(A).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the GOP Committee violated 2 U.S.C. § 441a(a)(1)(A) in connection with an excessive loan to the Courter Committee.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ray Mark, Treasurer  
Courter for Congress Committee  
121 Shelly Drive, Suite 2B  
Hackettstown, New Jersey 07840

Re: MUR 1100

Dear Mr. Mark:

This letter is to notify you that the Federal Election Commission, in the normal course of its supervisory responsibilities has found reason to believe that your committee may have violated 2 U.S.C. § 441a(f) of the Federal Election Campaign Act of 1971, as amended ("the Act"). A summary of the reason to believe finding is enclosed.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter within ten days of your receipt of this letter. In absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) (formerly 2 U.S.C. § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Ray Mark, Treasurer

Page 2

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedures for handling possible violations.

Sincerely,

Robert O. Tiernan  
Chairman

Max L. Friedersdorf  
Vice Chairman

Enclosures

1. Summary of reason to believe finding
2. Procedures

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE January 22, 1980

MUR NO. 1100  
STAFF MEMBER(S) & TEL. NO.  
Donaldson (202) 523-4057

RESPONDENT Courter for Congress Committee

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

During a regular review of reports filed by the New Jersey GOP Congressional Victory Fund Committee ("GOP Committee") and the Courter for Congress Committee ("Courter Committee"), the Reports Analysis Division discovered that the GOP Committee, a non-qualified multi-candidate committee loaned \$3,000 to the Courter Committee on November 3, 1978. On February 21, 1979, the GOP Committee was contacted by the Reports Analysis Division and informed of the excessive loan. The Courter Committee repaid \$2,000 of the \$3,000 loan on February 28, 1979. This matter was referred to the Office of General Counsel on December 10, 1979.

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 441a prohibits a political committee, other than a multicandidate committee, from contributing in excess of \$1,000 to any candidate and his authorized political committees; and 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C. § 441a (a)(1)(A). 11 C.F.R. § 100.4(a)(1) states that a loan is a contribution to the extent that the obligation remains outstanding. Therefore, it appears that the GOP Committee's \$3,000 loan, made in November 1978, may violate 2 U.S.C. § 441a(a)(1)(A); and the Courter Committee's acceptance of the loan appears to violate 2 U.S.C. § 441a(f).

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Courter for Congress Committee may have violated 2 U.S.C. § 441a(f).

E 122  
MAY 1968  
FEDERAL ELECTION COMMISSION  
General Counsel's Office  
Enforcement Section - Routing Slip

TRACK I

MUR # 1100 Type of Report 1st GC

Staff Member(s) Assigned DONALDSON

To \_\_\_ On \_\_\_ From \_\_\_ for work by staff member.

To CH On 1/8 From SD for typing.

To TV On 1/22 From SD for comment by team leader.

To \_\_\_ On \_\_\_ From \_\_\_ for approval by Special Asst G.C.

To ES On 1/14 From ES for reworking by author. formats on back

To \_\_\_ On \_\_\_ From \_\_\_ for typing.

To D On 1/8 From CH for approval of final by author.

To RE On 1/21 From RE for approval of final by Special Asst. G.C.

To CH On 1/14 From CH for signature by G.C.

To SC On 1/2 From CH for Commission via Docket.

To CH On 1/14 From CH for staff initial of carbon. The center has not raised the

To SC On 1/2 From CH for signature of G.C. intending to be a

To \_\_\_ On \_\_\_ From \_\_\_ for mailing by Docket.

To \_\_\_ On \_\_\_ From \_\_\_ for notification of mailing.

COMMENTS (Please date and initial all comments)

Contributor has terminated + took RAD  
almost a yr. to get up here. This  
matter is a bit old at this point  
but since Center won we can let the  
Comm. decide.

I think we should try

RTB + close the file (JL)

The case is over a year  
old - It's been almost  
a yr. since <sup>notice</sup> ~~RTB~~ was ~~for~~ sent to  
~~ages~~ the contributor + they  
are long gone now. The \$ was  
apparently ~~not~~ by the  
~~the~~ immediately upon  
notification. Also, seems to  
be some confusion over  
whether the contributor  
was multiple date - Also  
it seems like ~~the~~ is in deep debt -  
What do you think?

RTB,

FAD has got to infer these things  
sooner - they didn't even just  
RTB + they had it this long.

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN:

DATE July 2, 1980

ANALYST Mary Jo Mesner

TO: Office of General Counsel  
ATTENTION:

TEAM CHIEF Peter Kell *PK*

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW Wade McArthur

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1100(79)

DATE OF ORIGINAL REFERRAL 12/10/79

\*\*PURPOSE:

Results of RAD Action:

- |   |         |        |
|---|---------|--------|
| 1. 4SV1/80-0041 for 30 Day Post-General Report (1978) | 2/13/80 | Att. 1 |
| 2. RFAI for October 10 Quarterly Report (1979)        | 2/13/80 | Att. 2 |
| 3. Telecon of conversation with Ray Mark              | 2/25/80 | Att. 3 |
| 4. Adequate response to 4SV1/80-0041                  | 2/25/80 | Att. 4 |
| 5. Adequate response to October 10 RFAI               | 2/27/80 | Att. 5 |

OUTCOME: (if applicable)

The unregistered committees will not be referred as the excessive amounts have been refunded and they do not meet the threshold for referral.

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.





## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 13, 1980

Courter for Congress  
Ray Mark, Treasurer  
121 Shelley Drive, Suite 2B  
Hackettstown, NJ 07840

Dear Mr. Mark:

This letter is prompted by the Commission's review of your disclosure reports undertaken in the normal course of carrying out its supervisory responsibilities under the Federal Election Campaign Act (FECA). Based on the requirements of the FECA and appropriate Regulations, the review indicated possible prohibited activity, errors and/or omitted information. We have attached an itemization of the information needing clarification and/or correction.

The Federal Election Commission reviews all federal campaign disclosure documents including those filed initially with the Clerk of the House. For informational purposes only, the Office of the Clerk notifies filers of errors and omissions found in their preliminary review. However, this letter and attached documentation constitute official notification by the Commission.

