



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3812

DATE FILMED 6/15/94 CAMERA NO. 2

CAMERAMAN EES

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COMMISSION  
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AUG 20 1 14 PM '93

August 10, 1993

RECEIVED  
FEDERAL ELECTION COMMISSION  
93 AUG 20 PM 3:25

Federal Election Law Commission  
199 E. Street N.W.  
Washington, DC 20006

On October 22, 1992 President Bush and his staff visited the Village of Ridgewood, New Jersey to make a campaign speech. They landed at Veterans Field, a large acreage ordinarily used for sports activities, baseball etc.

The Bush group had rented the field from Mayor Patrick Mancuso who directed Village Manager Irwin to draw up the lease.

As a matter of fact Mancuso had no authority to take such actions without the approval of the entire Village Council and this group was totally unaware that he had rented Veterans Field to the Bush group until after the fact. The rental fee was \$500.00.

In addition the preparation of the field for this event, fencing, seating, etc. and the post meeting clean up plus the use of Village personnel for crowd control (approximately 20,000 or more people were in attendance) Police, Fire, and skilled labor cost the Village approximately \$7,200.00. Mancuso claimed the Bush group would pay this bill. To date they have paid only a small fraction of it and most residents believe that since Mancuso made all of the arrangements on his own initiative that he should pay the balance due. At a recent public meeting he took full responsibility for the Presidential visit and said he would do so again.

A wealthy Village property owner, David Bolger, in an effort to help the Mayor meet his obligation gave a gift to the Village of \$5,612.00 that the Bush group still owes and had never paid. Bolger has stated (see enclosed letters) that his gift was not to be considered as a payment for the Republican party. It therefore must be a payment for Mancuso.

I consider this to be an impropriety as the law does not allow an elected official to accept such a cash gift.

To settle the matter, I respectfully request that you investigate and evaluate the facts and render a decision.

8-12-93

*Gloria Cambria*

GLORIA CAMBRIA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Feb. 21, 1994

Thank you,

*Wilber Edwards*

Wilber Edwards  
254 Steilen Avenue  
Ridgewood, NJ 07450  
201-652-5874

*Wilber Edwards*

94043524128

FEB 16 PM 3:14

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK

Federal Election Law Enforcement Commission  
99 E. Street N.W.  
Washington, DC

Dear Sir,

Please review the attached article.

Several members of the community have raised questions as to whether this contribution is a violation of Federal Election Law.

Please forward a reply to:

The Village Council  
131 N. Maple Ave.  
Ridgewood, NJ 07450

## Banker pays Bush's Ridgewood bill

By THOMAS ZAMBITO  
Ridgewood Star Writer

A millionaire investment banker has bailed out George Bush's New Jersey campaign committee by paying a \$5,600 bill it incurred during a Bush rally in Ridgewood in October.

But David Bolger's check didn't spare village officials the anger of one councilman who was still unhappy over not being consulted before Bush was invited to Veterans Memorial Field on Oct. 22.

"This is a generous gesture on the part of Mr. Bolger," said Councilman Thomas M. Fitzgerald. "But it still doesn't offer an

### Check likely to quell campaign controversy

explanation as to why the village manager signed a lease without consulting the council."

Fitzgerald, a frequent critic of the village council's majority, saw Bush's campaign stop as a purely political event and questioned why village property would be turned over without first being discussed with the council.

Bush's state campaign committee paid \$500 to rent the field. In November, the

village sent it a bill for \$7,146 to cover the cost of security provided by police and of materials needed to build a fence around the field. The village has already received \$1,534 from the committee, village officials said.

On Tuesday, Bolger sent a check for the \$5,612 balance to Mayor Patrick Mancuso, along with a letter in which he expressed his wish that the payment would dispel the controversy that has trailed a "historic event" for the village.

"No matter what your political beliefs are," wrote Bolger, a lifelong Republican,

See RIDGEWOOD Page B-4

## RIDGEWOOD: Banker bails out campaign

From Page B-1

"a visit by the president of the United States — the leader of the greatest nation in the world — to the Village of Ridgewood is a tremendous honor for all of us."

Bolger, 60, said he attended the event with his family and found himself swept up in the excitement as helicopters swooped down on the field, one of them to bring the president.

"If [President] Clinton were here today, we should accord him the same honor and respect," Bolger said.

Mancuso said he hoped Bolger's gesture will silence critics of the village's handling of the matter.

"There's nothing else for them to say," Mancuso said Tuesday.

He said Bolger would be reimbursed once the village received the full payment from Bush's committee. The executive director of the campaign, William J. Palatucci, could not be reached for comment Tuesday.

Bolger said he's not interested in being reimbursed.

Bolger, the president of Bolger & Co. Inc., a real estate and invest-

ment firm, has lived in Ridgewood for 30 years and has come to the rescue of the village and other municipalities before.

He donated \$75,000 to the West Bergen Mental Health Center in Ridgewood. And he financed the conversion of the Lester Horse Stable into a community center.

He has been named an honorary mayor of Midland Park and Fayette, Iowa, for his contributions to those towns.

"This is just public spirit," Bolger said. "I don't see any controversy."

INTER-OFFICE CORRESPONDENCE  
VILLAGE OF RIDGEWOOD

TO Village Council, Village Attorney DATE March 9, 1993  
FROM Mayor Mancuso *Pam*  
SUBJECT: MR. DAVID BOLGER'S GIFT TO THE VILLAGE OF RIDGEWOOD

Enclosed are the following documents:

Attachment A - Letter from the "Village Council" to the Federal Election Law Enforcement Commission. An unauthorized letter sent using the name of the Village Council.

Attachment B - Response from the Federal Election Commission detailing the requirements for a properly filed complaint.

Attachment C - Mr. David Bolger's press release regarding this situation.

The facts of this situation are as follows:

Fact 1: The Village Council did not authorize any letter to the Federal Election Law Enforcement Commission. Since this letter was not authorized, I treated it as a non-letter.

Fact 2: The response from the Federal Election Commission suggests the procedure to be followed in the event a formal complaint was agreed to be filed by the Village Council.

Fact 3: Mr. David Bolger gave an outright gift to the Village of Ridgewood without regard for political implications, repayment, or obligation.

I erred in my original statement when I said if monies were collected -- Mr. Bolger would be re-imbursed. The simple fact is that Mr. Bolger gave this outright gift with no mention of any repayment, no ties, no strings -- just a pure civic gesture in an effort to end the controversy surrounding President Bush's visit in October.

His extreme generosity once again has benefitted the residents of our Village.

It is important to emphasize that Mr. Bolger's gift was to the Village of Ridgewood --not the Bush/Quayle Committee -- not the Republican Party.

We can discuss this issue at the Pre-Conference meeting. Please try to get there at 7:30 p.m.

9404524130



February 10, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

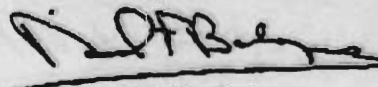
Dear Mayor Mancuso and Members of the Council,

With reference to my letter dated February 9, 1993, Mayor Mancuso's explanation at the public meeting that the \$5,612.00 constituted a loan to the Village is clearly erroneous. The payment was an absolute and outright gift to the Village.

While it is highly doubtful that funds will be forthcoming from the Bush/Quayle campaign committee, these funds would be the property of the Village. I would hope that the council would see fit to utilize any such funds for the further enhancement of the Village, be it Project Pride, the sports program, or for the senior citizens.

I trust this will clarify the matter for all concerned.

Sincerely,



David F. Bolger  
President

DFB/r1  
L15.dfb

94043524131

VILLAGE OF RIDGEWOOD  
ANALYSIS OF COSTS  
PRESIDENTIAL VISIT

EXPENDITURES:

Salaries and Wages

	<u>Amount</u>
Parks	\$ 2,120.97
Streets	453.33
Signal	1,988.30
Engineering	995.84
Police	957.21
Fire	370.30
	<u>\$ 6,885.95</u>

OTHER EXPENSE:

Emergency Services	28.00
Signal	232.62
	<u>\$ 260.62</u>

Total Expenditures

\$ 7,146.57

RECEIPTS:

New Jersey Republican State Committee (12/09/92)	\$ 1,534.35
David F. Bolger (02/11/93)	5,612.00
Bush-Quayle '92 General Committee, Inc. (03/02/93)	<u>2,120.97</u>

Total Receipts

\$ 9,267.32

*Supposedly Bush Quayle group  
paid 500<sup>00</sup> when they signed the agreement  
with Mancuso. It is not shown here*

94043524132



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 23, 1993

Wilber Edwards  
254 Steilen Avenue  
Ridgewood, NJ 07450

Dear Mr. Edwards:

This is to acknowledge receipt on August 20, 1993, of your letter dated August 10, 1993. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_\_ day of \_\_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

*Retha Dixon*

Retha Dixon  
Docket Chief

Enclosure

cc: Bush-Quayle '92 General Committee, Inc.  
David Bolger

94043524133

September 8, 1993

MUR 3812

Federal Election Law Commission  
199 E. Street N.W.  
Washington, DC 20006

On October 22, 1992 President Bush and his staff visited the Village of Ridgewood, New Jersey to make a campaign speech. They landed at Veterans Field, a large acreage ordinarily used for sports activities, baseball etc.

The Bush group had rented the field from Mayor Patrick Mancuso who directed Village Manager Irwin to draw up the lease.

As a matter of fact Mancuso had no authority to take such actions without the approval of the entire Village Council and this group was totally unaware that he had rented Veterans Field to the Bush group until after the fact. The rental fee was \$500.00.

