



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2510

DATE FILMED 5/6/88 CAMERA NO. 3

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH  
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT  
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

0040701812

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2 U.S.C. §438(b) audit.

83040701813

Attachments :

88040701814

88040701815

88040701816

C00011221

Sapoc, N.J.

87MF-130

83040701817

**SAPEC, N J**

**(Attachments 45a - 45g)**



FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE: 19MAY87  
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SAPEC, N J				NON-PARTY QUALIFIED		ID 6C00011221
CONNECTED ORGANIZATION:	NEW JERSEY SAVINGS LEAGUE					
1985	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG85	5	85FEC/386/4519
	STATEMENT OF ORGANIZATION - AMENDMENT			3SEP85	2	85FEC/387/0973
	MID-YEAR REPORT	26,376	11,684	1JAN85 - 30JUN85	12	85FEC/378/3950
	1'ST LETTER INFORMATIONAL NOTICE			1JAN85 - 30JUN85	1	85FEC/392/2415
	YEAR-END	25,699	37,197	1JAN85 - 31DEC85	57	86FEC/394/4521
	YEAR-END - AMENDMENT	-	-	1JAN85 - 31DEC85	2	86FEC/402/4413
	YEAR-END - AMENDMENT	-	-	1JUL85 - 31DEC85	2	86FEC/403/2525
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 - 31DEC85	3	86FEC/397/3429
1986	APRIL QUARTERLY	14,977	3,341	1JAN86 - 31MAR86	7	86FEC/410/2222
	JULY QUARTERLY	23,925	1,675	1APR86 - 30JUN86	6	86FEC/422/0097
	OCTOBER QUARTERLY	15,287	22,915	1JUL86 - 30SEP86	8	86FEC/438/0680
	POST-GENERAL	9,474	3,495	1OCT86 - 24NOV86	7	87FEC/452/4988
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1239
	YEAR-END	250	5,200	25NOV86 - 31DEC86	6	87FEC/455/0759
	YEAR-END - AMENDMENT	7,517	5,200	25NOV86 - 31DEC86	4	87FEC/460/4388
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 - 31DEC86	1	87FEC/459/5094
1987	STATEMENT OF ORGANIZATION - AMENDMENT			29APR87	1	87FEC/466/3221
	APRIL QUARTERLY	18,696	7,850	1JAN87 - 31MAR87	10	87FEC/465/2761
	TOTAL	141,951	0 93,357	0	96	TOTAL PAGES

Total 1985-1986 receipts: \$123,255  
Total 1985-1986 disbursements: \$85,507

All 1985-1986 reports have been reviewed.  
Ending cash-on-hand as of 12/31/86: \$57,645  
Outstanding debts owed by the committee as of 12/31/86: \$0



TELECON

ANALYST: Chris Nuland

CONVERSATION WITH: Secretary to Mr. Hart

COMMITTEE: SAPEC, N.J.

DATE: December 28, 1986

SUBJECT(S): 30 Day Post-General Non-Filer

Mr. Hart's secretary called me this afternoon in response to the Non-Filer letter for the 30 Day Post-General Report. She explained that personnel recently hired at SAPEC was not aware that the report had to be filed. I advised her to prepare and send the report as soon as possible. I also mentioned that, if the committee did not file the 12 Day Pre-General Report, that the 30 Day Report should cover the period from 10/1/86 through 11/24/86.

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RECEIVED AT THE FEC

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411 North Avenue East • Charlotte, NJ 07010-2444 • (800) 272-6889

December 29, 1986

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00011221

Reference: 30 Day Post-General Report (through 11/24/86)

Dear Mr. Gibson:

We are in receipt of your recent letter regarding SAFEC-W.J. failure to file the above referenced report. In reviewing our records, we show that this report was not filed.

My secretary spoke to Mr. Christopher Muland on December 28, 1986 and obtained the information and dates necessary so that this report could be mailed to you promptly. We explained to Mr. Muland that we were unaware of having to file this report, as a change in personnel has made it difficult.

We have always attempted to comply to the regulations of the Federal Election Commission. We apologise for any inconvenience and will take the proper precautions to prevent this from occurring again.

Sincerely,

Thomas L. Hart  
Executive Vice President

TJH:sjd

enclosure

## REPORT OF RECEIPTS AND DISBURSEMENTS

### For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

87 JAN 5 AM: 38

**(Summary Page)**

<p>1 Name of Committee (in Full)  <b>SAPEC-N.J. '86</b>  <b>Savings Association Political Election</b>  <b>Committee - New Jersey 1986</b></p> <hr/> <p>Address (Number and Street)</p> <p><b>411 North Avenue East</b></p> <hr/> <p>City, State and Zip Code</p> <p><b>Cranford, N.J. 07016</b></p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <hr/> <p>2. FEC Identification Number  <b>C 000 11221</b></p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during the Reporting Period on _____ (Date)</p>	<p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report      <input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report      <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Date of Election)</p> <p>election on _____ in the State of _____</p> <p><input checked="" type="checkbox"/> Twelfth day report following the General Election</p> <p>on _____ in the State of <u><b>New Jersey</b></u></p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p><input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p>
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SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period <u>10-1-86</u> through <u>11-24-86</u>			
6 (a) Cash on hand January 1, 19 <u>86</u>			\$23,091.43
(b) Cash on Hand at Beginning of Reporting Period	\$49,349.93		
(c) Total Receipts (from Line 18)	\$9,474.00	\$63,663.50	
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$58,823.93	\$86,754.93	
7 Total Disbursements (from Line 28)	\$3,495.00	\$31,426.00	
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$55,328.93	\$55,328.93	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$		
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$		

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

Edmond V. Lawlor, Jr.

Value of First Name of Treasurer

**SIGNATURE OF TRAVELER**

12-36-80

For further information contact:

**Post Post Card**

NO. 1. 1900. 1901. 1902. 1903. 1904. 1905. 1906. 1907. 1908. 1909. 1910. 1911. 1912. 1913. 1914. 1915. 1916. 1917. 1918. 1919. 1920. 1921. 1922. 1923. 1924. 1925. 1926. 1927. 1928. 1929. 1930. 1931. 1932. 1933. 1934. 1935. 1936. 1937. 1938. 1939. 1940. 1941. 1942. 1943. 1944. 1945. 1946. 1947. 1948. 1949. 1950. 1951. 1952. 1953. 1954. 1955. 1956. 1957. 1958. 1959. 1960. 1961. 1962. 1963. 1964. 1965. 1966. 1967. 1968. 1969. 1970. 1971. 1972. 1973. 1974. 1975. 1976. 1977. 1978. 1979. 1980. 1981. 1982. 1983. 1984. 1985. 1986. 1987. 1988. 1989. 1990. 1991. 1992. 1993. 1994. 1995. 1996. 1997. 1998. 1999. 2000. 2001. 2002. 2003. 2004. 2005. 2006. 2007. 2008. 2009. 2010. 2011. 2012. 2013. 2014. 2015. 2016. 2017. 2018. 2019. 2020. 2021. 2022. 2023. 2024. 2025. 2026. 2027. 2028. 2029. 2030. 2031. 2032. 2033. 2034. 2035. 2036. 2037. 2038. 2039. 2040. 2041. 2042. 2043. 2044. 2045. 2046. 2047. 2048. 2049. 2050. 2051. 2052. 2053. 2054. 2055. 2056. 2057. 2058. 2059. 2060. 2061. 2062. 2063. 2064. 2065. 2066. 2067. 2068. 2069. 2070. 2071. 2072. 2073. 2074. 2075. 2076. 2077. 2078. 2079. 2080. 2081. 2082. 2083. 2084. 2085. 2086. 2087. 2088. 2089. 2090. 2091. 2092. 2093. 2094. 2095. 2096. 2097. 2098. 2099. 2100. 2101. 2102. 2103. 2104. 2105. 2106. 2107. 2108. 2109. 2110. 2111. 2112. 2113. 2114. 2115. 2116. 2117. 2118. 2119. 2120. 2121. 2122. 2123. 2124. 2125. 2126. 2127. 2128. 2129. 2130. 2131. 2132. 2133. 2134. 2135. 2136. 2137. 2138. 2139. 2140. 2141. 2142. 2143. 2144. 2145. 2146. 2147. 2148. 2149. 2150. 2151. 2152. 2153. 2154. 2155. 2156. 2157. 2158. 2159. 2160. 2161. 2162. 2163. 2164. 2165. 2166. 2167. 2168. 2169. 2170. 2171. 2172. 2173. 2174. 2175. 2176. 2177. 2178. 2179. 2180. 2181. 2182. 2183. 2184. 2185. 2186. 2187. 2188. 2189. 2190. 2191. 2192. 2193. 2194. 2195. 2196. 2197. 2198. 2199. 2200. 2201. 2202. 2203. 2204. 2205. 2206. 2207. 2208. 2209. 2210. 2211. 2212. 2213. 2214. 2215. 2216. 2217. 2218. 2219. 2220. 2221. 2222. 2223. 2224. 2225. 2226. 2227. 2228. 2229. 2230. 2231. 2232. 2233. 2234. 2235. 2236. 2237. 2238. 2239. 2240. 2241. 2242. 2243. 2244. 2245. 2246. 2247. 2248. 2249. 2250. 2251. 2252. 2253. 2254. 2255. 2256. 2257. 2258. 2259. 2260. 2261. 2262. 2263. 2264. 2265. 2266. 2267. 2268. 2269. 2270. 2271. 2272. 2273. 2274. 2275. 2276. 2277. 2278. 2279. 2280. 2281. 2282. 2283. 2284. 2285. 2286. 2287. 2288. 2289. 2290. 2291. 2292. 2293. 2294. 2295. 2296. 2297. 2298. 2299. 2300. 2301. 2302. 2303. 2304. 2305. 2306. 2307. 2308. 2309. 2310. 2311. 2312. 2313. 2314. 2315. 2316. 2317. 2318. 2319. 2320. 2321. 2322. 2323. 2324. 2325. 2326. 2327. 2328. 2329. 2330. 2331. 2332. 2333. 2334. 2335. 2336. 2337. 2338. 2339. 2340. 2341. 2342. 2343. 2344. 2345. 2346. 2347. 2348. 2349. 2350. 2351. 2352. 2353. 2354. 2355. 2356. 2357. 2358. 2359. 2360. 2361. 2362. 2363. 2364. 2365. 2366. 2367. 2368. 2369. 2370. 2371. 2372. 2373. 2374. 2375. 2376. 2377. 2378. 2379. 2380. 2381. 2382. 2383. 2384. 2385. 2386. 2387. 2388. 2389. 2390. 2391. 2392. 2393. 2394. 2395. 2396. 2397. 2398. 2399. 2400. 2401. 2402. 2403. 2404. 2405. 2406. 2407. 2408. 2409. 2410. 2411. 2412. 2413. 2414. 2415. 2416. 2417. 2418. 2419. 2420. 2421. 2422. 2423. 2424. 2425. 2426. 2427. 2428. 2429. 2430. 2431. 2432. 2433. 2434. 2435. 2436. 2437. 2438. 2439. 2440. 2441. 2442. 2443. 2444. 2445. 2446. 2447. 2448. 2449. 2450. 2451. 2452. 2453. 2454. 2455. 2456. 2457. 2458. 2459. 2460. 2461. 2462. 2463. 2464. 2465. 2466. 2467. 2468. 2469. 2470. 2471. 2472. 2473. 2474. 2475. 2476. 2477. 2478. 2479. 2480. 2481. 2482. 2483. 2484. 2485. 2486. 2487. 2488. 2489. 2490. 2491. 2492. 2493. 2494. 2495. 2496. 2497. 2498. 2499. 2500. 2501. 2502. 2503. 2504. 2505. 2506. 2507. 2508. 2509. 2510. 2511. 2512. 2513. 2514. 2515. 2516. 2517. 2518. 2519. 2520. 2521. 2522. 2523. 2524. 2525. 2526. 2527. 2528. 2529. 2530. 2531. 2532. 2533. 2534. 2535. 2536. 2537. 2538. 2539. 2540. 2541. 2542. 2543. 2544. 2545. 2546. 2547. 2548. 2549. 2550. 2551. 2552. 2553. 2554. 2555. 2556. 2557. 2558. 2559. 2560. 2561. 2562. 2563. 2564. 2565. 2566. 2567. 2568. 2569. 2570. 2571. 2572. 2573. 2574. 2575. 2576. 2577. 2578. 2579. 2580. 25

Washington, D.C. 20545

**YOU CAN REMEMBER THIS**

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NOTE: Submission of false or erroneous or incomplete information may subject the person making this report to the penalties of 2 U.S.C. 6432.

All previous versions of FIC FORM 1 and FIC FORM 2a are obsolete and should no longer be used.

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FEC FORM 32 (3/80)

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee or Fund

SAPEC-W.J. '86 (Savings Association Political Electric  
-New Jersey

Period of Report to Date

From 10-1-86 To 11-24-86

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
<b>I. RECEIPTS</b>			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees . . . . .	9,474.00	63,663.50	11(a)
(Memo Entry Unitemized <u>2,699.00</u> )			
(b) Political Party Committees . . . . .			11(b)
(c) Other Political Committees . . . . .			11(c)
12. TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .	9,474.00	63,663.50	11(d)
13. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .			13
14. ALL LOANS RECEIVED . . . . .			14
15. LOAN REPAYMENTS RECEIVED . . . . .			15
16. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .			16
18. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .			18
17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .			17
19. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .	9,474.00	63,663.50	19
<b>II. DISBURSEMENTS</b>			
18. OPERATING EXPENDITURES . . . . .			18
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .	300.00	22,000.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .			23
(2 U.S.C. 9441 etd) (Use Schedule F)			
24. LOAN REPAYMENTS MADE . . . . .			24
25. LOANS MADE . . . . .			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees . . . . .			26(a)
(b) Political Party Committees . . . . .			26(b)
(c) Other Political Committees . . . . .			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .			26(d)
27. OTHER DISBURSEMENTS . . . . .	3,195.00	9,426.00	27
28. TOTAL DISBURSEMENTS (add lines 18, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .	3,495.00	31,426.00	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .	9,474.00	63,663.50	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .	9,474.00	63,663.50	31
32. TOTAL OPERATING EXPENDITURES from Line 18 . . . . .			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 16 . . . . .			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .			34

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Budgeted Summary Page

PAGE 1 OF 1  
FORM LINE NUMBER 21

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

## NAME OF COMMITTEE (in Full)

SAPAC-N.J.'86 - Savings Association Political Election Committee-New Jersey 1986)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Charles Neumann (R-5th) 355 Route 17 S., Ridgewood, N.J. 07450	Paid raise Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-7-86	300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) ..... \$ 300.00

TOTAL This Period (last page this line number only) ..... \$ 300.00

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John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

CERTIFIED

P 620 489 687

MAIL



FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-862134  
STAFF MEMBER: George F. Rishel

SOURCE OF MUR:

I N T E R N A L L Y   G E N E R A T E D

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- 2 -

33040701826

Sapac, N.J. and Edmond V. Lawlor, Jr., as  
treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)

INTERNAL REPORTS  
CHECKED: Referral Materials

FEDERAL AGENCIES  
CHECKED: None

**I. GENERATION OF MATTER**

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

**II. FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

88040701827

filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

83040701828

The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

<u>Committee</u>	<u>Date Filed</u> 1/	<u>Pre-Election Activity</u>
------------------	----------------------	------------------------------

83040701829

88040701830



88040701831

Sapac, N.J.

12-30-86  
(68 days late)

\$300 in contributions  
to one candidate

8 8 0 4 0 7 0 1 8 3 2  
The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

COMMITTEE

Date Filed<sup>4/</sup>

Pre-Election Activity

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

<sup>4/</sup> See footnote 1.

### III. RECOMMENDATIONS

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

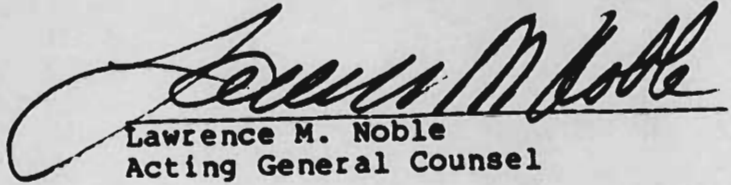
830407018333

83040701834

Sapac, N.J. and Edmond V. Lawlor, Jr., as treasurer

2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
- 3.