Please respond within fifteen (15) days from the date of this letter to the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. If you have any questions, you may contact our Reports Analysis Division. The name and telephone number of the analyst handling this matter are located on the attached page(s).

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas J. Haselhorst", is written over the typed name.

Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division

Attachment(s)

C00084269

NJ/13

Courter for Congress

Ray Mark, Treasurer

121 Shelley Drive, Suite 2B

Hackettstown, NJ 07840

Toll Free Number: (800)424-9530

Local Number: (202)523-4172

The following information is requested by our analyst, Mary Jo Mesner, for the 30 Day Post-General Report, covering October 24, 1978 through November 27, 1978.

Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or a political committee, other than a multi-candidate committee, from making contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received contributions which exceed the limits, the Commission recommends that you refund to the donors the amounts in excess of \$1,000. (Any refund should appear on Line 21a of Schedule B on your next report.)

If you find that the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive amount to the donor will be taken into consideration by the Commission. Please inform the Commission of your determination in this matter by letter within fifteen (15) days from the date of this notification.

# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 2 of 2 for

Line Number: 25 c

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

## COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Backetts town, NJ 07840 <i>186</i>	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Rec this Period \$1,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860 <i>186</i>	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Rec this Period \$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960 <i>TRK</i>	Principal Place of Business Share of Billboard Advertising Occupation <i>100105114</i>	Date (month, day, year) 11/78	Amount of each Rec this Period \$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928 <i>186</i>	Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each Rec this Period \$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1725 Politics Washington, DC 20013 <i>TRK</i>	Principal Place of Business Bernard K. Allanson - Organizing Occupation <i>100082040</i>	Date (month, day, year) 10/12/78	Amount of each Rec this Period \$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional) .....			\$ 2,965.24
TOTAL this period (last page this line number only) .....			\$ 2,965

NJ/13

Courter for Congress

Ray Mark, Treasurer

121 Shelley Drive, Suite 2B

Hackettstown, NJ 07840

Toll Free Number: (800) 424-9530

Local Number: (202) 523-4172

The following information is requested by our analyst, Mary Jo Mesner for the October 10 Report, covering July 1, 1979 through September 30, 1979.

On your previous report, you disclose the following outstanding debt:

Bennett Business Equipment \$126.00

However you fail to disclose the status of this debt.

Section 104.8(a) of the Commission's Regulations requires continuous reporting of all debts until extinguished. Please submit a Schedule C, disclosing the status of these debts.

On Schedule C, your report discloses a loan(s) from James A. Courter. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loan(s) is from a bank, please provide the name and address of a lending institution and the interest rate and terms of the loan(s).

On Line 17a of the Detailed Summary Page and Line 13 of Schedule C you disclose a \$7,000 loan from the candidate. However, you have not shown this receipt on Line 17a of Schedule A. Please amend your report accordingly.

On your previous report, you disclose two debts to Creative Ink on 10/23/78 totalling \$5,278.21. The cumulative payment to date is listed as \$3,000. On this report, however, the original debt is disclosed as \$4,870.67 on 10/8/78 and the payment to date is \$799.02. Please amend your report to explain these discrepancies.

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Ray Mark, Treas.

DATE: 2/25/80

NAME OF COMMITTEE OR CANDIDATE: Courter for Congress, NJ

TELEPHONE:

---

Mr. Mark called to say that some amendments that he had already sent in in response to an RFAI were incorrect. In the amendments that had already been sent, he had explained that an excessive contribution from the Warren Co. committee and the Sussex Co. committee were really legal because each was intended for both the primary and general elections. Mr. Mark now told me that, upon further investigation, he had discovered that the contributions were for the general election only and that he was sending another amendment explaining this and saying that the excess amount was being refunded to each committee. He said that the next report, the Q1 would show these amounts being refunded and he apologized for the error. I thanked for calling and said that I would put a note in the committee's file.

JIM COURTER  
15TH DISTRICT, NEW JERSEY

WASHINGTON OFFICE:  
325 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, D.C. 20515  
(202) 223-8801

COMMITTEES:  
ARMED SERVICES  
POST OFFICE AND CIVIL SERVICE

ATTACHMENT 4

Congress of the United States  
House of Representatives  
Washington, D.C. 20515

3001# 557  
DISTRICT OFFICES:

22 N. SUSSEX STREET  
DOVER, NEW JERSEY 07801  
(201) 344-0974

7 MAIN STREET  
FLEMINGTON, NEW JERSEY 08822  
(201) 788-2813

58 TRINITY STREET  
NEWTON, NEW JERSEY 07860  
(201) 383-8818

February 25, 1980

Federal Election Commission  
Washington, D.C. 20463

Att: Miss Mary Jo Mesner

Re: 4SV1/80-0041  
Courter For Congress  
C00084269 . NJ/13

Dear Miss Mesner:

In accordance with our follow-up conversation of today's date, I am herewith enclosing a copy of the original letter I sent to you on February 20, 1980 with respect to the answer I had originally conveyed to you in connection with the in-kind contributions for the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee. I am also enclosing a copy of Schedule A which you had originally sent to me showing that the in-kind contributions received by the Committee were in excess of the \$1,000 that is allowed per election.

In my letter of February 20, 1980 I indicated that the billboard advertising covered both the primary and general election in 1978. This was incorrect. In checking further, I found that the billboard advertising for both committees was for the general election only as originally reported and I am, therefore, on this date, refunding checks to the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee for \$238.00 and \$385.24 respectively. These refunds will be shown on our Quarterly report for the period January 1, 1980 to March 31, 1980 on Line 21 of Schedule B.

Thanking you in advance for your cooperation in this matter.

Very truly yours,

  
Ray Mark, CPA  
Treasurer

RM/kc  
Encl.

