



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1497

Date Filmed 3-15-83 Camera No. --- 2

Camera ~~man~~ M. J. L.

MUR 1497

FEDERAL ELECTION COMMISSION

Routing Cards

12-Day Report

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy. |
| <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) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Stephen H. Minors

date

March 1, 1983

FEC 9-21-77



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 22, 1983

Rowley Redington
Rowley Redington Corporation
14 Berkeley Place
Montclair, New Jersey 07042

RE: MUR 1497
Rowley Redington Corporation
Rey Redington for Congress
Committee
Rowley Redington

Dear Mr. Redington:

The Federal Election Commission notified you on October 28, 1982, of a complaint which alleges that you, the Rowley Redington Corporation and the Rey Redington for Congress Committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on February 1, 1983, determined that there is an insufficient basis upon which to base a finding that any violation of the Act was committed. Accordingly, the Commission determined there is no reason to believe that you, the Rowley Redington Corporation, or the Rey Redington for Congress Committee violated 2 U.S.C. § 441b(a). The Commission has therefore, closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

8304038403



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 22, 1983

Mr. Stephen J. Edelstein
Craig & Edelstein
1129 Bloomfield Avenue
West Caldwell, New Jersey 07006

Re: MUR 1497

Dear Mr. Edelstein:

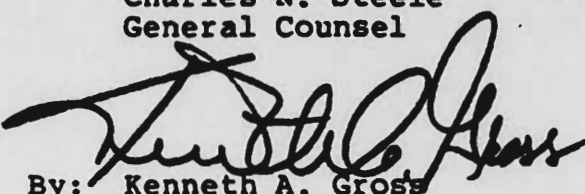
The Federal Election Commission has reviewed the allegations of your complaint dated October 21, 1982, and determined that on the basis of the information provided in your complaint and by the respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1497
Rowley Redington)
Stephen J. Edelstein)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 16, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1497:

1. Approve and send the letter to the respondents as attached to the General Counsel's Memorandum to the Commission dated February 14, 1983.
2. Approve and send the letter to the complainant as attached to the General Counsel's February 14, 1983 Memorandum to the Commission.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

2-16-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-14-83, 11:22
2-14-83, 4:00

B 3 0 4 0 3 8 4 0 3 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL *mwe*
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: FEBRUARY 16, 1983
SUBJECT: MUR 1497 - Memorandum to the Commission
dated February 14, 1983

You were previously notified of an objection to the
above-captioned matter by Commissioner Reiche.

On February 15, 1983, Commissioner Reiche withdrew
his objection to this matter and cast a affirmative
vote.

3304018403



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JAN SAVAGE *JS*
DATE: FEBRUARY 15, 1983
SUBJECT: OBJECTION - MUR 1497 General Counsel's
Report dated February 14, 1983

The above-named document was circulated to the
Commission on Monday, February 14, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	<u>X (Comments)</u>

This matter will be placed on the Executive Session
agenda for Wednesday, February 23, 1983.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES STEELE,
GENERAL COUNSEL

FROM:

MARJORIE EMMONS/JAN SAVAGE *JS*

DATE:

FEBRUARY 15, 1983

SUBJECT:

COMMENTS RE: MUR 1497 General
Counsel's Report dated
February 14, 1983

Attached is a copy of Commissioner Harris'
vote sheet with comments regarding MUR 1497.

8304038403

February 14, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1497

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

Attachment

cc: Mims

3304038400



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER SECRETARY
ON
83 FEB 14 All: 22

February 14, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1497

SENSITIVE

On February 1, 1983, the Commission by a vote of five to one, declined to adopt the recommendation of the General Counsel in the above-captioned matter to find reason to believe violations occurred. Accordingly, this Office has revised the proposed letter to the respondents in this matter and submits it, along with the letter to the complainant, for your approval.

Recommendation

1. Approve and send the attached letter to respondents.
2. Approve and send the attached letter to complainant.

Attachments

1. Letter to Rowley Redington, et al.
2. Letter to Stephen J. Edelstein



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Rowley Redington
Rowley Redington Corporation
14 Berkeley Place
Montclair, New Jersey 07042

RE: MUR 1497
Rowley Redington Corporation
Rey Redington for Congress
Committee
Rowley Redington

Dear Mr. Redington:

The Federal Election Commission notified you on October 28, 1982, of a complaint which alleges that you, the Rowley Redington Corporation and the Rey Redington for Congress Committee violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on February 1, 1983, determined that there is an insufficient basis upon which to base a finding that any violation of the Act was committed. Accordingly, the Commission determined there is no reason to believe that you, the Rowley Redington Corporation, or the Rey Redington for Congress Committee violated 2 U.S.C. § 441b(a). The Commission has therefore, closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Attachment 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Stephen J. Edelstein
Craig & Edelstein
1129 Bloomfield Avenue
West Caldwell, New Jersey

Re: MUR 1497

Dear Mr. Edelstein:

The Federal Election Commission has reviewed the allegations of your complaint dated October 21, 1982, and determined that on the basis of the information provided in your complaint and by the respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 2

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 21 A10: 23

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION 1-21-83

MUR NO. 1497
DATE COMPLAINT RECEIVED
BY OGC 10/25/82
DATE OF NOTIFICATION TO
RESPONDENT 10/28/82
STAFF MEMBER Mims

SENSITIVE

COMPLAINANT'S NAME: Stephen J. Edelstein
RESPONDENTS' NAMES: Rowley Redington
Rey Redington for Congress Committee
Rowley Redington Corporation

RELEVANT STATUTE: 2 U.S.C. §§ 441b(a) and 441d

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On October 25, 1982, the Office of General Counsel received a complaint from Stephen J. Edelstein. The complaint alleged that an article which appeared in the classified section of the Montclair Times (September 2, 1982) constituted a political advertisement and as such it violated 2 U.S.C. § 441d by its failure to carry the required notice. The complainant further asserted that the article, if paid for by respondent Old Rowley Farms, violated 2 U.S.C. § 441b(a).

FACTUAL AND LEGAL ANALYSIS

The newspaper article (Attachment 1) clearly shows Congressional candidate Rey Redington standing in front of two signs, the first of which reads, "Rey Redington for United..." and the second, "Republican...." (The photograph in question is

at the top of the article. The manner in which the picture is cropped does not reveal the entire message on the sign.) Although the picture does not carry enough information from which one can infer an attempted political message, the body of the article makes it clear that Redington is a Congressional candidate. The body of the article, in conjunction with the photograph, arguably suggests that the reader should support Redington's candidacy.

Determining whether the article violates the Act, however, is a different matter. First, it should be noted that the article is set up as a feature in the middle of an entire page of advertising. The title of the page is "Who's Who in Montclair, A Business Review." The importance of this point is that had the article been prepared by the newspaper without regard to any compensation by Redington or his business, it would have been part of the legitimate function of the press and not violative of the Act, in our view. See Readers Digest Association, Inc. v. FEC, 509 F.Supp. 1210 (S.D.N.Y. 1981).

On December 29, 1982, the Office of General Counsel received a response from Mr. Redington on behalf of the Rey Redington for Congress Committee and Rowley Redington Corporation. The response clearly indicates that the article in question was paid for by the Redington Corporation:

"The advertisement referred to in the complaint is an ongoing business ad that my corporation participates in...."

3304038407

Mr. Redington further explains:

"This ad was the result of the continuation of a long term business ad that has consistently featured my business...."