6/10/87  
Date

  
Lawrence M. Noble  
Acting General Counsel

Attachments

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

88040701835

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref.'s  
87NF-86  
THROUGH  
87NF-134

it  
it

83040701836

(continued)





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[illegible][illegible]

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Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15, 1987

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88040701839

(continued)

Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15. 1987

Page 5

83040701840

Sapac, N.J. and Edmond V. Lawlor, Jr., as treasurer

Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15, 1987

Page 6

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

3

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34  
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00  
Deadline for vote: Mon., 6-15-87, 4:00

83040701841



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 29, 1987

Edmond V. Lawlor, Jr., Treasurer  
Sapac, N.J.  
411 North Avenue East  
Cranford, N.J. 07016

RE: MUR 2510  
Sapac, N.J., and Edmond V.  
Lawlor, Jr., as treasurer

Dear Mr. Lawlor:

On June 15, 1987, the Federal Election Commission found that there is reason to believe Sapac, N.J., ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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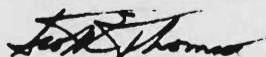
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel will not ordinarily give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

83040701843

**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS:**      Sapec, N.J., and Edmond V.  
                         Lawlor, Jr., as treasurer

MUR:2510

8 8 0 4 0 7 0 1 8 4 4

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 1986 Post-General Election Report that disclosed a \$300 contribution to one candidate between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-General Election Report on December 30, 1986. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

# SAPEC - N.J.

411 NORTH AVENUE EAST • CRANFORD, N.J. 07016

July 9, 1987

RECEIVED AT THE FEC

QCE# 3914

87 JUL 15 11:51

Ms. Deborah Curry, Counsel  
Federal Election Commission  
General Counsel Office  
Washington, D.C. 20463

RE: MUR 2510  
SAPEC, N.J. and Edmond V.  
Lawlor, Jr., as Treasurer

87 JUL 15 13:10

Dear Ms. Curry:

We are in receipt of your letter of June 29, 1987, regarding possible violation of a provision of the Federal Election Campaign Act of 1971, as amended [2 U.S.C. §434(a)(4)(A)(ii)]. This letter sets forth facts which we believe are pertinent to the Commission's consideration of this matter.

On December 29, 1986, we received a letter from Mr. John D. Gibson of the Federal Election Commission with reference to the 30-day Post-General Report (through 11/24/86). That letter brought to our attention that SAPEC, N.J. had not filed a 30-day Post-General Report.

We immediately contacted the Federal Election Commission and spoke with Mr. Christopher Nuland. We explained to Mr. Nuland that the apparent failure to file this report resulted from a change in personnel. Mr. Nuland said he understood and we need only submit this report to be in compliance with our reporting obligations under the Federal Election Campaign Act. Based upon our conversation with Mr. Nuland we understood that the Post-Election Report was the only report needed to bring SAPEC, N.J. current insofar as its reporting obligations under the Act. On December 30, 1986, we mailed out the 30-day Post-General Report and a letter explaining the situation to Mr. John D. Gibson, a copy of which is enclosed.

As Treasurer of SAPEC, N.J., I have always used my best efforts to obtain, maintain and submit the information required by the Act. Failure to submit the Pre-Election Report was not knowingly or willfully done but was merely an inadvertent oversight. In accordance with §434(i) of the Act, the reports and records of SAPEC, N.J. should be considered in compliance with the requirements of the Act based on best efforts.

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We have attempted to keep up with all the necessary dates and deadlines so that an oversight of this type would not occur. Mr. Nuland advised that the Federal Register would be listing some workshops during the months of May or June, 1987. We are also aware of three upcoming workshops in September, October and November that are being co-sponsored by the Federal Election Commission. We intend to have a representative of SAPEC, N.J. attend one of these workshops. We believe further that this commitment should be considered as further evidence of SAPEC, N.J.'s intent to comply with all applicable requirements of the Act.

We have enclosed the Pre-Election Report of SAPEC, N.J. for the period October 1, 1986 to October 15, 1986.

We respectfully suggest that the reasons set forth in this letter clearly and convincingly demonstrate that the failure to file the Pre-Election Report was an inadvertent oversight which has been rectified and that no action should be taken against the Committee or me as its Treasurer.

Very truly yours,

SAPEC, N.J.

By: E. J. Lawlor, Jr.  
Edmond V. Lawlor, Jr.  
Treasurer

EVL:cm

Enclosures

Letter to John D. Gibson

30 Day Post-General Report

Pre-General Election Report (10/1/86 to 10/15/86)

03040701845

NEW JERSEY

SAVINGS LEAGUE

411 North Avenue East • Cranford, NJ 07016-2444 • (201) 272-8500

December 29, 1986

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00011221

Reference: 30 Day Post-General Report (through 11/24/86)

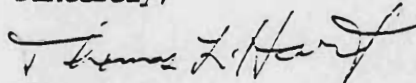
Dear Mr. Gibson:

We are in receipt of your recent letter regarding SAPEC-N.J. failure to file the above referenced report. In reviewing our records, we show that this report was not filed.

My secretary spoke to Mr. Christopher Nuland on December 28, 1986 and obtained the information and dates necessary so that this report could be mailed to you promptly. We explained to Mr. Nuland that we were unaware of having to file this report, as a change in personnel has made it difficult.

We have always attempted to comply to the regulations of the Federal Election Commission. We apologize for any inconvenience and will take the proper precautions to prevent this from occurring again.

Sincerely,



Thomas L. Hart  
Executive Vice President

TLH:sjd

enclosure

8 3 0 4 0 7 0 1 8 4 7



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<b>SENDER:</b> Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.	
<b>(CONSULT POSTMASTER FOR FEES)</b>	
1. The following service is requested (check one).	
<input type="checkbox"/> Show to whom and date delivered .....	
<input checked="" type="checkbox"/> Show to whom, date, and address of delivery .....	
2. <input type="checkbox"/> RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.)	
TOTAL \$	
ARTICLE ADDRESSED TO: John D. Gibson, Asst. Staff Dir. Reports Analysis Division Federal Election Commission Washington, D.C. 20463	
4. TYPE OF SERVICE:	ARTICLE NUMBER
<input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED	P620 489 887
<input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD	
<input type="checkbox"/> EXPRESS MAIL	
(Always obtain signature of addressee or agent)	
I have received the article described above.	
SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
5. DATE OF DELIVERY	POSTMARK
6. ADDRESSEE'S ADDRESS (Only if requested)	
87 JAN 5 411:38	
7. UNABLE TO DELIVER BECAUSE:	7a. EMPLOYEE'S INITIALS



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)  
SAPEC-N.J. '86  
Savings Association Political Election  
Committee - New Jersey 1986

Address (Number and Street)

411 North Avenue East

City, State and ZIP Code

Cranford, N.J. 07016

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 000 11221

3. ☐ This committee qualified as a multicandidate committee during  
this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election.

on \_\_\_\_\_ in the State of New Jersey

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

**SUMMARY**

5. Covering Period 10-1-86 through 11-24-86

6. (a) Cash on hand January 1, 19 86 . . . . .

(b) Cash on Hand at Beginning of Reporting Period . . . . .

(c) Total Receipts (from Line 18) . . . . .

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B) . . . . .

7. Total Disbursements (from Line 28) . . . . .

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) . . . . .

9. Debts and Obligations Owed TO The Committee . . . . .  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee . . . . .  
(Itemize all on Schedule C or Schedule D)

**COLUMN A**  
This Period

**COLUMN B**  
Calendar Year-to-Date

	\$23,091.43
\$ 49,349.93	
\$ 9,474.00	\$ 63,663.50
\$ 58,823.93	\$ 86,754.93
\$ 3,495.00	\$ 31,426.00
\$ 55,328.93	\$ 55,328.93
\$	
\$	

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

Edmond V. Lawlor, Jr.  
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

12-30-86

For further information contact:

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

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

FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

**SAPEC-N.J. '86 (Savings Association Political Election  
-New Jersey**

Period Covering the Period

From: 10-1-86 To 11-24-86

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-To-Date**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees . . . . .

(Memo Entry Unitarized \$ 8,699.00 )

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**13. ALL LOANS RECEIVED . . . . .**

**14. LOAN REPAYMENTS RECEIVED . . . . .**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES . . . . .**

AND OTHER POLITICAL COMMITTEES

**17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .**

**18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES . . . . .**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND . . . . .**

OTHER POLITICAL COMMITTEES

**22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .**

(2 U.S.C. § 441 a(d)) (Use Schedule F)

**24. LOAN REPAYMENTS MADE . . . . .**

**25. LOANS MADE . . . . .**

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees . . . . .

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .

**27. OTHER DISBURSEMENTS . . . . .**

**28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .**

**31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .**

**32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .**

EXPENDITURES (Subtract Line 33 from Line 32)

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SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1  
FOR LINE NUMBER 11a

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. - 1986 (Savings Association Political Election Committee)

<p>A. Full Name, Mailing Address and ZIP Code Edmond V. Lawlor, Jr. 321 N. Avenue East, Unit 103 Cranford, N.J. 07016</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): 30day Post-General</p>	<p>Name of Employer N.J. Savings League</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-20-86</p>	<p>Amount of Each Receipt this Period 300.00</p>
<p>B. Full Name, Mailing Address and ZIP Code J. Robert Duff 12 Rockledge Place Cedar Grove, N.J. 07009</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): 30day Post-General</p>	<p>Name of Employer Llewellyn-Edison Savings and Loan</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-27-86</p>	<p>Amount of Each Receipt this Period 250.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Leonard Pikaard, Sr. 183 Rock Road Glen Rock, N.J. 07452</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer GlenRock Savings &amp; Loan</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-27-86</p>	<p>Amount of Each Receipt this Period 225.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

SUBTOTAL of Receipts This Page (optional)

\$775.00

TOTAL Tax Exempt (list page this line number only)

\$775.00

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

U. Separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. '86 - Savings Association Political Election Committee-New Jersey 1986)

<b>A. Full Name, Mailing Address and ZIP Code</b> Congresswoman Marge Roukema (R-5th) 555 Route 17 S., Ridgewood, N.J. 07450	<b>Purpose of Disbursement</b> Fund raiser Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 10-7-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>B. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

SUBTOTAL of Disbursements This Page (optional) ..... \$300.00

TOTAL This Period (last page this line number only) ..... \$300.00

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**REPORT OF RECEIPTS AND DISBURSEMENTS**  
**For Political Committee Other Than an Authorized Committee**

(Summary Page)

<p><b>1. Name of Committee (In Full)</b> SAPEC-N.J. '86 Savings Association Political Election Committee - New Jersey, 1986</p> <hr/> <p><b>Address (Number and Street)</b>  411 North Avenue East</p> <hr/> <p><b>City, State and ZIP Code</b>  Cranford, N.J. 07016</p> <hr/> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <hr/> <p><b>2. FEC Identification Number</b> C 000 11221</p> <hr/> <p><b>3.</b> <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	<p><b>4. TYPE OF REPORT (Check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report    <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report    <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only) <input type="checkbox"/> Monthly Report for _____ <input checked="" type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on <u>Nov. 4, 1986</u> in the State of <u>New Jersey</u> <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES    <input checked="" type="checkbox"/> NO</p>
---	---

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10-1-86</u> through <u>10-15-86</u>		
6. (a) Cash on hand January 1, 19 <u>86</u>		----	\$ 23,091.43
(b) Cash on Hand at Beginning of Reporting Period		\$ 49,349.93	
(c) Total Receipts (from Line 18)		\$ -0-	\$ 54,189.50
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 49,349.93	\$ 77,280.93
7. Total Disbursements (from Line 28)		\$ 1,050.00	\$ 28,981.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 48,299.93	\$ 48,299.93
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$	----
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	----

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

Edmond V. Lawlor, Jr.  
Type or Print Name of Treasurer

  
SIGNATURE OF TREASURER

7-2-87  
Date

For further information contact:

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

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

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FEC FORM 3X (3/80)

**of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Report Covering the Period

From: 10-1-86 To: 10-15-86

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-To-Date**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees. . . . .

(Memo Entry Unitarized \$ -0- )

(b) Political Party Committees. . . . .

(c) Other Political Committees. . . . .

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .

-0-

54,189.50

11(a)

11(b)

11(c)

11(d)

-0-

54,189.50

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES. . . . .

12

13. ALL LOANS RECEIVED. . . . .

13

14. LOAN REPAYMENTS RECEIVED. . . . .

14

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .

15

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES . . . . .

16

AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .

17

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .

-0-

54,189.50

18

**II. DISBURSEMENTS**

19. OPERATING EXPENDITURES. . . . .

19

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES. . . . .

20

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES

500.00

22,000.00

21

22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .

22

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. . . . .

23

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE. . . . .

24

25. LOANS MADE. . . . .

25

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees. . . . .

26(a)

(b) Political Party Committees. . . . .

26(b)

(c) Other Political Committees. . . . .

26(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .

26(d)

27. OTHER DISBURSEMENTS. . . . .

750.00

6,981.00

27

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .

1,050.00

28,981.00

28

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .

-0-

54,189.50

29

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .

30

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .

-0-

54,189.50

31

32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .

32

33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .

33

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .

34

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**SCHEDULE B**

**ITEMS DISBURSEMENTS**

separate schedules  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. '86 - Savings Association Political Election Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congresswoman Marge Roukema (R-5th) 555 Rte. 17S Ridgewood, N.J. 07450	Fundraiser Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-7-86	300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

300.00

TOTAL This Period (last page this line number only)

300.00

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

## NAME OF COMMITTEE (in Full)

SAPEC-N.J. '86 - Savings Association Political Election Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
N.J. Republican State Committee 310 West State Street Trenton, N.J. 08618	Membership Dues Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-3-86	250.00
B. Full Name, Mailing Address and ZIP Code Assemblyman Louis F. Kosco 275 Forest Avenue Paramus, N.J. 07652	Fund Raiser Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-10-86	500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

750.00

TOTAL This Period (last page this line number only)

750.00

33040701856

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

SAPEC, N.J. and Edmond  
V. Lawlor, Jr., as treasurer

MUR 2510

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, based on the assessment of the information presently available.

Date

9/30/87

Lawrence M. Noble  
Acting General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 14, 1987

SENSITIVE

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87 OCT 14 AM 11:34

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

SUBJECT: MUR #2510

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 October 14, 1987. 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

83040701858





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

October 14, 1987

**Edmond V. Lawlor, Jr., Treasurer**  
**SAPEC, N.J.**  
**411 North Avenue East**  
**Cranford, N.J. 07016**

**RE: MUR 2510**  
**SAPEC, N.J. and**  
**Edmond V. Lawlor, Jr.,**  
**as treasurer**

Dear Mr. Lawlor:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on June 15, 1987, found reason to believe that SAPEC, N.J., and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) and instituted an investigation in 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) 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 the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

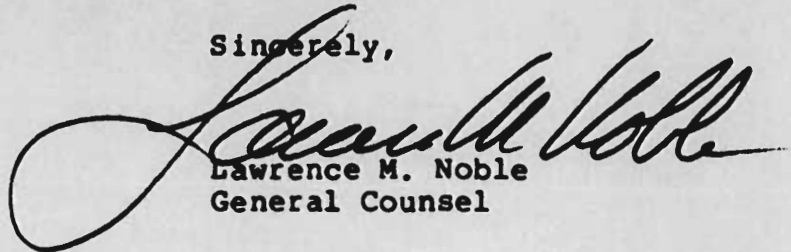
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If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Deborah Curry, the attorney assigned to handle this matter, at (202) 376-376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

880040701860



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
SAPEC, N.J. and Edmond ) MUR 2510  
V. Lawlor, Jr., as treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities. SAPEC, N.J. ("Committee") is a political committee registered with the Commission. Edmond V. Lawlor, Jr., is the treasurer of SAPEC, N.J.