91:38 82-11 08



WASHINGTON OFFICE:  
325 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, D.C. 20515  
(202) 225-5801

COMMITTEES:  
ARMED SERVICES  
POST OFFICE AND CIVIL SERVICE

**Congress of the United States**  
**House of Representatives**  
**Washington, D.C. 20515**

DISTRICT OFFICES:  
22 N. SUSSEX STREET  
DOVER, NEW JERSEY 07801  
(201) 366-0974  
7 MAIN STREET  
FLEMINGTON, NEW JERSEY 08822  
(201) 788-2813  
88 TRINITY STREET  
NEWTON, NEW JERSEY 07860  
(201) 383-9818

February 20, 1980

**COPY**

Federal Election Commission  
Washington, D.C. 20463

Att: Miss Mary Jo Mesner

Re: 4SV1/80-0041  
Courter For Congress  
C00084269 NJ/13

Dear Miss Mesner:

In accordance with your letter dated February 13, 1980 (copy attached) I am herewith enclosing an amended Schedule A for Line 15c which indicates that the in-kind contribution for the Warren County Republican Campaign Finance Committee and the Sussex County Republican Committee for the share of billboard advertising covers both the primary and general elections.

Very truly yours,

Ray Mark, CPA  
Treasurer

RM/kc

Encl.



# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 3 of 3

Line Number: 25

(Use Separate Schedules  
each numbered line)

Name of Candidate or Committee in Full

## COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Rackettstown, NJ 07840 <i>186</i>	Principal Place of Business Share of Billboard Advertising Occupation <i>186</i>	Date (month, day, year) 11/78	Amount of each this Period \$1,238.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860 <i>186</i>	Principal Place of Business Share of Billboard Advertising Occupation <i>186</i>	Date (month, day, year) 11/78	Amount of each this Period \$1,385.24
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960 <i>186</i>	Principal Place of Business Share of Billboard Advertising Occupation <i>100105114</i>	Date (month, day, year) 11/78	Amount of each this Period \$302.64
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928 <i>186</i>	Principal Place of Business Share of Expenses Occupation <i>186</i>	Date (month, day, year) 11/78	Amount of each this Period \$37.12
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1726 Washington, DC 20013 <i>186</i>	Principal Place of Business Bernard K. Allanson - Organizing Occupation <i>000082040</i>	Date (month, day, year) 10/12/78	Amount of each this Period \$2.26
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$		
SUBTOTAL of receipts this page (optional) .....			\$ 2,965.26
TOTAL this period (last page this line number only) .....			\$ 2,965.26

100115732

**ARMED SERVICES  
POST OFFICE AND CIVIL SERVICE**

**CERTIFIED**

FEB 20 1964

Congress of the United States

House of Representatives

Washington, D.C. 20515

① Black Stone :  
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 Black Stone Stone : 6  
 (20) 20-20 4  
 ? Black Stone :  
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 (20) 70-20 1  
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 4 ✓ (20) 20-20 8

072869

February 19, 1980

Federal Election Commission  
Washington, D.C. 20463

Att: Miss Mary Jo Musner

Re: 4SV1/80-0041  
Courter For Congress  
C0008426) NJ/13

150 FEB 27 AM 3 21

Dear Miss Mesner:

In accordance with your letter dated February 13, 1980 (copy attached) I am herewith responding to the questions you raised concerning our October 10, 1979 report for the period July 1, 1979 to September 30, 1979.

1. Bennett Business Equipment - The amount owed to Bennett Business Equipment in the amount of \$126.00 was omitted on this report because we discovered that this amount was previously paid and that this was an erroneous invoice that was listed on our FEC report Schedule C.
2. Please be advised that the total amount of loans from James A. Courter was loaned to the Committee from the candidate's personal funds. None of the amounts were borrowed from a banking institution. In addition, I am also enclosing an amended sheet for Line 17a of Schedule A.
3. On our October 10, 1979 report, the amount listed as owing to Creative Ink and Joe Rubin Company in the amounts of \$4,870.67 and \$5,278.21 with cumulative payments to date of \$799.02 and \$4,278.21 were correctly listed. However,

- cont.

FEB 20 1984

-2-

February 19, 1980

**If you have any questions, please do not hesitate to contact me.**

Very truly, yours,

Ray Mark, CPA  
Treasurer

RM/kc

Encl.

CERTIFIED

COM 3269

FEB 28

Courter for Congress  
Ray Mark, Treasurer  
121 Shelley Drive, Suite 2D  
Hackettstown, NJ 07840

Toll Free Number (800) 424-9530  
Local Number (202) 523-4172

The following information is requested by our analyst, Mary Jo Mesner for the October 10 Report, covering July 1, 1979 through September 30, 1979.

On your previous report, you disclose the following outstanding debt:  
Bennett Business Equipment \$120.00

However you fail to disclose the status of this debt.

Section 104.8(a) of the Commission's Regulations requires continuous reporting of all debts until extinguished. Please submit a Schedule C, disclosing the status of these debts.

On Schedule C, your report discloses a loan(s) from James A. Courter. Please clarify whether the amount loaned to the committee was from the candidate's personal funds, or a note obtained from a bank through the candidate. If the loan(s) is from a bank, please provide the name and address of a lending institution and the interest rate and terms of the loan(s).

On Line 17a of the Detailed Summary Page and Line 13 of Schedule C you disclose a \$7,000 loan from the candidate. However, you have not shown this receipt on Line 17a of Schedule A. Please amend your report accordingly.

On your previous report, you disclose two debts to Creative Ink on 10/23/78 totalling \$5,278.21. The cumulative payment to date is listed as \$3,000. On this report, however, the original debt is disclosed as \$4,870.67 on 10/8/78 and the payment to date is \$700.02. Please amend your report to explain these discrepancies.