In addition the preparation of the field for this event, fencing, seating, etc. and the post meeting clean up plus the use of Village personnel for crowd control (approximately 20,000 or more people were in attendance) Police, Fire, and skilled labor cost the Village approximately \$7,200.00. Mancuso claimed the Bush group would pay this bill. To date they have paid only a small fraction of it and most residents believe that since Mancuso made all of the arrangements on his own initiative that he should pay the balance due. At a recent public meeting he took full responsibility for the Presidential visit and said he would do so again.

A wealthy Villager, David Bolger, gave the Village \$5,612.00 which is the amount still owed by the Bush-Quayle Campaign group.

The giving and taking of bribes is a violation of Federal Law under Title 18 of the United States Criminal Code. Mr. Bolger appears to be clearly trying to help Mr. Mancuso out of the predicament created solely by Mancuso. Otherwise there is no reason for Bolger to make such a payment of \$5,612.

I also believe that the amount of this donation might be considerably above the one thousand dollar limit for an individual contribution. If this is so would Mr. Bolger be in violation of Federal election laws?

Apparently Mr. Mancuso believes Mr. Bolger's gift relieves him of any personal obligation to make good on the unpaid balance owed by the Bush-Quayle Campaign organization. To date I know of no payments that he has personally made.

Enclosed, also, is a copy of your letter, sent to me, by David Bolger. He apparently has no intention of maintaining the Confidentiality requirement listed on page 9 of your Filing a Complaint brochure. I have no objection to his using the letter for a rather childish purpose but I believe it indicates his lack of respect for your efforts.

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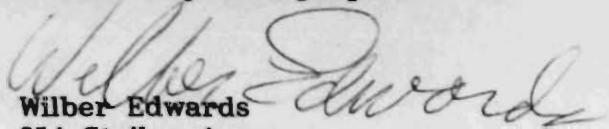
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Page 2

While some of my comments may appear to be repetitious their primary purpose is for emphasis.

I do not believe that this matter should be readily dismissed as I do not believe Bolgers cash gift deserves casual treatment as it may be improper.



Wilber Edwards  
254 Steilen Avenue  
Ridgewood, NJ 07450  
201-652-5874

94043524135

Subscribed and sworn to before me on this date, September 9, 1993.



CHRISTOPHER J. MEYER  
NOTARY PUBLIC OF NEW JERSEY  
MY COMMISSION EXPIRES JUNE 30, 1994



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 16, 1993

Wilber Edwards  
254 Steilen Avenue  
Ridgewood, NJ 07450


RE: MUR 3812

Dear Mr. Edwards:

This letter acknowledges receipt on September 13, 1993, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the BUSH-QUAYLE '92 General Committee, Inc. and J. Stanley Huckaby, as treasurer, David Bolger, The Honorable Mayor Patrick Mancuso, and the Village of Ridgewood. 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 3812. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

  
Jonathan A. Bernstein  
Assistant General Counsel

Enclosure  
Procedures

94043524136



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 16, 1993

J. Stanley Huckaby, Treasurer  
BUSH-QUAYLE '92 General Committee, Inc.  
1030 15th St., NW  
Washington, D.C. 20005

RE: MUR 3812

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that BUSH-QUAYLE '92 General Committee, Inc. ("Committee") 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 3812. 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 the Committee and you, as treasurer, 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.

94043524137

J. Stanley Huckaby, Treasurer  
BUSH-QUAYLE '92 General Committee, Inc.  
Page 2

If you have any questions, please call (202) 219-3690 and ask to speak with a member of the Central Enforcement Docket (CED). For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*J. A. Bernstein*

Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

94043524138





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SEPTEMBER 16, 1993

David Bolger  
79 Chestnut Street  
Ridgewood, NJ 074507

RE: MUR 3812

Dear Mr. Bolger:

The Federal Election Commission received a complaint which indicates 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 3812. 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.

94043524139

David Bolger  
Page 2

If you have any questions, please call (202) 219-3690 and ask to speak with a member of the Central Enforcement Docket (CED). For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*J. A. Bernstein*  
Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

94043524140



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

SEPTEMBER 16, 1993

The Honorable Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

RE: MUR 3812

Dear Mayor Mancuso:

The Federal Election Commission received a complaint which indicates that the Village of Ridgewood, and 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 3812. 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.

94043524141

The Honorable Mayor Patrick Mancuso  
Page 2

If you have any questions, please call (202) 219-3690 and ask to speak with a member of the Central Enforcement Docket (CED). For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*Jonathan A. Bernstein* <sup>6/12</sup>  
Jonathan A. Bernstein  
Assistant General Counsel

Enclosures

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

94043524142



OAC 0003

WELLS, GAROFALO, JAWORSKI & LIEBMAN

ATTORNEYS AT LAW

12 ROUTE 17 NORTH

POST OFFICE BOX 1827

PARAMUS, NEW JERSEY 07653-1827

(201) 587-0888

TELEFAX (201) 587-8845

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SEP 27 9 26 AM '93

237 PARK AVENUE  
SUITE 2100  
NEW YORK, N.Y. 10017  
(212) 551-1424  
TELEFAX (212) 697-8486

THOMAS M. WELLS (NJ & OHIO)  
RICHARD T. GAROFALO (NJ)  
JAMES E. JAWORSKI (NJ & NY)  
STUART D. LIEBMAN (NJ)  
KIMBERLY A. PATON (NJ & NY)  
CHERYL MORRISSEY (NJ & NY)  
JEFFREY M. KAHAN (NJ & NY)  
ANTHONY PANTANO (NJ & PA)  
JAMES J. DELLA (NJ)  
JAMES M. MAGGIO, JR. (NJ & PA)

September 24, 1993

Jonathan A. Bernstein, Esq.  
Assistant General Counsel  
Federal Election Commission  
Washington D.C. 20463

Re: Village of Ridgewood  
David F. Bolger  
Your No.: MUR 3812

Dear Mr. Bernstein:

Enclosed please find the following:

(1) Executed Statement of Counsel completed by David F. Bolger authorizing me to act as his counsel with respect to the above captioned matter.

(2) A signed Affidavit from David F. Bolger explaining the circumstances under which he made a gift to the Village of Ridgewood, New Jersey in the amount of \$5,612.00.

Please be advised, that my client does not require that this matter be kept confidential. By copy of this letter, I am informing the Mayor and Council of the Village of Ridgewood of Mr. Bolger's response to the Commission and enclosing a copy of his Affidavit.

94043524143

SEP 27 11:04 AM '93

WELLS, GAROFALO, JAWORSKI & LIEBMAN  
ATTORNEYS AT LAW

Jonathan A. Bernstein, Esq.  
September 24, 1993  
Page - 2 -

Mr. Bolger considers this complaint to the Federal Election Committee to be frivolous. He believes the complaint is a reflection of a long time adversarial relationship between the Complainant, Wilbur Edwards and the Mayor of Ridgewood and certain members of the Village Council, nothing more.

Please do not hesitate to contact the undersigned if you need any further information with respect to this matter.

Very truly yours,



Thomas M. Wells

TMW/kjs  
Enclosures

cc: David F. Bolger  
Mayor Patrick Mancuso  
Village of Ridgewood Council

94043524144

STATEMENT OF DESIGNATION OF COUNSELNOR 3812NAME OF COUNSEL: Thomas M. Wells; Esq.ADDRESS: WELLS, GAROFALO, JAWORSKI & LIEBMAN  
12 North Route 17, P.O. Box 1827  
Paramus, New Jersey 07653-1827TELEPHONE: ( 201 ) 587-0888

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

Sept 21, 1993  
DateDavid F. Bolger  
SignatureRESPONDENT'S NAME: David F. BolgerADDRESS: Bolger & Co., Inc.  
79 Chestnut Street  
Ridgewood, New Jersey 07450TELEPHONE: HOME (        )                     BUSINESS ( 201 ) 670-9270

94043524145

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AFFIDAVIT

David F. Bolger, being duly sworn, states as follows:

(1) I have resided in Ridgewood, New Jersey for over 25 years and my principal office is Bolger & Co., Inc., 79 Chestnut Street, Ridgewood, New Jersey 07450 (Telephone No.: (201) 670-9270).

(2) On February 9, 1993 with a letter which I have attached hereto as Exhibit A, I gave to the Village of Ridgewood, my check for the amount of \$5,612.00 to cover unpaid costs associated with a visit to the Village by the then, President Bush.

(3) Attached as Exhibit B, is a copy of my letter dated February 10, 1993, by which I clarified to the Mayor and Village Council that my check made payable to the Village was an outright gift to the Village and specified that in the event that the costs being paid through my contribution were otherwise paid, the Mayor and Council could utilize my gift in accordance with its wishes.



(4) It was never my intention to make a political contribution to President Bush's re-election campaign or any political party. Rather, I made a civic contribution to the Village of Ridgewood, so that the unfortunate controversy with respect to the unpaid charges, would not be allowed to blemish our Village's fine reputation.

(5) Because of my success in the business world, I have been able to make a number of civic donations to the Village of Ridgewood and the adjoining Borough of Midland Park, including the Renovation of Lester Stable, a gift of a Municipal Flag Pole, a gift to Van Neste Square Renovation, a gift of new running courses in both Ridgewood and Midland Park, renovation of Wortendyke Park, a gift of a Municipal bulletin board, renovation of a Municipally owned cemetery in Midland Park, N. J., and major financial support to the Midland Park Ambulance Corp. My gift to the Village of Ridgewood with respect to the visit by President Bush was totally consistent with my strong civic commitment as demonstrated by past gifts.