SAPEC, N.J. was required, pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), to file its 1986 Pre-General Election Report no later than October 23, 1986, if the Committee made contributions or expenditures on behalf of federal candidates in the general election. On September 29, 1986, prior notification was sent to all unauthorized quarterly filers informing them of this requirement. The SAPEC, N.J. filed a 1986 Post General Election Report that disclosed a \$300 contribution to one candidate between October 1, 1986, and October 15, 1986. SAPEC, N.J. did not file a report disclosing this activity until it filed its 1986 Post General Election Report on December 30, 1986, which was filed 69 days late.

Based upon its consideration of the foregoing facts, the Commission determined on June 15, 1987, that there was reason to believe SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer violated 2 U.S.C. § 434(a)(4)(A)(ii). Notification of the Commission's finding was mailed to the Committee on June 29,

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1987. On July 15, 1987, the Office of General Counsel received a response from SAPEC, N.J.

According to the SAPEC, N.J. response, the committee received a letter from the Commission dated December 29, 1986 indicating that the 30 Day Post General Election Report had not been filed by the Committee. SAPEC, N.J., described a prior telephone conversation with the Reports Analysis Division where the RAD analyst was told that the missed report was due to personnel changes. Additionally, during that same conversation, it was SAPEC, N.J.'s understanding that the missed 30 Day Post General Election Report was the only report needed to bring SAPEC, N.J. current with regard to its reporting obligations of the Act. SAPEC, N.J. notes that on December 30, 1986 the 30 Day Post General Election Report was mailed out with a letter explaining the situation.

SAPEC, N.J. contends that failure to submit the Pre-Election Report was not willfully done but an oversight. SAPEC, N.J. concludes, therefore, that best efforts were used to obtain maintain and submit the information required by the Act in accordance with 2 U.S.C. § 432(i) and no further action should be taken. SAPEC, N.J. also indicates that steps are being taken by the committee to insure that this type of oversight will not occur again.

## II. LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(ii) requires that unauthorized quarterly filers file a Pre-General Election Report before any election in which the committee makes a contribution to or

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expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before such election.

8 8 0 4 0 7 0 1 8 6 3  
The record in this case reveals that SAPEC, N.J. made a \$300 contribution to a federal candidate during October 1, 1986 and October 15, 1986. Therefore, SAPEC, N.J. failed to file its 1986 Pre-General Election Report within the time-frame required by 2 U.S.C. § 434(a)(4)(A)(ii). Failure to file reports within the time-frame required is a violation of this section of the Act. SAPEC, N.J.'s arguments, while perhaps mitigating, do not negate the violation nor demonstrate that no action should be taken. Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

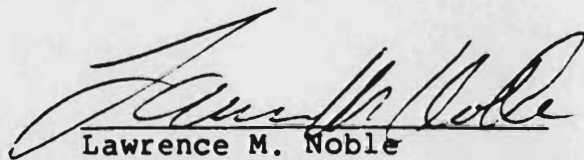
III. GENERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that SAPEC, N.J. and Edmond V. Lawlor, as treasurer, violated 2 U.S.C.

§ 434(a)(4)(A)(ii).

Date

10/13/87

  
Lawrence M. Noble  
General Counsel

LAW OFFICES

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

600#4682

**APRUZZESE, McDERMOTT, MASTRO & MURPHY**

A PROFESSIONAL CORPORATION

87 NOV -2 AM 9:31

INDEPENDENCE PLAZA

500 MORRIS AVENUE

P.O. Box 329

SPRINGFIELD, N.J. 07081

(901) 467-1776

521 FIFTH AVENUE

SUITE 1700

NEW YORK, N.Y. 10017

(212) 692-5644

TELECOPIER: (904) 467-8612

IN REPLY PLEASE REFER

TO FILE NO.

VINCENT J. APRUZZESE (1)(2)  
FRANK X. McDERMOTT (1)(2)  
MERRITT T. VISCARDI (2)  
FRANCIS A. MASTRO (1)  
JAMES F. MURPHY (1)  
FREDERICK T. DANSEY, III  
MAURICE J. NELLIGAN, JR. (5)  
RICHARD C. MARIANI (2)  
MELVIN L. GELADE  
CHARLES F. WASEVICH, JR. (1)(2)(3)(4)  
BARRY MARELL  
ROBERT T. CLARKE  
MARGARET M. MADDEN  
JERROLD J. WOHLGEMUTH (4)  
PAUL E. STEVENSON (4)  
LAWRENCE HENDERSON (6)

**VIA FEDERAL EXPRESS**

ALSO D.C. (1) N.Y. (2) CONN. (3)  
PA. (4) MD. (5) OK (6)

October 28 , 1987

Secretary  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2510  
Sapac, N.J. and Edmond V. Lawlor, Jr., as Treasurer

Dear Sir or Madam:

This firm has been designated as counsel for Sapac, N.J. and Edmond V. Lawlor, Jr., as Treasurer, for the referenced MUR in accordance with the executed Statement of Designation of Counsel enclosed. Pursuant to the procedures of the Federal Election Commission, we have enclosed ten (10) copies of a reply brief in opposition to the General Counsel's recommendation that the Commission find probable cause to believe that Sapac, N.J. and its Treasurer, Edmond V. Lawlor, Jr., violated 2 U.S.C. Section 434(a)(4)(A)(ii). By copy of this letter, three (3) copies of such brief are being forwarded to the Office of the General Counsel.

Very truly yours,

  
Barry Marell

BM:ja

Enclosures

cc: Federal Election Commission, Office of General Counsel (w/encs.)

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2510

NAME OF COUNSEL: Barry Marcell, Esq.

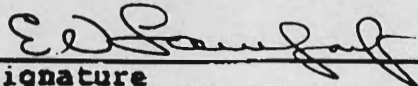
ADDRESS: Acquasano, McDermott, Mastro & Murphy  
500 Morris Avenue  
P. O. Box 329

Springfield, N.J. 07081

TELEPHONE: (201) 467-1776

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

October 28, 1987  
Date

  
Signature  
Edmond V. Lawlor, Treasurer

RESPONDENT'S NAME: SAPPC, N.J. and Edmond V. Lawlor Jr., as treasurer

ADDRESS: 411 North Avenue, East  
Cranford, N.J. 07016

HOME PHONE: N/A

BUSINESS PHONE: (201) 272-8500

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

SAPEC, N.J. and Edmond  
V. Lawlor, Jr., as treasurer

)  
)  
)  
)

MUR 2510

REPLY BRIEF SUBMITTED ON BEHALF OF  
SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer

I. PRELIMINARY STATEMENT

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The Federal Election Commission, (the "Commission") based upon information ascertained in the normal course of carrying out its supervisory responsibilities found, on June 15, 1987, reason to believe that SAPEC, N.J., and its treasurer, Edmond V. Lawlor, Jr., violated 2 U.S.C. § 434(a)(4)(A)(ii) of the Federal Election Campaign Act (the "Act") and instituted an investigation into the matter. Notification of the Commission's finding was mailed to SAPEC, N.J. on June 29, 1987. By letter dated July 15, 1987, (Attached as Exhibit A), SAPEC, N.J. replied to such notification setting forth facts and legal contentions believed pertinent to the Commission's consideration of this matter.

By letter dated October 14, 1987, the Office of the General Counsel to the Commission advised SAPEC, N.J. through its treasurer that it was prepared to recommend that the Commission find probable cause to believe that a violation had occurred and submitted a copy of a brief stating its position on the legal and factual issues of the case.

This reply brief is submitted on behalf of SAPEC, N.J. and its treasurer, Edmond V. Lawlor, Jr., in opposition to the position of the General Counsel.



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## II. STATEMENT OF FACTS

SAPEC, N.J. and its treasurer rely upon the facts set forth in its initial response to the office of the General Counsel dated July 15, 1987, and incorporate that response which is attached as Exhibit A herein. Those facts set forth in SAPEC N.J.'s July 15, 1987 response have not been disputed by the office of the General Counsel.

SAPEC, N.J. first became aware that it had failed to meet a report deadline when, on December 29, 1986, it received a letter from John D. Gibson, Assistant Staff Director of the Commission, concerning the 30 day Post General Election Report. Upon receipt of this letter SAPEC, N.J. promptly contacted Mr. Christopher Nuland, an employee of the Commission and explained that the apparent filing oversight had occurred due to a change in personnel at SAPEC, N.J. Mr. Nuland stated that SAPEC, N.J. need only submit the 30 day Post General Election Report to be in compliance with the reporting obligations of the Federal Election Campaign Act. (the "Act"). No mention was made of the Pre-Election Report and it was SAPEC, N.J.'s understanding that the Post Election Report was the only report needed to bring it current with the reporting obligations of the Act.