SCHEDULE A  
REVISED  
January, 1978  
Federal Election Commission  
1325 A Street, N.W.  
Washington, D.C. 20463

COURT  
FEB 21 1980

# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1  
Line Number  
(Use Separate Sheet Number)

Name of Candidate or Committee in Full		Date (month, day, year)		Amount
COURTIER FOR CONGRESS COMMITTEE		7/9/79		17.00
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
James A. Courtier Hatchery Road Hackettstown, NJ 07840		U.S. House of Representatives Washington, DC 20515		
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		Occupation U.S. Congressman		
		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$ 9,000.00		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
		Aggregate Year To Date \$		
Full Name, Mailing Address and ZIP Code		Principal Place of Business		
		Occupation		
SUBTOTAL of receipts this page (optional)				7
TOTAL this period (last page this line number only)				7

SCHWAB & CO  
REVISED  
January 1978  
Federal Election Commission  
1325 A Street, N.W.  
Washington, D.C. 20463

**CERTIFIED**  
**FEB 20 1980**

# DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13  
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

072864

Page 1 of 1  
Line Number 1  
(Use Separate Sheet for each number)

Name of Candidate and Committee in Full

COURTNER FOR CONGRESS COMMITTEE

AMOUNT

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Joe Rubin Company  
128 E. 2nd Street  
Plainfield, NJ 07060

Date (month,  
day, year)

10/23/78

Amount of Original  
Debt, Contract,  
Agreement or  
Promise

\$ 5,278.21

Cumulative  
Payment  
To Date

\$ 4,278.21

☐ Primary ☒ General ☐ Other

NATURE OF OBLIGATION (Details of Debt)

Flyers

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Creative Ink  
Box 1412  
Plainfield, NJ 07061

Date (month,  
day, year)

10/8/78

Amount of Original  
Debt, Contract,  
Agreement or  
Promise

\$ 4,870.67

Cumulative  
Payment  
To Date

\$ 799.02

☐ Primary ☒ General ☐ Other

NATURE OF OBLIGATION (Details of Debt)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,  
day, year)

Amount of Original  
Debt, Contract,  
Agreement or  
Promise

\$

Cumulative  
Payment  
To Date

\$

☐ Primary ☐ General ☐ Other

NATURE OF OBLIGATION (Details of Debt)

SUBTOTALS this period this page (optional) . . . . .

\$

\$

TOTAL this period (last page this line number only) . . . . .

\$

\$

Carry outstanding balance only to appropriate line of summary





## FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

DECEMBER 10, 1977

MEMORANDUM

TO: CHARLES STEELE

THROUGH: ORLANDO B. POTTER *OBP*

FROM: THOMAS HASELHORST *TH*

SUBJECT: REFERRALS FOR NEW JERSEY GOP CONGRESSIONAL VICTORY FUND AND  
COURTER FOR CONGRESS

Please note that the attached refferals are concerned with the  
same violation and should be reviewed concurrently.



REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

## REPORTS ANALYSIS REFERRAL SHEET

DATE 11/1/79ANALYST Dug Greevy *W. J. Jones*

TO: Office of General Counsel

TEAM CHIEF Roberta Werfel *RBW*THROUGH: STAFF DIRECTOR *RBW*COMPLIANCE REVIEW CB/ESFROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JH*

CANDIDATE/COMMITTEE: New Jersey G.O.P. Congressional Victory Fund

TREASURER: Walter T. Peters, Jr.

ADDRESS: Suite 612 - 28 W. State Street  
Trenton, New Jersey 08608

AFFILIATE(S):

ALLEGATION(S):

Excessive Contribution  
to Candidate

CITE:

2 U.S.C. 441a

ATTACHMENT(S)

2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 2/21/79

ATTACHMENT

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 9/15/78 TO 4/10/79

TOTAL RECEIPTS \$ \$16,754 TOTAL EXPENDITURES \$ 16,704

CASH ON HAND \$ 4/10--\$50 DEBTS \$ 1,000 (owed to committee)

**HISTORY:**

RESULTS OF REVIEW: ATTACHMENT

Letter received from committee indicating repayment of excessive amount  
of loan prior to mailing of SV notification by RAD. 5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

Telecon: Greevy with Earling, 2/21/79 3

Telecon: Greevy with Peters, 6/11/79 4

REASON(S) FOR REFERRAL: ATTACHMENT

Excessive contribution (loan) meets RAD threshold for OGC Review

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

**OTHER RELEVANT INFORMATION:**

Letter from Peters, 3/26/79 6

Partial Copy of Committee's April 10, 1979 report 7

RE: Multicandidate Status of Committee--Committee sent Statement of Organization on 8/27/78.  
However, this apparently was not received by Commission. The six month requirement  
for qualified status would have been on 2/27/79 had that document RAD Form 1  
been received. SEE REFERRAL FOR RECIPIENT COMMITTEE, COURTER FOR CONGRESS 1878

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSED DOCUMENTS - (C)

DATE 11JUN79  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		DATES	# OF PAGES	MICROFILM LOCATION
		PREPAID	RECEIVED	PRIMARY	GENERAL			
NEW JERSEY GOP CONG VICTORY FUND								ID# 100105676
1979	STATEMENT OF ORGANIZATION - AMENDED					5MAR79	4	79FEC/11/1841
	MISCELLANEOUS TRANSACTION TO FILE					16MAR79	2	79FEC/121/0384
1978	10 DAY PRE-GENERAL		15,000			15SEP78 - 23OCT78	6	78FEC/095/1440
	REQUEST FOR ADDITIONAL INFORMATION					15SEP78 - 23OCT78	2	79FEC/122/0494
	10 DAY PRE-GENERAL - AMENDMENT					1OCT78 - 23OCT78	1	79FEC/122/4458
	30 DAY POST-GENERAL		14,159			29OCT78 - 20NOV78	8	78FEC/096/2541
	REQUEST FOR ADDITIONAL INFORMATION					29OCT78 - 20NOV78	1	79FEC/122/0496
	30 DAY POST-GENERAL - AMENDMENT					24OCT78 - 27NOV78	3	79FEC/122/3619
	YEAR END REPORT					27AUG78 - 31JAN79	3	79FEC/121/1845
	TERMINATION REPORT - TERMINATED	52		1,254		21NOV78 - 12DEC78	8	78FEC/116/0820
1979	APRIL 10 QUARTERLY		2,000			10APR79	6	79FEC/126/0867
	TOTAL	52	16,696	1,254	1,950		44	TOTAL PAGES

*All reports reviewed*

**SCHEDULE B  
REVISED**

January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

(Operating, Transfers Out, Contributions In-Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 1 of 1 for  
Line Number 22A

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full			
New Jersey G.O.P. congressional Victory Fund			
Full Name, Mailing Address and ZIP Code Republican Party of N.J. Suite 612-28 West State St. Trenton, N.J. 08608	Particulars of Expenditure Organization and administrative support	Date (month, day, year) 11/10/78	Amount of each expendi- ture this period \$6,000.00
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code Courter for Congress Committee P.O. Box 1 Hackettstown, N.J. 07083	Particulars of Expenditure Loan	Date (month, day, year) 11/3/78	Amount of each expendi- ture this period \$3,000.00
Expenditure for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expendi- ture this period
Expenditure for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			

Telecon:

Dug Greevy to Dave Earling  
NJGOP Congressional Victory Fund  
2/21/79

DE called this day regarding the YE non-filer mailgram. The committee had submitted a termination report.