(6) Among the materials submitted to the Federal Election Commission, Office of the General Counsel, of which I have now been copied, is a xerox copy of a photograph which appears to be of former President Bush and myself. It is not clear to me, what is the relevance of submitting this photograph to the Federal Election Commission as to my gift to

the Village of Ridgewood, but to the extent that it has any relevance, please let me state that the xerox copy submitted, is actually a portion of a photograph of my twin sister and myself taken with a cardboard cutout of President Bush, on the occasion of our 60th Birthday. I attach an original of the photograph as Exhibit C.

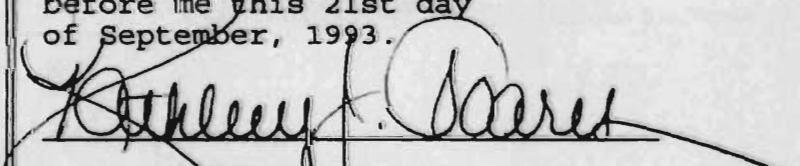
I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED:

9/21/93

  
DAVID F. BOLGER

Sworn and subscribed to  
before me this 21st day  
of September, 1993.

  
KATHLEEN J. SOARES  
A Notary Public of New Jersey  
My Commission Expires 8/17/97

94043524148

February 9, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

Dear Mayor Mancuso and Members of the Council,

It has come to my attention that the issue of \$5,612.00 in unpaid charges related to the visit of the then-President George Bush to the Village last October is still unresolved and a matter of some controversy. As you know, the ambience of our Village has always been a matter of vital concern to me.

It is my belief that no matter what your political beliefs are, a visit by the President of the United States -- the leader of the greatest nation in the world -- to the Village of Ridgewood is a tremendous honor for all of us. In fact, 25,000 to 30,000 people are reported to have turned out to see the President of the United States here in Ridgewood. A grand and awesome moment for some, and a once in a lifetime historic event for all, unfolded in our Village on a very personal basis.

Therefore, I think it is very unfortunate that we have a continuing diatribe within the Village Council with respect to reimbursement of incidental costs incurred by the Village in connection with police, emergency, and crowd-control services provided for the President's visit to the Village. In order to end this controversy and allow that eventful day to be remembered without a blemish, enclosed herewith is my check made payable to the Village of Ridgewood in the amount of \$5,612.00 to satisfy the unpaid costs of President Bush's visit to the Village of Ridgewood.

While life in our Village in many ways may seem far removed from our Federal Government in Washington, D.C., the two are fundamentally intertwined. We in the Village enjoy the honor of having one of our fellow residents, the highly esteemed, respected and beloved Congresswoman Marge Roukema, serving with distinction in the United States Congress. When high Federal Government officials, be they a United States Senator or certainly the President of the United States, come to our Village, even if only on a campaign visit, I believe we should treat these events as an honor being bestowed upon all of our residents.

94043524149

As always, please know that I will work with you and other Village Officials to keep the Village of Ridgewood a community we all can be proud of.

Sincerely,



David F. Bolger  
President

DFB/rl  
L08.dfb

Enclosure: Check# 4301

94043524150

BOLGER & CO., INC. SEVENTY-NINE CHESTNUT STREET, RIDGEWOOD, N.J. 07450 - (201) 670-9270  
(201) 670-9685 FAX

February 10, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

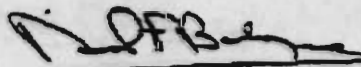
Dear Mayor Mancuso and Members of the Council,

With reference to my letter dated February 9, 1993, Mayor Mancuso's explanation at the public meeting that the \$5,612.00 constituted a loan to the Village is clearly erroneous. The payment was an absolute and outright gift to the Village.

While it is highly doubtful that funds will be forthcoming from the Bush/Quayle campaign committee, these funds would be the property of the Village. I would hope that the council would see fit to utilize any such funds for the further enhancement of the Village, be it Project Pride, the sports program, or for the senior citizens.

I trust this will clarify the matter for all concerned.

Sincerely,



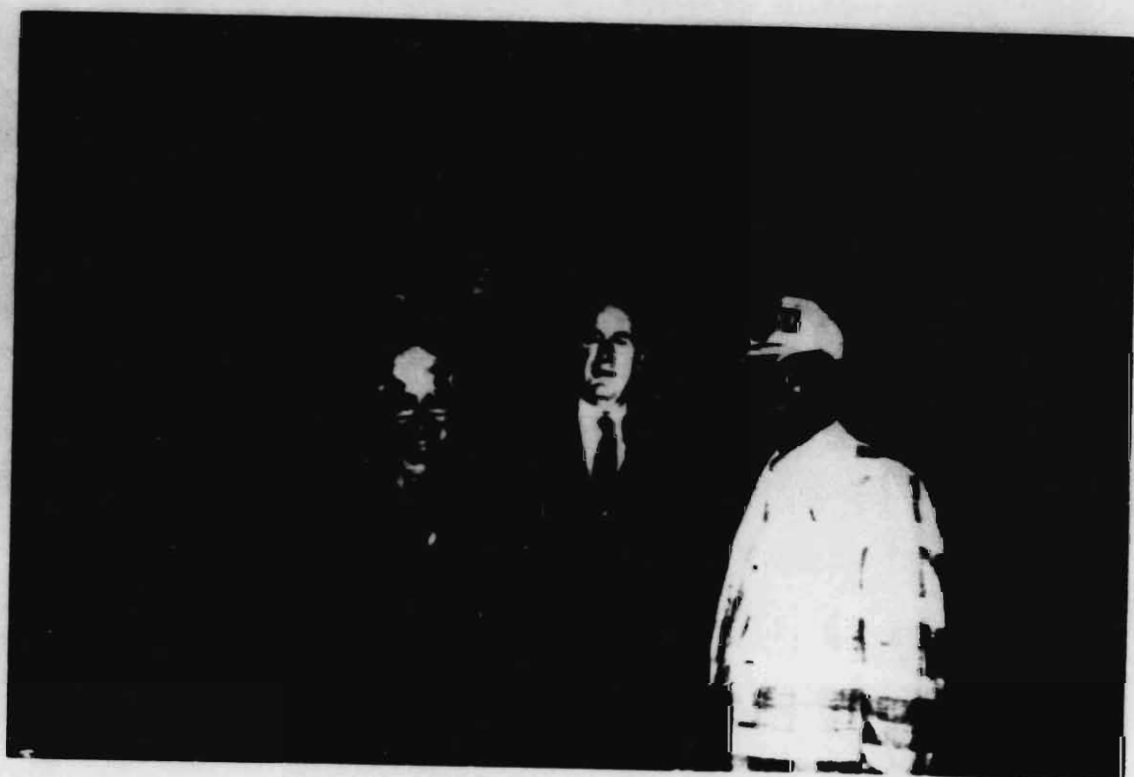
David F. Bolger  
President

DFB/rl  
L15.dfb

94043524151



94043524152



LAW OFFICES  
**STOLDT & HORAN**  
A PROFESSIONAL CORPORATION  
CONTINENTAL PLAZA  
401 HACKENSACK AVENUE  
HACKENSACK, NEW JERSEY 07601  
(201) 646-9200  
TELECOPIER (201) 646-0167

September 28, 1993

Jonathan A. Bernstein  
Assistant General Counsel  
Federal Election Commission  
999 E. Street N.W., Rm 657  
Washington, D.C. 20463

RE: Village of Ridgewood  
MUR 3812

Dear Mr. Bernstein:

This office is counsel to the Village of Ridgewood and Mayor Patrick Mancuso in the above matter. Enclosed is the "Statement Of Designation Of Counsel" signed by Mayor Mancuso.

The purpose of this letter is to request an extension of time in which the Village of Ridgewood has to respond to the complaint filed by Mr. Wilber Edwards with the Federal Election Commission in this matter.

In order for the Village to make a good faith response to the allegations made by Mr. Edwards, we will have to review the Ridgewood council meeting minutes and any memos or correspondence from, or to, the Mayor and/or members of the council regarding this matter and interview many of the people as well. Since the incident complained of occurred eleven months ago, this will take some time. To complicate matters, the Village Clerk is presently out on maternity leave.

We request a 15 day extension of time, to October 20, 1993, in which to respond to Mr. Edwards' allegations.

Thank you.

Very truly yours,

Sydney V. Stoldt, Jr.

SVS/dk  
Enclosure

94043524153

**STATEMENT OF DESIGNATION OF COUNSEL**

NO. 3812

NAME OF COUNSEL: Sydney V. Stoldt, Jr.

ADDRESS: Stoldt & Horan, P.A.  
401 Hackensack Avenue  
Hackensack, NJ 07601

TELEPHONE: (201) 646-9200

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

9/27/93  
Date

Patrick A. Mancuso  
Signature

RESPONDENT'S NAME: Village of Ridgewood, Mayor Patrick Mancuso

ADDRESS: 131 North Maple Avenue, Ridgewood, NJ 07450

OAC 9902

94043524154



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 1, 1993

Sydney V. Stoldt, Jr., Esq.  
Stoldt & Horan  
Continental Plaza  
401 Hackensack Avenue  
Hackensack, NJ 07601

RE: MUR 3812  
Village of Ridgewood,  
Mayor Patrick Mancuso

Dear Stoldt:

This is in response to your facsimile dated September 28, 1993, which we received on that same day, requesting an extension of 15 days to respond to the Commission's Notification of Complaint. After considering the circumstances presented in your facsimile, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on October 20, 1993.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

*Erik Morrison*

Erik Morrison  
Paralegal

94043524155

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044

(202) 662-6000

TELEFAX: (202) 662-6291

TELEX: 89-593 (COVLING WSH)

CABLE: COVLING

BOBBY R. BURCHFIELD

DIRECT DIAL NUMBER

(202) 662-5350

ACHESON HOUSE

48 HERTFORD STREET

LONDON W1T7TF ENGLAND

TELEPHONE: 44-71-495-5655

TELEFAX: 44-71-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-512-0890

TELEFAX: 32-2-502-1598

October 7, 1993

By Hand

Jonathan A. Bernstein, Esq.  
Assistant General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 3812

Dear Mr. Bernstein:

The letter informing Bush-Quayle '92 General Committee, Inc. (the "Committee") of MUR 3812 was received on September 23, 1993. While we have been working to respond to this matter as quickly as possible, our progress has been slowed by the post-election Commission audit currently occupying the bulk of the Committee's personnel, as well as travel by individuals necessary to prepare a response.