In accordance with Mr. Nuland's instructions, SAPEC, N.J. forwarded a 30 day Post General Election Report and a letter explaining the situation to Mr. Gibson on December 29, 1986. (Attached as Exhibit B).

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It was not until SAPEC, N.J. received the June 29, 1987, letter from the Commission that it became aware of the need to file a 1986 Pre-General Election Report. That report was apparently required because of a \$300 contribution made by SAPEC, N.J. to a candidate for federal office during the period of October 1, 1986 to October 15, 1986. However, that expenditure was fully disclosed in the 1986 Post General Election Report filed by SAPEC, N.J. SAPEC, N.J. has always used its best efforts to obtain, maintain and submit the information required by the Act and any failure to submit the subject Pre-General Election Report was not knowingly or willfully done, but was merely an inadvertent oversight. Moreover, almost as soon as SAPEC, N.J. became aware of the need to file a 1986 Pre-General Election Report it did so.

### III. LEGAL ANALYSIS

The standard which governs SAPEC, N.J.'s compliance with the federal election laws is set forth in 2 U.S.C. § 432 (i):

When the treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by this Act for the political committee, any report or any records of such committee shall be considered in compliance with this Act or Chapter 95 or Chapter 96 to Title 26 (emphasis added).

The language of this section does not provide that a failure to file unequivocally constitutes a statutory violation. Rather the statute obligates a treasurer to use his "best efforts" to obtain, maintain, and submit the information required by law. In fact, the statute mandates that the Commission recognize compliance once a treasurer shows that his or her best efforts have been utilized.

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The fact that the filing oversight was due to a personnel change and SAPEC N.J.'s swift actions to rectify this matter as set forth above and evidenced by Exhibits A and B indicate that SAPEC, N.J. used its best efforts to submit the information required by 2 U.S.C. § 434(a)(4)(A)(ii) in accordance with 2 U.S.C. § 432(i).

These factors have more than the "mitigating" effect that the General Counsel's brief attributes to them. These activities constitute the "best efforts" required under the statute. Therefore, the Commission does not have sufficient reason to find a violation of 2 U.S.C. § 434 (a)(4)(A)(ii) by SAPEC, N.J. or Edmond V. Lawlor Jr. as treasurer.

III. CONCLUSION

Based upon the aforesaid Statement of Facts and conclusions of law it is respectfully submitted that no probable cause exists to believe that SAPEC, N.J. and Edmond V. Lawlor Jr., as treasurer, violated 2 U.S.C. § 434 (a)(4)(A)(ii) and the recommendation of the General Counsel should be denied.

Dated: October 28, 1987

APRUZZESE, McDERMOTT, MASTRO  
& MURPHY, A Professional  
Corporation  
Attorneys for SAPEC, N.J. and  
Edmond V. Lawlor, Jr. as  
treasurer

By: 

Barry Mazell

A Member of the Firm

EXHIBIT A

88040701870

# SAPEC - N.J.

411 NORTH AVENUE EAST • CRANFORD, N.J. 07016

July 9, 1987

Ms. Deborah Curry, Counsel  
Federal Election Commission  
General Counsel Office  
Washington, D.C. 20463

RE: MUR 2510  
SAPEC, N.J. and Edmond V.  
Lawlor, Jr., as Treasurer

Dear Ms. Curry:

We are in receipt of your letter of June 29, 1987, regarding possible violation of a provision of the Federal Election Campaign Act of 1971, as amended [2 U.S.C. §434(a)(4)(A)(ii)]. This letter sets forth facts which we believe are pertinent to the Commission's consideration of this matter.

On December 29, 1986, we received a letter from Mr. John D. Gibson of the Federal Election Commission with reference to the 30-day Post-General Report (through 11/24/86). That letter brought to our attention that SAPEC, N.J. had not filed a 30-day Post-General Report.

We immediately contacted the Federal Election Commission and spoke with Mr. Christopher Nuland. We explained to Mr. Nuland that the apparent failure to file this report resulted from a change in personnel. Mr. Nuland said he understood and we need only submit this report to be in compliance with our reporting obligations under the Federal Election Campaign Act. Based upon our conversation with Mr. Nuland we understood that the Post-Election Report was the only report needed to bring SAPEC, N.J. current insofar as its reporting obligations under the Act. On December 30, 1986, we mailed out the 30-day Post-General Report and a letter explaining the situation to Mr. John D. Gibson, a copy of which is enclosed.

As Treasurer of SAPEC, N.J., I have always used my best efforts to obtain, maintain and submit the information required by the Act. Failure to submit the Pre-Election Report was not knowingly or willfully done but was merely an inadvertent oversight. In accordance with §434(i) of the Act, the reports and records of SAPEC, N.J. should be considered in compliance with the requirements of the Act based on best efforts.



Ms. Deborah Curry, Counsel

-2-

We have attempted to keep up with all the necessary dates and deadlines so that an oversight of this type would not occur. Mr. Nuland advised that the Federal Register would be listing ~~some~~ workshops during the months of May or June, 1987. We are also aware of three upcoming workshops in September, October and November that are being co-sponsored by the Federal Election Commission.. We intend to have a representative of SAPEC, N.J. attend one of these workshops. We believe further that this commitment should be considered as further evidence of SAPEC, N.J.'s intent to comply with all applicable requirements of the Act.

We have enclosed the Pre-Election Report of SAPEC, N.J. for the period October 1, 1986 to October 15, 1986.

We respectfully suggest that the reasons set forth in this letter clearly and convincingly demonstrate that the failure to file the Pre-Election Report was an inadvertent oversight which has been rectified and that no action should be taken against the Committee or me as its Treasurer.

Very truly yours,

SAPEC, N.J.

By: E. J. Lawlor, Jr.  
Edmond V. Lawlor, Jr.  
Treasurer

EVL:cm

Enclosures

Letter to John D. Gibson

30 Day Post-General Report

Pre-General Election Report (10/1/86 to 10/15/86)

83040701872



**(Summary Page)**

## SUMMARY

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

7-2-87

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

[illegible]

**OF Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

Report Covering the

From: 10-1-86

To: 10-15-86

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-To-Date**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees . . . . .

(Memo Entry Unitemized \$ -0- )

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**13. ALL LOANS RECEIVED . . . . .**

**14. LOAN REPAYMENTS RECEIVED . . . . .**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES . . . . .**

**17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .**

**18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES . . . . .**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES . . . . .**

**22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .**  
(2 U.S.C. § 441 a(d)) (Use Schedule F)

**24. LOAN REPAYMENTS MADE . . . . .**

**25. LOANS MADE . . . . .**

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees . . . . .

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .

**27. OTHER DISBURSEMENTS . . . . .**

**28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .**

**31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .**

**32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .**

**34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .**

11(a)

11(b)

11(c)

11(d)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26(a)

26(b)

26(c)

26(d)

27

28

29

30

31

32

33

34

28040701874

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

**NAME OF COMMITTEE (in Full)**

**SAPEC-N.J. '86 - Savings Association Political Election Committee**

<b>A. Full Name, Mailing Address and ZIP Code</b> Congresswoman Marge Roukema (R-5th) 555 Rte. 17S Ridgewood, N.J. 07450	<b>Purpose of Disbursement</b> Fundraiser Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 10-7-86	<b>Amount of Each Disbursement This Period</b> 300.00
<b>B. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

**SUBTOTAL of Disbursements This Page (optional)**

300.00

**TOTAL This Period (last page this line number only)**

300.00

88040701875



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 1  
FOR LINE NUMBER 27

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. '86 - Savings Association Political Election Committee

<b>A. Full Name, Mailing Address and ZIP Code</b> N.J. Republican State Committee 310 West State Street Trenton, N.J. 08618	<b>Purpose of Disbursement</b> <u>Membership Dues</u> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 10-3-86	<b>Amount of Each Disbursement This Period</b> 250.00
<b>B. Full Name, Mailing Address and ZIP Code</b> Assemblyman Louis F. Kosco 275 Forest Avenue Paramus, N.J. 07652	<b>Purpose of Disbursement</b> <u>Fund Raiser</u> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 10-10-86	<b>Amount of Each Disbursement This Period</b> 500.00
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b>  Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

SUBTOTAL of Disbursements This Page (optional) .....