Thus, it appears that the ad was not within the scope of the "legitimate press function" contemplated by Readers Digest, supra. Because the article should be properly viewed as an advertisement, and because it appears to meet the "in connection with a federal election" standard of 2 U.S.C. § 441b(a), it would not be permissible for the Rowley Redington Corporation to pay for the ad or for Rey Redington, as an officer of the corporation, to authorize the expenditure. Knowledge of the source of funds used to pay for the ad must be imputed to Mr. Redington as a candidate in accepting the benefits of the ad, as well as to the Rey Redington for Congress Committee.

Accordingly, it is the recommendation of the Office of General Counsel that the Commission determine there is reason to believe the Rey Redington for Congress Committee, Rowley Redington Corporation, and Rowley Redington (in his capacity as a corporate officer) violated 2 U.S.C. § 441b(a).

Because the content of the advertisement does not rise to the level of "express advocacy" as contemplated in 2 U.S.C. § 441d, however, we do not recommend that the Commission find reason to believe regarding the complainant's assertion that a sponsorship notice should have appeared on the advertisement.

RECOMMENDATIONS

1. Find reason to believe that Rowley Redington Corporation violated 2 U.S.C. § 441b(a) by making a contribution in connection with a federal election.
2. Find reason to believe that the Rey Redington for Congress Committee violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.
3. Find reason to believe Rowley Redington violated 2 U.S.C. § 441b(a) by consenting to the making of a corporate contribution and by accepting such contribution as a candidate.
4. Find no reason to believe Rowley Redington Corporation violated 2 U.S.C. § 441d by failing to include a sponsorship notice on an advertisement.
5. Send the attached letter.

Charles N. Steele
General Counsel

January 20, 1983
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - Article
- 2 - Response
- 3 - Proposed letter

03040594007

Who's Who in Montclair A BUSINESS REVIEW

REY REDINGTON

For United

"!%#\$%!!," quoth the commuter, having neglected to stop at the grocery store on the way home, "I forgot the milk!" Episodes like this seldom occur in the lives of drivers who get their gasoline and their groceries on the corner of Elm Street and Bloomfield Avenue.

It's there you'll find OLD ROWLEY FARMS, at the sign of MONTCLAIR EXXON (which has been hanging out on that corner for about fifty years). Owner and Congressional candidate Rey Redington, a gent of bucolic bent, and his staff of friendly neighbors who make shopping at OLD ROWLEY a real down-home pleasure.



Attachment 1, page 1 of 1

Rey Redington
14 Berkeley Road
Montclair, New Jersey
December 20, 1982

DEC 29 P 1:24
02042

Mims

Charles N. Steele Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1497

Dear Mr. Steele:

Please excuse the time since my initial telephone response to the subject complaint. I am currently working without the benefit of staff or funds.

I am responding to the subject complaint for both my campaign committee and for the Rowley Redington Corporation of which I am President.

The advertisement referred to in the complaint is an ongoing business ad that my corporation participates in on a weekly basis with our local weekly newspaper. Every several months the subscribing advertisers are featured individually in the main text of the advertisement.

When the time comes for a subscriber to be featured, the advertising salesman arranges to take pictures of the business and its employees and writes current copy to go with the feature.

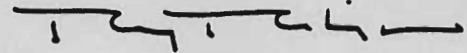
When the time came for my business to be the subject of the feature, I was not readily available to meet the salesman at my business location to take a current picture. Since I had a full beard in the previous picture, we felt the update was needed. To accomodate my schedule, the salesman arranged to meet me when I was scheduled to be at my campaign headquarters. When he arrived, we stepped outside where he took the picture. The salesman then updated the copy that appeared thereafter with my picture and the others in the newspaper.

I have taken the liberty of enclosing a copy of a previous feature (along with another) so that you might see the type and personal nature of these types of ads.

This ad was the result of the continuation of a long-term business ad that has consistantly featured my business, myself, my employees and even my wife, in a personal way. The background of the questioned picture was the result of my inability to meet with the salesman at my business because of schedule constraints.

I hope this explanation responds to the concerns mentioned in the subject complaint. Should you desire or require further information or discussion, please advise. I can be reached during the day at (201) 746-5500.

Sincerely,



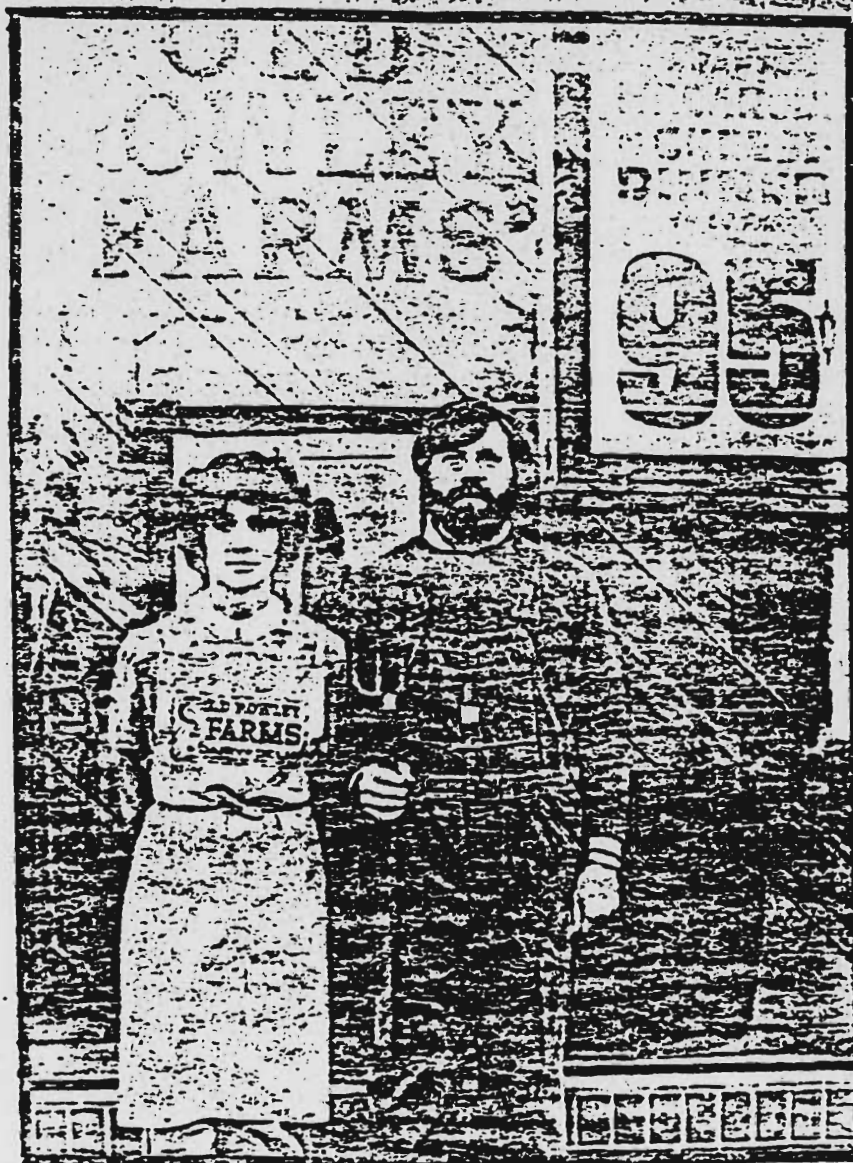
Rey Redington
Rey Redington for Congress
Committee
and
Rowley Redington Corporation

83040334100

Attachment 2, page 2 of 10

Who's Who in Montclair

A BUSINESS REVIEW



Food and fuel in one stop — a concept whose time has come and that's making Elm Street and Bloomfield Avenue or corners for miles around. It's there that delicious dependable petroleum products are being dispensed to muters and shoppers who have discovered Monclair's

