



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2552

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN PC

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## PERKINS COIE

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May 7, 1987

Lawrence M. Noble. Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Noble:

The Democratic Congressional Campaign Committee ("DCCC") files this complaint pursuant to §437g of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §431 et seq. ("FECA"), challenging the receipt of an illegal contribution by the Kennedy for Congress Committee, its treasurer, and Mr. Brian Kennedy ("Respondents").

In the course of Mr. Kennedy's campaign for election to the U.S. Congress, Respondents negotiated, received and expended a "loan" from an individual which substantially exceeded the applicable contribution limitations under §441a of the FECA. Respondents' actions in accepting these illegal funds reflect knowing disregard of the federal campaign finance laws.

Toward the close of the campaign, in an apparent 11th hour effort to generate funds, Respondents accepted a "loan" in the amount of \$10,000 from a Jackie Gilligan of Sea Girt, New Jersey. This loan appears on Schedule C of the Kennedy for Congress' October 15, 1986 report, attached hereto as Exhibit A. While designated as a loan, this \$10,000 gift was not collateralized; it did not carry interest; and there was no agreement on a due date or date certain by which it would be repaid.

Respondents should be charged with rudimentary knowledge of the FECA provisions governing loans. These provisions clearly provide that a loan from an individual to a candidate or candidate's committee constitutes a "contribution." 2 U.S.C. §431(8)(A)(i); 11 C.F.R. §100.7(a)(1)(i)(B). As a contribution, it is subject to dollar limitations in the same manner as any other contribution. Thus, FEC regulations state that:

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A loan which exceeds the contribution limitations of 2 U.S.C. 441a and 11 CFR Part 110 shall be unlawful whether or not it is repaid.

11 C.F.R. §100.7(a)(1)(i)(A).

Contributions by individuals to the general election campaign of a candidate for Congress are limited to \$1,000 per election. The contribution reported as a loan by Mr. Gilligan exceeds this general election contribution limitation by fully \$9,000. A substantial violation of the contribution limitations of the federal law is therefore presented.

Upon investigation by the FEC, it may become clearer how Respondents came to achieve so gross a violation of federal law. There is only one of two possible explanations. Either Respondents are egregiously ignorant of the campaign finance laws and somehow assumed that contributions from individuals could be masked as "loans"; or alternatively, as the campaign came to a close and Mr. Kennedy's financial needs became desperate, he and his committee chose to disregard the law in order to achieve their immediate financial objectives.

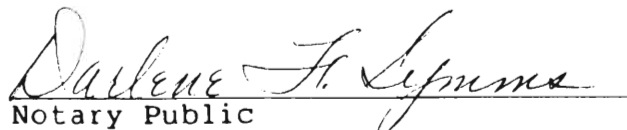
In either case, the law requires strict and immediate enforcement and DCCC requests that the same proceed immediately.

Respectfully submitted,



Robert F. Bauer  
Counsel, Democratic  
Congressional Campaign  
Committee

Subscribed and sworn to before me this 7th day of May, 1987.

  
Notary Public

My commission expires: 3/31/89

• • • • •



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

Name of Committee (in Full) <b>KENNEDY FOR CONGRESS</b>		Period Covering the Period From <b>6/30/86</b> To <b>9/30/86</b>	
		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)		23,701.00	50,599.88
(b) Political Party Committees			4,900.00
(c) Other Political Committees		6,250.00	6,500.00
(d) The Candidate			
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b), 11(c), and 11(d))		29,951.00	61,999.88
12 TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			
13 LOANS			
(a) Made or Guaranteed by the Candidate		11,000.00	11,000.00
(b) All Other Loans		10,000.00	10,000.00
(c) TOTAL LOANS (add 13(a) and 13(b))		21,000.00	21,000.00
14 OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)			
15 OTHER RECEIPTS (Dividends, Interest, etc.)			
16 TOTAL RECEIPTS (add 11(a), 12, 13(c), 14 and 15)		50,951.00	78,484.52
<b>II DISBURSEMENTS</b>			
17 OPERATING EXPENDITURES		52,951.00	82,999.88
18 TRANSFERS TO OTHER AUTHORIZED COMMITTEES			
19 LOAN REPAYMENTS			
(a) Of Loans Made or Guaranteed by the Candidate			
(b) Of All Other Loans			
(c) TOTAL LOAN REPAYMENTS (add 19(a) and 19(b))			
20 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), 20(b) and 20(c))			
21 OTHER DISBURSEMENTS			
22 TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)		52,951.00	78,484.52
<b>III CASH SUMMARY</b>			
23 CASH IN HAND AT BEGINNING OF REPORTING PERIOD			5,514.00
24 TOTAL RECEIPTS THIS PERIOD (from Line 16)			50,951.00
25 CASH IN HAND (add Line 23 and Line 24)			56,465.00
26 TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)			52,951.00
27 CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from Line 25)			3,514.00

**SCHEDULE C**  
(Revised 3/80)

**LOANS**

Page 1 of 1  
L-1000 (Rev. 11-79)  
Use separate schedules  
for each numbered loan

Name of Committee (in full)			
KENNEDY F. A. GRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
BRIAN T. KENNEDY 503 WASHINGTON BLVD SEA GIRT NJ 08750		N.A.	11,000.00
Election: Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred 9/26/86 Date Due N			
List All Employers or Guarantors of any in Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
JACKIE GILLIGAN CRESCENT AVENUE SEA GIRT NJ 08750		10,000.00	10,000.00
Election: Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred 9/26/86 Date Due N			
List All Employers or Guarantors of any in Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Amount Guaranteed Outstanding	
SUBTOTALS For Period This Page Includes:			31,000.00
TOTAL (This totals first page in this schedule)			31,000.00

Carry outstanding balance only to L-1000 Schedule C for this loan. If no Schedule C, carry forward to appropriate line of Summary.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 14, 1987

Ms. Jackie Gilligan  
726 Crescent Avenue  
Sea Girt, NJ 08750

RE: MUR 2412  
Jackie Gilligan

Dear Ms. Gilligan:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2412. Please refer to this number in all future correspondence.

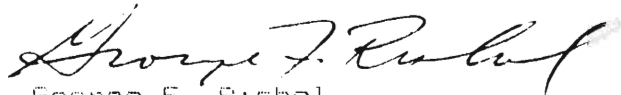
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
Acting General Counsel



By: George F. Rishel  
Acting Associate General Counsel

Enclosures

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

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20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 14, 1987

Brian T. Kennedy, Treasurer  
Kennedy For Congress  
PO Box 411  
Sea Girt, NJ 08750

RE: MUR 2412  
Kennedy For Congress  
Brian T. Kennedy,  
Treasurer

Dear Mr. Kennedy:

The Federal Election Commission received a complaint which alleges that Kennedy For Congress and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2412. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and Kennedy For Congress in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

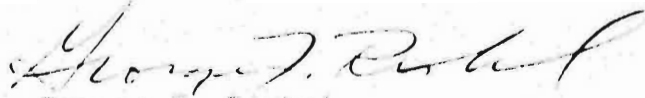
This matter will remain confidential in accordance with 2 U.S.C. § 4374(a)(4)(B) and § 4374(a)(12). A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble  
Acting General Counsel



By: George F. Rishel  
Acting Associate General Counsel

Enclosures

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

cc: Brian T. Kennedy

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 14, 1987

Robert F. Bauer, Esquire  
Democratic Congressional Campaign Committee  
Perkins Coie  
1110 Vermont Avenue, NW  
Washington, DC 20005

RE: MUR 2412

Dear Mr. Bauer:

This letter acknowledges receipt of your complaint, received on May 7, 1987, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by Kennedy For Congress and Brian T. Kennedy, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2412. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Petha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble  
Acting General Counsel

By: George F. Kishel  
Acting Associate General Counsel

Enclosures  
Procedures

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RECEIVED AT THE FEC  
COC# 3501  
37 JUN 1 49:21

KENNEDY AND DANIEL  
COUNSELLORS AT LAW

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
EDWARD B. KNAUER  
MEMBER OF N.J. AND FL. BAR  
PAUL S. KENNEDY

503 WASHINGTON BLVD.  
P. O. BOX 243  
SEA GIRT, N. J. 08750  
(201) 440-9555

May 28th, 1987

Lawrence M. Noble, Esquire  
Acting General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, NJ 20463

RE: MUR 2412  
KENNEDY FOR CONGRESS

Dear Mr. Noble:

This is to acknowledge receipt of your letter of May 14th, 1987 with its enclosures. To begin with, I was the candidate and not the treasurer, which is the title used in addressing me in this correspondence.

It is true that my FEC October Quarterly report of 6/30 - 9/30 does reflect a loan to campaign from one named Jackie Gilligan in the amount to \$10,000. Ms. Gilligan is my fiancée and in checking our records I have determined that on 9/26/86 a check in the amount of \$4,000.00 was drawn on an account in both of our names, I enclose a copy of the cancelled check for verification.

The second check was drawn on an account in my fiancée's name alone in the amount of \$6,000.00 and made payable to the account.

I did not know that there was a limitation on the amount that an individual could loan to a congressional campaign fund, particularly a fiancée. Not only was I unaware that a fiancée could not loan the campaign a sum more than \$1,000 but I honestly cannot understand the logic or rationale behind such a ruling. If we were married she could contribute \$10 million to my campaign but as a fiancée she can contribute or loan only \$1,000?

The Democrat Congressional Campaign Committee alleges that this loan was made at the 11th hour. The two checks were dated September 26th, 1986, six weeks before the election, hardly the 11th hour.

The Democrat Congressional Campaign Committee also complains that my fiancée did not charge me interest nor a date for repayment. I would think that this would indeed be proper for a fiancée not to charge interest or demand a date certain for repayment, at least with my fiancée.

Very truly yours,

*Brian T. Kennedy*  
BRIAN T. KENNEDY

*Jackie H. Gilligan*  
JACQUELINE H. GILLIGAN

37 JUN 1 11:02

RECEIVED  
GENERAL COUNSEL



**Dreyfus Preferred Check** NO. 105  
JACQUELINE GELIGAN  
BRIAN F. KENNEDY  
9/26 1986 30-235/270  
Pay to the Order of Kennedy For Congress \$ 4,000.00  
Four Thousand Dollars  
THE BANK OF NEW YORK  
White Plains New York 10698  
Thomas A. To Cantrio Jacqueline Geligan  
⑆02190235215740004511024200105

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR # 2412  
Date Complaint Received: 5/7/87  
By OGC 5/7/87  
Date of Notification to  
the Respondents 5/12/87  
Staff Member John Drury

COMPLAINT: The Democratic Congressional Campaign Committee

RESPONDENTS: Kennedy for Congress Committee and  
C. Daniel, as treasurer  
Jackie Gilligan  
Brian T. Kennedy

RELEVANT STATUTES: 2 U.S.C. § 431(8)(A)(i)  
2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 104.8(c) & (d)

INTERNAL REPORTS CHECKED: C Index, Committee's Statement  
of Organization

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF THE MATTER

This matter was generated as a result of a complaint from the Democratic Congressional Campaign Committee dated and received on May 7, 1987. (Attachment I). A response to the complaint was received by this Office on June 1, 1987.

II. FACTUAL AND LEGAL ANALYSIS

The complainant alleges that the Kennedy for Congress Committee (the "Committee") and C. Daniel, as treasurer, violated the Act by accepting an excessive contribution from Jackie Gilligan.<sup>1/</sup>

<sup>1/</sup> The Commission recently approved an audit of the Kennedy for Congress Committee, which audit is currently being conducted by the Audit Division.

Specifically, information supplied in the complaint indicates that Jackie Gilligan made a loan of \$10,000 to the Committee on or about September 26, 1986. Pursuant to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his authorized committees with respect to any election for Federal office which in the aggregate exceed \$1,000.

On June 1, 1987, this Office received a letter signed by Brian Kennedy and Jackie Gilligan stating that Ms. Gilligan is Kennedy's fiancée. The response indicates that she provided the Kennedy for Congress Committee with two checks totalling \$10,000. (Attachment III). One check was for \$4,000, the other check was for \$6,000. The \$4,000 check was drawn on an account held in the names of Jackie Gilligan and Brian Kennedy. However, Ms. Gilligan alone signed the check.

Pursuant to 11 C.F.R. § 104.8(d), a joint contribution shall indicate on the written instrument, or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor. The \$4,000 check does not bear any such indication, and the respondents have not furnished evidence of an accompanying written statement. Also, pursuant to 11 C.F.R. § 104.8(c), absent evidence to the contrary, any contribution made by check shall be reported as a contribution by the last person signing the instrument prior to delivery to the candidate or committee. Jackie Gilligan was the only person to sign the check. The Committee reported this contribution, combined with

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the \$6,000 contribution, as being from Gilligan. Therefore, it appears that the \$4,000 check does not constitute a joint contribution but is instead a contribution by Gilligan alone.

Pursuant to 11 C.F.R. § 110.10(a), candidates for federal office may make unlimited expenditures from personal funds. Pursuant to 11 C.F.R. § 110.10(b), personal funds include any assets which, under state law, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest. Although Brian Kennedy presumably had legal right of access and legal and rightful title to some portion of the funds in the account on which the \$4000 check was drawn, the contribution was made by Jackie Gilligan, rather than by Kennedy, and hence is not comprised of the personal funds of the candidate.

According to the respondents, "The second check was drawn on an account in [Jackie Gilligan's] name alone in the amount of \$6,000.00 and made payable to the [Committee's] account." (Attachment III, page 2).

Jackie Gilligan's combined contribution of \$10,000 exceeds the contribution limitation set forth in Section 441a(a)(1)(A). Therefore, there is reason to believe that Jackie Gilligan violated 2 U.S.C. § 441a(a)(1)(A).

The Committee reported receipt of this contribution on its 1986 October Quarterly Report. Pursuant to 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution in violation of the provisions of 2 U.S.C. § 441a,

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including Section 441a(a)(1)(A). Inasmuch as Jackie Gilligan's contribution is in apparent violation of Section 441a(a)(1)(A), there is reason to believe that the Committee is in violation of Section 441a(f).

In MUR 2112, the Commission found reason to believe that Chipman C. Bull, a candidate for federal office, violated 2 U.S.C. § 441a(f). The Commission premised this finding on Bull's apparent personal involvement in obtaining a loan on behalf of the Chipman C. Bull for Congress Committee. \*/ Similarly, in this case it appears that the candidate, Brian Kennedy, may have personally participated in the process by which Jackie Gilligan extended a loan of \$10,000 to the Kennedy for Congress Committee. For example, in his responses to the complaint, Brian Kennedy stated, "I did not know that there was a limitation on the amount that an individual could loan to a congressional campaign fund, particularly [sic] a fiancée." Mr. Kennedy also stated the following:

"Not only was I unaware that a fiancée could not loan the campaign a sum more than \$1000 but I honestly cannot understand the logic or rationale behind such a ruling. If we were married she could contribute \$10 million to my campaign but as a fiancée she can contribute or loan only \$1,000?"