We therefore request an extension of thirty days until November 8, 1993, to respond to the issues raised by the MUR.

We appreciate your consideration of this request.

Sincerely,

*Bobby Burchfield*

Bobby Burchfield

cc: J. Stanley Huckaby

bjl

94043524156

0080



096 0082

**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 3812

NAME OF COUNSEL: Bobby R. Burchfield

ADDRESS: Covington & Burling

1201 Pennsylvania Avenue NW  
P.O. Box 7566

Washington, DC 20044

TELEPHONE: ( 202 ) 662-5350

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
JAN 07 - 7 PM 3:26

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

10/6/93  
Date

  
Signature

RESPONDENT'S NAME: J. Stanley Huckaby, Treasurer

ADDRESS: Bush-Quayle '92 General Committee, Inc.

228 S. Washington Street, Suite 200

Alexandria, VA 22314

TELEPHONE: HOME(        )                     

BUSINESS( 703 ) 549-7705

\* For informational purposes only, I also request that a copy  
of all correspondence from the Commission regarding MUR 3812  
be sent to me as Treasurer at the campaign's address in  
Alexandria, VA.

94043524157



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

OCTOBER 12, 1993

Bobby R. Burchfield, Esq.  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

RE: MUR 3812  
BUSH-QUAYLE '92 General  
Committee, Inc. and  
J. Stanley Huckaby,  
as treasurer

Dear Mr. Burchfield:

This is in response to your letter dated October 7, 1993, which we received on that same date, requesting an extension until November 8, 1993 to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on November 8, 1993.

If you have any questions, please contact me at  
(202) 219-3690.

Sincerely,

*Mary-Loretta Taksar*

Mary-Loretta Taksar, Attorney  
Central Enforcement Docket

94043524158

OAC 0190

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIN CHIEF ROOM

OCT 21 5 15 PM '93

RECEIVED  
FEDERAL ELECTION COMMISSION  
93 OCT 22 AM 3:20

LAW OFFICES  
**STOLDT & HORAN**  
A PROFESSIONAL CORPORATION  
CONTINENTAL PLAZA  
401 HACKENSACK AVENUE  
HACKENSACK, NEW JERSEY 07601  
(201) 646-9200  
TELECOPIER (201) 646-0167

October 20, 1993

Jonathan A. Bernstein  
Office of the General Counsel  
Federal Election Commission  
999 E. St. N.W., Rm. 657  
Washington, D.C. 20463

**RE: Village of Ridgewood  
MUR 3812**

Dear Mr. Bernstein:

This firm is counsel to the Village of Ridgewood and its mayor, Patrick A. Mancuso, in the referenced matter. This matter concerns a complaint filed by Wilber Edwards, alleging a violation of the Federal Election Campaign Act of 1971. Many of the allegations set forth in the complaint are irrelevant to the claimed violations of federal law. This letter will only respond to the allegations which concern those alleged violations of federal law.

In addition to this letter, please consider the accompanying Affidavit of Mayor Mancuso dated today which is also submitted in opposition to the complaint filed by Mr. Edwards. All references to exhibits in this letter concern exhibits that are attached to that affidavit.

\* \* \*

Mr. Edwards alleges that David Bolger, a Village of Ridgewood citizen, and the Mayor were involved in the giving and taking of bribes in violation of Title 18 of the Criminal Code. This is false. 18 U.S.C. sec 201 et seq., Bribery, Graft, and Conflicts of Interest, defines bribery in relevant part:

- (b) Whoever-
- (2) being a public official ... directly or indirectly, corruptly demands, seeks, receives, accepts or agrees to receive or accept anything of value personally or for any other person or entity, in return for:

94043524159

Jonathan A. Bernstein  
October 20, 1993  
Page Two

- (A) being influenced in his the performance of any official act;
- (B) being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States; or
- (C) being induced to do or omit to do any act in violation of the official duty of such official or person;....

18 U.S.C. sec 201.

This code provision applies only to public officials. "Public Official" is defined at sec 201(a)(1) as:

the term "public official" means Member of Congress, or Resident Commissioner, either before or after such official has qualified, or an officer or employee or person acting for or on behalf of the United States, or any department, agency or branch of Government thereof, including the District of Columbia, in any official function, under or by authority of any such department, agency, or branch of Government, or a juror.

Although Mayor Mancuso may be a "public official" as that term may be used at common law or in state statutes, he is not a public official under Title 18 as alleged by Mr. Edwards. More important, however, is the fact that the Mayor did not accept anything of value personally, nor was he influenced in his performance of any official act. A check in the amount of \$5,612.00 made payable to the Village of Ridgewood, not Mayor Mancuso or the Bush committee, was given to the Village as a gift by Mr. Bolger. This gift was given to the Village outright, without any political implications or obligations of any kind. Mr. Bolger did not ask nor did he receive anything in return from the Village or Mayor Mancuso for his gift.

\* \* \*

Mr. Edwards inquires in his letter whether Mr. Bolger's donation of over \$1,000.00 would be in violation of the Federal Election laws. The original gift from Mr. Bolger was first presented to the Village on or about February 9, 1993. At the Village Council meeting that evening, Mr. Edwards made many of the same allegations of wrongdoing that are set forth in the pending complaint to which this letter responds. As a follow-up, this firm contacted the Federal Election Commission on February 11, 1993 and spoke to a Mr. Sterton, an information specialist. We explained that our review of the Act did not indicate any wrongdoing

94043524160



Jonathan A. Bernstein  
October 20, 1993  
Page Three

whatsoever by the Village in accepting a gift from Mr. Bolger. Mr. Sterton confirmed our conclusions and stated that the Federal Election Commission would not consider it a violation of the Act for a town to accept a donation from one of its citizens to defray the costs incurred by the town as a result of a visit by a Presidential candidate. He also stated that if the Commission prohibited this type of generosity, towns and cities would no longer allow political candidates to visit because of the financial burdens imposed upon them. We sent a letter to Mr. Sterton, dated February 16, 1993, confirming this. See Exhibit 1.

\* \* \*

The Federal Election Campaign Act ("Act"), 2 USC sec 431 et seq., defines the term "contribution" to include:

any gift, subscription, loan, advance, or deposit of money or anything of value made by a person for the purpose of influencing any election for Federal office.

2 USC sec 431(8)(a)(i).

Mr. Bolger's gift to the Village of Ridgewood was not a contribution to any candidate or his authorized political committee, nor was his gift made "for the purpose of influencing any election for Federal office." The fact is that Mr. Bolger's gift was not a political contribution at all. It was simply an absolute and outright gift to the Village of Ridgewood by one of its civic minded citizens.

This was not a clandestine act between the Mayor and Mr. Bolger. Mr. Bolger sent a letter addressed to the Mayor and all members of the Village Council, well after the election was over, enclosing a check made payable to the Village of Ridgewood, for the Village to spend as it saw fit. Although Mr. Bolger's gift was initially spurred by an effort on his part to end the controversy surrounding the President's visit, his check in no way constituted a discharge of the Bush committee's financial obligations.

Mr. Bolger neither asked for nor expected reimbursement of his gift. In his February 10, 1993 letter to the Mayor and members of the Council, Mr. Bolger specifically stated that should the Village receive funds from the Bush Campaign in the future, those funds should be used by the Village "for the further enhancement of the Village, be it Project Pride, the sports program, or for the senior citizens." See Exhibit 2.

According to the Director of Finance of the Village of

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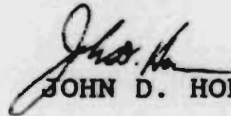
Jonathan A. Bernstein  
October 20, 1993  
Page Four

Ridgewood, the total amount billed to the Bush/Quayle Committee was \$7,146.57 (Exhibit 4). The total amount paid to date was \$4,155.32. The first payment of \$500.00 was made by the Bush/Quayle Committee on 10/23/92; the second payment of \$1,534.35 was made on 12/9/92 by the New Jersey Republican State Committee; and the third payment of \$2,120.97 was made on 3/2/93 by the Bush/Quayle Committee. The current balance due from the Bush/Quayle Committee is \$2,991.25 (i.e. \$7,146.57 minus \$4,155.32).

Conclusion

The Complaint should be dismissed. There has been no violation of the Federal Election Campaign Act by The Village of Ridgewood nor by the Mayor, nor has there been a violation by Mr. Bolger. Again, see Exhibit 2.

Very truly yours,

  
JOHN D. HORAN

JDH/dg  
Enclosure

94043524162

STOLDT & HORAN  
401 Hackensack Avenue  
Hackensack, NJ 07601  
(201) 646-9200  
Attorneys for the Village  
of Ridgewood

IN THE MATTER OF THE  
COMPLAINT BY WILBER EDWARDS

MUR3812

AFFIDAVIT OF MAYOR  
PATRICK A. MANCUSO

ss.:

PATRICK A. MANCUSO, of full age, being duly sworn, according to the law, deposes and says:

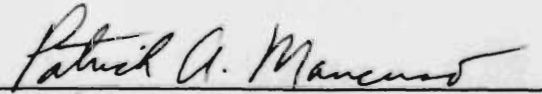
1. I am the Mayor of the Village of Ridgewood and have held that position since July 1, 1992. I have personal knowledge regarding the facts of this matter.