OLYMPIC
FOR BOYS, MEN AND

OLYMPIC CHARGE/MAS

HOUSE OF F
FINIAL'S
RA

Lamp Repairs A

51 UPPER MONTCLAIR PLAZA

MULT
Investment

Call or write for
An investment
years is worth

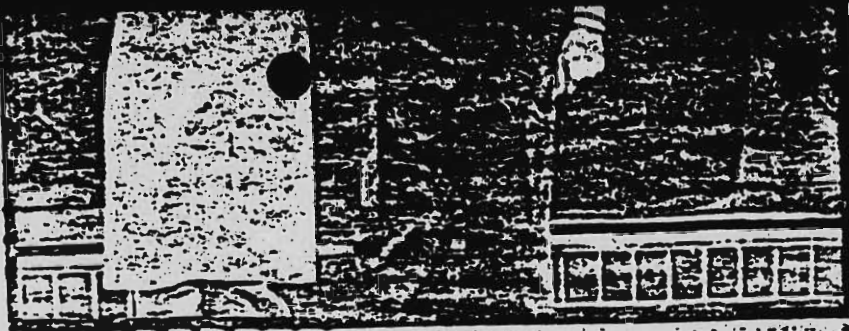
17 James St., Bloomfield

- Engagement Rings
- Repairs
- Investment Jewelry
- Custom Design

KITCHEN

Attachment 2, page 3 of 10

ER



Food and fuel in one stop — a concept whose time has come, and one that's making Elm Street and Bloomfield Avenue one of the hottest corners for miles around. It's there that delicious delicatessen and dependable petroleum products are being dispensed to throngs of commuters and shoppers who have discovered Monclair's ultimate convenience store, OLD ROWLEY FARMS/MONTCLAIR EXXON.

They've also discovered that high standards of quality and service are the rule there, and that Owner Rey Redington is maintaining a tradition of excellence and community service begun at MONTCLAIR EXXON half a century ago.

OLD ROWLEY features a fine selection of groceries, dairy products, deli, snacks, baked goods, beverages, sandwiches, newspapers and lots more, including a great cup of coffee, which is given free to early morning customers. They also specialize in what Rey refers to as "Oops, I forgot" items.

"We wanted to be more than a convenience store for our gasoline customers," Rey told us. "OLD ROWLEY FARMS carries one of the largest selections of everyday items to be found. It's a full line convenience food store. If you're out of something, chances are you'll find it here."



- Engagement Rings
- Repairs
- Investment Jewelry
- Custom Design

KITCHEN M

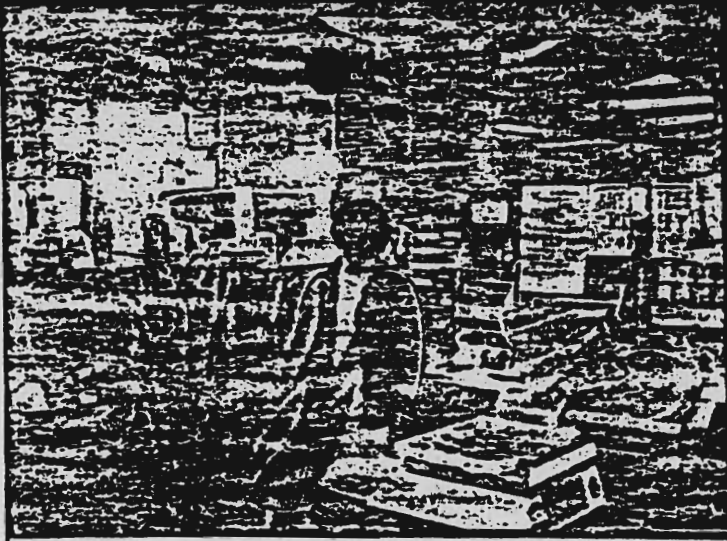
BY CLAREMONT KITCHEN



JOHN WRIGHT
WINNER 1974 + 1978
NATIONAL CONTRACTOR
OF THE YEAR



VIII



"We're always expanding our selection of snacks and deli products, and we have some of the tastiest food in town. Some people come to us the first time for fuel, and keep coming back for the food!"

And they can do so at all hours. They're open 24 hours Thursdays through Sundays, and from six in the morning to 1 A.M. the rest of the week.

"No matter what the time of day, all our customers can be sure they'll get prompt and friendly service," Rey adds. "Convenience without courtesy is no bargain."

Rail commuters are finding OLD ROWLEY very handy indeed, and, Rey tells us, folks are coming from miles around to fill up their tanks and their tummies. There's plenty of free, on-premises parking at OLD ROWLEY, and there's always a sale, bargain, or giveaway to be found there.

Rey and the staff are always happy to make new friends, so if you haven't paid them a visit as yet, why not stop in and fill up with the best.



Vitti

WE HELP YOU GET A BETTER

Photo

SINCE 1882

574 Valley Road,

Monday 9 to 8, Tuesday thru

Free parking at store, Mail & phone orders



MONTCL

OPEN

An "Old Fashioned"
We fuel some of the

Madison



Alex



HUB

Car

Who's Who In Montclair

A BUSINESS REVIEW

Geismar-Kaplan



S. Claus and other gift givers take note: gentlemen prefer presents from GEISMAR KAPLAN, Montclair's headquarters for quality classic and traditional menswear and accessories. And that's just one of several excellent reasons to do your holiday shopping there. Their special brand of genteel service is another plus for GEISMAR-KAPLAN customers, as is their large and varied selection.

And if that doesn't coax you into browsing at G-K, try this on for size: there's a 1/3 discount sale on selected Calvin Klein sweaters, trousers and shirts and they're also featuring a number of items for under \$25 that are sure to please both giver and receiver. (For details see ad on page 9 in this issue.)



Attachment 2, page 6 of 10

PLAZA
SEAFOOD
744-0099
45 Fairfield Street
Watchung Plaza
Montclair

Sell & Install Carpet
Tom Drapery
ical, Venetian & Levelor Blinds
iture Reupholstered
stic & Fabric Slipcovers
ains
en Cushions Refilled
At Home Services Repairs

Buy • Sell
Service • Rent
Everything
Photographic
COMPETITIVE PRICES!
746-1234

744-4354

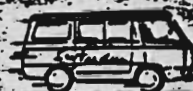
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Vinyls

d

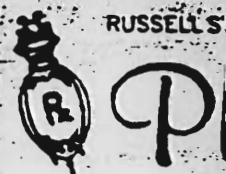


FINIA

• Shades Recovered
• Sculptured Lamps



10 SO. PARK ST.
BUY YOUR EQU



618 VALLEY R

ing
Vinyls



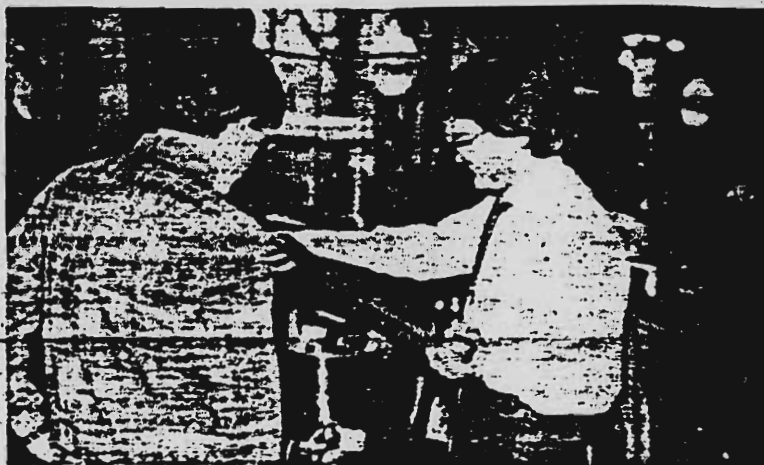
complete banking
personal checking
personal attention
convenient hours

CE

746-931

their large and varied selection.