[sic] (Attachment III, page 1). These statements indicate that Ms. Gilligan may in fact have been acting at Mr. Kennedy's behest. Therefore, as in MUR 2112, it appears that the candidate may have been personally involved in accepting the excessive

\*/ While a subsequent investigation indicated that Bull was not personally involved, the principle is still valid at this initial stage of the Commission's inquiry.

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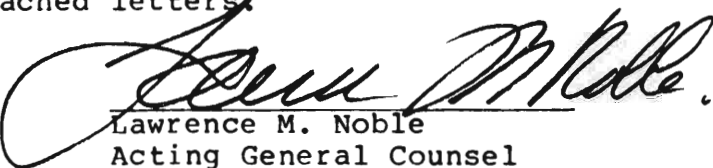
from Ms. Gilligan. Accordingly, this Office recommends that the Commission find reason to believe Brian Kennedy violated 2 U.S.C. § 441a(f) by knowingly accepting a contribution which violates the provisions of 2 U.S.C. § 441a.

III. RECOMMENDATIONS

1. Find reason to believe that Jackie Gilligan violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe the Kennedy for Congress Committee and C. Daniel, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Brian T. Kennedy violated 2 U.S.C. § 441a(f).
4. Approve and send the attached letters.

Date

7/14/57

  
Lawrence M. Noble  
Acting General Counsel

Attachments

- I. Complaint
- II. Proposed Letters (3)
- III. Response to the Complaint

23040722856

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kennedy for Congress Committee  
and C. Daniel, as treasurer  
Jackie Gilligan  
Brian T. Kennedy

)  
)  
)  
)  
)  
)

MUR 2412

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 21, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2412:

1. Find reason to believe that Jackie Gilligan violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe the Kennedy for Congress Committee and C. Daniel, as treasurer, violated 2 U.S.C. § 441a(f).
3. Direct the Office of General Counsel to send appropriate letters.

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

Attest:

7-21-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

July 24, 1987

Jackie Gilligan  
726 Crescent Place  
Sea Girt, NJ 08750

RE: MUR 2412  
Jackie Gilligan

Dear Ms. Gilligan:

On May 14, 1987, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on July 21, 1987, found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Act. Specifically, it appears that in advancing a \$10,000 loan to the Kennedy for Congress Committee, you made an excessive contribution in violation of 2 U.S.C. § 441a(a)(1)(A).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. 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 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 you 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.

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 ordinarily does not give extensions beyond 20 days.

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

If you have any questions, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

2 3 7 4 0 7 2 2 8 5 9



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

July 24, 1987

C. Daniel, Treasurer  
Kennedy for Congress Committee  
P.O. Box 411  
Sea Girt, NJ 08750

RE: MUR 2412  
Kennedy for Congress Committee  
and C. Daniel, as treasurer

Dear Mr. Daniel:

On May 14, 1987, the Federal Election Commission notified the Kennedy for Congress Committee and you, as treasurer of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on July 21, 1987, found that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. Specifically, it appears that the \$10,000 loan from Jackie Gilligan which you reported on the 1986 October Quarterly Report was an excessive contribution, and that the committee knowingly accepted this excessive contribution, in violation of 2 U.S.C. § 441a(f).

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 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.

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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.

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 ordinarily does not give extensions beyond 20 days.

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

If you have any questions, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

93040722871

QCC#4135

KENNEDY AND DANIEL  
COUNSELLORS AT LAW

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
EDWARD B. KNAUER  
MEMBER OF N.J. AND FL. BAR  
PAUL S. KENNEDY

503 WASHINGTON BLVD.  
P. O. BOX 243  
SEA GIRT, N. J. 08750  
(201) 449-0555

August 5, 1987

Federal Election Commission  
Washington, D.C. 20463

Attention: Scott E. Thomas, Chairman

Re: MUR 2412  
Kennedy for Congress Committee  
and C. Daniel, as Treasurer

Dear Mr. Thomas:

This is to acknowledge receipt of your letter of July 24, 1987. You are correct in stating that the Kennedy for Congress Committee did report a loan from Jackie Gilligan in the 1986 October quarterly report in the amount of \$10,000.00. You are not correct however, in stating that the Committee knowingly accepted this contribution in violation of 2 U.S.C. § 441a(f).

Neither Mr. Kennedy, the candidate, nor I knew that there was any limitation placed on the amount a candidate could borrow. As you can see, there was no attempt to hide this loan by not reporting it.

Not only did I not know that there was this limitation on borrowing funds, but neither did William Maguire, our campaign manager who came to us from Washington. Even he did not know that there was a limitation on the amount that could be borrowed by a candidate or a committee.

Accordingly, please be advised that I am requesting a pre-probable cause conciliation in accordance with 11 C.F.R. § 111.18(d).

Very truly yours,

KENNEDY AND DANIEL



CORNELIUS W. DANIEL, III

CWD/kb

167 AUG 10 A 8:40

CCC# 4152

87 AUG 13 P12: 56

87 AUG 13 P4: 13

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

August 6, 1987

FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

Attention: Scott E. Thomas, Chairman

Re: MUR 2412  
Jackie Gilligan

Dear Mr. Thomas:

This is to acknowledge receipt of your letter of July 24, 1987. It is true that on September 26, 1986 I did lend to my fiancé' Brian Kennedy, who was a candidate for Congress, the sum of \$10,000.00 as was reported by Mr. Kennedy in his financial reports to the commission. As you can see, there was no attempt to hide or deceive anyone about this.

I frankly did not know that I could not lend the sum of \$10,000.00 to Mr. Kennedy's campaign. In fact, I happen to know that since Mr. Kennedy is my fiancé' that he didn't know that there was a restriction on the amounts of monies that could be loaned to a candidate.

Again, to be technically correct, and as I believe Mr. Kennedy has already reported to you, \$4,000.00 of the \$10,000.00 was drawn on a joint checking account in his name and my name. If there was a violation of the Federal Election Campaign Act, again it was not done intentionally and there was no attempt by anyone connected with the campaign to deceive or to hide this loan.

As mentioned in your letter of July 24, 1987, I would request a pre-probable cause conciliation and I hope that this matter can be resolved in the near future.

Sincerely yours,

  
JACKIE GILLIGAN

830402273



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 18, 1987

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner *LOL/m*  
Associate General Counsel

SUBJECT: MUR 2412 -- Withdrawal and Recirculation of  
General Counsel's Report

On November 6, 1987, this Office's report in MUR 2412 was circulated to the Commission. It has come to the attention of this Office that the recommendation section on the second page of the report requires the addition of a recommendation concerning respondent Jackie Gilligan, and that both proposed conciliation agreements list in item IV.3. the date of the loan giving rise to this matter as September 26, 1987, when in fact the loan was made on September 26, 1986. Attached to this memorandum is a revised report and set of attachments reflecting these revisions.

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SENSITIVE  
EXECUTIVE SESSION  
DEC 01 1987

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In the Matter of )  
 )  
 Kennedy for Congress Committee ) MUR 2412  
 and C. Daniel, as treasurer )  
 Jackie Gilligan )

## GENERAL COUNSEL'S REPORT

## I. BACKGROUND

On July 21, 1987, the Commission found reason to believe Jackie Gilligan violated 2 U.S.C. § 441a(a)(1)(A) by extending a loan of \$10,000 to the Kennedy for Congress Committee (the "Committee") and C. Daniel, as treasurer. The Commission also found reason to believe the Committee violated 2 U.S.C. § 441a(f) by accepting the loan. The respondents were notified of these findings by letters dated July 24, 1987.

On August 10, 1987, this Office received a pre-probable cause conciliation request from the Committee, and received a similar request from Ms. Gilligan on August 13, 1987.

## II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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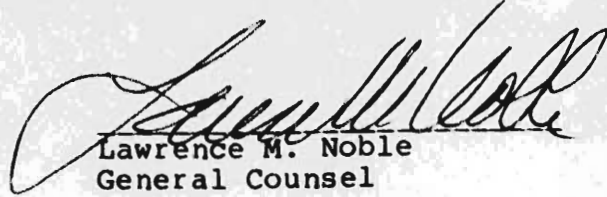
### III. RECOMMENDATIONS

1. Enter into conciliation with Jackie Gilligan prior to a finding of probable cause to believe.
2. Enter into conciliation with Kennedy for Congress and C. Daniel, as treasurer, prior to a finding of probable cause to believe.



3. Approve the attached proposed conciliation agreements and letters.

11/19/87  
Date

  
Lawrence M. Noble  
General Counsel

Attachments

1. Requests for conciliation
2. Proposed Conciliation Agreements and letters (2)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20461

MEMORANDUM TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: NOVEMBER 19, 1987

SUBJECT: OBJECTION TO MUR 2412 - General Counsel's Report  
Signed November 18, 1987

The above-captioned document was circulated to the  
Commission on Thursday, November 19, 1987 at 11:00 A.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____ X _____
Commissioner Thomas	_____

This matter will be placed on the Executive Session  
agenda for December 1, 1987.

Please notify us who will represent your Division  
before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Kennedy for Congress Committee) MUR 2412  
and C. Daniel, as treasurer )  
Jackie Gilligan )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 1, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2412:

1. Enter into conciliation with Jackie Gilligan prior to a finding of probable cause to believe.
2. Enter into conciliation with Kennedy for Congress and C. Daniel, as treasurer, prior to a finding of probable cause to believe.
- 3.

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

Attest:

12-1-87

Date

Marjorie W Emmons

Marjorie W. Emmons  
Secretary of the Commission

98040722379



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

07 December 1987

C. Daniel, Treasurer  
Kennedy for Congress Committee  
P.O. Box 411  
Sea Girt, NJ 08705

RE: MUR 2412  
Kennedy for Congress  
and C. Daniel, as  
treasurer

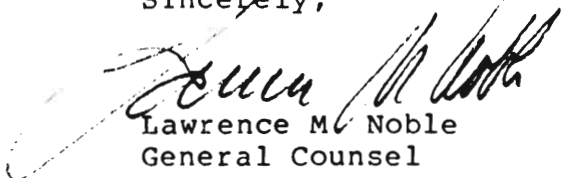
Dear Mr. Daniel:

On July 21, 1987, the Federal Election Commission found reason to believe that the Kennedy for Congress Committee and you as treasurer, violated 2 U.S.C. § 441a(f). At your request, on December 1, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,

  
Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

07 December 1987

Ms. Jackie Gilligan  
726 Crescent Place  
Sea Girt, NJ 08750

RE: MUR 2412  
Jackie Gilligan

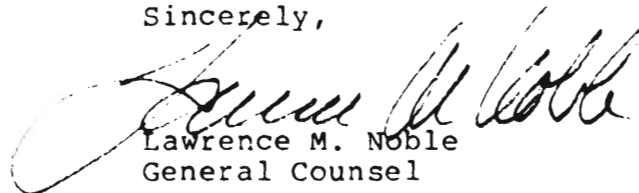
Dear Ms. Gilligan:

On July 21, 1987, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). At your request, on December 1, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,

  
Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

23040722991

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Final Audit Report -  
Kennedy for Congress

)  
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A87-7

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 24, 1987, the Commission decided by a vote of 6-0 to approve the Final Audit Report on Kennedy for Congress, as recommended in the Audit Division Memorandum dated November 19, 1987.

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

Attest:

11-24-87

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 11-20-87, 9:50  
Circulated on 48 hour tally basis: Fri., 11-20-87, 12:00  
Deadline for vote: Tues., 11-24-87, 4:00



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

A87-7

December 1, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: ROBERT J. COSTA  
ASSISTANT STAFF DIRECTOR  
AUDIT DIVISION

SUBJECT: FINAL AUDIT REPORT - KENNEDY FOR CONGRESS-MATTERS  
REFERABLE TO OFFICE OF GENERAL COUNSEL

On November 24, 1987, the Commission approved the Final Audit Report on Kennedy for Congress which included the referral of the attached matters to your office.

If you have any question regarding this matter, please contact Mr. Dexter Curry or Mr. Joseph Stoltz at 376-5320. All workpapers related to the matter referred are available in the Audit Division.

## Attachments:

Exhibit 1 - Apparent Corporate Contributions  
Exhibit 2 - Disclosure of Loans

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A. Apparent Corporate Contributions

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any corporation whatever to make a contribution or expenditure in connection with any election at which a Senator or Representative in Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices.

Section 114.7(d) of Title 11 of the Code of Federal Regulations state that the question of whether a professional organization is a corporation is determined by the law of the state where the professional organization exists.

Our review of contributions indicated that 41 contributions, totaling \$6,143, were received from 37 <sup>1/</sup> entities which appear to be incorporated. (See Attachment I).

At the exit conference, the Committee questioned the applicability of 2 U.S.C. § 441b(a) to one person [individual] corporations, such as an individual's incorporated law practice (See items 5,6,11,12,18 and 19 on Attachment I). The Committee also questioned whether an incorporated law firm, should be subject to the prohibition contained at 2 U.S.C. § 441b(a).

Under New Jersey law, professional corporations are treated the same as business corporations except for certain purposes specified in the New Jersey Professional Corporation Act, N.J.S.A. 14A App. 14:17-1 et. seq. (1987) and are therefore, subject to the provisions of 2 U.S.C. § 441b(a).

The Act in addressing the prohibition against contributions by corporations does not distinguish between corporations established and controlled by one individual and those owned by many shareholders. Rather, the Act prohibits contributions from any corporation whatever.

In the interim audit report, the Audit staff recommended that, within 30 days of receipt of this report, the Committee either (1) present evidence to demonstrate that the contributions were not funded from corporate sources, or (2) refund the amount of the contributions and submit photocopies of the refund check (front and back) to the Audit staff.

---

<sup>1/</sup> One entity, although identified on its check as "A Professional Corporation", could not be verified by the appropriate Secretary of State as incorporated, based on a search of its records.