750.00

TOTAL This Period (last page this line number only) .....

750.00

33040701876

EXHIBIT B

83040701877



NEW JERSEY

SAVINGS LEAGUE

411 North Avenue East • Cranford, NJ 07016-2444 • (201) 272-8500

December 29, 1986

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00011221

Reference: 30 Day Post-General Report (through 11/24/86)

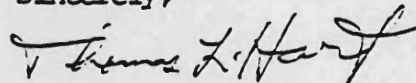
Dear Mr. Gibson:

We are in receipt of your recent letter regarding SAPEC-N.J. failure to file the above referenced report. In reviewing our records, we show that this report was not filed.

My secretary spoke to Mr. Christopher Nuland on December 28, 1986 and obtained the information and dates necessary so that this report could be mailed to you promptly. We explained to Mr. Nuland that we were unaware of having to file this report, as a change in personnel has made it difficult.

We have always attempted to comply to the regulations of the Federal Election Commission. We apologize for any inconvenience and will take the proper precautions to prevent this from occurring again.

Sincerely,



Thomas L. Hart  
Executive Vice President

TLH:sjd

enclosure

8 3 0 4 0 7 0 1 8 7 8

8 8 0 4 0 7 0 1 8 7 9

<p>● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.</p>		<p>(CONSULT POSTMASTER FOR FEES)</p>		<p>1. The following service is requested (check one):</p> <p><input type="checkbox"/> Show to whom and date delivered ..... \$</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery ..... \$</p> <p>2. <input type="checkbox"/> RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee.) ..... \$</p>		<p>TOTAL \$</p>	
<p>ARTICLE ADDRESSED TO: John V. Gibson, Asst. Staff Dir. Reports Analysis Division Federal Election Commission Washington, D.C. 20463</p>				<p>4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL</p>		<p>ARTICLE NUMBER P620 489 887</p>	
<p>(Always obtain signature of addressee or agent) I have received the article described above.</p>							
<p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p>				<p>DATE OF DELIVERY</p>			
<p>POSTMARK</p>				<p>8 JAN 5 11:30</p>			
<p>9. ADDRESSEE'S ADDRESS (Only if requested)</p>				<p>10. EMPLOYEE'S INITIALS</p>			
<p>7. UNABLE TO DELIVER BECAUSE:</p>							

REPORT OF RECEIPTS AND DISBURSEMENTS  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (In Full)  
SAPEC-N.J. '86  
Savings Association Political Election  
Committee - New Jersey 1986

Address (Number and Street)

411 North Avenue East

City, State and ZIP Code

Cranford, N.J. 07016

☐ Check here if address is different than previously reported.

2. FEC Identification Number  
C 000 11221

3. ☐ This committee qualified as a multicandidate committee during  
this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of New Jersey

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 10-1-86 through 11-24-86

6. (a) Cash on hand January 1, 19 86

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

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

Edmond V. Lawlor, Jr.

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

12-30-86

For further information contact:

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-576-3120

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

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

FEC FORM 3X (3/80)



**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee or Fund:

**SAPEC-N.J. '86 (Savings Association Political Election  
-New Jersey**

Reason for Change in Period

From: 10-1-86 To: 11-24-86

**COLUMN A  
Total This Period**

**COLUMN B  
Calendar Year-To-Date**

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees . . . . .

(Memo Entry Unitemized \$ 8,699.00 )

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**13. ALL LOANS RECEIVED . . . . .**

**14. LOAN REPAYMENTS RECEIVED . . . . .**

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .**

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES . . . . .**

**17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .**

**18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .**

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES . . . . .**

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .**

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES . . . . .**

**22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .**

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .**  
(2 U.S.C. § 441 a(d)) (Use Schedule F)

**24. LOAN REPAYMENTS MADE . . . . .**

**25. LOANS MADE . . . . .**

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees . . . . .

(b) Political Party Committees . . . . .

(c) Other Political Committees . . . . .

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .

**27. OTHER DISBURSEMENTS . . . . .**

**28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .**

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .**

**30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .**

**31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .**

**32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .**

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .**

(Subtract Line 33 from Line 32)

83040701981

**SCHEDULE A**

**ITEMIZED RECEIPTS**

(For Schedule A)  
Category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 11a

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. - 1986 (Savings Association Political Election Committee)

<p>A. Full Name, Mailing Address and ZIP Code Edmond V. Lawlor, Jr. 321 N. Avenue East, Unit 103 Cranford, N.J. 07016</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): 30day Post-General</p>	<p>Name of Employer N.J. Savings League</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-20-86</p>	<p>Amount of Each Receipt this Period 300.00</p>
<p>B. Full Name, Mailing Address and ZIP Code J. Robert Duff 12 Rockledge Place Cedar Grove, N.J. 07009</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): 30day Post-General Ele</p>	<p>Name of Employer Llewellyn-Edison Savings and Loan</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-27-86</p>	<p>Amount of Each Receipt this Period 250.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Leonard Pikaard, Sr. 183 Rock Road Glen Rock, N.J. 07452</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer GlenRock Savings &amp; Loan</p> <p>Occupation President</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year) 10-27-86</p>	<p>Amount of Each Receipt this Period 225.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

SUBTOTAL of Receipts This Page (optional) ..... \$775.00

..... \$775.00

3304070182



**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

U. S. Representative  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

SAPEC-N.J. '86 - Savings Association Political Election Committee-New Jersey 1986)

<p>A. Full Name, Mailing Address and ZIP Code Congresswoman Marge Roukema (R-5th) 555 Route 17 S., Ridgewood, N.J. 07450</p>	<p>Purpose of Disbursement Fund raiser</p> <p>Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year) 10-7-86</p>	<p>Amount of Each Disbursement This Period 300.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>C. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>D. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>H. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement</p> <p>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>

SUBTOTAL of Disbursements This Page (optional) ..... \$300.00

TOTAL This Period (last page this line number only) ..... \$300.00

8304070183

**CONFIDENTIAL**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
FEDERAL ELECTION COMMISSION  
88 JAN 14 PM 3:30

In the Matter of )  
 )  
SAPEC, N.J. and Edmond V. )  
Lawlor, Jr., as treasurer )

MUR 2510

**EXECUTIVE SESSION**

**JAN 20 1988**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

This matter was generated by the Reports Analysis Division ("RAD"), after review of the disclosure reports of SAPEC, N.J. The RAD referral revealed that SAPEC, N.J. and Edward V. Lawlor, Jr., as treasurer, may have violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file its 1986 Pre-General Election Report in a timely manner.

On June 15, 1987, the Commission found reason to believe SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). On October 14, 1987, the Office of General Counsel sent a brief to SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, recommending that the Commission find probable cause to believe that they violated 2 U.S.C. § 434(a)(4)(A)(ii). SAPEC, N.J. responded to the brief on November 2, 1987.

(Attachment 1)

**II. ANALYSIS**

The legal analysis of the Office of General Counsel is set out in its brief dated October 13, 1987. Respondents reiterated in this brief that the failure to submit the 1986 Pre-General Election Report was not knowing and willful but an oversight on the part of the Committee. Respondents state further that the Committee's actions to rectify the matter constitute "best

88 JAN 20 1988

efforts" in accordance with 2 U.S.C. § 432(i). (Attachment 1, pages 5-6) However, Respondents reliance on 432(i) to nullify the reporting violation is misplaced. Section 432(i) specifies a best efforts standard for submitting information required in reports filed with the Commission. Here, Respondents best efforts do not negate the 2 U.S.C. § 434(a)(4)(A)(ii) violation since the timeliness of the report is in question not the content. Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe SAPEC, N.J. and Edward V. Lawlor, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION PROVISIONS

8 3 0 4 0 7 0 1 8 8 5

IV. RECOMMENDATIONS

1. Find probable cause to believe SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
2. Approve the attached conciliation agreement and letter.