And if that doesn't coax you into browsing at G-K, try this on for size: there's a 1/3 discount sale on selected Calvin Klein sweaters, trousers and shirts and they're also featuring a number of items for under \$25 that are sure to please both giver and receiver. (For details see ad on page 9 in this issue.)



"What makes us stand out is our merchandise, service and selection" Owner Ed Kaplan says. "But it's also important to realize that we carry a large number of novelty and unusual gifts, things that you won't find anywhere else, and at very reasonable prices. Kids on a piggy bank budget can always find something for Dad at GEISMAR-KAPLAN."

Though G-K is a store for all seasons, they really shine this time of year. Every package is beautifully and personally gift wrapped at no charge. Alterations are swiftly and expertly done by Master Tailor Romeo DiLauro, while Ed's partner, Jack Dorr, and staffers Michael McMahon, Jim Blake and Kirk Vilim and of course Ed himself, make sure that GEISMAR-KAPLAN customers are happy customers.



618 VALLEY R



RS

PLAZA
Laurel

- Diamonds
- Colored Stones
- Appraisals
- Estates Purchased

hill's

GS & CARPETS, INC.

GS OF MONTCLAIR

CE: 29 Park Street, Montclair Phone 746-2700
 MONTCLAIR: 603 Valley Road Phone 746-4400
 D: 320 Orange Road Phone 746-9868
 OFFICE: 640 Bloomfield Avenue Phone 239-2629
 R ALL OFFICES: 9 A.M. to 2 P.M.
 ing 6:30 to 5:30 P.M.

R. co.
Insurance

IR, N.J. 07042
 RANCE AGENCY

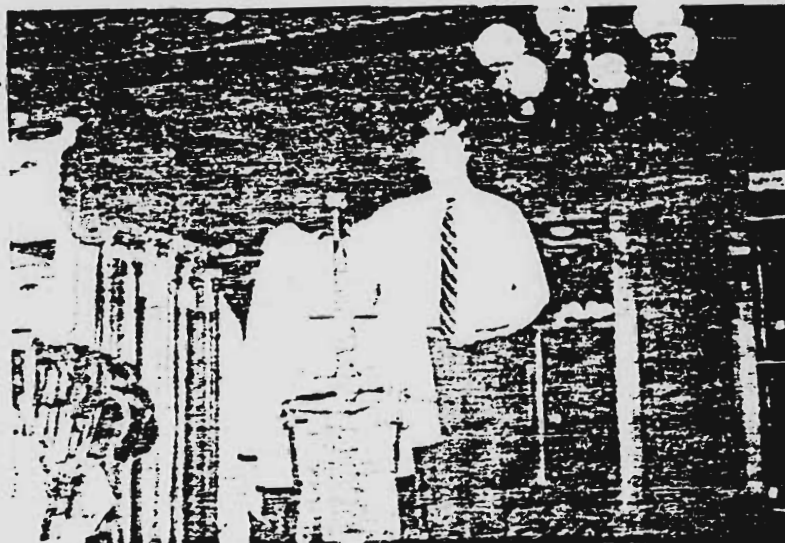
en's Apparel
 nd Fine Furs

Upper Montclair, N.J. 07043
 746-4800, Mon-Sat. 9-5:30



"We'd like to extend an invitation to holiday shoppers to stop in for coffee and cake, on us, this Saturday, and to take a look at what we have to offer," Ed said. "We will also be open weeknights until 9, and all packages will be gift wrapped right up until closing."

With everything from the best in suits and coats to the best in socks and ties to choose from, GEISMAR KAPLAN is the perfect one-stop shopping center for the man who has almost everything!



FINE MEN'S CLOTHING *naturally...*

FORMAL WEAR
 SALES • RENTALS

598 VALLEY RD

783-9393

Geismar-Kaplan

BUD

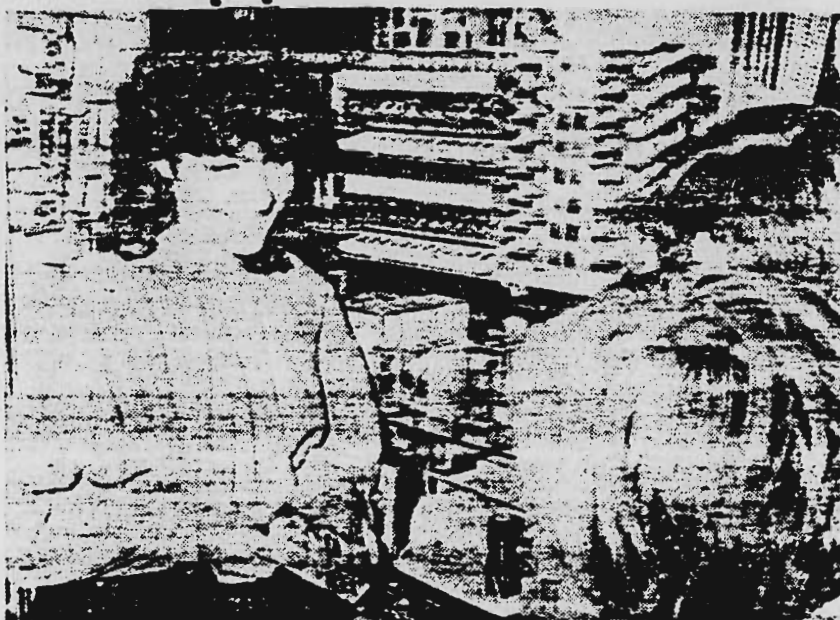
OFFSET P

- LETTERHEADS
- BUSINESS CARDS
- BUSINESS FORMS

Who's Who In Montclair

A BUSINESS REVIEW

Phipps Pharmacy



'Tis almost the Night Before Christmas, and if you have any stockings yet unstuffed and unhung by the chimney with care, you can fill 'em up at PHIPPS PHARMACY, the procrastinators' paradise that has become a tradition for last minute holiday shoppers. Long and widely known for their pharmaceutical services, in recent years Phipps other departments have been getting lots of customer attention as well, due to the wily merchandising of Owner Frank Iannarone and Manager Laurie Alseida.

"Over the years we've learned to anticipate our customers needs during the holiday season, and that naturally includes having a large and varied selection of gifts" Laurie says, and indeed they do.

"Each year our selection of gift items gets bigger, and this year we're really proud of what we have to offer our customers" Laurie says. "Our line of cosmetics is extensive, and so are our perfumes, colognes, and men's toiletries. These are excellent gifts for kids to give Mom and Dad, and you'll also find gifts for children at PHIPPS."

For children of all ages who like gadgets, PHIPPS is now featuring Ronco products, as seen on television — you know, the inside the auto cup, the smokeless ashtray, the miracle dehydrator — on special display for the holidays.



Mo
The

568

HOUSE OF FIN

FINIAL'S
RAI

- Shades Recovered
- Sculptured Lampshades

WE BUY,
SAVE O



PERD

10 SO. PARK ST. • 744-4343
BUY YOUR EQUIPMENT WHE

FINE MEN'S CLOTHING

FORMAL WEAR
SALES • RENTALS

598 VALLEY RD

783-9393

Charles

Attachment 2, page 9 of 10



Another nifty gift to check out at PHIPPS is the "Chompers" watch by Omni which plays an electronic game. Sort of a "wrist arcade", and it costs less than \$30.

Gift wrapping is a specialty of the house at PHIPPS, and will be cheerfully done free of charge by Laurie, or by one of the other friendly salespersons, namely, Juliet Bobrowski, Sue Grady, Diane Lent, and Sue Jefferson.