Recommendation

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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Kennedy for Congress  
Apparent Corporate Contributions Received

<u>Name</u>	<u>Date of Contribution</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Mommouth Consulting Services	3/21/86	\$ 100.00	6/10/82
2. Jost Garage	3/10/86	50.00	7/30/62
3. Levinson, Conover, Axelrod, Wheaton and Grayzel	5/05/86	75.00	12/31/79
4. Madnick, Milstein, Mason & Weber, P.A.	5/06/86	75.00	3/17/70
5. Francis J. Lutz, P.A.	5/19/86	200.00	9/21/77
6. Richard A. Amdur	5/20/86 8/29/86	75.00 1000.00	1/11/73
7. Orlovsky, Grasso, Moody, P.A.	6/04/86	100.00	11/05/81
8. Auerbach, Rudnick, Waldman, Ford, Addonizio and Pappa, P.A.	6/09/86	100.00	11/16/76
9. F.J. Foggia Florist	6/12/86 8/16/86	25.00 25.00	9/19/73
10. McOmber & McOmber	7/02/86	100.00	6/05/79
11. Philip Jacobowitz	7/02/86	99.00	10/27/83
12. George G. Whitmore P.A.	7/09/86	100.00	6/24/85
13. Monte & Marriott Counselors at Law, P.A.	7/09/86	100.00	2/26/86
14. Mauro & Barry, P.A.	7/18/86	100.00	12/10/73
15. Sea Girt Village Center	7/21/86	100.00	9/10/54

	<u>Name</u>	<u>Date of Contribution</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
16.	Hoffman & Schreiber	7/21/86	100.00	12/30/76
17.	Lawrence & Kapalko, P.A.	7/24/86	100.00	10/10/79
18.	Francis X. Moore, P.A.	7/24/86	100.00	8/26/82
19.	Law Office, William P. Murphy, P.A.	7/24/86	100.00	11/01/71
20.	Hudson, Associates	8/08/86	100.00	10/06/78
21.	Fran Mar Builders	7/08/86	500.00	1/30/85
22.	Laurel Associates, LTD.	9/16/86	250.00	3/29/85
23.	Winant-Bomack Insurance Agency, Inc.	9/23/86	34.00	11/30/83
24.	A. Apollo Sewer and Plumbing	9/24/86	85.00	10/02/79
25.	Ocean Union Operating Company	10/04/86	100.00	6/20/69
26.	Spring Lake Gardens, Inc.	9/04/86 5/31/86	100.00 200.00	9/02/65
27.	SPYCO, Inc.	6/08/86	150.00	7/22/80
28.	Crown Beer Distributors, Inc.	5/16/86	75.00	4/18/69
29.	Squan Tavern, Inc.	5/29/86 10/10/86	100.00 100.00	6/30/75
30.	Health Care Services, Inc.	5/30/86	75.00	4/06/81
31.	Hydronic Heating and Plumbing Corp.	5/31/86	150.00	11/18/63
32.	Flavo, Bonello, Moriarty and Steiger	10/03/86	100.00	7/07/86
33.	Omega Specialties, Inc.	10/06/86	100.00	10/17/85
34.	Dynamic Controls, Inc.	10/22/86	100.00	6/24/71

<u>Name</u>	<u>Date of Contribution</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
35. Hiering & Dupignac, P.A.	10/23/86	500.00	*
36. Coast Imported Car Corp.	10/28/86	250.00	11/01/84
37. Citro Builders, Inc.	11/04/86	<u>250.00</u>	2/04/71
Total		<u>\$6143.00</u>	

\* Could not be confirmed, under this name, as an active corporation.

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B. Disclosure of Loans

Sections 434(b)(2)(G) and (H) of Title 2 of the United States Code state, in part, that each report shall disclose for the reporting period and calendar year, the total amount of receipts, for an authorized committee, loans made by or guaranteed by the candidate and all other loans.

Section 434(b)(8) of Title 2 of the United States Code requires each report filed by the treasurer of a political committee to disclose the amount and nature of outstanding debts and obligations owed by the committee.

Section 104.11(a) of Title 11, Code of Federal Regulations states, in part, that debts and obligations shall be continuously reported until extinguished.

Section 104.3(a)(4)(iv) of Title 11 of the Code of Federal Regulations requires the itemization of all loans received by the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, the date such loan was made and the amount or value of such loan.

Section 104.14(b)(1) of Title 11 of the Code of Federal Regulations states, in part, that each political committee or other person required to file any report under this Subchapter shall maintain records, including bank records, which shall provide in sufficient detail the necessary information and data from which the filed reports and statements may be verified, explained, clarified, and checked for accuracy and completeness.

Our review of contribution records made available revealed that the Committee received \$77,500 in loans. Loans totaling \$67,500 were received from the candidate; and a \$10,000 loan was received from an individual.

The Committee, on its disclosure reports filed relative to the period audited, itemized on Schedule C (Loans Received), \$98,310 in loans received (\$88,310 from the candidate and \$10,000 from an individual). The Committee did not file any Schedules A itemizing the receipt of each loan, nor were the loans continuously reported on Schedule C, as required. All loans remained outstanding as of the close of audit fieldwork.

Further, according to the candidate, a loan in the amount of \$35,000 was obtained from a bank in October 1986 by the candidate and the proceeds then loaned to the Committee. Committee disclosure reports did not provide details regarding the bank's role relative to this loan.<sup>2/</sup>

During the exit conference, the Audit staff provided the Committee with information to assist in the filing of a comprehensive amendment to correct the irregularities described above. The candidate stated that he would research his files and forward a photocopy of any documents related to the \$35,000 bank loan which he obtained in October 1986.

In the interim audit report, the Audit staff recommended that, within 30 days of receipt of this report, the Committee file, in the form of a comprehensive amendment, Schedules A to itemize the \$77,500 in loans received. Further, the filing of an amended Schedule C for the 1986 Year End Report was also recommended.

The Committee did not respond to this recommendation.

Finally, it was recommended that the Committee/candidate provide photocopies of any documents relating to loans received, including but not limited to the loan agreement(s), renewal(s), if any, collateral agreement(s), etc.

On July 13, 1987, the Committee submitted a copy of the loan agreement between the candidate and Ocean County National Bank for the \$35,000 loan mentioned above.

#### Recommendation

The Audit staff recommends that this matter of the disclosure of loans be referred to the Office of General Counsel.

---

<sup>2/</sup> The Committee reported receiving a \$33,000 loan from the candidate on October 24, 1986.

**FEDERAL ELECTION COMMISSION  
999 E STREET, N.W.  
WASHINGTON, D.C. 20463**

**FIRST GENERAL COUNSEL'S REPORT**

MUR 2552

**RESPONDENTS:** Kennedy for Congress Committee and  
Cornelius Daniel, III, as treasurer

**RELEVANT STATUTES  
AND REGULATIONS:**

2 U.S.C. § 432(e) (2)  
2 U.S.C. §§ 434(b) (2) (G) and (H)  
2 U.S.C. § 434(b) (8)  
2 U.S.C. § 441b(a)  
11 C.F.R. § 101.2  
11 C.F.R. § 102.7(d)  
11 C.F.R. § 104.3(a) (4)  
11 C.F.R. § 104.11(a)  
11 C.F.R. § 104.14(b) (1)  
11 C.F.R. § 110.10(b)  
11 C.F.R. § 114.2(b)  
11 C.F.R. § 114.7(d)  
N.J. STAT. §§ 14A:17-1, 3, 15 and 17

**INTERNAL REPORTS CHECKED:** Disclosure Reports

**FEDERAL AGENCIES CHECKED:** None

**I. GENERATION OF THE MATTER**

On November 24, 1987, the Commission approved the Final Audit Report on the Kennedy for Congress Committee (the "Committee") which included this referral with allegations that the Committee accepted contributions from corporations and failed to report loans made on behalf of the Committee.

**II. FACTUAL BASIS AND LEGAL ANALYSIS**

**A. Acceptance of Corporate Contributions**

Pursuant to 2 U.S.C. § 441b(a), and also 11 C.F.R. § 114.2(b), it is unlawful for any corporate entity to make a contribution or expenditure in connection with any federal election. Pursuant to 11 C.F.R. § 114.7(d), the question of whether a professional organization is a corporation subject to the prohibitions of 2 U.S.C. § 441b(a) is determined by state

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law where the professional organization exists. See also Advisory Opinion ("AO") 1983-34. Under New Jersey law, professional corporations are treated the same as business corporations, except for certain limited purposes as specified in the New Jersey Professional Service Corporation Act, L.1969, c. 232, § 2, eff. Dec. 16, 1969 [N.J. STAT. ANN. § 14A:17-1 et seq. (West 1987)]. 1/ Since professional corporations are treated the same as business corporations under New Jersey law, New Jersey professional corporations are prohibited by 2 U.S.C. § 441b(a) from making contributions or expenditures in connection with any federal election.

In this matter, the Audit Division has determined in its Final Audit Report that the Committee received 41 contributions, totaling \$6,143, from 37 entities which are registered as business or professional corporations with the New Jersey Secretary of State. 2/ The Audit Division earlier had recommended in its Interim Audit Report that the Committee, within 30 days, either (1) present evidence to demonstrate that the contributions were not from corporate sources, or (2) refund the contributions and submit photocopies of the refund checks to

1/ The term "professional corporation" is defined under that Act as a corporate entity. N.J. STAT. ANN. § 14A:17-3 (West 1987). Further, that Act is intended to supplement the other regulations on incorporation, and does not repeal, modify or restrict any other applicable provisions, including the Business Corporation Act of New Jersey, which also applies to professional corporations. N.J. STAT. ANN. §§ 14A:17-1, 15, 17 (West 1987).

2/ One entity, Hiering & Dupignac, P.A., although identified on its check as "A Professional Corporation," could not be verified by the New Jersey Secretary of State as incorporated.



the Audit Division. After a three week extension, a Committee response was due on October 30, 1987. The Committee never carried out these recommendations. Thus, it appears that the Committee received contributions from corporations and this Office recommends that the Commission find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441b(a) which prohibits such contributions.

B. Disclosure of Loans

Pursuant to 2 U.S.C. §§ 434(b)(2)(G) and (H), each committee report shall disclose for the reporting period and the calendar year the total amount of all receipts, including for an authorized committee, loans made by or guaranteed by a candidate, and all other loans. In accordance with 2 U.S.C. § 434(b)(8), each report must disclose the amount and nature of outstanding debts and obligations owed by a committee. Pursuant to 2 U.S.C. § 434(b)(8), and also 11 C.F.R § 104.11(a), committees must continuously report debts and obligations until extinguished. Section 104.11(a) of Title 11 of the Code of Federal Regulations also requires reporting on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished. Section 104.3(a)(4) of Title 11 of the Code of Federal Regulations, which requires the itemization of all loans received by a committee during the reporting period, also requires the identification of any endorsers or guarantors of such loans, the dates such loans were made and the amounts or values of such loans. Section 104.14(b)(1) of Title 11 of the Code of Federal Regulations requires every committee to maintain records, including bank records, with sufficient detail to provide information so that

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filed reports and statements may be verified, explained, clarified and checked for accuracy and completeness.

The Audit Division has determined, based upon records made available by the Committee, that the Committee received \$77,500 in loans, of which \$67,500 is attributed to the candidate, and \$10,000 is attributed to an individual. 3/ The Committee has failed to file a Schedule A itemizing the receipt of each loan, and also has failed to continuously report the loans on Schedule C, as required. To date, all loans appear to remain outstanding.

Pursuant to 2 U.S.C. §432(e)(2), and also Sections 101.2 and 102.7(d) of Title 11 of the Code of Federal Regulations, when a candidate receives a loan for use in connection with his campaign, the candidate receives such a loan as an agent of his authorized committee. Accordingly, a committee should report and itemized such a loan as coming from the initial lender rather than as coming from personal funds. See AO 1985-33. Further, pursuant to Section 110.10(b) of Title 11 of the Code of Federal Regulations, loans obtained by a candidate after becoming a candidate may not be treated as personal funds. See also AO 1978-40. When such loans are obtained from a bank, the outstanding balance, name of the bank, and other information specified by Section 104.3 of Title 11 of the Code of Federal

3/ The \$10,000 loan is the subject of MUR 2412. In that matter the Commission has found reason to believe that the lender violated 2 U.S.C. § 441a, and that the Committee violated 2 U.S.C. § 441a(f). Thus, this Office makes no additional recommendation to the Commission concerning this loan at the present time.

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Regulations should be disclosed in reports to the Commission. See AO 1982-64. Of the \$67,500 in loans that is attributed to the candidate, \$35,000 was obtained by the candidate, after becoming a candidate, from a bank in October, 1986. 4/ The proceeds of this loan were in turn provided to the Committee, but the Committee failed to provide details concerning the bank loan in reports to the Commission. Instead, the Committee reported receiving these proceeds as a personal loan from the candidate on October 24, 1986. On July 13, 1987, at the request of the Audit Division, the Committee submitted a copy of the loan agreement between the candidate and the Ocean County National Bank.

The Audit Division recommended in its Interim Audit Report that the Committee file a comprehensive amendment, including a Schedule A to itemize all loans, and an amended Schedule C, covering the 1986 Year-End Report, to report outstanding debts. After a three week extension, a Committee response was due on October 30, 1987. The Committee never carried out these recommendations. Thus, it appears that the Committee has failed to disclose required information concerning loans it received, and also has failed to continuously report these loans. Therefore, this Office recommends that the Commission find reason to believe that the Committee and its treasurer have violated 2 U.S.C. § 434(b) reporting requirements.

4/ The Commission received Statements of Candidacy from Mr. Kennedy on March 20, 1986, and May 23, 1984.

C. Merger of MUR 2412 into this MUR

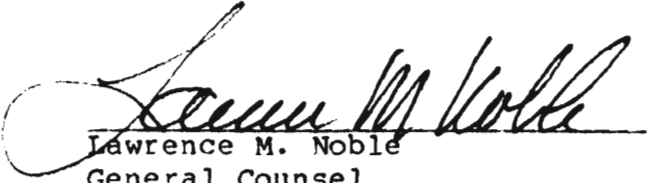
Since the subject matter of MUR 2412 is one of the same loans discussed in section B of this report, and also since that MUR involves two of the same respondents, this Office recommends that the Commission merge that MUR into this MUR. 5/

**III. RECOMMENDATIONS**

1. Find reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, have violated 2 U.S.C. §§ 434(b) and 441b(a).
2. Merge MUR 2412 into this MUR.
3. Approve the attached letter and Factual and Legal Analysis

98040722800  
Date

1/27/88

  
Lawrence M. Noble  
General Counsel

Attachments:

Referral Materials  
Proposed letter and Factual and Legal Analysis

5/ A lender is an additional respondent in MUR 2412.

Staff Person: Jim Voegeli

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kennedy for Congress Committee and  
Cornelius Daniel, III, as treasurer

)  
)  
)  
) MUR 2552  
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 1, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2552:

1. Find reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, have violated 2 U.S.C. §§ 434(b) and 441b(a).
2. Merge MUR 2412 into this MUR.
3. Approve the letter and Factual and Legal Analysis, as recommended in the General Counsel's Report signed January 27, 1988.

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

Attest:

*Feb. 1, 1988*

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 1-27-88, 1:47  
Circulated on 48 hour tally basis: Thurs., 1-28-88, 11:00  
Deadline for vote: Mon., 2-01-88, 11:00

98040722837

CCC # 6295

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

KENNEDY AND DANIEL

COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

P. O. BOX 243  
SEA GIRT, N.J. 08750

(201) 449-9555

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
JOHN T. RIHACEK  
EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038

(212) 267-4008

February 1, 1988

MR. JOHN DRURY  
FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

RE: MUR 2412  
Kennedy for Congress

Dear Mr. Drury:

Enclosed herewith please find both concilliation agreements pertaining to C. Daniel and Mrs. Gilligan.

Very truly yours,



BRIAN T. KENNEDY  
BTK/jg

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
88 FEB -4 PM 2:10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 8, 1988

Cornelius Daniel, III, Treasurer  
Kennedy for Congress Committee  
503 Washington Boulevard  
Sea Girt, New Jersey 08750

RE: MUR 2552  
The Kennedy for Congress  
Committee and Cornelius  
Daniel, III, as  
treasurer

Dear Mr. Daniel:

On February 1, 1988, the Federal Election Commission found that there is reason to believe that the Kennedy for Congress Committee and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441b(a), provisions 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.