2. By letter dated February 9, 1993 to the Mayor and members of the Village Council, David Bolger, a citizen of the Village, presented a check made payable to the Village in the amount of \$5,612.00. See Exhibit 1. This check was given to the Village as a gift. It was not a gift to the Bush/Quayle Committee. It was not a contribution to the Bush/Quayle Committee. It was not even a loan to the Bush/Quayle Committee. Mr. Bolger neither asked for nor expected reimbursement for his gift to the Village. In fact, Mr. Bolger specifically stated in his second letter to the Village Council, dated February 10, 1993, that should the Village receive the funds that were still owed from the Bush/Quayle Committee at some future time, those funds should be used by the Village "for the further enhancement of the Village, be it Project Pride, the sports program or for the senior citizens." See Exhibit 2. This gift by Mr. Bolger in no way relieved the Bush/Quayle Committee of any obligations it may have incurred to the Village.

3. Exhibit 3 indicates that immediately after Mr. Bolger presented his check to the Village, the Village, through its attorneys, consulted with the Federal Election Commission to determine the propriety of acceptance of same. The Commission confirmed that the generosity of Mr. Bolger in making a gift to the Village and the common sense acceptance of the gift by the Village would not constitute any violation of the law.

4. According to the Director of Finance of the Village of Ridgewood, the total amount billed to the Bush/Quayle Committee was \$7,146.57 (Exhibit 4). The total amount paid to date was \$4,155.32. The first payment of \$500.00 was made by the Bush/Quayle Committee on 10/23/92; the second payment of \$1,534.35 was made on 12/9/92 by the New Jersey Republican State Committee; and the third payment of \$2,120.97 was made on 3/2/93 by the Bush/Quayle Committee. The current balance due from the Bush/Quayle Committee is \$2,991.25 (i.e. \$7,146.57 minus \$4,155.32).

5. The \$5,612.00 gift to the town by David F. Bolger was made on 2/11/93 (i.e. before the most recent payment by the Bush/Quayle Committee). The Bolger funds can be used by the Village in any way it sees fit. In making his gift, Mr. Bolger in no way restricted the use of the funds gifted to the Village. Again, see Exhibit 2.

  
Patrick A. Mancuso  
Mayor, Village of Ridgewood

Sworn to and subscribed to before  
me this 20<sup>th</sup> day of October, 1993.

  
Notary Public-State of  
New Jersey

**DEANE C. GRUBE**  
A Notary Public of the State of New Jersey  
My Commission Expires June 6, 1997

February 9, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

Dear Mayor Mancuso and Members of the Council,

It has come to my attention that the issue of \$5,612.00 in unpaid charges related to the visit of the then-President George Bush to the Village last October is still unresolved and a matter of some controversy. As you know, the ambience of our Village has always been a matter of vital concern to me.

It is my belief that no matter what your political beliefs are, a visit by the President of the United States -- the leader of the greatest nation in the world -- to the Village of Ridgewood is a tremendous honor for all of us. In fact, 25,000 to 30,000 people are reported to have turned out to see the President of the United States here in Ridgewood. A grand and awesome moment for some, and a once in a lifetime historic event for all, unfolded in our Village on a very personal basis.


Therefore, I think it is very unfortunate that we have a continuing diatribe within the Village Council with respect to reimbursement of incidental costs incurred by the Village in connection with police, emergency, and crowd-control services provided for the President's visit to the Village. In order to end this controversy and allow that eventful day to be remembered without a blemish, enclosed herewith is my check made payable to the Village of Ridgewood in the amount of \$5,612.00 to satisfy the unpaid costs of President Bush's visit to the Village of Ridgewood.

While life in our Village in many ways may seem far removed from our Federal Government in Washington, D.C., the two are fundamentally intertwined. We in the Village enjoy the honor of having one of our fellow residents, the highly esteemed, respected and beloved Congresswoman Marge Roukema, serving with distinction in the United States Congress. When high Federal Government officials, be they a United States Senator or certainly the President of the United States, come to our Village, even if only on a campaign visit, I believe we should treat these events as an honor being bestowed upon all of our residents.



As always, please know that I will work with you and other Village Officials to keep the Village of Ridgewood a community we all can be proud of.

Sincerely,



David F. Bolger  
President

DFB/rl  
L08.dfb

Enclosure: Check# 4301

9 4 0 4 3 5 2 4 1 6 6



BOLGER & CO., INC. SEVENTY-NINE CHESTNUT STREET, RIDGEWOOD, N.J. 07450 - (201) 676-9270  
(201) 676-9485 FAX

February 10, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

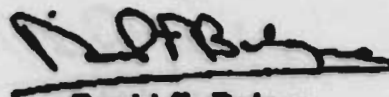
Dear Mayor Mancuso and Members of the Council,

With reference to my letter dated February 9, 1993, Mayor Mancuso's explanation at the public meeting that the \$5,612.00 constituted a loan to the Village is clearly erroneous. The payment was an absolute and outright gift to the Village.

While it is highly doubtful that funds will be forthcoming from the Bush/Quayle campaign committee, these funds would be the property of the Village. I would hope that the council would see fit to utilize any such funds for the further enhancement of the Village, be it Project Pride, the sports program, or for the senior citizens.

I trust this will clarify the matter for all concerned.

Sincerely,



David F. Bolger  
President

DFB/rl  
L15.dfb

EXHIBIT

2

ALL-STATE LEGAL SUPPLY CO.

LAW OFFICES  
**STOLDT & HORAN**  
A PROFESSIONAL CORPORATION  
CONTINENTAL PLAZA  
401 HACKENSACK AVENUE  
HACKENSACK, NEW JERSEY 07601  
(201) 846-9200  
TELECOPIER (201) 846-0187

February 16, 1993

Federal Election Commission  
Public Affairs Specialist  
999 E. Street N.W.  
Washington, DC 20463  
Attn: Mr. Sterton

RE: Federal Election Campaign Act

Dear Mr. Sterton:

Thank you for taking the time to speak with me on the telephone last week regarding my question pertaining to the Federal Election Campaign Act. I am writing this letter to confirm the information I received from you.

As I understand it, the Federal Election Commission would not consider it a violation of the Act for a town to accept a donation, in excess of \$1,000.00, from one of its citizens to defray the costs incurred by the town as a result of a visit by a Presidential candidate. As I understood you to say, if the Commission prohibited this type of generosity, towns and cities would no longer allow political candidates to visit because of the financial burdens imposed upon them.

There is no private cause of action regarding an alleged violation of the Federal Election Campaign Act, therefore a complainant would have to report a suspected violation to the Federal Election Commission. Since the Commission does not view this type of generosity as a violation of the Act, it would not proceed against the citizen for making the donation, or the town for accepting it.

Thank you again for your time and courtesy. Your confirmation of my reading of the law and applying common sense to the situation has ended our inquiry.

Very truly yours,

Dorothy A. Kowal





# VILLAGE OF RIDGEWOOD

131 NORTH MAPLE AVENUE  
RIDGEWOOD, NEW JERSEY 07451

(201) 670-5506  
FAX (201) 652-7623

RODNEY H. IRWIN  
VILLAGE MANAGER

November 6, 1992

William J. Palatucci  
Executive Director  
Bush-Quayle 92 New Jersey  
1700 Galloping Hill Road  
Kenilworth, NJ 07033

Dear Mr. Palatucci:

I am transmitting herewith the statements of expenses incurred as a result of the President's visit to Ridgewood last month. Please note that the billable costs totaled \$7,146.57.

Would you please remit payment for these services, which were rendered to support the event, to:

Chief Financial Officer  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, N.J. 07451

Thank you for your attention to this matter. Should you have a question or desire clarification on any of the material attached hereto, please feel free to contact us.

Very truly yours,

Rodney H. Irwin  
Village Manager

RHI/mh

cc: Village Council  
Attachments



94043524169

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N.W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

TELEFAX: (202) 662-6291

TELEX: 89-593 (COVLING WSH)

CABLE: COVLING

BOBBY BURCHFIELD

DIRECT DIAL NUMBER

(202) 662-5350

November 8, 1993

LECONFIELD HOUSE

CURSON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 071-495-5665

TELEFAX: 071-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-512-9890

TELEFAX: 32-2-502-1598

VIA HAND DELIVERY

Jonathan A. Bernstein, Esq.  
Assistant General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 3812 -- Bush-Quayle '92 General  
Committee, Inc. and J. Stanley Huckaby

Dear Mr. Bernstein:

This letter constitutes the response of Bush-Quayle '92 General Committee, Inc. and its Treasurer J. Stanley Huckaby (collectively "Respondents") to your letter to Mr. Huckaby dated September 16, 1993, concerning the above-captioned matter under review ("MUR"). By letter dated October 12, 1993, Respondents were granted an extension of time through and including November 8, 1993, to file this response.

BACKGROUND

This MUR stems from a letter written by Wilber Edwards concerning a campaign stop by President Bush at Veterans Field in Ridgewood, New Jersey (the "Complaint"). During the general election campaign, a campaign representative in the state of New Jersey negotiated with both the Mayor and the Village Manager of Ridgewood to lease Veterans Field on October 22, 1993. The contract, attached as Exhibit A, provided Respondents the right to use the stadium for one day in return for a fee of \$500. The contract did not obligate Respondents to make any other payments.