I told him that the termination report was not accepted by the FEC because it disclosed remaining debts and obligations owed by the committee. I provided the appropriate section of the regulations which prohibited termination under such circumstances.

He stated that he understood, and that he would file the YE as requested.

I stated further that we had not received an FEC form 1 for the committee. He stated that ~~it~~ had ~~not~~ been sent ~~in~~ in August, but that he would send a copy with an original signature in case it ~~had~~ been lost in the mail.

I stated further that the committee had loaned the Courter for Congress committee \$3,000, that this loan would be viewed as a contribution to the extent that it remained outstanding, and that the committee was not a multicandidate committee, and therefore, the loan appeared to be in excess of the limits.

He said he would follow up on this matter shortly. I have prepared an SV on the matter.

# NEW JERSEY REPUBLICAN STATE COMMITTEE

FEDERAL ELECTION  
COMMISSION

'79 MAR 16 AM 9:41

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

March 12, 1979

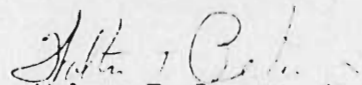
Mr. David Greevy  
Federal Election Commission  
1325 K Street NW  
Washington, D.C. 20403

Dear Mr. Greevy:

This is to officially notify you that on March 5, 1979, the New Jersey G.O.P. Congressional Victory Fund and Committee received a \$2,000.00 payment on the \$3,000.00 outstanding loan from the Courter for Congress Committee.

We wish that this notification be made a part of our official file.

Very truly yours,

  
Walter T. Peters, Jr.  
Executive Director

WTP:rp

*"Because We Care"*



# NEW JERSEY REPUBLICAN STATE COMMITTEE

RECEIVED  
FEDERAL ELECTION  
COMMISSION

DAVID F. NORCROSS  
Chairman

ANN D. FLYNN  
Vice Chairman

ROBERT D. JONES  
Treasurer

KATHLEEN A. THORPE  
Secretary

'79 MAR 28 PM 1:36

March 26, 1979

Federal Election Commission  
Attn: David Greeny  
1325 K. Street, N.W.  
Washington, D.C. 20463

Re: N.J. G.O.P. Victory Fund  
#C00105676

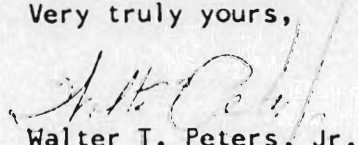
Dear Mr. Greeny:

In reply to your notification of March 19, 1979 concerning missing or incomplete data on reports of the above committee covering periods ending 10/28/78 and 11/20/78, please be advised as follows:

1. 10 Day Pre-Election Report - 10/28/78
  - (a) Please refer to copies of Organization of Committee Report filed with your office earlier. Mr. Peters is the designated Treasurer of this committee and signed accordingly.
2. 30 Day Post-Election Report - 11/20/78
  - (a) For missing or incorrect signature, see above.
  - (b) Missing Schedule C - copy attached.

We thank you for calling these matters to our attention and hope that this will satisfy your requirements. In closing, I would again mention that \$2000 of the \$3000 account receivable shown on the attached Schedule C has been repaid by the Courter Committee.

Very truly yours,



Walter T. Peters, Jr.  
attachment

*"Because We Care"*



RECEIVED MAIL  
APR 10 1979

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

79 APR 16 AM 8

Notes: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND I.D. No. C0015676  
Name of Candidate or Committee (in full) Candidate/Committee  
SUITE 612 - 28 W. STATE ST  
Address (number and street)  
TRENTON, NEW JERSEY 08608  
City, State and ZIP Code ☐ Check if address is different than previously reported. Year of Election 1978

4 Type of Report (check appropriate boxes)

- ☒ April 10 Quarterly Report ☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention) ☐ Termination Report  
☐ July 10 Quarterly Report on \_\_\_\_\_ in the State of \_\_\_\_\_ ☐ Amendment for \_\_\_\_\_  
(date) (attach report)  
☐ October 10 Quarterly Report ☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)  
☐ January 31 Annual Report ☐ Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
(month) (date)  
This is a report for ☐ Primary Election ☒ General Election ☐ Primary and General ☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES  
(Figures may be rounded to nearest dollar.)

5 Covering Period _____ Through <u>APR 10, 1979</u>	Column A This Period	Column B Calendar Year-To Date
6 Cash on hand January 1, 19		\$
7 Cash on hand at beginning of reporting period	\$ - 0 -	
8 Total receipts (from line 19)	\$ 2,000.00	\$ 2,000.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 2,000.00	\$ 2,000.00
9 Total expenditures (from line 25)	\$ 1,950.00	\$ 1,950.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 50.00	\$ 50.00
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ - 0 -	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 1,000.00	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

4/10/1979  
(Date)

WALTER T. PETERS, JR.  
(Typed Name of Treasurer or Candidate)

[Signature]  
(Signature of Treasurer or Candidate)

Notes: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441; (see reverse side of form).