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 ordinarily will not 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.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 Jim Voegeli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

cc: Brian Kennedy



RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 MAR -7 AM 10:36

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
JOHN T. RIHACEK

P. O. BOX 243  
SEA GIRT, N.J. 08750  
(201) 449-9555

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038  
(212) 267-4008

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS  
March 4, 1988

James Voegeli, Esq.  
Federal Election Commission  
999 East E. Street  
Washington, D.C. 20463

Re: MUR 2552  
Kennedy for Congress Committee

Dear Mr. Voegeli:

As a follow up to you of our telephone conversation on February 23, 1988, please be advised that I would be very much interested in a pre-probable cause conciliation.

I am in the process of obtaining the \$7,000.00 necessary to return to those attorneys who contributed to my political campaign, even though they were individuals and their names appeared as a professional association.

Thank you for your assistance and cooperation in this matter.

Very truly yours,

KENNEDY AND DANIEL

*Brian T. Kennedy*

BRIAN T. KENNEDY  
BTK/kb

RECEIVED  
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88 MAR -7 PM 12:21

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88 APR 11 AM 9:28

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038

(212) 267-4008

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS

EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

P. O. BOX 243

SEA GIRT, N.J. 08750

(201) 449-9555

IN NEW YORK

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

April 5th, 1988

James Voegeli, Esq.  
Federal Election Commission  
999 East E. Street  
Washington, DC 20463

RE: MUR 2552  
Kennedy for Congress Committee

Dear Mr. Voegeli:

As per our telephone conversation of April 5th, 1988, I enclose copies of the correspondence and checks sent to the various attorneys and others as requested.

Please furnish me with the addresses for those 5 corporations which I requested.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.

*Brian T Kennedy*

BRIAN T. KENNEDY

BRIAN T. KENNEDY  
BTK/jg

88 APR 12 PM 12:54

RECEIVED  
FEDERAL ELECTION COMMISSION

March 30, 1988

Citro Builders, Inc.  
Box 186 e Hwy. 37 E  
Oakhurst, N.J. 07755

Dear Frank:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$250.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722903

March 30, 1988

Coast Imported Car Corp.  
247 State Hwy. 37 E  
Toms River, N.J. 08753

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$250.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

83040722904

March 30, 1988

Hiering & Dupignac, P.A.  
204 Horner Street  
Toms River, N.J. 08753

Attention: William Hiering, Esq.

Dear Bill:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$500.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722905

March 30, 1988

Dynamic Controls ,Inc.  
2430 State Hwy. 34  
Wall, N.J. 07719

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722906

March 30, 1988

Omega Specialties, Inc.  
State Hwy. 36  
Hazlet, N.J.

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

83040722907

March 30, 1988

Falvo, Bonello, Moriarty and Steiger, Esqs.  
P.O. Box 3002  
Oakhurst, N.J. 07755

Attention: Peter Falvo, Esq.

Dear Pete:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722908



March 30, 1988

Hydronic Heating and Plumbing Corp.  
620 15th Avenue  
Belmar, N.J. 07719

Attention: G. Forrest Osborn

Dear Forrest:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$150.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722909

March 30, 1988

Health Care Services, Inc.  
316 Broad Street  
Red Bank, N.J. 07701

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$75.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

March 30, 1988

Squan Tavern, Inc.  
15 Broad Street  
Manasquan, N.J. 08736

Attention: Dominick

Dear Dominick:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$200.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722911

March 30, 1988

Crown Beer Distributors, Inc.  
2301 Atlantic Avenue  
Wall, N.J. 08736

Attention: Ralph Rapisardi

Dear Ralph:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$75.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

08040722912

March 30, 1988

Spring Lake Gardens, Inc.  
20 Vroom Street  
Spring Lake N.J. 07762

Attention: George Peck

Dear George:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$300.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722913

March 30, 1988

Winant-Bomack Insurance Agency, Inc.  
54 Broad Street  
Red Bank, N.J. 07701

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$34.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

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March 30, 1988

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Fran Mar Builders  
41 William Street  
Belleville, N.J. 07109

Dear Frank:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$500.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb



March 30, 1988

William P. Murphy, P.A.  
Box 711  
Point Pleasant, N.J. 08742

Dear Bill:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

63040722916



March 30, 1988

Francis X. Moore, Esq.  
Box 830  
Red Bank, N.J. 07701

Dear Frank:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

83040722917

March 30, 1988

Lawrence & Kapalko, P.A.  
706 Main Street  
Asbury Park, N.J. 07712

Attention: Paul Kapalko, Esq.

Dear Paul:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

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March 30, 1988

Mauro & Barry, P.A.  
1433 Hooper Avenue  
Toms River, N.J. 08753

Attention: T. Brent Mauro, Esq.

Dear Brent:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

93040722920

March 30, 1988

Monte & Marriott, Esqs.  
P.O. Box 255 e  
Sea Girt, N.J. 08750

Attention: William G. Marriott, Esq.

Dear Bill:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

83040722921

March 30, 1988

George G. Whitmore, P.A.  
130 Maple Avenue  
Red Bank, N.J. 07701

Dear George:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

229072008

March 30, 1988

Philip E. Jacobowitz, Esq.  
777 West Park Avenue  
P.O. Box 609  
Oakhurst, N.J. 07755

Dear Phil:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$99.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

0 8 0 4 0 7 2 2 9 2 3

March 30, 1988

McOmber & McOmber, Esqs.  
54 Shrewsbury Avenue  
Red Bank, N.J. 07701

Attention: Richard D. McOmber, Esq.

Dear Dick:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

83040722924



March 30, 1988

F.J. Foggia Florist  
196 Monmouth Boulevard  
Oceanport, N.J.

Gentlemen:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$50.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

98040722925



March 30, 1988

Orlovsky, Grasso & Moody, P.A.  
1314 Hooper Avenue  
Toms River, N.J. 08753

Attention: Dale Orlovsky

Dear Dale:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

88040722926

March 30, 1988

Francis J. Lutz, Esq.  
77 Livingston Avenue  
Box 596  
New Brunswick, N.J.

Dear Frank:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$200.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb  
Encl.

83040722928

March 30, 1988

Madnich, Milstein, Mason & Weber, P.A.  
550 Cookman Avenue  
Asbury Park, N.J. 07712

Attention: Frederick Milstein, Esq.

Dear Fred:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$75.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb

830407229229

March 30, 1988

Jost Garage  
1502 State Highway #38  
Wall, N.J. 07719

Dear Wes:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$50.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.

Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.

Sincerely yours,

BRIAN T. KENNEDY  
BTK/kb  
Encl.

98040722931

March 30, 1988

Monmouth Consulting Services  
c/o John A. Carroll  
104 Beacon Boulevard  
Sea Girt, New Jersey 08750

Dear Jim:

My congressional campaign account for 1986 was audited by the Federal Election Commission and they are requesting that I return to you your campaign contribution because it came from a corporate account.

Accordingly, I am returning your contribution in the amount of \$100.00.

The political contribution checks must come from personal accounts and not corporate accounts.

As I still have outstanding campaign bills to be paid, I would appreciate it if you could send me a personal check for the same amount made payable to the Kennedy for Congress Committee.

I apologize for any inconvenience this may cause you and I am enclosing a self-addressed envelope for your convenience.


Your financial support towards my political campaign has always been appreciated and I want to take this opportunity to again thank you for your support and assistance.


Sincerely yours,


BRIAN T. KENNEDY  
BTK/kb  
Encl.


03040722932

88040722933

KENNEDY FOR CONGRESS 129  
4/4 19 88 55-430/312  
PAY TO THE ORDER OF T. J. Foggett & Sons \$ 50.00  
T. J. Foggett 00  
100 DOLLARS  
 ocean county national bank  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702  
MEMO  
⑆03⑆204309⑆ 207⑆326 0⑆0129

KENNEDY FOR CONGRESS 125  
4/4 19 88 55-430/312  
PAY TO THE ORDER OF Monte Marnett, Esq. \$ 100.00  
One Hundred 00 DOLLARS  
 ocean county national bank  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702  
MEMO  
⑆03⑆204309⑆ 207⑆326 0⑆0125

KENNEDY FOR CONGRESS 126  
4/4 19 88 55-430/312  
PAY TO THE ORDER OF George Whitmore, P.A. \$ 100.00  
One Hundred Dollars 00/100 00 DOLLARS  
 ocean county national bank  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702  
MEMO  
⑆03⑆204309⑆ 207⑆326 0⑆0126

KENNEDY FOR CONGRESS 127  
4/4 19 88 55-430/312  
PAY TO THE ORDER OF Philip Jacobowitz, P.A. \$ 99.00  
Ninety Nine and 00/100 00 DOLLARS  
 ocean county national bank  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702  
MEMO  
⑆03⑆204309⑆ 207⑆326 0⑆0127

83040722934


KENNEDY FOR CONGRESS

128

4/4 1988 55-430/312

PAY TO THE ORDER OF McOnise - McOnise, Esq \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO

1:0312043091: 20711326 011 0128

*William P. McGinn*


KENNEDY FOR CONGRESS

110

3/31 1988 55-430/312

PAY TO THE ORDER OF Dynexon Controls, Inc \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO

1:0312043091: 20711326 011 0110

*William P. McGinn*


KENNEDY FOR CONGRESS

124

4/4 1988 55-430/312

PAY TO THE ORDER OF Memo: Barry PA \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO

1:0312043091: 20711326 011 0124

*William P. McGinn*


KENNEDY FOR CONGRESS

123

4/4 1988 55-430/312

PAY TO THE ORDER OF Hoffman: Schreier, P.A. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO

1:0312043091: 20711326 011 0123

*William P. McGinn*




3 3 0 4 0 7 2 2 9 3 5

KENNEDY FOR CONGRESS 122

4/4 19 88 55-430/312

PAY TO THE ORDER OF Lawrence J. Kapachko, P.A. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, Freehold, NJ 08701

MEMO: William P. Murphy


⑆03⑆204309⑆ 207⑆326 0⑆ 0122

KENNEDY FOR CONGRESS 121

3/31 1988 55-430/312

PAY TO THE ORDER OF Frederic X. Moss, Esq. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, Freehold, NJ 08701

MEMO: William P. Murphy


⑆03⑆204309⑆ 207⑆326 0⑆ 0121

KENNEDY FOR CONGRESS 120

3/31 1988 55-430/312

PAY TO THE ORDER OF William P. Murphy, P.D. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, Freehold, NJ 08701

MEMO: William P. Murphy


⑆03⑆204309⑆ 207⑆326 0⑆ 0120

KENNEDY FOR CONGRESS 119

3/31 1988 55-430/312

PAY TO THE ORDER OF Frank Mar Builders \$ 500.00

Five Hundred and 00/100 DOLLARS


 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, Freehold, NJ 08701


MEMO: William P. Murphy


⑆03⑆204309⑆ 207⑆326 0⑆ 0119




93040722936

KENNEDY FOR CONGRESS 118  
 3/31 1988 55-430/312  
 PAY TO THE ORDER OF Wesley Bonach Insurance Agency Inc. \$ 34.00  
Thirty Four and 00/100 DOLLARS  
 **ocean county national bank**  
 Member of The Summit Bancorporation  
 P.O. Box 1000, New Jersey 08742  
 MEMO \_\_\_\_\_  
 ⑆03⑆204309⑆ 207⑈326 0⑈ 0118

KENNEDY FOR CONGRESS 117  
 3/31 1988 55-430/312  
 PAY TO THE ORDER OF Spring Lake Garden Inc. \$ 300.00  
Three Hundred and 00/100 DOLLARS  
 **ocean county national bank**  
 Member of The Summit Bancorporation  
 P.O. Box 1000, New Jersey 08742  
 MEMO \_\_\_\_\_  
 ⑆03⑆204309⑆ 207⑈326 0⑈ 0117

KENNEDY FOR CONGRESS 116  
 3/31 1988 55-430/312  
 PAY TO THE ORDER OF Brown Base Distributors Inc. \$ 75.00  
Seventy Five and 00/100 DOLLARS  
 **ocean county national bank**  
 Member of The Summit Bancorporation  
 P.O. Box 1000, New Jersey 08742  
 MEMO \_\_\_\_\_  
 ⑆03⑆204309⑆ 207⑈326 0⑈ 0116

KENNEDY FOR CONGRESS 115  
 3/31 1988 55-430/312  
 PAY TO THE ORDER OF Squire Taxers Inc. \$ 200.00  
Two Hundred and 00/100 DOLLARS  
 **ocean county national bank**  
 Member of The Summit Bancorporation  
 P.O. Box 1000, New Jersey 08742  
 MEMO \_\_\_\_\_  
 ⑆03⑆204309⑆ 207⑈326 0⑈ 0115


93040722937

KENNEDY FOR CONGRESS 114

3/31 1988 55-430/312

PAY TO THE ORDER OF Health Care Services Inc. \$ 75.00

Seventy Five and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO \_\_\_\_\_

1:0312043091: 207 326 01 0114


*William McGowan*

KENNEDY FOR CONGRESS 113

2/31 1988 55-430/312

PAY TO THE ORDER OF Hydronic Heating & Plumbing Corp. \$ 150.00

One Hundred and Fifty Dollars and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO \_\_\_\_\_

1:0312043091: 207 326 01 0113


*William McGowan*

KENNEDY FOR CONGRESS 107

3/31 1988 55-430/312

PAY TO THE ORDER OF Auto Builders Inc. \$ 250.00

Two Hundred and Fifty and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702

MEMO \_\_\_\_\_

1:0312043091: 207 326 01 0107


*William McGowan*

KENNEDY FOR CONGRESS 112

3/31 1988 55-430/312

PAY TO THE ORDER OF Felix Brullo, Mortuary & Stinger Eggs \$ 100.00

One Hundred and 00/100 DOLLARS


 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08702


MEMO \_\_\_\_\_


1:0312043091: 207 326 01 0112


*William McGowan*

88040722938

KENNEDY FOR CONGRESS 108  
March 31 1988 55-430/312  
PAY TO THE ORDER OF Coast Importers Car. Corp. \$ 250.00  
Two Hundred and Fifty Dollars and 00/100 DOLLARS  
 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, New Jersey 08712  
MEMO: William J. Guine  
⑆03⑆204309⑆ 207⑆326 0⑆ 0108

KENNEDY FOR CONGRESS 109  
3/31 1988 55-430/312  
PAY TO THE ORDER OF Heering & Dupignac, P.O. \$ 500.00  
Five Hundred and 00/100 DOLLARS  
 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, New Jersey 08712  
MEMO: William J. Guine  
⑆03⑆204309⑆ 207⑆326 0⑆ 0109


KENNEDY FOR CONGRESS 111  
3/31 1988 55-430/312  
PAY TO THE ORDER OF Onoga Specialties, Inc. \$ 100.00  
One Hundred and 00/100 DOLLARS  
 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, New Jersey 08712  
MEMO: William J. Guine  
⑆03⑆204309⑆ 207⑆326 0⑆ 0111