Respondents paid the rental fee of \$500 on October 22, 1993. See Exhibit B. The Complaint alleges that after the event, some local individuals protested the act of renting the stadium for a visit by the President. The Complaint alleges that the Mayor and Village Manager lacked authority to enter into such a contract without approval of the entire Village Council and further contends that the Council was not aware of the rental agreement until after the fact. During the local political

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FEDERAL ELECTION COMMISSION

94043524170



Jonathan A. Bernstein, Esq.  
November 8, 1993  
Page 2

turmoil that ensued, the Village submitted to Respondents a bill for over \$7,000 in supposed costs incurred because of the visit. Most of these supposed costs related to the provision of security at the event, such as salaries of police and fire personnel. The bill also included costs in the amount of \$2,120.97 for non-security work performed by the Parks Department. The Complaint does not allege, much less establish, that Respondents ever agreed to pay for such costs, or any other costs beyond the terms of the contract (Exhibit A).

Nevertheless, Respondents paid for the work performed by the Parks Department (\$2,120.97) because it was not related to security (Exhibit D). Respondents referred the Village to the Secret Service with respect to the security-related expenses. The Committee is not aware of the response, if any, of the Secret Service.

In what may have been an attempt to resolve the local political dispute, Mr. David Bolger on his own initiative donated \$5,612.00 to the Village. Mr. Bolger has stated that the donation was "an absolute and outright gift to the Village" (see Exhibit C), and Complainant has provided no proof to the contrary. The Complaint itself demonstrates in an attachment entitled "Village of Ridgewood Analysis of Costs Presidential Visit" that the Village has now received \$9,267.32 to cover purported costs of \$7,146.57, leaving a *profit* on the event of at least \$2,120.75.

The Complaint appears to present two basic questions, each with numerous subissues. *First*, does this Commission have jurisdiction to determine whether Respondents are liable under state law for the expenses that the city claims to have incurred in connection with the President's visit? *Second*, does Mr. Bolger's "absolute and outright gift" to the Village constitute a violation by Respondents of the Federal Election Campaign Act, or any of this Commission's regulations?

As discussed below, Respondents are simply not responsible for the expenses of which the city complains. Nor are they responsible for the payment by Mr. Bolger. Moreover, the Complaint represents a dispute beyond the bounds of the Commission's jurisdiction.

94043524171



Jonathan A. Bernstein, Esq.  
November 8, 1993  
Page 3

**I. UNTIL RESPONDENTS' LIABILITY FOR THE  
PURPORTED EXPENSES IS ESTABLISHED BY  
AN APPROPRIATE TRIBUNAL APPLYING STATE  
LAW, THIS COMMISSION LACKS JURISDICTION  
TO ADDRESS THESE ISSUES.**

**A. The Commission Lacks Jurisdiction To  
Decide the Central Issue Here.**

As a threshold matter, the Commission does not have jurisdiction to resolve the primary issue underlying the Complaint. The Complaint asserts essentially that Respondents incurred a debt for \$7,146.57 and then failed to pay the entire amount due. A substantial question exists, however, whether the Committee in fact incurred any debt beyond the \$500 rental fee due under the rental contract. The Complaint contains no evidence to establish that Respondents incurred a debt, but even if it did, under Commission precedent that question must be resolved by the New Jersey courts as a matter of state contract law.

During the 1984 campaign, a similar issue arose and was addressed in a Commission Advisory Opinion. After a rally by the Reagan-Bush campaign in the city of Cupertino, California, the city manager sought unsuccessfully to obtain reimbursement for the cost of police and security services. The city asked the Commission to advise whether the campaign was responsible for the alleged debt. The Commission declined to answer the question, explaining that "the Commission concludes that [the issue concerns] a factual dispute going to the validity of [the city's] claim as a matter of contract law, quasi-contract, or other legal theory. The rights and obligations on such claims are outside the Commission's jurisdiction." Advisory Opinion 1984-58.

Similarly, in Advisory Opinion No. 1989-2, the Commission reiterated that "state law governs whether an alleged debt in fact exists, what the amount of a debt is, and which persons or entities are responsible for paying a debt. . . . Therefore, the California court, applying California law, is the proper forum for determining whether the Committee breached its contract and, if it did, what amount it owes . . . ." Each of these issues is contested by Respondents here. Surely a presidential campaign committee is not required to pay for all services purportedly provided to it by any officious intermeddler who unilaterally decides to perform unsolicited work for the Committee.

94043524172

Jonathan A. Bernstein, Esq.  
November 8, 1993  
Page 4

**B. Even If the Commission Did Not  
Lack Jurisdiction, the Evidence  
Shows That Respondents Owe the  
Village No Money.**

In the event the Commission -- contrary to its own well-established precedent -- decides to address whether Respondents incurred the debt, the record is quite clear that they did not. *First*, the evidence indicates that Respondents committed to pay only for the rental of the Stadium, and in fact paid the agreed \$500. Complainant has submitted no evidence that Respondents asked for or agreed to pay for additional police, firemen, or other services.

*Second*, the expenses at issue relate to the provision of security for which Respondents were not responsible. The Secret Service provides the security for presidential campaigns. Campaigns have never been and are not now required to pay for the time and expense incurred by, or on behalf of, the Secret Service in performing this task. Here, many of the expenses at issue are the result of meetings between Village personnel and Secret Service personnel. (Exhibit E, Nov. 2 & 5, 1993 Memoranda from Robert D. Missel to James Ten Hoeve).<sup>1/</sup>

Respondents have in a few instances received "bills" for support services and/or security provided at campaign events. The standard practice has been to pay non-security expenses where the activity appears to have been requested or authorized by Respondents. Because security was typically arranged through the Secret Service, any claims for security-related expenses have been referred to the Secret Service. Pursuant to this policy, Respondents informed the Village that it should direct any claims for security-related expenses to the Secret Service. Pursuant to the policy stated above, Respondents paid the amount of \$2,190.17 to the Village for non-security-related expenses incurred by the Parks Department even though a substantial question exists as to whether Respondents requested or authorized such expenditures. (Exhibit D).

In short, if the Village has a claim for repayment, it should seek reimbursement from the Secret Service, not Respondents.

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<sup>1/</sup> Of course, it would be pertinent for the Commission to determine whether the Village, like most local governments, regularly provides such security or crowd control services without charge for political, civic, and business events at which large crowds are expected.

94043524173

Jonathan A. Bernstein, Esq.

November 8, 1993

Page 5

**II. THE DONATION BY MR. BOLGER  
WAS NOT IMPROPER.**

The Complaint questions the propriety of the donation made by Mr. Bolger to the Village, suggesting that Mr. Bolger's donation constituted a potentially unlawful contribution either to Respondents or to the Mayor. Obviously, this Commission has no jurisdiction to determine whether the donation constituted a "bribe" under either federal or state law.

As an initial matter, Mr. Bolger has indicated in writing that the donation is not a loan or payment on behalf of another party. (Exhibit C). Rather, it was simply an "outright gift." As such, it does not affect any claim that the Village may, or may not, have for reimbursement of expenses and could not constitute a contribution on behalf of any other party.

Moreover, Mr. Bolger's donation was not a "contribution" to Respondents as defined in the Federal Election Campaign Act or the Commission's regulations. The services for which payment was made -- security and crowd control -- did not constitute an attempt to influence a federal election, see 11 C.F.R. § 100.7(a)(1), and the donation was neither requested nor authorized by Respondents (Exhibit C). Moreover, the Village does not appear to have a legitimate claim against Respondents for reimbursement of the expenses at issue. (See Part I-B above). Accordingly, there is no basis for concluding that the donation was to, on behalf of, or bestowed a benefit on Respondents.<sup>2/</sup>

\* \* \*

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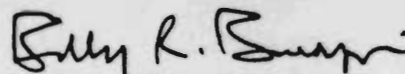
<sup>2/</sup> In order to create the "bill" that was submitted to Respondents, Village personnel had to perform an analysis *after* the event. Fire Chief Missel came up with the "correct" analysis only after a second -- and perhaps more pointed -- request from the Village's Chief Financial Officer. (See Exhibit D.) Moreover, the desire to submit a bill appears to have stemmed from a disagreement about the Mayor's authority to execute the lease rather than from any agreement by Respondents to pay the charges. A disagreement after the fact between the Mayor and the Village Council cannot create an obligation that did not already exist.

94043524174

Jonathan A. Bernstein, Esq.  
November 8, 1993  
Page 6

For these reasons, Respondents respectfully urge that the Commission find no reason to believe that a violation has occurred, and promptly dismiss the Complaint.

Respectfully submitted,

  
Bobby R. Burchfield

94043524175

Jonathan A. Bernstein, Esq.  
November 8, 1993  
Page 7

VERIFICATION

I DECLARE UNDER PENALTY OF PERJURY under the laws of  
the United States of America that the foregoing is true and  
correct to the best of my knowledge, information and belief.

  
Bobby R. Burchfield

Dated: November 8, 1993

94043524176



LEASE AGREEMENT

This agreement made and entered into this 19th day of October, by and between the Village of Ridgewood, located at Ridgewood, New Jersey, hereinafter referred to as the "Lessor", and the New Jersey Bush/Quayle '92 General Committee, hereinafter referred to as the "Lessee".

WITNESSETH

WHEREAS, the LESSOR owns in Ridgewood, New Jersey, property known as Veterans Field and said LESSOR is desirous of leasing to LESSEE said premises herein described for the date of October 22, 1992.

NOW THEREFORE, for and in consideration of the rental charges, covenants, and agreements contained here and in this lease, LESSEE does hereby hire, take and lease from LESSOR, and LESSOR does hereby grant, demise and lease onto the LESSEE, said property, with respect to which LESSEE is to have for the term of this lease exclusive use of said area.