For further  
information,  
Contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

or call 800/424 9530

Approved by GAO  
B 187620 (R0506)  
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

SCHEDULE A  
REVISED  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

ITEMIZED RECEIPTS  
(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)  
Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for

Line Number 17A

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full				
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND				
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
COURTNEE FOR CONGRESS COMMITTEE 256 MAIN ST. HACKETTSTOWN, N.J. 07840		SAME	3/8/79	\$ 2,000.00
Receipt for <u>LOAN REPAYMENT</u>		Occupation		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed		
Full Name, Mailing Address and ZIP Code		Aggregate Year To Date \$		
		Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
		Occupation		
SUBTOTAL of receipts this page (optional)				\$ 2,000.00
TOTAL this period (last page this line number only)				\$ 2,000.00

Telecon:

Greevy with Walter Peters  
NJ GOP Congressional Victory Fund  
6/11/79

I noted that the committee requested termination in '78, and then was informed that they could not terminate until the debt outstanding to the committee was either paid or settled. I called to ask if the committee planned to terminate once the final \$1,000 was paid. He stated that they would be terminating at that time, and that they did not want to forgive the debt, as they needed the funds.

He will send a letter to this effect.

SCHEDULE C  
REVISED  
January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

DEBTS AND OBLIGATIONS  
Supporting Line Numbers 12 and 13  
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 1 for

Line Number 12

(Use Separate Schedules for  
each numbered line)

Name of Candidate and Committee in Full				
NEW JERSEY G.O.P. CONGRESSIONAL VICTORY FUND				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
COURT FOR CONCRETE COMMITTEE 256 MAIN ST HACKETTSTOWN, N.J. 07840		\$3,000.00	\$2,000.00	\$1,000.00
<input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt)				
SUBTOTALS (this period this page (optional))		\$	\$	\$
TOTAL this period (last page this line number only)		\$ 3,000-	\$ 2,000-	\$ 1,000-

7003157871

REFER INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

D  
RAD

### REPORTS ANALYSIS REFERRAL SHEET

DATE 12/10/79 ANALYST Mary Jo Mesner *mjm*  
TO: Office of General Counsel TEAM CHIEF Suzanne Wilson *SW*  
THROUGH: STAFF DIRECTOR *SP* COMPLIANCE REVIEW Carroll Bowen *CB/PS*  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *[Signature]*

CANDIDATE/COMMITTEE: COURTER FOR CONGRESS, NJ/13  
TREASURER: Ray Mark  
ADDRESS: 121 Shelley Drive, Suite 2B, Hackettstown, NJ 07840

AFFILIATE(S): None

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Accepted an excessive loan from  
a non-qualified committee

2 U.S.C. 441a

2

DATE INITIATED: 3/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

- ☒ Normal Review  
☐ Special Project:

Other:

ATTACHMENT

**REPORTS:** All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

**PERIOD COVERED FROM** 10/24/78 **TO** 11/27/78

**TOTAL RECEIPTS \$** 61,558 **TOTAL EXPENDITURES \$** 58,865

**CASH ON HAND \$** 3,273 **DEBTS \$** 104,760 (owed by committee)

**HISTORY:**

**RESULTS OF REVIEW:**

**ATTACHMENT**

Excessive loan disclosed on 30 Day Post-General report  
Amount in excess was repaid by committee on April 10 report  
prior to RAD notification of surface violation.

2  
3

**COMMUNICATIONS WITH CANDIDATE/COMMITTEE:**

**ATTACHMENT**

None

**REASON(S) FOR REFERRAL:**

**ATTACHMENT**

Loan received by committee was \$2,000 in excess of limit  
for non-qualified committees

**OTHER PENDING ACTIONS INITIATED BY RAD:**

**ATTACHMENT**

Surface violation notice being processed for 30 Day Post General report  
for two excessive in-kind contributions received from two  
non-qualified committees. These contributions were received prior to  
the General Election.

4

**OTHER RELEVANT INFORMATION:**

**ATTACHMENT**

Committee received excessive loan on 11/6/78 - one day prior to  
general election. Candidate won general election with 52% of  
vote.

See companion referral of New Jersey GOP Congressional  
Victory Fund

**PREVIOUS OGC/AUDIT REFERRALS FROM RAD:**

None

**PREVIOUS MURS:**

MUR 905, closed 3/6/79 (Candidate)



FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURTNEY FOR CONGRESS COMMITTEE								
	1978 STATEMENT OF ORGANIZATION					3JAN78	3	ID# 000084259
	STATEMENT OF ORGANIZATION- AMENDMENT					11JAN78	3	78HSE/127/3608
	STATEMENT OF ORGANIZATION- AMENDMENT					27JAN78	4	78HSE/129/1343
	48 HOUR CONTRIBUTION NOTICE					6JUN78	1	78HSE/137/3622
	48 HOUR CONTRIBUTION NOTICE					8JUN78	1	78HSE/137/4093
	STATEMENT OF ORGANIZATION- AMENDMENT					31AUG78	1	78HSE/144/0329
	48 HOUR CONTRIBUTION NOTICE					30C178	1	78HSE/154/4380
	48 HOUR CONTRIBUTION NOTICE					24OCT78	1	78HSE/151/2241
	48 HOUR CONTRIBUTION NOTICE					26OCT78	1	78HSE/151/3109
	48 HOUR CONTRIBUTION NOTICE					27OCT78	1	78HSE/152/0081
	48 HOUR CONTRIBUTION NOTICE					28OCT78	1	78HSE/152/0787
	48 HOUR CONTRIBUTION NOTICE					29OCT78	1	78HSE/152/0814
	48 HOUR CONTRIBUTION NOTICE					29OCT78	1	78HSE/152/3405
	48 HOUR CONTRIBUTION NOTICE					3NOV78	1	78HSE/154/4746
	48 HOUR CONTRIBUTION NOTICE					3NOV78	1	78HSE/155/0190
	48 HOUR CONTRIBUTION NOTICE					3NOV78	1	78HSE/155/0293
	48 HOUR CONTRIBUTION NOTICE					9NOV78	1	78HSE/155/1415
1977	YEAR END REPORT		400			0 29DEC77 -31DEC77	2	78HSE/127/4110
	YEAR END REPORT 3A - POSTCARD						1	77HSE/127/4109
	REQUEST FOR ADDITIONAL INFORMATION					29DEC77 -31DEC77	2	78FEC/083/5002
1978	APRIL 10 QUARTERLY	27,252		26,872		1JAN78 -31MAR78	10	78HSE/132/5173
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	2	78FEC/083/5005
	10 DAY PRE-PRIMARY	36,666		28,496		1APR78 -22MAY78	17	78HSE/136/3041
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 -22MAY78	1	78FEC/083/5000
	30 DAY POST-PRIMARY	17,230		19,442		23MAY78 -26JUN78	12	78HSE/139/3772
	30 DAY POST-PRIMARY AMENDMENT					23MAY78 -26JUN78	1	78HSE/151/0187
	JULY 10 QUARTERLY	0		5,464		27JUN78 -30JUN78	6	78HSE/140/4471
	OCTOBER 10 QUARTERLY		130,988		110,894	1JUL78 -30SEP78	46	78HSE/148/2918
	10 DAY PRE-GENERAL		51,675		72,061	1OCT78 -23OCT78	33	78HSE/152/0105
	30 DAY POST-GENERAL		61,558		58,865	24OCT78 -27NOV78	42	78HSE/157/3813
	YEAR END REPORT		6,248		8,594	28NOV78 -31DEC78	19	79HSE/161/1994
	REQUEST FOR ADDITIONAL INFO 2ND						1	78FEC/099/2895
	TOTAL	31,148	250,982	30,274	250,414		230	TOTAL PAGES