KENNEDY FOR CONGRESS 130  
4/4 1988 55-430/312  
PAY TO THE ORDER OF Orlovsky, Grasso & Moody, P.A. \$ 100.00  
One Hundred and 00/100 DOLLARS  
 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 100, New Jersey 08712  
MEMO: William J. Guine  
⑆03⑆204309⑆ 207⑆326 0⑆ 0130

9 8 0 4 0 7 2 2 9 3 9

KENNEDY FOR CONGRESS 131  
4/4 1988 55-430/312

PAY TO THE ORDER OF Richard A. Ambrose, P.A. \$ 1,075.00  
One Thousand and Seventy Five and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08742


MEMO \_\_\_\_\_

William P. McGuire

⑆03⑆204309⑆ 207⑆326 0⑆ 0131

KENNEDY FOR CONGRESS 132  
4/4 1988 55-430/312

PAY TO THE ORDER OF Francis J. Litty, Esq. \$ 200.00  
Two Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08742


MEMO \_\_\_\_\_

William P. McGuire

⑆03⑆204309⑆ 207⑆326 0⑆ 0132

KENNEDY FOR CONGRESS 133  
4/4 1988 55-430/312

PAY TO THE ORDER OF Madrick, Melatean, Mason & Wilson, P.A. \$ 75.00  
Seventy Five and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08742


MEMO \_\_\_\_\_

William P. McGuire

⑆03⑆204309⑆ 207⑆326 0⑆ 0133

KENNEDY FOR CONGRESS 134  
4/4 1988 55-430/312

PAY TO THE ORDER OF Lerrion Coons, Alexander, Whiston & Gray, P.A. \$ 75.00  
Seventy Five and 00/100 DOLLARS


 **ocean county national bank**  
Member of The Summit Bancorporation  
P.O. Box 1000, New Jersey 08742


MEMO \_\_\_\_\_

William P. McGuire

⑆03⑆204309⑆ 207⑆326 0⑆ 0134

93040722940

KENNEDY FOR CONGRESS		136
4/4 1988 55-430/312		
PAY TO THE ORDER OF	Mormann Consulting Services	
One Hundred and 00/100	\$ 100.00	
DOLLARS		
 ocean county national bank Member of The Summit Bancorporation Peter Plummer, New Jersey 08540		
MEMO		
William J. McEwen		
1:0312043091: 207 326 01 0136		

KENNEDY FOR CONGRESS		135
4/4 1988 55-430/312		
PAY TO THE ORDER OF	Jet Garage	
Fifty and 00/100	\$ 50.00	
DOLLARS		
 ocean county national bank Member of The Summit Bancorporation Peter Plummer, New Jersey 08540		
MEMO		
William J. McEwen		
1:0312043091: 207 326 01 0135		

plum



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 14, 1988

Brian Kennedy, Esquire  
Kennedy and Daniel  
503 Washington Boulevard  
P.O. Box 243  
Sea Girt, New Jersey 08750

RE: MUR 2552  
Kennedy for Congress  
Committee and  
Cornelius Daniel, III,  
as treasurer

Dear Mr. Kennedy:

Per your written request, received on April 12, 1988, we are herein providing you with the addresses of some of the corporations which our records indicate contributed to your campaign. We understand that you are requesting this information as part of your efforts to accomplish reimbursements to these corporations.

1. Sea Girt Village Center, P.O. Box 16, Belmar, New Jersey 07719
2. Hudson, Associates, 505 Main Street, P.O. Box 1225, Toms River, New Jersey 08753
3. Laurel Associates, LTD., 75 Eisenhower Parkway, Roseland, New Jersey 07068
4. A. Apollo Sewer and Plumbing, 110 West Front Street, Keyport, New Jersey 07735
5. Ocean Union Operating Company, c/o Allaire Hotel, P.O. Box 607, Spring Lake, New Jersey 07762
6. Citro Builders, Inc., P.O. Box 186, Oakhurst, New Jersey 07755
7. SPYCO, Inc., 1332-2 Ocean Avenue, Sea Bright, New Jersey 07760

98740722941

Brian Kennedy

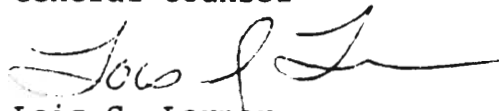
8. Auerbach, Rudnick, Waldman, Ford, Addonizio and Pappa,  
P.A., 36 Fleetwood Drive and Highway 35, Hazlet, New  
Jersey 07730

These addresses were taken from copies of contribution checks submitted by your Committee. We recommend that you verify these addresses as this information may have changed.

If you have any further questions, contact Jim Voegeli, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel



By: Lois G. Lerner  
Associate General Counsel

83040722942

CCC # 9105

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 APR 20 AM 9:59

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

P. O. BOX 243  
SEA GIRT, N.J. 08750  
(201) 449-9555

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS  
JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS  
EDWARD B. KNAUER  
MEMBER N.J., ME & FLA. BARS

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038  
(212) 267-4008

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALIE RIFAI  
MEMBER N.J. & N.Y. BARS

April 15th, 1988

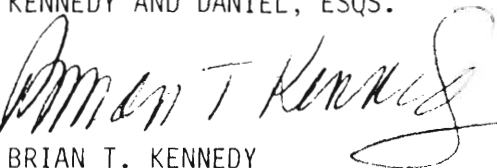
James Voegeli, Esq.  
Federal Election Commission  
PERSONAL AND CONFIDENTIAL  
999 East E. Street  
Washington, DC 20463

RE: MUR 2552  
KENNEDY FOR CONGRESS

Dear Mr. Voegeli:

As per our telephone conversation of this date, as soon as I receive the addresses from you for those Corporations whose addresses I requested those checks will also be returned.

Sincerely yours,  
KENNEDY AND DANIEL, ESQS.



BRIAN T. KENNEDY  
BTK/jg

88 APR 20 PM 3:42

RECEIVED  
FEDERAL ELECTION COMMISSION

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4  
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2  
2  
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4  
0  
3  
8



600 # 9291  
✓ *mm* 2552

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

88 MAY 16 AM 9:16

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS  
JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS  
EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

P. O. BOX 243  
SEA GIRT, N.J. 08750  
(201) 449-9555

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038  
(212) 267-4008

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

May 11, 1988

Federal Election Commission  
999 E Street  
NW Washington, DC 20463

Attn: James Voegeli, Esq.

RE: Kennedy for Congress

Dear Jim:

Photocopies of those checks which have cleared to date which were sent to those individuals requested by the FEC are enclosed.

As soon as I have all of them I will, in turn, forward copies to you.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.

*Brian*

BRIAN T. KENNEDY  
BTK/jg  
enclosures

88 MAY 17 PM 2:01

RECEIVED  
FEDERAL ELECTION COMMISSION

9 3 0 4 7 2 2 9 4 4

KENNEDY FOR CONGRESS

130

4/4 1988

66-430/312

PAY TO THE  
ORDER OF

Orlovsky, Grace &amp; Moody, P.A. \$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Total Payment, New Jersey 08702

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0130

⑆00000⑆0000⑆

KENNEDY FOR CONGRESS

124

4/4 1988

66-430/312

PAY TO THE  
ORDER OF

Maurice Barry, PA \$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Total Payment, New Jersey 08702

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0124

⑆00000⑆0000⑆

KENNEDY FOR CONGRESS

128

4/4 1988

66-430/312

PAY TO THE  
ORDER OF

McDonnell &amp; McDonnell, Esqs. \$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Total Payment, New Jersey 08702

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0128

⑆00000⑆0000⑆

83040722945

8 3 7 4 0 7 2 2 9 4 6

307  
A Professional Assn.  
Attorney Business Acc.  
1009 423

10-13

53-14-12 53-14-12

10-13

10-13

61 88 49 For Deposit Only  
Orlovsky, Grasso & Bolger, P.A.  
ATTORNEY BUSINESS ACCOUNT  
10-0849-8

PROCESSED  
FEB. 07  
10-13

1022250

FOR DEPOSIT ONLY  
MCOMBER & MCOMBER/ESQS  
OFFICE ACCOUNT

10-13 49 37 9

PNB 1 AP 88 20 P.E. P  
3 PAY ANY 1  
BANK

1022250


98040722947

KENNEDY FOR CONGRESS 126

4/4 1988 66-430/312

PAY TO THE ORDER OF George Whitmore, P.A. \$ 100.00

One Hundred Dollars and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
FDIC Member, New Jersey 02102

MEMO \_\_\_\_\_

William J. Kennedy


⑆03⑆204309⑆ 207⑆326 0⑆ 0126 ⑆0000010000⑆

KENNEDY FOR CONGRESS 107

5/31 1988 66-430/312

PAY TO THE ORDER OF Alto Builders Inc. \$ 250.00

Two Hundred and Fifty and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
FDIC Member, New Jersey 02102

MEMO \_\_\_\_\_

William J. Kennedy


⑆03⑆204309⑆ 207⑆326 0⑆ 0107 ⑆0000025000⑆

KENNEDY FOR CONGRESS 117

3/31 1988 66-430/312

PAY TO THE ORDER OF Spring Lake Gardens Inc. \$ 300.00

Three Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
FDIC Member, New Jersey 02102

MEMO \_\_\_\_\_

William J. Kennedy

⑆03⑆204309⑆ 207⑆326 0⑆ 0117 ⑆0000030000⑆

107170

GEORGE HAY ACCOUNT  
ATTORNEY  
62-036-845

AP 88 20  
3 PAY ANY BANK 1

123236265

2522000 TO

AP 88 21  
3 PAY ANY BANK 1

118202435

AP 88 20  
3 PAY ANY BANK 1

118031305

*for deposit only  
Dite Builders, Inc*

2522000 TO

AP 88 28  
PAID  
10124126

10124126

AP 88 28  
PAID  
10124126

10124126

AP 88 28  
PAID  
10124126

10124126

*for deposit only  
LACC, 31-05-2834*

98040722948

133

4/5 1988

85-430/312

PAY TO THE  
ORDER OF \_\_\_\_\_

PAY TO THE ORDER OF Michael, Melatean, Mason - Walter PA \$ 75.00  
Twenty Five and 00/100 DOL

DOLLARS



**ocean county national  
bank**

**Member of The Summit Bancorporation**  
**First National New York City**

**MEMO.**

1:03 1 2043091:

207 3 26 01 0133

000000?500

103 12043091

0000007500

## KENNEDY FOR CONGRESS

118

3/31 1988

**55-430/312**

PAY TO THE  
ORDER OF \_\_\_\_\_

PAY TO THE ORDER OF Wickard - Boruck Insurance Agency Inc \$ 74.02  
Thos. Wickard and wife

\_DOLLARS



***ocean county national  
bank***

Member of The Summit Bancorporation  
*First National New Jersey 60702*

**MEMO**

1:03 1 204 309:

207-326 011 0118

000000 3400

## KENNEDY FOR CONGRESS

109

3/2, 19 PS

65-430/312

**PAY TO THE  
ORDER OF**

PAY TO THE ORDER OF Hearing: Dupre, P.A. \$ 500.00  
Five Hundred and 00/100

**\_\_\_\_\_DOLLARS**



**ocean county national  
bank**

**Member of The Summit Bancorporation**  
*First Summit New Jersey 2007*

**MEMO.**

1:03 1 204309:

207m326 000 0109

00000050000

FOR DEPOSIT ONLY  
BANK OF AMERICA, N.A.  
REGULAR ACCOUNT  
NO. 012-021-406

AP '88 19  
041988 3-41 11 4550244 27103314 33 31 0039 04

AP '88 20

05622204068

AP '88 29  
P.A.B.  
0310-0004 0  
FOR DEPOSIT ONLY  
215-6027145  
WINT-POWELL INS. AGENCY, INC.

AP '88 28

PROCESSED

05622204068

FOR DEPOSIT ONLY  
S. & P. PIGNAC, P.A.  
ATTORNEY BUSINESS ACCOUNT

50-0000-0000

KENNEDY FOR CONGRESS

123

4/4 19 88

65-430/312

PAY TO THE  
ORDER OF

*Hoffman & Schreier, P.A.*  
*One Hundred and 00/100*

\$ 100.00

DOLLARS



**ocean county national  
bank**

Member of The Summit Bancorporation  
Full Branch No. 0000

*William F. McGuire*

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0123

⑈0000010000⑈

KENNEDY FOR CONGRESS

134

4/4 19 88

65-430/312

PAY TO THE  
ORDER OF

*Lanning Coors Alacort Wheaton & Gray's*  
*Seventy Five and 00/100*

75.00  
DOLLARS



**ocean county national  
bank**

Member of The Summit Bancorporation  
Full Branch No. 0000

*William F. McGuire*

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0134

⑈0000007500⑈

KENNEDY FOR CONGRESS

131

4/4 19 88

65-430/312

PAY TO THE  
ORDER OF

*Richard A. Amodeo, P.A.*  
*One Thousand and Seventy Five and 00/100*

\$ 1,075.00

DOLLARS



**ocean county national  
bank**

Member of The Summit Bancorporation  
Full Branch No. 0000

*William F. McGuire*

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0131

⑈0000107500⑈

23040722951



0000000000

PAY TO THE ORDER OF  
COLONIAL FIRST NAT'L BANK  
RED BANK, NJ  
FOR DEPOSIT ONLY  
HOBBS, SCOTT  
PROFESSIONAL CORP.  
COUNSELLORS AT LAW  
216005100

AP 88 26  
PAY ANY BANK  
THE FIDELITY BANK  
A NEW JERSEY BANK

1000000000

0000000000

AP 88 27  
FOR DEPOSIT ONLY  
HOBBS, SCOTT  
PROFESSIONAL CORP.  
COUNSELLORS AT LAW  
216005100  
ACCT. #73-99785

10033923  
THE FIDELITY BANK  
PHILA., PA. 19109  
PAY ANY BANK  
AP 88 25  
#19

1000000000

0000000000

PAY TO THE ORDER OF  
UNITED COUNTIES TRUST CO.  
DAKHURST, N.J.  
FOR DEPOSIT ONLY  
RICHARD A. AMOUR  
A PROFESSIONAL CORP.  
83008136

AP 88 22  
3 PAY ANY BANK 1

1000000000

25622706086


83040722953

**KENNEDY FOR CONGRESS** 112

3/31 1988 55-430/312

PAY TO THE ORDER OF Leticia Bonilla, Mercedes Stenger, Esq. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
Peter Plummer, New Jersey 08702

MEMO \_\_\_\_\_

⑆031204309⑆ 207⑆326 0⑆ 0112 ⑆0000010000⑆


*William P. McGinn*

**KENNEDY FOR CONGRESS** 110

3/31 1988 55-430/312

PAY TO THE ORDER OF Dynexone Controls, Inc. \$ 100.00

One Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
Peter Plummer, New Jersey 08702