Meanwhile Pharmacists Frank and Michael Sordill keep things running smoothly and helpfully at PHIPPS popular pharmaceutical department, which features free delivery, a store charge account and an emergency 24 hour phone number.

"As a Pharmacist, my primary concern is maintaining the excellence of our prescription services" Frank states. "That includes not only high standards of quality control but good delivery service as well. But our most important asset is individualized, genuinely personal service. We care about our customers!"

P.S.



RUSSELL STOVER CANDY • HUDSON & FOODS PLUS VITAMINS • COSMETICS



Phipps Pharmacy

618 VALLEY ROAD

7



REDS
PAINT SUP
Paints-Wall
We Discount All Pa
420 Bloomfield Avenue
Open Fri. Even TH

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"Almost Fr



MONTCLAIR

OPEN 24 H

An "Old Fashion
We fuel some of the p

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Madison



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KITCHEN AND BATH IN



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50 Church St

BUDGET P

Try Our Xerox "Micro" M

OFFSET PRINTING • PHOTO
FREE ESTIMATES ANY

• LETTERHEADS
• BUSINESS CARDS
• BUSINESS FORMS

• FLYERS
• BOOKLETS
• BROCHURES

Attachment 2, page 10 of 10



Another nifty gift to check out at PHIPPS is the "Chompers" watch by Omni which plays an electronic game. Sort of a "wrist arcade", and it costs less than \$30.

Gift wrapping is a specialty of the house at PHIPPS, and will be cheerfully done free of charge by Laurie, or by one of the other friendly salespersons, namely, Juliet Bobrowski, Sue Grady, Diane Lent, and Sue Jefferson.

Meanwhile Pharmacists Frank and Michael Sordill keep things running smoothly and helpfully at PHIPPS popular pharmaceutical department, which features free delivery, a store charge account and an emergency 24 hour phone number.

"As a Pharmacist, my primary concern is maintaining the excellence of our prescription services" Frank states. "That includes not only high standards of quality control but good delivery service as well. But our most important asset is individualized, genuinely personal service. We care about our customers!"

P.S.



RUSSELL STOVER CANDY • HUDSON & FOODS PLUS VITAMINS • COSMETICS



Phipps Pharmacy



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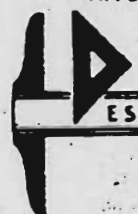
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Rowley Redington
Rowley Redington Corporation
14 Berkeley Place
Montclair, New Jersey 07042

RE: MUR 1497
Rowley Redington Corporation
Rey Redington for Congress
Committee
Rowley Redington

Dear Mr. Redington:

The Federal Election Commission notified you on October 28, 1982, of a complaint which alleges that you, the Rowley Redington Corporation and the Rey Redington for Congress Committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on , 1983, determined that there is reason to believe that the Rowley Redington Corporation violated 2 U.S.C. § 441b(a) by making a contribution in connection with a federal election, and that the Rey Redington for Congress Committee violated 2 U.S.C. § 441b(a) by accepting the corporate contribution. Furthermore, the Commission determined that you violated 2 U.S.C. § 441b(a) in your capacity as a corporate officer or director by giving your consent to the making of a corporate contribution, as well as in your capacity as a candidate by accepting the contribution. The Commission finally determined that there was no reason to believe the Rowley Redington Corporation violated 2 U.S.C. § 441d by failing to include a sponsorship notice on an advertisement.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

Attachment 3, page 1 of 2

Letter to Rowley Redington
Page 2

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against you, the Rowley Redington Corporation, or the Rey Redington for Congress Committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter, at (202) 523-4039.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Procedures

Attachment 3, page 2 of 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Rowley Redington) MUR 1497
Rey Redington for Congress Committee)
Rowley Redington Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1497:

1. Find no reason to believe that Rowley Redington Corporation violated 2 U.S.C. §441b(a) by making a contribution in connection with a federal election.
2. Find no reason to believe that the Rey Redington for Congress Committee violated 2 U.S.C. §441b(a) by accepting a corporate contribution.
3. Find no reason to believe Rowley Redington violated 2 U.S.C. §441b(a) by consenting to the making of a corporate contribution and by accepting such contribution as a candidate.
4. Find no reason to believe Rowley Redington Corporation violated 2 U.S.C. §441d by failing to include a sponsorship notice on an advertisement.
5. Close the file in this matter.

Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Harris dissented.

Attest:

February 2, 1983

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS ~~EMMONS~~ JODY C. RANSOM *JCR*
DATE: JANUARY 25, 1983
SUBJECT: OBJECTIONS - MUR 1497 First General
Counsel's Report dated January 21, 1983

The above-named document was circulated to the
Commission on Friday, January 21, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u>X</u>
Commissioner Harris	<u></u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>
Commissioner Reiche	<u>X</u>

This matter will be placed on the Executive Session
agenda for Tuesday, February 1, 1983.

33040684112



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*
DATE: JANUARY 25, 1983
SUBJECT: OBJECTIONS - MUR 1497 First General
Counsel's Report dated January 21, 1983

The above-named document was circulated to the
Commission on Friday, January 21, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____ X (comments attached) _____

This matter will be placed on the Executive Session
agenda for Tuesday, February 1, 1983.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JANUARY 25, 1983
SUBJECT: OBJECTION - MUR 1497 First General
Counsel's Report dated January 21,
1983

The above-named document was circulated to the
Commission on January 21, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, February 1, 1983.

3304063411

January 21, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1497

Please have the attached First General Counsel's
Report distributed to the Commission onna 48 hour tally
basis as a sensitive matter. Thank you.

Attachment

cc: Mims

0304038411



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/ JAN SAVAGE *mwe* *JS*

DATE:

DECEMBER 17, 1982

SUBJECT:

OBJECTION: MUR 1497 First General
Counsel's Report dated
December 16, 1982

The above-named document was circulated to the
Commission on December 16, 1982 at 4:00.

Commissioner Harris submitted an objection on
December 17, 1982 at 11:22.

This matter will be placed on the agenda for the
executive session of January 4, 1983.

83040684116

December 16, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1497

Please have the attached First General Counsel's
Report distributed to the Commission on a 48 hour tally
basis on a sensitive circulation. Thank you.

Attachment

cc: Mims

33040334117

● SENSITIVE ●

FEDERAL ELECTION COMMISSION

1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 DEC 16 All: 06

DATE AND TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION 12-16-82

MUR #1497

DATE COMPLAINT RECEIVED

BY OGC 10/25/82

DATE OF NOTIFICATION TO

RESPONDENT 10/28/82

STAFF MEMBER Mims

COMPLAINANT'S NAME: Stephen J. Edelstein

RESPONDENTS' NAMES: Rey Redington for Congress Committee
Old Rowley Farms, Inc.

RELEVANT STATUTE: 2 U.S.C. §§ 441b(a) and 441d.

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On October 25, 1982, the Office of General Counsel received a complaint from Stephen J. Edelstein. The complaint alleged that an article which appeared in the classified section of the Montclair Times (September 2, 1982) constituted a political advertisement and as such it violated 2 U.S.C. § 441d by its failure to carry the required notice. The complainant further asserted that the article, if paid for by respondent Old Rowley Farms, violated 2 U.S.C. § 441b(a).

FACTUAL AND LEGAL ANALYSIS

The newspaper article (Attachment 1) clearly shows Congressional candidate Rey Redington standing in front of two signs, the first of which reads, "Rey Redington for United..." and the second, "Republican...." (The photograph in question

33040384113

is at the top of the article. The manner in which the picture is cropped does not reveal the entire message on the sign.)

Although the picture does not carry enough information from which one can infer an attempted political message, the body of the article makes it clear that Redington is a Congressional candidate. The body of the article, in conjunction with the photograph, arguably suggests that the reader should support Redington's candidacy.