All reports reviewed



FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1979-1980

DATE 29NOV79  
PAGE

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COURTIER FOR CONGRESS COMMITTEE								ID# C00004269
1979	STATEMENT OF ORGANIZATION- AMENDMENT					6JUL79	1	79HSE/166/1118
	STATEMENT OF ORGANIZATION- AMENDMENT					26SEP79	1	79HSE/168/1884
	STATEMENT OF ORGANIZATION					2NOV79	3	79HSE/170/0730
	APRIL 10 QUARTERLY		7,404		7,259	1JAN79 -31MAR79	19	79HSE/164/2093
	JULY 10 QUARTERLY		5,825		6,753	1APR79 -30JUN79	20	79HSE/167/0511
	OCTOBER 10 QUARTERLY		26,770		24,071	1JUL79 -30SEP79	19	79HSE/169/1916
	TOTAL	0	39,999	0	38,083		63	TOTAL PAGES

All reports reviewed

30 Day Post-General

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for  
Line Number 17 a

(Use Separate Schedule for  
each numbered line)

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code: James A. Courtier Hatchery Road Hackettstown, NJ 07840	Principal Place of Business Courtier, Robert & Hare Hackettstown, NJ 07840	Date (month, day, year) 11/1/78	Amount of each this Period \$5,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 70,000.00		
Full Name, Mailing Address and ZIP Code: NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608	Principal Place of Business	Date (month, day, year) 11/6/78	Amount of each Rec this Period \$3,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3,000.00		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
Full Name, Mailing Address and ZIP Code:	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
SUBTOTAL of receipts this page (optional).			\$ 8,000.00
TOTAL this period (last page this line number only).			\$ 8,000.00

7301157333

# ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions to-Kind  
 Loans, Loan Repayments and Refunds Made)  
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
 of FEC FORM 3

Page 21 of 21  
 Line Number 21

(Use Separate Schedules for  
 each numbered line)

April 10 Quarterly

Name of Candidate or Committee in Full

COURTIER FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
NJ GOP Congressional Victory Fund 28 West State St., Suite 612 Trenton, NJ 08608 220 K	Repayment of Loan C00105676 Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	2/28/79	\$2,000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional) . . . . .			\$ 2,000.00
TOTAL this period (last page this line number only). . . . .			\$ 2,000.00

**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 125 K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 15 c

Also See the Schedules for  
 each numbered line

Name of Candidate or Committee in Full <b>COURTNEY FOR CONGRESS</b> <span style="float: right;">30 Day Post Card</span>			
Full Name, Mailing Address and ZIP Code <b>Warren County Republican Campaign Finance Committee</b> <b>Rackettstown, NJ 07840</b>	Principal Place of Business <b>Share of Billboard Advertising</b> Occupation	Date (month, day, year) <b>11/78</b>	Amount of each Receipt this Period <b>\$1,238.00</b>
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code <b>Sussex County Republican Comm.</b> <b>P.O. Box 425</b> <b>Newton, NJ 07860</b>	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business <b>Share of Billboard Advertising</b> Occupation	Date (month, day, year) <b>11/78</b>	Amount of each Receipt this Period <b>\$1,385.24</b>
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code <b>Morris County Republican Comm.</b> <b>11 Washington Street</b> <b>Morristown, NJ 07960</b>	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business <b>Share of Billboard Advertising</b> Occupation	Date (month, day, year) <b>11/78</b>	Amount of each Receipt this Period <b>\$302.64</b>
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code <b>Morris County Women's Club</b> <b>Ferndale Avenue</b> <b>Chatham, NJ 07928</b>	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business <b>Share of Expenses</b> Occupation	Date (month, day, year) <b>11/78</b>	Amount of each Receipt this Period <b>\$37.12</b>
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code <b>National Chamber Alliance for</b> <b>Box 1728</b> <b>Politics</b> <b>Washington, DC 20013</b>	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business <b>Bernard K. Allanson - Organizing</b> Occupation	Date (month, day, year) <b>10/12/78</b>	Amount of each Receipt this Period <b>\$2.26</b>
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
<b>SUBTOTAL of receipts this page (optional):</b>			<b>\$ 2,965.26</b>
<b>TOTAL this period (last page this line number only):</b>			<b>\$ 2,965.26</b>

78011573932

**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20543

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 15 c

Also Separate Schedules for  
 each numbered line

Name of Candidate or Committee in Full			
<b>COURTIER FOR CONGRESS</b> <i>3C Day Post GEN</i>			
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Warren County Republican Campaign Finance Committee Rackettstown, NJ 07840	Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,238.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Sussex County Republican Comm. P.O. Box 425 Newton, NJ 07860	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$1,385.24
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Republican Comm. 11 Washington Street Morristown, NJ 07960	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Billboard Advertising Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$302.64
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code Morris County Women's Club Ferndale Avenue Chatham, NJ 07928	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Share of Expenses Occupation	Date (month, day, year) 11/78	Amount of each Receipt this Period \$37.12
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code National Chamber Alliance for Box 1728 Politics Washington, DC 20013	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Bernard K. Allanson - Organizing Occupation	Date (month, day, year) 10/12/78	Amount of each Receipt this Period \$2.26
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other Full Name, Mailing Address and ZIP Code	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date \$ Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional) .....			\$ 2,965.26
TOTAL this period last page this line number only) .....			\$ 2,965.26

78011573932



**SCHEDULE A**  
**REVISED**  
 January, 1978  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20545

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution in-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 1 for  
 Line Number 15 c

Is the Separate Schedule for  
 each numbered line?