MEMO \_\_\_\_\_

⑆031204309⑆ 207⑆326 0⑆ 0110 ⑆0000010000⑆


*William P. McGinn*

**KENNEDY FOR CONGRESS** 115

3/31 1988 55-430/312

PAY TO THE ORDER OF Squan Taverna Inc. \$ 200.00

Two Hundred and 00/100 DOLLARS

 **ocean county national bank**  
Member of The Summit Bancorporation  
Peter Plummer, New Jersey 08702

MEMO \_\_\_\_\_

⑆031204309⑆ 207⑆326 0⑆ 0115 ⑆0000020000⑆

*William P. McGinn*

1 3 5 8 0 0 0 0 0 0

FOR DEPOSIT ONLY  
FALVO, BONELLO, MORIARTY & STEIGER  
ATTORNEY BUSINESS ACCOUNT  
200-894-377

AP 88 22  
1 3 **PAY ANY BANK** 1 11

32  
398-6  
ANAL  
32

2 2 1 0 0 0 0 0 0

AP 88 29  
FOR DEPOSIT ONLY  
MICROFILM CONTROLS, INC.  
#235 20808 203

AP 88 22  
THE FIDELITY BANK  
PHILA., PA. 19103  
PAY ANY BANK

AP 88 22  
PAY ANY BANK P.E.B.  
FIRST FIDELITY BANK  
N.A. NEW JERSEY (NBOC)

1 3 5 8 0 0 0 0 0 0

1 3 5 8 0 0 0 0 0 0

3 4 5 1 0 0 0 0 0 0

1 3 **PAY ANY BANK** 1 11



1 3 5 8 0 0 0 0 0 0

8 9 0 4 0 7 2 2 9 5 4

KENNEDY FOR CONGRESS

119

3/31

1985

66-430/312

PAY TO THE  
ORDER OFFrom Mrs. Boudreau  
One Hundred and 00/100

\$ 500.00

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
First National, New Jersey 08540

MEMO

*William J. Kennedy*

⑆03⑆204309⑆

207⑆326 0⑆ 0119

⑈0000050000⑈

KENNEDY FOR CONGRESS

113

3/31

1985

66-430/312

PAY TO THE  
ORDER OFHygiene Heating Plumbing Co., Inc.  
One Hundred and Fifty Dollars and 00/100

\$ 150.00

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
First National, New Jersey 08540

MEMO

*William J. Kennedy*

⑆03⑆204309⑆

207⑆326 0⑆ 0113

⑈0000015000⑈

KENNEDY FOR CONGRESS

114

3/31

1988

66-430/312

PAY TO THE  
ORDER OFHeard Case Services, Inc.  
One Hundred and Seventy Five Dollars and 00/100

\$ 75.00

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
First National, New Jersey 08540

MEMO

*William J. Kennedy*

⑆03⑆204309⑆


207⑆326 0⑆ 0114


⑈0000007500⑈

559527204030

2 3 4 0 7 2 2 9 5 6

89040722957

KENNEDY FOR CONGRESS		136
		4/4 1988 66-430/312
PAY TO THE ORDER OF	Moxman, Consulting Services	\$ 100.00
	One Hundred and 00/100	DOLLARS
 <b>ocean county national bank</b> Member of The Summit Bancorporation P.O. Box 1000, New Jersey 08702		
MEMO		
William J. Moxman		
⑆03⑆204309⑆ 207⑆326 0⑆ 0136 ⑆0000010000⑆		

KENNEDY FOR CONGRESS		111
		3/31 1988 66-430/312
PAY TO THE ORDER OF	Omega Speculation, Inc.	\$ 100.00
	One Hundred and 00/100	DOLLARS
 <b>ocean county national bank</b> Member of The Summit Bancorporation P.O. Box 1000, New Jersey 08702		
MEMO		
William J. Moxman		
⑆03⑆204309⑆ 207⑆326 0⑆ 0111 ⑆0000010000⑆		

8 5 9 2 2 4 0 7

AP 88 21 P.E.  
3 PAY ANY 1  
BANK BANK PHILA. FED. RES.

1020000000

DEPOSIT ONLY  
OMEGA SPECIALTIES

AP 88 18  
PAID  
PROCESSING

AP 88 18  
IF DEPOSIT ON/THROUGH A  
TRUST CO. - PAID  
IF NOT ON D.T. CO.  
BY ANY BANK - N.E.A.

142 10 30 21  
0310-004 0  
FOR DEPOSIT ONLY  
PACIFIC  
SEASIDE CONSULTING  
SERVICES, INC.  
007 C 0 4 5 0  
1000000000

GCC#9505

FEDERAL ELECTION COMMISSION

KENNEDY AND DANIEL

COUNSELLORS AT LAW

503 WASHINGTON BLVD.

P. O. BOX 243

SEA GIRT, N.J. 08750

(201) 449-9555

BRIAN T. KENNEDY

CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS

EDWARD B. KNAUER  
MEMBER N.J., ME & FLA. BARS

IN NEW YORK

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

88 JUN 13 AM 8:30  
THU 2552

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038

(212) 267-4008

June 8th, 1988

Federal Election Commission  
999 E Street  
NW Washington, DC 20463

Attn: James Voegeli, Esq.

RE: Kennedy for Congress

Dear Jim:

Photocopies of the additional checks which have cleared the account are enclosed.

Also, please find a copy of the 6 extra checks which we sent out.

I will forward the front and back of the other checks as I receive them from the bank.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.

*Brian T. Kennedy*

BRIAN T. KENNEDY  
BTK/jg  
enclosures

88 JUN 13 AM 11:50

RECEIVED  
FEDERAL ELECTION COMMISSION

6507240400



These have been  
checked & returned  
-Charles Jem

33040722060

KENNEDY FOR CONGRESS

129

4/4

19 85

65-430/312

PAY TO THE  
ORDER OF

T. J. Foggia &amp; Sons

\$ 50.00

T. J. Foggia

00

100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Full Payment, No Army 6572

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0129

⑈0000005000⑈

KENNEDY FOR CONGRESS

C

N. P

116

4/4 1985

65-430/312

PAY TO THE  
ORDER OF

Crown Bros. Distributors, Inc.

\$ 75.00

Sweeney, Inc. and son

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Full Payment, No Army 6572

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0116

⑈0000007500⑈

KENNEDY FOR CONGRESS

125

4/4

19 85

65-430/312

PAY TO THE  
ORDER OF

Monte M. Marriot, Esq.

\$ 100.00

One Hundred

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Full Payment, No Army 6572

MEMO

⑆03⑆204309⑆

207⑆326 0⑆ 0125

⑈00000010000⑈

83743722261

FOR DEPOSIT ONLY  
F.J. FUGGIA FLOREST, INC.  
101-405-3299

193 MON. BLVD.  
OCEANPORT, N.J. 07757

MY '88 03  
3 PAY ADV  
BANK

MAY 4 88  
02120

FOR DEPOSIT IN  
ATLANTIC NATIONAL BANK/MERCHANTS  
55-244  
Neptune, N. J. New Jersey  
CROWN BEER DISTRIBUTORS, INC.  
# 012-024-096

3 PAY ADV  
BANK  
MY 88 09

FOR DEPOSIT ONLY  
MONTE  
COUNSELLOR  
800 THE C 645 45  
PO BOX 250  
SEA GIRL, NEW JERSEY 07757

MY '88 02  
3 PAY ADV  
BANK

8 3 0 4 0 7 2 2 9 5 2

KENNEDY FOR CONGRESS

120

3/21 1988

65-430/312

PAY TO THE  
ORDER OF

William P. Murphy, P.A.

\$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Federal Reserve, New Jersey 08719

MEMO

William P. Murphy

⑆03⑆204309⑆

207⑆326 0⑆ 0120

⑆0000010000⑆

KENNEDY FOR CONGRESS

127

4/4 1988

65-430/312

PAY TO THE  
ORDER OF

Philip Jacobowitz, P.A.

\$ 99.00

Ninety Nine and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Federal Reserve, New Jersey 08719

MEMO

William P. Murphy

⑆03⑆204309⑆

207⑆326 0⑆ 0127

⑆0000009900⑆

KENNEDY FOR CONGRESS

132

4/4 1988

65-430/312

PAY TO THE  
ORDER OF

Francis J. Litley, Esq.

\$ 200.00

Two Hundred and 00/100

DOLLARS

ocean county national  
bankMember of The Summit Bancorporation  
Federal Reserve, New Jersey 08719

MEMO

William P. Murphy

⑆03⑆204309⑆

207⑆326 0⑆ 0132

⑆0000020000⑆

93040722353

3 MAY 1964

0212-02447 2712-02447  
MAY 02 38  
USED

3  
 MY  
 PAY TO THE ORDER OF  
 BANK OF AMERICA  
 BRANCH  
 ADDRESS  
 CITY  
 STATE  
 ZIP  
 ACCOUNT NO.  
 CHECK NO.  
 DATE  
 AMOUNT  
 ENDORSEMENT  
 SIGNATURE  
 NAME  
 ADDRESS  
 CITY  
 STATE  
 ZIP  
 PHONE  
 FAX  
 E-MAIL  
 URL  
 COMMENTS  
 CHECK NO.  
 DATE  
 AMOUNT  
 ENDORSEMENT  
 SIGNATURE  
 NAME  
 ADDRESS  
 CITY  
 STATE  
 ZIP  
 PHONE  
 FAX  
 E-MAIL  
 URL  
 COMMENTS

PAY ANY BANK, P. E. G.  
 NEW BRUNSWICK SAVINGS BANK  
 MAY 09 1968  
 00-0001  
 NB14 2212-72387

100-440850-10  
 FBI NY  
 CRANFORD OFFICE  
 PAY ANY BANK  
 100-440850 0212-0400

1 MAY '87 10 1  
1:11 P.M. 1  
15 0310-0004 0 1

*Handwritten:* 17 Dec 1964  
M. L.  
L. H.

93040722965

These are  
going out -

KENNEDY FOR CONGRESS

137

June 7<sup>th</sup> 1988

65-430/312

PAY TO THE  
ORDER OF

Sea Girt Village Center

\$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bank  
Member of The Summit Bancorporation  
Peter Placani, New Jersey 08512

William J. McLean

MEMO

⑆03⑆204309⑆

207⑈326 0⑈ 0⑆37

UNIVERSITY MICROFILMS

KENNEDY FOR CONGRESS

138

June 7<sup>th</sup> 1988

65-430/312

PAY TO THE  
ORDER OF

Hudson Assoc. Limited

\$ 100.00

One Hundred and 00/100

DOLLARS

ocean county national  
bank  
Member of The Summit Bancorporation  
Peter Placani, New Jersey 08512

William J. McLean

MEMO

⑆03⑆204309⑆

207⑈326 0⑈ 0⑆38

UNIVERSITY MICROFILMS

KENNEDY FOR CONGRESS

139

June 7<sup>th</sup> 1988

65-430/312

PAY TO THE  
ORDER OF

Hudson Assoc. Limited

\$ 250.00

Two Hundred and Fifty and 00/100

DOLLARS

ocean county national  
bank  
Member of The Summit Bancorporation  
Peter Placani, New Jersey 08512

William J. McLean

MEMO

⑆03⑆204309⑆

207⑈326 0⑈ 0⑆39

UNIVERSITY MICROFILMS

89040722936




89743722967

KENNEDY FOR CONGRESS 140

June 7 1988 55-430/312

PAY TO THE ORDER OF A Apollo Service Plumbing \$ 85.<sup>00</sup>

Eighty Five and 00/100 DOLLARS

 ocean county national bank  
Member of The Summit Bancorporation  
Fiduciary, New Jersey 08702

MEMO \_\_\_\_\_

William J. McGee


⑆03⑆204309⑆ 207⑆326 0⑆ 0140

KENNEDY FOR CONGRESS 141

June 7 1988 55-430/312

PAY TO THE ORDER OF Ocean Union Operating Company \$ 100.<sup>00</sup>

One Hundred and 00/100 DOLLARS

 ocean county national bank  
Member of The Summit Bancorporation  
Fiduciary, New Jersey 08702

MEMO \_\_\_\_\_

William J. McGee


⑆03⑆204309⑆ 207⑆326 0⑆ 0141

KENNEDY FOR CONGRESS 142

June 7 1988 55-430/312

PAY TO THE ORDER OF SPY CO, Inc \$ 150.<sup>00</sup>

One Hundred and Fifty and 00/100 DOLLARS

 ocean county national bank  
Member of The Summit Bancorporation  
Fiduciary, New Jersey 08702

MEMO \_\_\_\_\_

William J. McGee

⑆03⑆204309⑆ 207⑆326 0⑆ 0142



83 JUN 23 AM 9:44

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 Kennedy for Congress Committee, ) MUR 2552  
 Cornelius Daniel, III, as )  
 treasurer, and Jackie Gilligan )

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 1, 1988, the Commission found reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, (the "Committee") violated 2 U.S.C. § 441b(a) by accepting corporate contributions, and 2 U.S.C. § 434(b) by failing to adequately report loans received by the Committee.

Also on February 1, 1988, the Commission merged MUR 2412 into this MUR. In MUR 2412, the Commission had found reason to believe on July 21, 1987, that the Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from an individual who loaned money to the Committee. The Commission found reason to believe that this individual, Ms. Jackie Gilligan, violated 2 U.S.C. § 441a(a)(1)(A) for making an excessive contribution.

On December 1, 1987, the Commission authorized conciliation in MUR 2412. On March 7, 1988, the Commission received a request for conciliation with respect to the new RTB findings associated with MUR 2552 from candidate Brian T. Kennedy. 1/ (Attachment 1)

1/ Mr. Kennedy has been the main party to respond to the Commission with respect to both MURs.

830407222938

The Office of the General Counsel recommends that the Commission approve pre-probable cause conciliation with respect to the 2 U.S.C. §§ 441b(a) and 434(b) violations associated with MUR 2552 since the Respondents have requested it and since the Commission has merged MUR 2412 with this MUR.

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTIES

89040722969

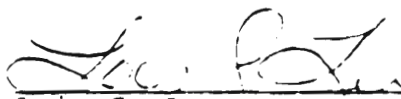
III. RECOMMENDATIONS

The Office of the General Counsel recommends that the Commission:

- 1.
2. Enter into pre-probable cause conciliation with the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, for the apparent violations associated with MUR 2552.
3. Approve the proposed conciliation agreement covering violations associated with both MUR 2412 and 2552, and letter, to the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer.
- 4.
- 5.

Lawrence M. Noble  
General Counsel

6/27/88  
Date

By:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Letter from Mr. Kennedy, received March 7, 1988
2. Letter from Mr. Kennedy, received January 11, 1988
3. Letter from Mr. Kennedy, received January 19, 1988
- 4.
- 5.
6. OGC Letter to Mr. Kennedy, sent April 14, 1988
7. Letter from Mr. Kennedy, received April 20, 1988
8. Proposed conciliation agreement for the Committee
9. Proposed letter for the Committee
10. Proposed conciliation agreement for Ms. Gilligan
11. Proposed letter for Ms. Gilligan

Staff Assigned: Jim Voegeli

83040722970

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Kennedy for Congress Committee, ) MUR 2552  
Cornelius Daniel, III, as )  
treasurer )  
Jackie Gilligan )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 6, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2552:

- 1.
2. Enter into pre-probable cause conciliation with the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, for the apparent violations associated with MUR 2552.
3. Approve the proposed conciliation agreement covering violations associated with both MUR 2412 and MUR 2552, and the letter to the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, as recommended in the General Counsel's report dated June 27, 1988, s

(continued)

330407222371

Federal Election Commission  
Certification for MUR 2552  
July 6, 1988

Page 2

4.