1. LESSEE shall pay LESSOR \$500. for the use of said property ~~with all services provided on~~ October 22, 1992.
2. This lease shall not be assigned without the consent of the LESSOR.

*W. Pannucci*

*Robert J. ...*

94043524177



BOLGER & CO., INC. SEVENTY-NINE CHESTNUT STREET, RIDGEWOOD, N.J. 07450 • (201) 670-9270  
(201) 670-9685 FAX

February 10, 1993

The Honorable  
Mayor Patrick Mancuso  
Village of Ridgewood  
131 North Maple Avenue  
Ridgewood, NJ 07450

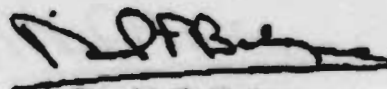
Dear Mayor Mancuso and Members of the Council,

With reference to my letter dated February 9, 1993, Mayor Mancuso's explanation at the public meeting that the \$5,612.00 constituted a loan to the Village is clearly erroneous. The payment was an absolute and outright gift to the Village.

While it is highly doubtful that funds will be forthcoming from the Bush/Quayle campaign committee, these funds would be the property of the Village. I would hope that the council would see fit to utilize any such funds for the further enhancement of the Village, be it Project Pride, the sports program, or for the senior citizens.

I trust this will clarify the matter for all concerned.

Sincerely,



David F. Bolger  
President

DFB/rl  
L15.dfb

94043524179

Exhibit D

11/01/93

15:47

NO. 166

018

BUSH-QUAYLE '92 GENERAL COMMITTEE, INC.

Operating Account

PO Box 18898

Washington, D.C. 20038

ANKLIN NATIONAL BANK OF WASHINGTON DC  
875 E STREET NW, WASHINGTON, DC 20006

0515856

15-154/540

02/25

Check No: 0515856

2,120.97

THE SUM OF:

Two Thousand One Hundred Twenty Dollars & 97/100

PAY TO THE ORDER OF:

Village of Ridgewood

131 North Maple Ave.

Ridgewood, NJ 07411

★  
NON NEGOTIABLE

#515856# 1051001547# 2 377271#12

BUSH-QUAYLE '92 GENERAL COMMITTEE, INC.

051585

INVOICE	DATE	AMOUNT	PAID	DISC	NET PAID
MEM921106	11/06/92	2,120.97	2,120.97	0.00	2,120.97
					2,120.97

VENDOR: 10441

ENTERED MANUAL CHECK ☐

Invoice #	Inv. Date	Inv. Total	GL Code	FEC Code	Amount	CMTMT #
MEM921106	11/6/92	2,120.97	PG-B15	2315X4	2,120.97	6448
TOTAL		2,120.97			2,120.97	

Check to be given to: Alley

☐ Mail to vendor

ENTERED VOUCHER ☒

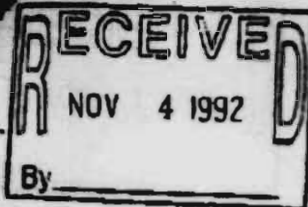
11/01/93

15:45

Exhibit E

NO. 160

014



RIDGEWOOD FIRE DEPARTMENT  
INTER-OFFICE CORRESPONDENCE

DATE: November 2, 1992

FROM : Robert D. Missel, Chief  
TO : James Ten Hoeve, Chief Financial Officer  
SUBJECT: PRESIDENTIAL VISIT

With reference to your request concerning costs incurred by this department for the Presidential visit. This department incurred no overtime and our operation required no material and supplies to be expended.

RDM:djt

94043524181



RIDGEWOOD FIRE DEPARTMENT  
INTER-OFFICE CORRESPONDENCE

DATE: November 5, 1992

FROM : Robert D. Missel, Chief  
TO : James Ten Hoeve, Chief Financial Officer  
SUBJECT: PRESIDENTIAL VISIT

Pursuant to your request for additional information concerning indirect costs to this department for the Presidential visit, following is a breakdown of the time expended on a straight time basis

Tuesday - October 20, 1992:

Meetings with Whitehouse and Secret Service Staff and Village Staff for the purpose of planning the visit.

Chief Missel: (2) Hours @ \$33.80 : \$ 67.60

Wednesday - October 21, 1992:

Meeting with Police Chief and Secret Service Staff.

Chief Missel: (1) Hour @ \$33.80 : \$ 33.80

Required Engine Company Stand-by as required by Secret Service for Helicopter Field Testing.

(1) Lieutenant : (2) Hours @ \$25.40 : \$ 50.80

(3) Firefighters: (2) Hours @ \$21.90 : \$131.40

Thursday - October 22, 1992:

Meeting with Fire Department Staff for the purpose of layout of evolutions required for Helicopter Stand-by.

Chief Missel: (1/2) Hour @ \$16.90 : \$ 16.90

Required Helicopter Stand-by for President visit.

Chief Missel : (4) Hours @ \$33.80 : \$135.20

Deputy Chief Mullay: (4) Hours @ \$29.20 : \$116.80

Engine Company :

(1) Lieutenant : (4) Hours @ \$25.40 : \$101.60

(4) Firefighters : (4) Hours @ \$21.90 : \$350.40

In addition, the apparatus had an approximate fuel use cost of : \$ 25.00

Total: \$1029.50

RDM:djt

cc: Rodney Irwin, Village Manager

INTER-OFFICE CORRESPONDENCE  
VILLAGE OF RIDGEWOOD

TO JAMES TEN HOEVE,  
CHIEF FINANCIAL OFFICER  
DATE NOVEMBER 5, 1992

FROM LOUIS J. MADER, ACTING CHIEF OF POLICE

SUBJECT: EXPENSES INCURRED FOR PRESIDENT BUSH RALLY

The Police Department incurred \$957.21 in overtime expenses for the President Bush Rally on October 22, 1992.

The additional men who worked this detail requested accumulated overtime to be taken when manpower permitted.

  
LOUIS J. MADER  
Acting Chief of Police

LJM/oh

Attachment

94043524183

POLICE DEPARTMENT  
OCTOBER 23, 1992

MUNICIPAL OFFICERS  
OVERTIME AUTHORIZATION

DATE	NATURE OF WORK	HRS	APPROVAL
10/22/92	Ptl. Dinica Presidential Rally	2 hrs-15 mins.	"114 25"
10/22/92	Ptl. Gilard Called to duty due to manpower shortage	8 hrs.	
10/22/92	Ptl. Gilard Presidential Rally	1 hr-15 mins.	"113 69"
10/20/92	Ptl. Harris #92-7656	1 hr-15 mins.	
10/22/92	Ptl. Hirsch Presidential Rally	2 hrs-15 mins.	"117 83"
10/15/92	Ptl. Kennedy Municipal Court	3 hrs.	
10/22/92	Ptl. Kennedy Presidential Rally	1 hr-15 mins.	"114 51"
10/15/92	Ptl. Kiernan Municipal Court	1 hr.	
10/18/92	Ptl. Kiernan Crop Walk	4 hrs.	
10/22/92	Ptl. Kiernan Presidential Rally	3 hrs-15 mins.	"116 15"
10/15/92	Ptl. Kozielecki Municipal Court	3 hrs-45 mins.	
10/22/92	Ptl. Kozielecki Presidential Rally	1 hr-15 mins.	"114 00"
10/14/92	Ptl. LaPorta #92-7499	1 hr.	
10/22/92	Ptl. LaPorta Presidential Rally	3 hrs-15 mins.	"114 43"
10/22/92	Disp. Loughner Presidential Rally	2 hrs-15 mins.	"110 56"
10/19/92	Ptl. McDermott #92-7630	45 mins.	
10/22/92	Ptl. McDermott Presidential Rally	2 hrs-15 mins.	"117 25"
10/15/92	Ptl. McDowell Municipal Court	2 hrs.	
10/20/92	Sergt. Maier Accrediation Meeting	6 hrs-30 mins.	
10/22/92	Ptl. Moore Presidential Rally	2 hrs-15 mins.	"113 69"
10/22/92	Ptl. Orr Presidential Rally	2 hrs-15 mins.	"117 12"
10/22/92	Ptl. Prukema Presidential Rally	3 hrs-15 mins.	"114 43"
10/15/92	Ptl. Santucci Municipal Court	1 hr.	
10/14/92	Ptl. Savaria #92-7497	1 hr.	
10/15/92	Ptl. Savaria Municipal Court	3 hrs.	
10/16/92	Ptl. Savaria #92-7552	1 hr-30 mins.	
10/15/92	Sergt. Shortway Called to duty due to manpower shortage	8 hrs.	
10/22/92	Ptl. Shortway Presidential Rally	1 hr-15 mins.	"117 25"
10/20/92	Ptl. Smith Municipal Court	1 hr.	
10/22/92	Ptl. Smith Presidential Rally	2 hrs-15 mins.	"117 43"
10/14/92	Lieut. Van Goor Called to duty due to manpower shortage	8 hrs.	
10/15/92	Ptl. Ward Municipal Court	2 hrs.	
10/17/92	Ptl. Ward Called to duty due to manpower shortage	1 hr.	
10/17/92	Ptl. Weiler Called to duty due to manpower shortage	8 hrs.	
10/15/92	A.C.O. Wyder #92-7530	2 hrs.	

"95 10"



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
F.E.C.  
SECRETARIAT

93 NOV 29 AM 11:49

NOVEMBER 29, 1993

**SENSITIVE**

**MEMORANDUM**

TO: The Commission

FROM: Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner *LP*  
Associate General Counsel

SUBJECT: MUR 3812  
Waiver of Confidentiality- David F. Bolger

David F. Bolger has submitted a statement that he does not require that this matter be kept confidential. The other four respondents in this matter, Bush-Quayle '92 General Committee Inc. and J. Stanley Huckaby, as treasurer, Village of Ridgewood, and Patrick A. Mancuso have not waived confidentiality. Thus, the waiver of confidentiality pertains solely to the information in the MUR concerning David F. Bolger.