Determining whether the article violates the Act, however, is a different matter. First, it should be noted that the article is set up as a feature in the middle of an entire page of advertising. The title of the page is "Who's Who in Montclair, A Business Review." The importance of this point is that it is possible that the article was prepared by the newspaper in an attempt to highlight a selected local business concern. Indeed, in a phone conversation initiated by Mr. Redington on November 4, 1982, he indicated that the article was prepared by the paper and is part of the paper's practice of featuring local businesses. If that is in fact the case, then the paper may have merely included the reference to Redington's Congressional candidacy as an aside to a local businessman's activities. Clearly the main focus of the article is its effort to promote the business of Old Rowley Farms (which Redington owns). If, therefore, the newspaper printed the article without regard to any compensation by Redington or his business, it was part of the legitimate

33040684119

function of the press and was not violative of the Act, in our view. See Readers Digest Association, Inc. v. FEC, 509 F.Supp. 1210 (S.D.N.Y. 1981).

Furthermore, during that phone conversation, Redington indicated that the photographer requested Redington's presence at the store for photos. Mr. Redington, occupied with his election efforts, suggested that they meet at the campaign headquarters. According to Redington, the photograph in question was indeed taken in front of his campaign headquarters.

The complaint assumes that the article is an advertisement, paid for by Old Rowley Farms. What is clear from the newspaper page, however, is that the article is unique when compared with other advertisements on the page. It is our view that the article was not an advertisement, but rather a feature highlighting the "down home style" of a local business whose owner happened to be a congressional candidate. Only one line of the entire article cites Redington's candidacy; more space is actually devoted to discussing the courteous services offered by the employees of Old Rowley Farms. The Redington candidacy is not a focal point and there is no express support for his candidacy.

Accordingly, it is the recommendation of the Office of General Counsel that the Commission conclude that, based upon the facts provided by the complainant, there is an insufficient basis for a determination of reason to believe a violation of the Act has occurred.

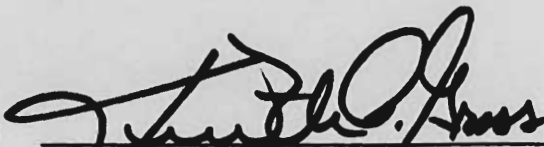
Recommendation

1. Find no reason to believe that Old Rowley Farms violated 2 U.S.C. §§ 441b(a) or 441d.
2. Find no reason to believe that the Rey Redington for Congress Committee violated 2 U.S.C. § 441b(a).
3. Approve the attached letters.

December 11, 1942
Date

Charles N. Steele
General Counsel

By:



Kenneth A. Gross
Associate General Counsel

Attachments

- 1 - article
- 2 - proposed letters

33040384121

Who's Who in Montclair

A BUSINESS REVIEW

REY REDINGTON

For United

"!%#\$%!!," quoth the commuter, having neglected to stop at the grocery store on the way home, "I forgot the milk!" Episodes like this seldom occur in the lives of drivers who get their gasoline and their groceries on the corner of Elm Street and Bloomfield Avenue.

It's there you'll find OLD ROWLEY FARMS, at the sign of MONTCLAIR EXXON (which has been hanging out on that corner for about fifty years). Owner and Congressional candidate Rey Redington, a gent of bucolic bent, and his staff of friendly neighbors who make shopping at OLD ROWLEY a real down-home pleasure.



Mon
The F

568 BL

HOUSE OF FINE

FINIAL'S RAIN

Need A Lamp Shade
And Can't Find It?

WE BUY, SE
SAVE ON



PERDU

10 SO. PARK ST. • 744-4343
BUY YOUR EQUIPMENT WHERE Y

2 Generations of Security Professionals



Attachment 1, pg 1

complete banking
personal checking
personal attention
convenient hours

COPIES

art/design
typesetting
photography

783-6282

54



S & CARPETS, INC.

OF MONTCLAIR

29 Park Street, Montclair Phone 746-2700
CLAIR: 606 Valley Road Phone 746-4400
20 Orange Road Phone 746-9868
DE: 640 Bloomfield Avenue Phone 239-2629
ALL OFFICES: 8 A.M. to 3 P.M.
6:30 to 8:30 P.M.

CO.
Insurance

N.J. 07042

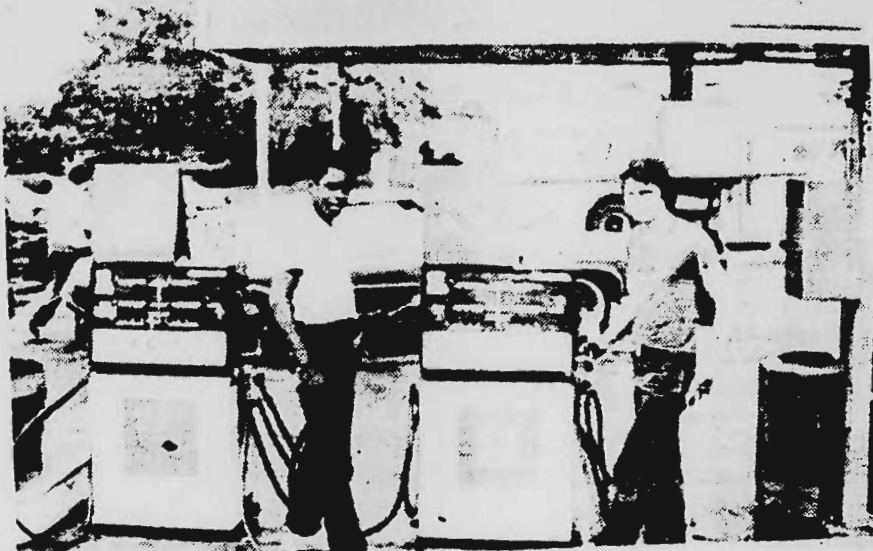
ANCE AGENCY

- Diamonds
- Colored Stones
- Appraisals
- Estates Purchased

groceries, dairy, and more. In typical neighborly fashion, coffee is given free to bleary-eyed A.M. gas customers. Service to the community and convenience for the consumer are long-standing traditions with MONTCLAIR EXXON, and with Rey, and OLD ROWLEY keeps that tradition alive and well.

"We wanted to be more than a convenience store for our gasoline customers," Rey informed us. "OLD ROWLEY FARMS carries one of the largest selections of everyday items to be found, and has the warmth of an old fashioned general store."

Rusticity is rife at OLD ROWLEY FARMS, and slogans, some memorable, some not so memorable, are plentiful in their advertising ... the likes of "Always near, always there," "Come and give us the business," "We fuel some of the people and feed the rest" and "A complete selection of whatever's." (Mercifully, the waggish "Eat here and get gas never saw print.") But the slogans do tell the story. When it comes to commuter convenience, MONTCLAIR EXXON/OLD ROWLEY FARMS is in a class by itself.



"OLD ROWLEY FARMS is a full line, convenience food store," Rey says. "If you're out of something, chances are you'll find it here. Our service is fast and friendly, and that goes for food and fuel!" There's plenty of free parking at OLD ROWLEY and that makes a hit with those who don't feel like enduring supermarket queues.

"No matter what the time of day, all our customers can be sure they'll get prompt and friendly service," Rey adds. "Convenience without courtesy is no bargain."

Rey tells us folks are coming from miles around to fill up their tanks and their tummies. There's plenty of free, on-premises parking at OLD ROWLEY, and there's always a sale, bargain, or giveaway to be found there.

Rey and the staff are always happy to make new friends, so if you haven't paid them a visit as yet, why not stop in and fill up with the best.