5.

Commissioners Aikens, Elliott, Josefiak, McDonald,  
and McGarry voted affirmatively for the decision;  
Commissioner Thomas was not present.

Attest:

7-6-88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

2 7 9 2 2 7 0 4 0 3 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Kennedy for Congress Committee, )  
Cornelius Daniel, III, as )  
treasurer, and Jackie Gilligan )

MUR 2552

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements; one signed by Cornelius Daniel, III, as treasurer of the Kennedy for Congress Committee ("Committee"), and another signed by Jackie Gilligan who is a separate respondent in this matter.

98040722973

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer.
2. Accept the attached conciliation agreement with Ms. Jackie Gilligan.
3. Close the file as to all respondents.

83040722974


4. Approve the attached letters.

Lawrence M. Noble  
General Counsel

Date

9/14/88

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments

1. Conciliation agreement with Committee
2. Conciliation agreement with Ms. Gilligan
3. Letter from Mr. Kennedy, received August 4, 1988
4. Letter from OGC to Mr. Kennedy, sent August 17, 1988
5. Letter from OGC to Ms. Gilligan, sent August 29, 1988
6. Proposed letter to the Committee
7. Proposed letter to Ms. Gilligan

Staff Assigned: Jim Voegeli

88040722975



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kennedy for Congress Committee,  
Cornelius Daniel, III, as  
treasurer, and Jackie Gilligan

)  
)  
)  
)  
)  
)

MUR 2552

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on September 19,  
1988, the Commission decided by a vote of 6-0 to take  
the following actions in MUR 2552:

1. Accept the conciliation agreement with the  
Kennedy for Congress Committee and Cornelius  
Daniel, III, as treasurer, as recommended in  
the General Counsel's report signed  
September 14, 1988.
2. Accept the conciliation agreement with  
Ms. Jackie Gilligan, as recommended in  
the General Counsel's report signed  
September 14, 1988.
3. Close the file as to all respondents.

(Continued)

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4. Approve the letters, as recommended in the General Counsel's report signed September 14, 1988.

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

Attest:

9-19-88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	9-15-88,	10:24
Circulated on 48 hour tally basis:	Thurs.,	9-15-88,	4:00
Deadline for vote:	Mon.,	9-19-88,	4:00

jm

9 3 0 4 0 7 2 2 0 7 7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Cornelius Daniel, III  
Treasurer, Kennedy for Congress Committee  
c/o Brian Kennedy, Esquire  
Kennedy and Daniel Counsellors at Law  
503 Washington Boulevard  
P.O. Box 243  
Sea Girt, New Jersey 08750

RE: MUR 2552  
(Merged with MUR 2412)  
Kennedy for Congress  
Committee and Cornelius  
Daniel, as treasurer

Dear Mr. Daniel:

On September 19, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of violations of 2 U.S.C. §§ 441b(a), 434(b) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Kennedy for Congress Committee, and you, as treasurer. 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. According to the agreement you are required to pay a civil penalty of \$3,750 in 12 monthly installments of \$312.50 each. Your first payment is due on October 1, 1988, with additional payments due on the first day of each successive month. Failure to make payments on the timely basis would place you in default of the agreement.

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Cornelius Daniel, III.  
Page 2

If you have any questions concerning this matter, please contact Jim Voegeli, 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

98040722979

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Kennedy for Congress Committee ) MUR 2552  
and Cornelius Daniel, III, ) (Merged with MUR 2412)  
as treasurer )

CONCILIATION AGREEMENT

The matter of MUR 2412 was initiated by a signed, sworn, and notarized complaint by the Democratic Congressional Campaign Committee. The Federal Election Commission (the "Commission") found reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer (the "Respondents") violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act").

The matter of MUR 2552 was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, III, as treasurer, violated 2 U.S.C. §§ 441b(a) and 434(b). The Commission voted to merge MUR 2412 into MUR 2552.

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matters of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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 these matters are as follows:

1. Respondent, Kennedy for Congress Committee, is the principal campaign committee of federal candidate Brian T. Kennedy within the meaning of 2 U.S.C. § 431(5).

2. Respondent, Cornelius Daniel, III, is the treasurer of the Kennedy for Congress Committee.

3. Pursuant to 2 U.S.C. § 431(8)(A)(i), a loan made for the purpose of influencing a federal election is a contribution. Jackie Gilligan loaned the Committee \$10,000 on September 26, 1986, approximately six weeks prior to the election in which Brian T. Kennedy was a candidate for federal office. Therefore, this loan was a contribution within the meaning of 2 U.S.C. § 431(8)(A)(i).

4. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to a candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1,000. Jackie Gilligan's \$10,000 contribution exceeded this limit by \$9,000.

5. Pursuant to 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution in violation of 2 U.S.C. § 441a. Respondents knowingly accepted Jackie Gilligan's \$10,000 contribution within the meaning of 2 U.S.C. § 441a(f).

6. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for any candidate, political committee, or other person to knowingly

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accept or receive any contribution from a corporation. During 1986, the Respondents received 41 contributions, totaling \$6,143, from 37 entities which are registered as corporations in the State of New Jersey.

7. Pursuant to 2 U.S.C. § 434(b), each committee report to the Commission shall disclose for the reporting period and the calendar year the total amounts of all receipts, including for an authorized committee, loans made by or guaranteed by the candidate, and all other loans. Each report must disclose the amount and nature of outstanding debts and obligations owed, and each committee must continuously report these debts and obligations until fully extinguished. Section 104.11(a) of Title 11 of the Code of Federal Regulations requires that such reporting be on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred and extinguished. Section 104.3(a)(4) of Title 11 of the Code of Federal Regulations requires the itemization of all loans received during the reporting period, and the identification of any endorsers or guarantors of such loans, the dates such loans were made, and the amounts or values of such loans.

8. The Respondents received loans totaling \$77,500 during 1986. The Respondents failed to correctly summarize these loans, file required schedules itemizing the receipt and extinguishment of each loan, and continuously report each loan as required as set forth in Paragraph 7 above.

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9. Pursuant to 2 U.S.C. § 432(e)(2), when a federal candidate receives a loan for use in connection with his campaign, the candidate receives that loan as an agent of his authorized committee. Accordingly, a committee is required to report and itemize that loan as coming from the initial lender rather than as coming from the personal funds of the candidate. Section 110.10(b) of Title 11 of the Code of Federal Regulations requires that loans obtained by a candidate after becoming a candidate for federal office may not be treated as personal funds. When loans are obtained from a bank, the outstanding balance, name of the bank, and other information specified in Section 104.3 of Title 11 of the Code of Federal Regulations should be contained in disclosure reports to the Commission.

10. After becoming a candidate for federal office, Brian Kennedy obtained a \$35,000 loan from a bank in October, 1986. The proceeds of this loan were provided to the Kennedy for Congress Committee, but the Respondents failed to provide details concerning the loan in accordance with Paragraph 9 above, and instead, reported receiving these proceeds as a personal loan from the candidate.

V. With respect to these matters:

1. Respondents knowingly accepted a \$10,000 contribution from Jackie Gilligan, in violation of 2 U.S.C. § 441a(f).

2. Respondents knowingly accepted and received \$6,143 in contributions from corporations, in violation of 2 U.S.C. § 441b(a).



3. The Respondents failed to correctly summarize, itemize and continually report \$77,500 in loans received in 1986, in violation of 2 U.S.C. § 434(b).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Thousand Seven Hundred and Fifty Dollars (\$3,750) pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. Respondents will pay in 12 monthly installments of \$312.50

2. Thereafter, beginning on October 1, 1988, consecutive monthly installment payments of \$312.50

3. Each such installment payment shall be paid on the first day of the month in which it becomes due;

4. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the Respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VII. Respondents shall repay Nine Thousand dollars (\$9,000) to Ms. Jackie Gilligan. This portion of Ms. Gilligan's loan is in excess of the contribution limit described in Section IV, Paragraph 4 above.

83040722984

VIII. Respondents shall amend their disclosure reports to the Commission to correctly summarize, itemize and continually report all loans made to the Committee, in accordance with the reporting requirements set forth in Section IV, Paragraphs 7 and 9 above.

IX. 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.

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

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

XII. 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

93040722985

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  
General Counsel

By:

*[Signature]*  
Lois G. Lerner  
Associate General Counsel

Date

9/28/88

FOR THE RESPONDENTS

*C Daniel*  
Cornelius Daniel, III, Treasurer  
Kennedy for Congress Committee

Date

AUG 29, 1988

83040722990



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert F. Bauer, Esquire  
Perkins Coie  
1110 Vermont Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 2552 (Merged with MUR 2412)  
Kennedy for Congress Committee,  
Cornelius Daniel, as treasurer,  
and Jackie Gilligan

Dear Mr. Bauer:

This is in reference to the complaint you filed with the Federal Election Commission on May 7, 1987, on behalf of the Democratic Congressional Campaign Committee concerning the Kennedy for Congress Committee, Cornelius Daniel, as treasurer, and Jackie Gilligan.

The Commission found that there was reason to believe that the Kennedy for Congress Committee and Cornelius Daniel, as treasurer, violated 2 U.S.C. §§ 441b(a), 434(b) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. The Commission also found that there was reason to believe that Ms. Jackie Gilligan violated 2 U.S.C. § 441a(a)(1)(A), and conducted an investigation. On September 19, 1988, the Commission accepted two conciliation agreements signed by the respondents. Accordingly, the Commission has closed the file in this matter. Copies of these agreements are enclosed for your information.

If you have any questions, please contact Jim Voegeli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

Lois G. Lerner  
Associate General Counsel

Enclosures  
Conciliation Agreements

9 8 0 4 0 7 2 2 9 9 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Jackie Gilligan

)  
)  
)  
)

MUR 2552  
(Merged with MUR 2412)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by the Democratic Congressional Campaign Committee. The Federal Election Commission (the "Commission") found reason to believe that Jackie Gilligan (the "Respondent") violated 2 U.S.C. § 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent, Jackie Gilligan, is an individual contributor.

2. The Kennedy for Congress Committee is the principal campaign committee for federal candidate Brian T. Kennedy within the meaning of 2 U.S.C. § 431(5).

3. Pursuant to 2 U.S.C. § 431(8)(A)(i), a loan made for the purpose of influencing a federal election is a

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contribution. Jackie Gilligan loaned the Committee \$10,000 on September 26, 1986, approximately six weeks prior to the election in which Brian T. Kennedy was a candidate for federal office. Therefore, this loan was a contribution within the meaning of 2 U.S.C. §431(9)(A)(i).

4. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to a candidate and his authorized political committee with respect to any election for federal office which, in the aggregate, exceed \$1,000. The \$10,000 contribution described above exceeded this limit by \$9,000.

V. With respect to this matter, Jackie Gilligan contributed \$10,000 to the Kennedy for Congress Committee in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Seven Hundred and Fifty Dollars (\$750.00), 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.

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.

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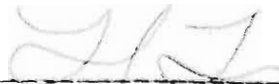
IX. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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  
General Counsel

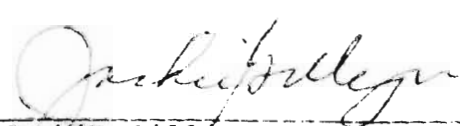
By:

  
Lois G. Lerner  
Associate General Counsel

Date

9/28/88

FOR THE RESPONDENT:

  
Jackie Gilligan

Date

Sept 6, 1988

33040722990



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2552

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN PC

88040722991





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2552

89040725250

OGC# 773

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

88 OCT 22 AM 9:39

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS  
JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS  
EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

P. O. BOX 243  
SEA GIRT, N.J. 08750  
(201) 449-9555  
FAX # (201) 449-2358

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038  
(212) 267-4008

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

October 18th, 1988

FEDERAL ELECTION COMMISSION  
999 EAST E STREET  
WASHINGTON, DC 20463

Attn: James Voegeli, Esq.

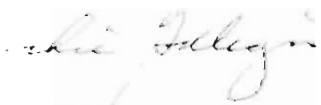
RE: MUR 2552

Dear Jim:

Enclosed please find my check in the amount of \$750.00. In addition please find Brian's check in the amount of \$312.80.

Thank you for your assistance in resolving this albatross.

Very truly yours,



Jackie Gilligan

88 OCT 26 PM 3:07

RECEIVED  
FEDERAL ELECTION COMMISSION

156522404068

OGC# 773

MEMORANDUM

CLOSED

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

88 OCT 26 PM 3:07

RECEIVED  
FEDERAL TRIMIEW COMMISSION

CHECK NO. 522 { A COPY OF WHICH IS ATTACHED } RELATING TO  
PUR 2552 AND NAME Kennedy For Congress Committee  
(Vogel)  
WAS RECIEVED ON 10/26/88. 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 10/27/88

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OGC# 773

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: = CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

88 OCT 26 PM 3:07


RECEIVED  
FEDERAL TRIMIEW COMMISSION


CHECK NO. 555 { A COPY OF WHICH IS ATTACHED } RELATING TO  
PUR 2552 AND NAME Jackie Gilligan  
WAS RECIEVED ON 10/26/88. 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 10/27/88

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<b>BRIAN T. KENNEDY</b> 503 WASHINGTON BOULEVARD SEA GIRT, N. J. 08750		555
		55-33/212
OCT 17 1988		
PAY TO THE ORDER OF	Federal Election Commission	\$ 312.00
Three hundred twelve & 00/100		DOLLARS
 See Girt Office See Girt, N. J.		
MEMO		
10212003391 33 65 98773 0555		

<b>JACQUELINE GILLIGAN</b> 726 CRESCENT PL. SEA GIRT, NJ 08750		522
		55-271/212
OCT 18 1988		
PAY TO THE ORDER OF	Federal Election Commission	\$ 750.00
Seven hundred and fifty Dollars and 00/100		DOLLARS
 National Community Bank of New Jersey SPRING LAKE, N.J. 07762		
MEMO		
10212027191 00164 268 51 0522		



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

R02-16-89

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2552

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0601552



RECEIVED  
JAN 19 1989  
NEW YORK COMMISSION

KENNEDY AND DANIEL

89 JAN 19 AM 9:39

COUNSELLORS AT LAW

503 WASHINGTON BLVD

P. O. BOX 243

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY

CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JOHN T. RIHACEK  
MEMBER N.J. & PA. BARS

EDWARD B. KNAUER  
MEMBER N.J., ME & FLA. BARS

IN NEW YORK

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALIE RIFAI  
MEMBER N.J. & N.Y. BARS

NEW YORK OFFICE

55 JOHN STREET  
NEW YORK, N.Y. 10038

(212) 267-4008


*Kennedy For Congress - NJ-3*

*Jan 1989 payment*

8 9 0 1 4 7 6 5 3 7 3

89 JAN 19 PM 3:12

# CLOSED

<b>BRIAN T. KENNEDY</b> 631 OCEAN AVE. BRADLEY BEACH, NJ 07720		422
PAY TO THE ORDER OF <u>F. E. C.</u>		JAN 9 19 89 55-271/212
<u>THREE HUNDRED TWELVE &amp; 51/100</u>		\$ 312.51
 <b>National Community Bank</b> of New Jersey SPRING LAKE, N.J. 07762		DOLLARS
MEMO: <u>Brian T. Kennedy</u>		
⑆02⑆2027⑆9⑆ 03200 379 6⑈ 0422		

DEC 1552

## MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 422 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2552 AND NAME Kennedy for Congress Committee  
(Bernstein)  
WAS RECIEVED ON 1/11/89. 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 1/17/89

CO JEN 11 PM 3:12



FEDERAL ELECTION COMMISSION  
WASHINGTON D C 20463

426 April 1989


THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2552

89040743289



# CLOSED

BRIAN T. KENNEDY 503 WASHINGTON BLVD. SEA GIRT, NJ 08750		780
APR 10 1989		55-271/212
PAY TO THE ORDER OF	F.E.C.	\$ 312.51
— THREE HUNDRED TWELVE & 51/100 —		DOLLARS
 National Community Bank of New Jersey SPRING LAKE, N.J. 07762		
MEMO		<i>Brian T. Kennedy</i>
⑆02⑆2027⑆9⑆03200 379 6⑈0780		

06C2504

## MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 780 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2552 AND NAME Kennedy for Congress Cmte.