By making this waiver, Mr. Bolger has requested that the Commission not apply the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) to this matter. However, that section merely provides that any notification or investigation shall not be made public by the Commission without the written consent of the person receiving such notification or the person with respect to whom such investigation is made. By its terms, Section 437g(a)(12)(A) does not impose an affirmative duty on the Commission to publicize this matter at this time as it pertains to David F. Bolger. Therefore, this Office will respond to requests for information subject to the following considerations. First, requests must be in writing. Second, such requests would be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in the Sunshine Act, and all relevant privileges which would limit or preclude the release of such requested information.

**RECOMMENDATION**

Approve the appropriate letter.

Attachment  
Waiver

94043524185



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
David F. Bolger.

)  
)  
) MUR 3812

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 3, 1993, the Commission decided by a vote of 6-0 to approve the appropriate letter, as recommended in the General Counsel's Memorandum dated November 29, 1993.

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

Attest:

12-3-93  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat:	Mon.,	Nov. 29, 1993	11:49 a.m.
Circulated to the Commission:	Mon.,	Nov. 29, 1993	4:00 p.m.
Deadline for vote:	Thurs.,	Dec. 02, 1993	4:00 p.m.

bjr

94043524186





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DECEMBER 3, 1993

Thomas M. Wells, Esq.  
Wells, Garofalo, Jaworski & Liebman  
12 North Route 17, P.O. Box 1827  
Paramus, NJ 07653-1827

RE: MUR 3812  
David F. Bolger

Dear Mr. Wells:

This is in response to your letter dated September 24, 1993, wherein your client, David F. Bolger waives his right to confidentiality in the above-captioned matter, pursuant to 2 U.S.C. § 437g(a)(12)(A). The waiver is hereby acknowledged by the Federal Election Commission.

The Commission will consider requests for information concerning this matter subject to the following considerations. First, requests must be in writing. Second, such requests will be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in Sunshine Act, and all relevant privileges which limit or preclude the release of such requested information.

Please note that this waiver pertains to information concerning David F. Bolger alone, and does not pertain to any other respondents in this matter. Thus, David F. Bolger may not disclose any information pertaining to the other respondents in this matter until notified by the Commission that the entire file in this matter is closed.

If you have any questions, please contact me, at (202) 219-3400.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

94043524187

GENERAL COUNSEL'S REPORT, DATED APRIL 5, 1994,  
AND CERTIFICATION OF COMMISSION VOTE, DATED MAY 5, 1994,  
ARE FILED AT THE FOLLOWING MICROFILM LOCATION:

MUR ROLL: 352

FRAMES: 2832-2847

94043524188



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 6, 1994

Wilber Edwards  
254 Steilen Avenue  
Ridgewood, NJ 07450

RE: MUR 3812

Dear Mr. Edwards:

On September 13, 1993, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

94043524189

MUR 3812

**BUSH QUAYLE '92 GENERAL COMMITTEE**

Wilber Edwards filed a complaint alleging that a donation made by David Bolger to the Village of Ridgewood to defray costs related to an October 1992, visit by President Bush was an excessive in-kind contribution to the Bush-Quayle '92 General Committee. In response to the complaint, Mr. Bolger states that on February 9, 1993, he gave a \$5,612 check to the Village of Ridgewood to cover unpaid costs associated with a visit of President Bush. Mr. Bolger also states that by letter dated February 10, 1993, he clarified to the Mayor and the Village Council that the check made payable to the Village was an outright gift to the Village and specified that if the costs associated with the visit were paid through another source, the Mayor and Council could use the gift in accordance with its wishes.

The Village of Ridgewood responded that the \$5,612 check to the Village of Ridgewood was a gift to the Village from Mr. Bolger and not a political contribution. The Village of Ridgewood indicates that the gift did not discharge the Bush-Quayle Committee's financial obligations. In its response to the complaint, the Bush-Quayle General Committee stated that the Committee contracted with the Village to lease a field for use during a visit by President Bush for \$500. The Committee indicates that after the event, it received a bill from the Village for costs associated with the visit. The Committee indicates that it paid for the non-security expense portion of the bill and referred the Village to the Secret Service regarding the security-related expenses.

There is no evidence of any serious intent to violate FECA or that the activity in this matter had significant impact on the process. This matter involves less significant issues relative to the other issues pending before the Commission and a limited amount of money.

94043524190



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 6, 1994

Bobby R. Burchfield, Esq.  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

RE: MUR 3812  
Bush-Quayle '92 General Committee,  
Inc. and J. Stanley Huckaby, as  
treasurer

Dear Mr. Burchfield:

On September 16, 1993, the Federal Election Commission notified your clients, the Bush-Quayle '92 General Committee, Inc. and J. Stanley Huckaby, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

94043524191



Bobby R. Burchfield, Esq.  
MUR 3812  
Page 2

If you have any questions, please contact Joan McEnery at  
(202) 219-3690.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

94043524192

MUR 3812

BUSH QUAYLE '92 GENERAL COMMITTEE

Wilber Edwards filed a complaint alleging that a donation made by David Bolger to the Village of Ridgewood to defray costs related to an October 1992, visit by President Bush was an excessive in-kind contribution to the Bush-Quayle '92 General Committee. In response to the complaint, Mr. Bolger states that on February 9, 1993, he gave a \$5,612 check to the Village of Ridgewood to cover unpaid costs associated with a visit of President Bush. Mr. Bolger also states that by letter dated February 10, 1993, he clarified to the Mayor and the Village Council that the check made payable to the Village was an outright gift to the Village and specified that if the costs associated with the visit were paid through another source, the Mayor and Council could use the gift in accordance with its wishes.

The Village of Ridgewood responded that the \$5,612 check to the Village of Ridgewood was a gift to the Village from Mr. Bolger and not a political contribution. The Village of Ridgewood indicates that the gift did not discharge the Bush-Quayle Committee's financial obligations. In its response to the complaint, the Bush-Quayle General Committee stated that the Committee contracted with the Village to lease a field for use during a visit by President Bush for \$500. The Committee indicates that after the event, it received a bill from the Village for costs associated with the visit. The Committee indicates that it paid for the non-security expense portion of the bill and referred the Village to the Secret Service regarding the security-related expenses.

There is no evidence of any serious intent to violate FECA or that the activity in this matter had significant impact on the process. This matter involves less significant issues relative to the other issues pending before the Commission and a limited amount of money.

94043524193



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 6, 1994

Thomas M. Wells, Esq.  
Wells, Garofalo, Jaworski & Liebman  
12 North Route 17, P.O. Box 1827  
Paramus, NJ 07653-1827

RE: MUR 3812  
David F. Bolger

Dear Mr. Wells:

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After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994.

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94043524194

Thomas M. Wells, Esq.  
MUR 3812  
Page 2

If you have any questions, please contact Joan McEnery at  
(202) 219-3690.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

94043524195

MUR 3812

BUSH QUAYLE '92 GENERAL COMMITTEE

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There is no evidence of any serious intent to violate FECA or that the activity in this matter had significant impact on the process. This matter involves less significant issues relative to the other issues pending before the Commission and a limited amount of money.

94043524196





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 6, 1994

Sydney V. Stoldt, Jr., Esq.  
Stoldt & Horan, P.A.  
401 Hackensack Avenue  
Hackensack, NJ 07601

RE: MUR 3812  
Patrick Mancuso and the Village of  
Ridgewood

Dear Mr. Stoldt:

On September 16, 1993, the Federal Election Commission notified your clients, Patrick Mancuso and the Village of Ridgewood, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on June 3, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

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Sydney V. Stoldt, Jr., Esq.  
MUR 3812  
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If you have any questions, please contact Joan McEnery at  
(202) 219-3690.

Sincerely,

*Mary L. Taksar*

Mary L. Taksar  
Attorney

Attachment  
Narrative

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MUR 3812

BUSH QUAYLE '92 GENERAL COMMITTEE

Wilber Edwards filed a complaint alleging that a donation made by David Bolger to the Village of Ridgewood to defray costs related to an October 1992, visit by President Bush was an excessive in-kind contribution to the Bush-Quayle '92 General Committee. In response to the complaint, Mr. Bolger states that on February 9, 1993, he gave a \$5,612 check to the Village of Ridgewood to cover unpaid costs associated with a visit of President Bush. Mr. Bolger also states that by letter dated February 10, 1993, he clarified to the Mayor and the Village Council that the check made payable to the Village was an outright gift to the Village and specified that if the costs associated with the visit were paid through another source, the Mayor and Council could use the gift in accordance with its wishes.

The Village of Ridgewood responded that the \$5,612 check to the Village of Ridgewood was a gift to the Village from Mr. Bolger and not a political contribution. The Village of Ridgewood indicates that the gift did not discharge the Bush-Quayle Committee's financial obligations. In its response to the complaint, the Bush-Quayle General Committee stated that the Committee contracted with the Village to lease a field for use during a visit by President Bush for \$500. The Committee indicates that after the event, it received a bill from the Village for costs associated with the visit. The Committee indicates that it paid for the non-security expense portion of the bill and referred the Village to the Secret Service regarding the security-related expenses.

There is no evidence of any serious intent to violate FECA or that the activity in this matter had significant impact on the process. This matter involves less significant issues relative to the other issues pending before the Commission and a limited amount of money.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MJR # 38/2

DATE FILMED 6/15/94 CAMERA NO. 2

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