Name of Candidate or Committee in Full		COURTESY FOR CONGRESS		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code Warren County Republican Finance Campaign Committee Backettstown, NJ 07840		Principal Place of Business Share of Billboard Advertising	Occupation	10.78	331.82
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		Date (month, day, year)	Amount of each Receipt this Period
Full Name, Mailing Address and ZIP Code		Principal Place of Business	Occupation	Date (month, day, year)	Amount of each Receipt this Period
SUBTOTAL of receipts this page (optional).....					\$ 331.82
TOTAL this period (last page this line number only).....					\$ 331.82



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1100

Date Filmed 4/22/81 Camera No. --- 2

Cameraman BPC





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 1100.

32010304653





PAID  
TO THE  
ORDER OF  
TREASURER OF THE UNITED STATES  
NEW JERSEY  
THRENTON STREET, NEW YORK  
05008

Five hundred and fifty  
THE NATIONAL STATE BANK  
STATE STREET OFFICE  
TRENTON, NEW JERSEY

Measure of the United States  
from hundred and forty  
The NATIONAL STATE P.  
STATE STREET

STATE STREET BANK  
TRENTON, NEW JERSEY

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March 21, 1907

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STERNS. HERBERT & WEINROTH

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

186 WEST STATE STREET

P. O. BOX 1298

TRENTON, NEW JERSEY 08607



Ms. Suzanne Callahan  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

JIM COURTER  
13TH DISTRICT, NEW JERSEY

WASHINGTON OFFICE:  
325 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, D.C. 20515  
(202) 225-5801

COMMITTEES:  
ARMED SERVICES  
POST OFFICE AND CIVIL SERVICE

**Congress of the United States**  
**House of Representatives**  
**Washington, D.C. 20515**

February 29, 1980

MAR 1980 000 # 551  
DISTRICT OFFICES:  
22 N. SUSSEX STREET  
DOVER, NEW JERSEY 07801  
(201) 366-0974  
7 MAIN STREET  
FLEMINGTON, NEW JERSEY 08822  
(201) 786-2813  
58 TRINITY STREET  
NEWTON, NEW JERSEY 07860  
(201) 383-9818

Mr. Robert O. Tiernan  
Federal Election Commission  
Washington, DC 20463

008710

RE: MUR 1100

Dear Mr. Tiernan:

This letter is in response to your letter of February 22, 1980 to my Campaign Treasurer, Mr. Ray Mark.

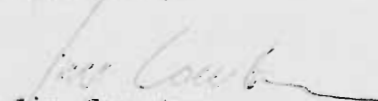
On November 3, 1978, Mr. Roger Bodman, my Campaign Manager, accepted a check from the New Jersey GOP Congressional Victory Fund, an arm of the New Jersey Republican State Committee, in the amount of \$3,000.00. This contribution was in the nature of a loan.

On or about February 21, 1979, Mr. Bodman, who now serves as my Administrative Assistant, received a call from Mr. Walter Peters, Executive Director of the New Jersey Republican State Committee, who informed us that the loan made on November 3, 1978 was in excess of the amount permitted by law. We immediately issued a check in the amount of \$2,000.00 in order to bring the loan into accordance with the law. A copy of the check and a copy of my letter to Mr. David Norcross, Chairman of the New Jersey Republican State Committee, are enclosed.

2 U.S.C.-441a (f) states that no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C.-441(a) (1) (A). The Courter for Congress Committee did not knowingly accept this contribution in violation of the law. In fact, the Committee assumed that the New Jersey GOP Congressional Victory Fund was properly registered with the Federal Election Commission as a multi-candidate committee legally able to contribute up to \$5,000.00 per candidate in the general election of 1978. Obviously this was not the case. Had we known in November of 1978 that this Committee was not properly registered with the Federal Election Commission, we certainly would not have accepted the check.

I hope that this explanation will assist in this inquiry.

Sincerely,

  
Jim Courter  
Member of Congress

JAC/rs  
Enclosures

February 28, 1979

Mr. David Norcross, Chairman  
N.J. Republican State Committee  
Room 612  
28 West State St.  
Trenton, N.J. 08608

Dear David:

As you know, there seems to be some question concerning the loan that the N.J. G.O.P. Congressional Victory Fund made to my campaign. I was assured, by Walt Peters, that this transaction was approved by the Federal Election Commission.

We, of course, noted this loan on our reports to the F.E.C. — as the law requires.

It has now come to my attention, however, that there is possibly a problem with this loan. I am, therefore, enclosing a check from the Courter for Congress Committee in the amount of \$2000.00, which will reduce the loan to the \$1,000.00 limit permitted by the F.E.C.

Although I sincerely appreciate the loan made to my campaign, I cannot help but feel that this problem could have been avoided with proper investigation of F.E.C. regulations by the State Committee.

I would hope that this type of problem could be avoided in the future.

Sincerely,

Jim Courter  
Member of Congress

JAC/rb  
Enc.  
CC: Walter Peters

COURTER FOR CONGRESS COMMITTEE

256 MAIN STREET  
HACKETTSTOWN, N. J. 07840

797

85-32/212

PAY  
TO THE  
ORDER OF

N.I. GOP Congressional Victory Fund

2/28 1979 \$2000.00

Two thousand & 00/100

DOLLARS



GARDEN STATE NATIONAL BANK  
PARAMUS, NEW JERSEY  
Hackettstown Office - Hackettstown, N.J. 07840

Roger A. Bohan

Ruth L. Wendler

FOR

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Congress of the United States

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OFFICIAL BUSINESS



Mr. Robert O. Tiernan  
Federal Election Commission  
Washington, DC 20463



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON D.C. 20463

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