(Bernstein)  
WAS RECIEVED ON 4/18/89. 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 4/19/89

06C2506

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 APR 14 AM 8:59

KENNEDY AND DANIEL

COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JAY A. WEISSMAN

EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

89 APR 13 PM 3:24

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

The Federal Election Commission  
999 E St. NW  
Washington DC 20463

RE: MUR 2552

Gentlemen:

Enclosed please find my April payment in the amount of \$312.51.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.



BRIAN T. KENNEDY  
BTK/jg  
enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2552

89040752161

06C1772

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 FEB -6 AM 10: 19

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

P. O. BOX 243  
SEA GIRT, N.J. 08750  
(201) 448-9555

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
JAMES W. DONNELLY  
MEMBER N.J. & N.Y. BARS

IN NEW YORK  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

NEW YORK OFFICE  
55 JOHN STREET  
NEW YORK, N.Y. 10038  
(212) 267-4008

JANUARY 31, 1989

FEDERAL ELECTION COMMISSION  
999 EAST E STREET  
WASHINGTON, DC 20463

RE: MUR 2552

Attn: James Voegeli, Esq.

Dear Jim:

Enclosed please find my check in the amount of \$312.00

Thank you.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.



BRIAN T. KENNEDY  
BTK/jg  
enclosure

89 FEB -8 AM 10: 20

RECEIVED  
FEDERAL ELECTION COMMISSION

2 9 0 4 0 7 5 2 1 6 2

CLOSED

BRIAN T. KENNEDY  
503 WASHINGTON BOULEVARD  
SEA GIRT, N. J. 08750

352

JAN 31 1989 55-33/212

PAY TO THE ORDER OF FEC \$ 320 -

THREE HUNDRED TWENTY DOLLARS

**FIRST** JERSEY  
NATIONAL BANK  
See Girt Office See Girt, N. J.

MEMO Brian Kennedy

⑆02⑆200339⑆ 33 65 98773⑈ 0352

OBC 1772

52163  
MEMORANDUM

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 352 { A COPY OF WHICH IS ATTACHED } RELATING TO

FOR 2552 AND NAME Kennedy for Congress Cmte.

(Bernstein)

WAS RECEIVED ON 2/8/89 . 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 2/8/89

06C 2169

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 MAR 14 AM 10:13

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JAY A. WEISSMAN

EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

*KENNEDY  
FOR CONGRESS*


*NJ-3 MVR-2552*

*March payment - \$312.51*

8 9 0 4 0 7 5 2 1 6 4

CO MAR 15 PM 3:15

# CLOSED

<b>BRIAN T. KENNEDY</b> 503 WASHINGTON BLVD. SEA GIRT, NJ 08750		506
MARCH 3 1989		55-271/212
PAY TO THE ORDER OF	F. E. C.	\$ 312.51
— THREE HUNDRED TWELVE & 5/100 —		DOLLARS
 <b>National Community Bank</b> of New Jersey SPRING LAKE, N.J. 07762		
MEMO		<i>Brian T. Kennedy</i>
⑆02⑆202719⑆ 03200 379 6⑈ 0506		

040752165

## MEMORANDUM

TO: DEBRA A. TRIMIEW  
FROM: CECILIA LIEBER

TO: CECILIA LIEBER  
FROM: DEBRA A. TRIMIEW

CHECK NO. 506 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2552 AND NAME Kennedy for Congress Cmte.  
WAS RECIEVED ON 3/15/89. 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 3/15/89

06C 2713

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 MAY -8 AM 11:15

KENNEDY AND DANIEL

COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JAY A. WEISSMAN

EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

89 MAY 10 AM 9:56

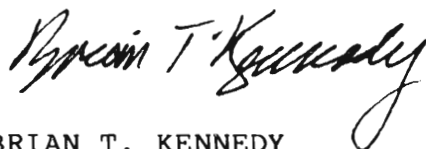
The Federal Election Commission  
999 E St. NW  
Washington DC 20463

RE: MUR 2552

Gentlemen:

Enclosed please find my May payment in the amount of \$312.51.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.




BRIAN T. KENNEDY  
BTK/jg  
enclosure

3 3 0 4 0 7 5 2 1 6 6



# CLOSED

BRIAN T. KENNEDY 503 WASHINGTON BLVD. SEA GIRT, NJ 08750		810
MAY 5 1989		55-271/212
PAY TO THE ORDER OF	FEC	\$ 322.57
THREE HUNDRED TWENTY TWO & 57/100		DOLLARS
 National Community Bank of New Jersey SPRING LAKE, N.J. 07762		
MEMO		<i>Debra A. Trimiew</i>
⑆02⑆2027⑆9⑆03200 379 6⑈08⑆0		

DEC 27/13

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 810 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2552 AND NAME Kennedy For Congress Cmte.  
WAS RECEIVED ON (Kapper) 5/10/89. 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 5/10/89

06C 3097

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 JUN 14 AM 8:45

KENNEDY AND DANIEL

COUNSELLORS AT LAW

503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JAY A. WEISSMAN

EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS

TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

The Federal Election Commission  
999 E St. NW  
Washington DC 20463

RE: MUR 2552

Gentlemen:

Enclosed please find my June payment in the amount of \$312.51.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.




BRIAN T. KENNEDY  
BTK/jg  
enclosure

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUN 16 PM 1:57

8 9 9 1 4 0 7 5 2 1 6 8

# CLOSED

BRIAN T. KENNEDY 503 WASHINGTON BLVD. SEA GIRT, NJ 08750		529
JUNE 6 1989		55-271/212
PAY TO THE ORDER OF	F.E.C.	\$ 312.51
— THREE HUNDRED TWELVE & 51/100 —		DOLLARS
 National Community Bank of New Jersey SPRING LAKE, N.J. 07762		
MEMO		<i>Debra A. Trimiew</i>
⑆02⑆2027⑆9⑆03200 379 6⑈0529		

06C3097

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CHERYL T WILLIAMS  
FROM: CHERYL T WILLIAMS FROM: DEBRA A. TRIMIEW

CHECK NO. 529 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2552 AND NAME Kennedy for Congress Cmte.

(Kapper) WAS RECEIVED ON 6/16/89. PLEASE INDICATE THE ACCOUNT IN

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Debra A. Trimiew

DATE 6/19/89

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE  
89 JUN 19 PM 1:57



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2552

11440764009

0603609

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

89 JUL 25 PM 8:38

KENNEDY AND DANIEL

COUNSELLORS AT LAW

503 WASHINGTON BLVD

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY

PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS

JAY A. WEISSMAN

EDWARD B. KNALLER  
MEMBER N.J., ME. & FLA. BARS

DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS

ALIE RIFAI  
MEMBER N.J. & N.Y. BARS

TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

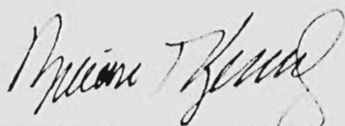
The Federal Election Commission  
999 E St. NW  
Washington DC 20463

RE: MUR 2552

Gentlemen:

Enclosed please find my July payment in the amount of \$312.51.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.



BRIAN T. KENNEDY  
BTK/jg  
enclosure

# CLOSED

<b>BRIAN T. KENNEDY</b> 503 WASHINGTON BOULEVARD SEA GIRT, N. J. 08750		603
JULY 9 1989		55-53/212
PAY TO THE ORDER OF	F.E.C.	\$ 312.51
— THREE HUNDRED TWELVE 12/100 —		DOLLARS
<b>FIRST JERSEY</b> NATIONAL BANK Sea Girt Office Sea Girt, N. J.		<i>[Signature]</i>
MEMO		
⑆02⑆200339⑆ 33 65 98773⑆ 0603		

OWC 3669

## MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS FROM: DEBRA A. TRIMIEW

CHECK NO. 603 [ A COPY OF WHICH IS ATTACHED & RELATING TO

MUR 2552 AND NAME Kennedy For Congress Cmte.

(Kapper)  
WAS RECEIVED ON 7/31/89 PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/	/	BUDGET CLEARING ACCOUNT	⑆ 95FEB75.16 ⑆
/	✓	CIVIL PENALTIES ACCOUNT	⑆ 95-1079.163 ⑆
/	/	OTHER	

SIGNATURE Debra A. Trimiew

DATE 8/1/89



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2552

800407/1703



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 14, 1989

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Cornelius Daniel, III, Treasurer  
Kennedy for Congress Committee  
c/o Brian Kennedy, Esquire  
Kennedy and Daniel Counsellors at Law  
503 Washington Boulevard  
P.O. Box 243  
Sea Girt, New Jersey 08750

**CLOSED**

RE: MUR 2552

Dear Mr. Daniel:

On September 19, 1988, the Federal Election Commission and Kennedy for Congress Committee ("Committee") and you, as treasurer, entered into a conciliation agreement in settlement of violations of 2 U.S.C. §§ 441b(a), 434(b) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. According to the agreement, you were required to pay a civil penalty of \$3,750 in 12 installments of \$312.50 each. Your first payment was due on October 1, 1988, with additional payments due on the first day of each successive month.

According to Commission records, your payments for the months of August and September have not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payments from you in five days, this Office will recommend that the Commission file suit to remedy this violation.

Should you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

890907/1700



BGC 4059

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

89 SEP 18 AM 9:53

KENNEDY AND DANIEL

COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750

(201) 449-9555

FAX # (201) 449-2358

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS  
JAY A. WEISSMAN  
EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALI E. RIFAI  
MEMBER N.J. & N.Y. BARS  
TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561

(516) 431-6092

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
89 SEP 21 AM 10:27

CLOSED

The Federal Election Commission  
999 E St. NW  
Washington DC 20463

RE: MUR 2552

Gentlemen:

Enclosed please find my September payment in the amount of \$312.51.

Very truly yours,  
KENNEDY AND DANIEL, ESQS.

*Brian T. Kennedy*

BRIAN T. KENNEDY  
BTK/jg  
enclosure

10011205068

CLOSED

BRIAN T. KENNEDY 503 WASHINGTON BOULEVARD SEA GIRT, N. J. 08750		685
PAY TO THE ORDER OF <u>F.E.C.</u>		SEPT 12 19 89 55-33/212
— THREE HUNDRED TWELVE <sup>51</sup> / <sub>100</sub> —		\$ 312.51
DOLLARS		
FIRST JERSEY NATIONAL BANK <small>See Gift Office</small>		<i>Brian T. Kennedy</i>
MEMO. <u>021200339: 33 65 98773 0685</u>		

MEMORANDUM

OGC 4059

TO: DEBRA A. TRIMIEW TO: CHERYL T WILLIAMS  
FROM: CHERYL T WILLIAMS FROM: DEBRA A. TRIMIEW

CHECK NO. 685 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2552 AND NAME Kennedy For Congress Cmte.  
(Kapper)  
WAS RECEIVED ON 9/21/89. 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 9/21/89

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
SEP 21 1989

OGC 4130

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

09 SEP 28 AM 11:04

KENNEDY AND DANIEL  
COUNSELLORS AT LAW  
503 WASHINGTON BLVD.

SEA GIRT, N.J. 08750  
(201) 449-9555  
FAX # (201) 449-2358

NEW YORK OFFICE  
370 WEST PARK AVENUE  
LONG BEACH, N.Y. 11561  
(516) 431-6092

BRIAN T. KENNEDY  
CORNELIUS W. DANIEL, III  
CERTIFIED CIVIL TRIAL ATTORNEY  
PAUL S. KENNEDY  
MEMBER N.J. & FLA. BARS  
JAY A. WEISSMAN  
EDWARD B. KNAUER  
MEMBER N.J., ME. & FLA. BARS  
DANIEL F. MAHER, JR.  
MEMBER N.J. & N.Y. BARS  
ALIE RIFAI  
MEMBER N.J. & N.Y. BARS  
TERRENCE R. FLYNN, JR.  
MEMBER N.Y. BAR

September 25, 1989

Federal Election Commission  
Washington, DC 20463

Attn: Lois G. Lerner

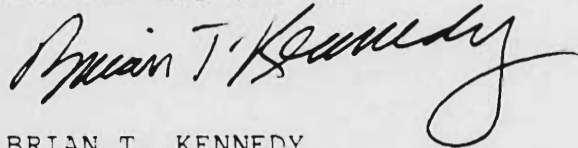
RE: MUR 2552

Dear Ms. Lerner:

This is to acknowledge receipt of your September 14, 1989 letter with regards to the above captioned matter. In checking my records, I note that the August 1989 payment was not made but the September 1989 payment was in fact sent to you on September 12, 1989.

According, I enclose the August 1989 payment and assume that by now you must have the September payment.

Very truly yours,  
KENNEDY AND DANIEL



BRIAN T. KENNEDY

**CLOSED**

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
09 SEP 29 PM 1:18

CLOSED


BRIAN T. KENNEDY  
503 WASHINGTON BLVD  
SEA GIRT, NJ 08750

1162

SEPT 25 19 89 55-271/212

PAY TO THE ORDER OF F.E.C. \$ 312.51

— THREE HUNDRED TWELVE & 51/100 DOLLARS

 National Community Bank  
of New Jersey  
SPRING LAKE, N.J. 07762

MEMO

312.51

⑆021202719⑆ 03200 379 6⑈ 1162

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 1162

A COPY OF WHICH IS ATTACHED RELATING TO

MUR 2552 AND NAME Kennedy for Congress Cmte.

(Aug. Pymt.) (Kapper)

WAS RECEIVED ON 9/29/89

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

9/29/89

CFC 4136