Date

1/14/88

  
Lawrence M. Noble  
General Counsel

Attachments

1. Response of SAPEC, N.J.
2. Proposed Conciliation Agreement
3. Letter

Staff Person: D. Curry

83040701886

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

SAPEC, N.J. and Edmond V. Lawlor,  
Jr., as treasurer

)  
)  
)  
)

MUR 2510

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of January 20,  
1988, do hereby certify that the Commission decided by a  
vote of 6-0 to take the following actions in MUR 2510:

1. Find probable cause to believe SAPEC, N.J.  
and Edmond V. Lawlor, Jr., as treasurer,  
violated 2 U.S.C. § 434(a)(4)(A)(ii).
2. Approve the conciliation agreement and  
letter attached to the General Counsel's  
report dated January 17, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald,  
McGarry, and Thomas voted affirmatively for the decision.

Attest:

Jan. 20, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

38040701887





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

January 22, 1988

Barry Marell, Esquire  
Apruzzese, McDermott, Mastro & Murphy  
500 Morris Avenue  
P.O. Box 329  
Springfield, N.J. 07081

RE: MUR 2510  
SAPEC, N.J. and  
Edmond V. Lawlor, Jr.,  
as treasurer

Dear Mr. Marell:

On January 20, 1988, the Federal Election Commission found that there is probable cause to believe your clients, SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with failing to file the 1986 Pre-General Election Report in a timely manner.

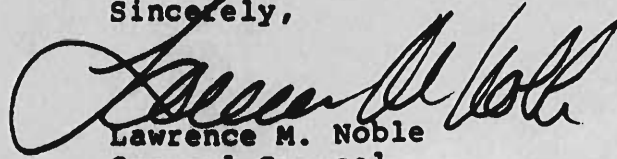
The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

830407018388

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

9 9 0 4 0 7 0 1 8 8 9

6CC #6553

LAW OFFICES

APRUZZESE, McDERMOTT, MASTRO & MURPHY

A PROFESSIONAL CORPORATION

INDEPENDENCE PLAZA

500 MORRIS AVENUE

P.O. Box 329

SPRINGFIELD, N.J. 07081

(201) 467-1776

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 FEB 23 AM 8:57

521 FIFTH AVENUE

SUITE 1700

NEW YORK, N.Y. 10017

(212) 682-5844

TELECOPIER: (201) 467-8812

IN REPLY PLEASE REFER

TO FILE NO.

VINCENT J. APRUZZESE (1)(2)  
FRANK X. McDERMOTT (1)(2)  
FRANCIS A. MASTRO (1)  
JAMES F. MURPHY (1)  
FREDERICK T. DANSEN, III  
MAURICE J. NELLIGAN, JR. (5)  
RICHARD C. MARIANI (2)  
MELVIN L. GELADE  
CHARLES F. WASSEVICH, JR. (1)(2)(3)(4)  
BARRY MARELL  
ROBERT T. CLARKE  
MARGARET M. MADDEN  
JERROLD J. WOHLGEMUTH (4)  
PAUL E. STEVENSON (4)  
LAWRENCE HENDERSON (6)

ALSO D.C. (1), N.Y. (2), CONN. (3),  
PA. (4), MD. (5), OK. (6)

February 19, 1988

Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

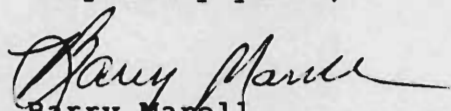
Attention: Deborah Curry, Esq.  
Office of General Counsel

Re: MUR 2510  
SAPEC, N.J. and Edmond V. Lawlor, Jr., as Treasurer

Dear Ms. Curry:

As indicated in our telephone conversation yesterday, enclosed is a check made payable to the Federal Election Commission in the amount of \$500.00 in payment of the civil penalty assessed in the referenced matter. Kindly return one fully countersigned copy of the Conciliation Agreement forwarded with my letter of January 29, 1988.

Very truly yours,

  
Barry Marell

BM:ja

Enclosure

cc: SAPEC, N.J.

Attention: Mr. Edmond V. Lawlor, Jr.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
88 FEB 24 AM 11:00

33040701890

**SAPEC-NJ ADMINISTRATIVE FUND**

411 NORTH AVENUE E.  
CRANFORD, NJ 07016

126

Feb. 16 1988

55-7121  
2212

PAY TO THE ORDER OF \*\*\*FEDERAL ELECTION COMMISSION\*\*\*

\$ 500.00

DOLLARS



**QUEEN CITY SAVINGS**

Cranford, New Jersey 07016

FOR PENALTY

*Ed Lawlor Jr.*

⑈000126⑈ • ⑈221271210⑈ 011 0018660⑈

MEMORANDUM

GCC#6553

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 126 { A COPY OF WHICH IS ATTACHED } RELATING TO

OUR 2510 AND NAME SAPEC N.J. and Edmond V. Lawlor, Jr.,  
(Curry) as treasurer

WAS RECIEVED ON 2/24/88. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ ☒ / BUDGET CLEARING ACCOUNT { 95F3875.16 }  
/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }  
/ / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 2/25/88

RECEIVED  
FEDERAL ELECTION COMMISSION  
88 FEB 24 AM 11:00

BEFORE THE FEDERAL ELECTION COMMISSION  
MARCH 3 AM 10:57

In the Matter of )

SAPEC, N.J. and Edmond V. Lawlor, )  
Jr., as treasurer )

MUR 2510

GENERAL COUNSEL'S REPORT

**SENSITIVE**

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Barry Marell on behalf of SAPEC, N.J. and Edmond V. Lawlor, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on January 20, 1988. A check for the civil penalty (\$500) has not been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer.
2. Close the file.
3. Approve the attached letter.

General Counsel  
Lawrence M. Noble

Date

3/3/88

BY:

*Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Member: Deborah Curry

88040701892



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

SAPEC, N.J. and Edmond V. Lawlor,  
Jr., as treasurer

MUR 2510

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 7, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2510:

1. Accept the conciliation agreement with SAPEC, N.J. and Edmond V. Lawlor, Jr., as treasurer, as recommended in the General Counsel's report signed March 3, 1988.
2. Close the file.
3. Approve the letter, as recommended in General Counsel's report signed March 3, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

3/8/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	3-3-88,	10:57
Circulated on 48 hour tally basis:	Thurs.,	3-3-88,	4:00
Deadline for vote:	Mon.,	3-7-88,	4:00



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

March 9, 1988

Barry Marell  
Apruzzese, McDermont, Mastro & Murphy  
500 Morris Avenue  
P.O. Box 329  
Springfield, N.J. 07081

RE: MUR 2510  
SAPEC, N.J. and  
Edmond V. Lawlor, Jr.,  
as treasurer

Dear Mr. Marell:

On March 7, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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

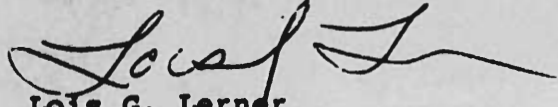
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-2-

questions, please contact Deborah Curry, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

38040701895

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
SAPEC, N.J. and Edmond V. ) MUR 2510  
Lawlor, Jr., as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that SAPEC, N.J. and Edmond Lawlor, Jr., as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-General Election Report in a timely manner.

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(ii), do hereby agree as follows:

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

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. SAPEC, N.J. is the separate segregated fund of New Jersey Savings League. Edmond V. Lawlor, is treasurer of SAPEC, N.J.

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2. Respondents were required by 2 U.S.C. § 434(a)(4)(A)(ii) to file the 1986 Pre-General Election Report on October 23, 1986.

3. Respondents failed to file a report containing pre-general election activity until December 30, 1986. The 30 Day Post General Election Report filed on December 30, 1986, contained the 1986 pre-general election activity. The 1986 Pre-General Election Report was filed 69 days late.

4. SAPEC, N.J. received \$0 in receipts and made \$1,050 in disbursements during the 1986 pre-general election reporting period.

V. Respondents failed to file the 1986 Pre-General Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

*Lawrence M. Noble (H2)*

Lawrence M. Noble  
General Counsel

Date

*March 9, 1988*

*Barry Maxwell*

Barry Maxwell, Esquire  
Counsel for Respondents

Date

*January 29, 1988*

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2510

DATE FILMED 5/6/88 CAMERA NO. 3

CAMERAMAN GPC

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