Attachment 2, pg 2



WE HELP YOU BE

Photo

SINCE 1882

574 Valley Road,
Monday 9 to 5
Free parking at store, M



Mad



KITCH



OLY
FOR BOYS. M

OLYMPIC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Rowley Redington
Old Rowley Farms
264 Bloomfield Avenue
Montclair, New Jersey 07042

Re: MUR 1497

Dear Mr. Redington:

On October 28, 1982, the Commission notified you of a complaint alleging that your company had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1982, determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 2-1 of 3

83040384124



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Eugene R. Malnati, Treasurer
Rey Redington for Congress Committee
561 Bloomfield Avenue
Montclair, New Jersey 07042

Re: MUR 1497

Dear Mr. Malnati:

On October 28, 1982, the Commission notified you of a complaint alleging that your committee had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1982, determined that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 2-20/3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Stephen J. Edelstein
Craig & Edelstein
1129 Bloomfield Avenue
West Caldwell, New Jersey

Re: MUR 1497

Dear Mr. Edelstein:

The Federal Election Commission had reviewed the allegations of your complaint dated October 21, 1982, and determined that on the basis of the information provided in your complaint there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(2).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Attachment 2-30/3

203692

RECEIVED AT THE FEC

Rey Redington
14 Berkeley
Montclair, New Jersey
December 20, 1982

CCF 7240
P 1:24
20463

Charles N. Steele Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1497

Dear Mr. Steele;

Please excuse the time since my initial telephone response to the subject complaint. I am currently working without the benefit of staff or funds.

I am responding to the subject complaint for both my campaign committee and for the Rowley Redington Corporation of which I am President.

The advertisement referred to in the complaint is an ongoing business ad that my corporation participates in on a weekly basis with our local weekly newspaper. Every several months the subscribing advertisers are featured individually in the main text of the advertisement.

When the time comes for a subscriber to be featured, the advertising salesman arranges to take pictures of the business and its employees and writes current copy to go with the feature.

When the time came for my business to be the subject of the feature, I was not readily available to meet the salesman at my business location to take a current picture. Since I had a full beard in the previous picture, we felt the update was needed. To accomodate my schedule, the salesman arranged to meet me when I was scheduled to be at my campaign headquarters. When he arrived, we stepped outside where he took the picture. The salesman then updated the copy that appeared thereafter with my picture and the others in the newspaper.

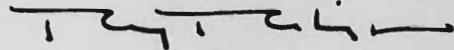
I have taken the liberty of enclosing a copy of a previous feature (along with another) so that you might see the type and personal nature of these types of ads.

This ad was the result of the continuation of a long-term business ad that has consistantly featured my business, myself, my employees and even my wife, in a personal way. The background of the questioned picture was the result of my inability to meet with the salesman at my business because of schedule constraints.

33040584127

I hope this explanation responds to the concerns mentioned in the subject complaint. Should you desire or require further information or discussion, please advise. I can be reached during the day at (201) 746-5500.

Sincerely,



Rey Redington
Rey Redington for Congress
Committee
and
Rowley Redington Corporation

33040384129

Who's Who In Montclair

A BUSINESS REVIEW



Food and fuel in one stop — a concept whose time has come, and one that's making Elm Street and Bloomfield Avenue one of the hottest corners for miles around. It's there that delicious delicatessen and dependable petroleum products are being dispensed to throngs of commuters and shoppers who have discovered Montclair's ultimate convenience store, OLD ROWLEY FARMS/MONTCLAIR EXXON.

They've also discovered that high standards of quality and service are the rule there, and that Owner Rey Redington is maintaining a tradition of excellence and community service begun at MONTCLAIR EXXON half a century ago.

OLD ROWLEY features a fine selection of groceries, dairy products, deli, snacks, baked goods, beverages, sandwiches, newspapers and lots more, including a great cup of coffee, which is given free to early morning customers. They also specialize in what Rey refers to as "Oops, I forgot" items.

"We wanted to be more than a convenience store for our gasoline customers," Rey told us. "OLD ROWLEY FARMS carries one of the largest selections of everyday items to be found. It's a full line convenience food store. If you're out of something, chances are you'll find it here."

OLYMP

FOR BOYS, MEN AND W

OLYMPIC CHARGE/MAST

HOUSE OF FIN
FINIAL'S
RA

Lamp Repairs Av

51 UPPER MONTCLAIR PLAZA (Ave)
Open

MULT

Investment gra

Call or write for
An investment
years is worth lo

17 James St., Bloomfield

- Engagement Rings
- Repairs
- Investment Jewelry
- Custom Design

KITCHEN M

BY
CLAREMONT KITCHENS



JOHN WRIGHT
WINNER 1974 + 1978
NATIONAL CONTRACTOR
OF THE YEAR

• KI
• AD
G
720





"We're always expanding our selection of snacks and dell products, and we have some of the tastiest food in town. Some people come to us the first time for fuel, and keep coming back for the food!"

And they can do so at all hours. They're open 24 hours Thursdays through Sundays, and from six in the morning to 1 A.M. the rest of the week.

"No matter what the time of day, all our customers can be sure they'll get prompt and friendly service" Rey adds. "Convenience without courtesy is no bargain."

Rail commuters are finding OLD ROWLEY very handy indeed, and, Rey tells us, folks are coming from miles around to fill up their tanks and their tummies. There's plenty of free, on-premises parking at OLD ROWLEY, and there's always a sale, bargain, or giveaway to be found there.

Rey and the staff are always happy to make new friends, so if you haven't paid them a visit as yet, why not stop in and fill up with the best.



WE HELP YOU GET A BETTER

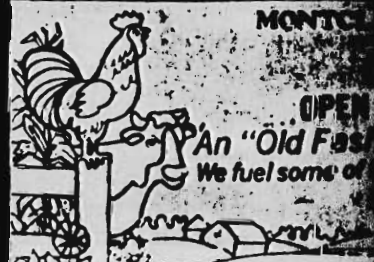
Photo

SINCE 1882

574 Valley Road,

Monday 9 to 8, Tuesday 9 to 6

Free parking at store. Mail & phone orders



Madison



Alex



HUB

Car

Who's Who in Montclair A BUSINESS REVIEW

Phipps Pharmacy



'Tis almost the Night Before Christmas, and if you have any stockings yet unstuffed and unhung by the chimney with care, you can fill 'em up at PHIPPS PHARMACY, the procrastinators' paradise that has become a tradition for last minute holiday shoppers. Long and widely known for their pharmaceutical services, in recent years Phipps other departments have been getting lots of customer attention as well, due to the wily merchandising of Owner Frank Iannarone and Manager Laurie Alseida.

"Over the years we've learned to anticipate our customers needs during the holiday season, and that naturally includes having a large and varied selection of gifts" Laurie says, and indeed they do.

"Each year our selection of gift items gets bigger, and this year we're really proud of what we have to offer our customers" Laurie says. "Our line of cosmetics is extensive, and so are our perfumes, colognes, and men's toiletries. These are excellent gifts for kids to give Mom and Dad, and you'll also find gifts for children at PHIPPS."

For children of all ages who like gadgets, PHIPPS is now featuring Ronco products, as seen on television — you know, the inside the egg scrambler, the auto cup, the smokeless ashtray, the miracle broom, the food dehydrator — on special display for the holidays.

Who's Who in Montclair A BUSINESS REVIEW

Geismar-Kaplan



S. Claus and other gift givers take note: gentlemen prefer presents from GEISMAR KAPLAN, Montclair's headquarters for quality classic and traditional menswear and accessories. And that's just one of several excellent reasons to do your holiday shopping there. Their special brand of genteel service is another plus for GEISMAR-KAPLAN customers, as is their large and varied selection.

And if that doesn't coax you into browsing at G-K, try this on for size: there's a 1/3 discount sale on selected Calvin Klein sweaters, trousers and shirts and they're also featuring a number of items for under \$25 that are sure to please both giver and receiver. (For details see ad on page 9 in this issue.)



Rey Redington
14 Berkeley Place
Montclair, New Jersey 07042

33040384113

RECEIVED AT THE FLO

82 DEC 29 11:24

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

REGISTERED

P 383 270 448

MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: George Demougeot *GD*
SUBJECT: MUR 1497 - Expedited

Please have the attached Memo to the Commission distributed to the Commission on pink paper per expedited procedures. Thank you.

Attachment

330403841

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 OCT 28 P 3: 16

October 28, 1982

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross *KAG*
Associate General Counsel

SUBJECT: Complaint received - MUR 1497

On October 25, 1982, the Office of General Counsel received a complaint from Stephen J. Edelstein which alleges that New Jersey Congressional candidate Rey Redington's campaign committee violated 2 U.S.C. §§ 441b(a) and 441d.

The basis for the §441d allegation is an advertisement which appeared in the Montclair Times (September 2, 1982). That "advertisement,"* while soliciting business for Old Rowley Farms (a convenience grocery store and gasoline station which is owned by Redington), pictures the candidate standing in front of a store window upon which is affixed two signs. Although the photo does not capture the entire message of either sign, it does catch enough of the first to show "Rey Redington for United..." and the second sign clearly reads "Republican..." Paragraphs which accompanying the photo identify Redington as "Congressional candidate Rey Redington, a gent of bucolic bent..."

Another issue which is raised relates to the source of funds used to pay for the "advertisement." If Old Rowley Farms is incorporated and paid for the advertisement, it may have violated section 441b(a).

Letters notifying the respondents have been sent. This is a matter which we believe warrants awaiting responses of the persons notified. Our Office will make a recommendation to the Commission upon receipt of those responses.

* The article in question is located in a section of the newspaper which appears to be devoted entirely to local advertising. This particular article is, however, unique both in its size and content (as compared with other local ads). While there is no specific reference to the fact that this is an advertisement as opposed to a feature article highlighting a local business, there is also no by-line which might otherwise distinguish it from an advertisement.

3304033413



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 28, 1982

Mr. Stephen J. Edelstein
Craig & Edelstein
1129 Bloomfield Avenue
West Caldwell, NJ 07006

Dear Mr. Edelstein:

This letter is to acknowledge receipt of your complaint of October 21, 1982, against the Rey Redington for Congress Committee and Montclair Exxon/Old Rowley Farms which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross", is written over the typed name of the Associate General Counsel.

By Kenneth A. Gross
Associate General Counsel

Enclosure

33040384136



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 28, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene R. Malnati, Treasurer
Rey Redington for Congress Committee
561 Bloomfield Avenue
Montclair, NJ 07042

Re: MUR 1497

Dear Mr. Malnati:

This letter is to notify you that on October 25, 1982, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1497. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

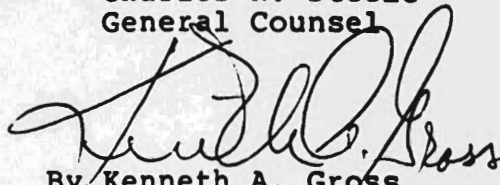
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form 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.

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4039. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel




By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Rowley Redington

1497

1. The following service 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 (The restricted delivery fee is charged in addition to the return receipt fee.)		34 TOTAL
2. ARTICLE ADDRESS TO: Eugene Malin Redington for Congress Montclair, N.J. 07042		
3. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER 438418	
(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 11/1/82		POSTAGE
5. ADDRESSEE'S ADDRESS (Only if requested)		
7. UNABLE TO DELIVER REASON:		8. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 28, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Montclair Exxon/Old Rowley Farms
264 Bloomfield Avenue
Montclair, NJ 07042

Re: MUR 1497

Dear Sir/Madam:

This letter is to notify you that on October 25, 1982, the Federal Election Commission received a complaint which alleges that your company may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1497. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

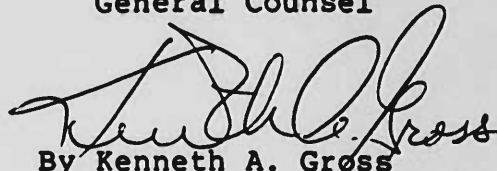
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

- 2 -

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4039. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

33040384140

Coct 8753

LAW OFFICES
CRAIG AND EDELSTEIN
A PROFESSIONAL CORPORATION
WEST ESSEX OFFICE CENTER
1129 BLOOMFIELD AVENUE
WEST CALDWELL, N. J. 07006
(201) 575-7733

RECEIVED
OFFICE OF THE
COMMISSION SECRET.

82 OCT 25 A11: 13

D. F. MOORE CRAIG
STEPHEN J. EDELSTEIN
—
LAURA BERTOLLO

October 21, 1982

12 OCT 25 P 2: 05

Frank P. Reiche, Chairman
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Dear Mr. Reiche:

Your attention is called to the enclosed advertisement, which appeared in the Montclair Times (New Jersey) of September 2, 1982 as a possible violation of federal election law and other laws.

This ostensible promotion of Old Rowley Farms/Montclair Exxon raises serious question in the light of United States Code, Title 2, Chapter 14, section 441d, in that the owner of these businesses, Rowley (Rey) Redington is pictured in front of his campaign signs, on which the word "Republican" clearly appears and the slogan "Rey Redington for United States Congress" partially appears. Furthermore, the text of the advertisement identifies Redington as a Congressional candidate. The advertisement thus does not appear to be strictly commercial, but campaign-related, yet it does not have any of the political disclaimers required by law where a "clearly identified candidate" (USC 2, Ch. 14 (18)) is involved.

How this advertisement was paid for is not clear, but a question of whether corporate funds were involved suggests itself. The tax question of whether this advertisement could be deducted as a business question is also relevant.

I urge that the Commission immediately look into this possible violation of circumvention of federal election law.

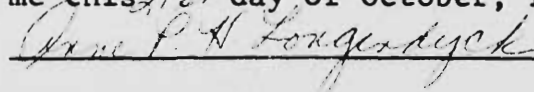
Thanking you for your attention to this matter, I am

Respectfully,


STEPHEN J. EDELSTEIN

SJE:jdm

Sworn & Subscribed to before
me this 21st day of October, 1982.



ANNE P. H. LONGENDYCK
Notary Public of
Commission Expires 12/31/83

Who's Who in Montclair A BUSINESS REVIEW

REY REDINGTON

For United

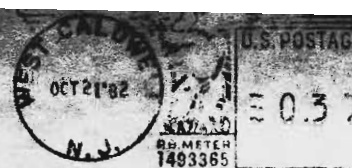
"!%#\$%!!," quoth the commuter, having neglected to stop at the grocery store on the way home, "I forgot the milk!" Episodes like this seldom occur in the lives of drivers who get their gasoline and their groceries on the corner of Elm Street and Bloomfield Avenue.

It's there you'll find OLD ROWLEY FARMS, at the sign of MONTCLAIR EXXON (which has been hanging out on that corner for about fifty years). Owner and Congressional candidate Rey Redington, a gent of bucolic bent, and his staff of friendly neighbors who make shopping at OLD ROWLEY a real down-home pleasure.



Open 24 hours weekends and 4-1 during

LAW OFFICES
NE AND EDELSTEIN
A PROFESSIONAL CORPORATION
WEST BUREAU OFFICE CENTER
129 BLOOMFIELD AVENUE
ST CALDWELL, N. J. 07008



Frank P. Reiche, Chairman
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

3 3 0 4 0 3 8 4 1 4 3



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1497

Date Filmed 3-15-83 Camera No. --- 2

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