HARSCOPAC

P.O. BOX 0000, CAMP HILL, PA 17001-0000 717 763 7064

RECEIVED
FEC MAIL ROOM
2002 JAN -3 A 10:41

January 2, 2002

Mr. Erik W. Koeppen
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Harsco Corporation Political Action Committee
Identification #: C00084145

Dear Mr. Koeppen:

This will serve as a reply to your letters of October 17, 2001 and December 27, 2001 regarding findings of an excessive contribution to Senator Santorum's campaign as a result of your audits of the July (4-1-00/6-30-00) and October (7-1-00/9-30-00) quarterly reports.

We did in fact reply to this matter October 25, 2001 and found out today that you never received our certified mail containing this reply.

I spoke with Colleen Manning in your office today, in your absence, and am sending you copies of all information concerning this matter.

Enclosed is a copy of our reply dated October 25, 2001 with amended reports for the periods in question and copies of the correspondence received from your office this date.

I trust you will find everything to be in order, however if you require further detail, please contact me. Thank you for your assistance!

Sincerely,

Stephen E. Baney
Treasurer

Enclosures

cc: R. S. Swanger

HARSCOPAC

P.O. BOX 8888, CAMP HILL, PA 17001-8888 717.763.7064

RECEIVED
FEC MAIL ROOM
2002 JAN -3 A 10:41

October 25, 2001

Mr. Erik W. Koeppen
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Harsco Corporation Political Action Committee
Identification #: C00084145

Dear Mr. Koeppen:

This will serve as a reply to your letters of October 17, 2001 regarding findings of an excessive contribution to Senator Santorum's campaign as a result of your audits of the July (4-1-00/6-30-00) and October (7-1-00/9-30-00) quarterly reports.

As I discussed with you by telephone, contribution to Santorum per election cannot exceed $5,000. I had mis-classified $4,000 of contributions made between April 13, 1999 through September 7, 1999 as relating to the general election whereas they were actually designated for the primary election.

I have completed and am enclosing amended reports for the periods January 1, 1999 through June 30, 1999 (July 31st mid-year) and July 1, 1999 through December 31, 1999 (January 31st year-end report).

I have denoted Santorum's contribution as relating to the primary election.

I trust you will find everything to be in order, however if you require further detail, please contact me. Thank you for your assistance!

Sincerely,

Stephen E. Baney
Treasurer

cc: R. S. Swanger

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2002 JAN -3 A 10:42

RQ-3 JAN 2 2002

Harsco Risk Mgmt. Dept.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 27, 2001

Stephen E. Baney, Treasurer
Harsco Corporation Political Action Committee
350 Poplar Church Road
Camp Hill, PA 17011

1-2-02
Talked with Colleen Manning in Erik Kuppers Agency

Identification Number: C00084145

Reference: July Quarterly (4/1/00-6/30/00) and October Quarterly (7/1/00-9/30/00) Reports

Dear Mr. Baney:

This letter is to inform you that as of December 26, 2001 the Commission has not received your response to our requests for additional information dated October 17, 2001. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

Due to recent events, the United States Postal Service is experiencing delays in the processing and delivery of mail for the Washington D.C. area. Consequently, the Federal Election Commission is not in receipt of all incoming first-class mail. The Commission recommends that you resubmit your response to this notice and consider using alternate delivery services such as overnight delivery or delivery by courier. If feasible, your response can also be hand-delivered. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.FEC.gov.

An adequate response must be received at the Commission by January 16, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being

amended. If you should have any questions regarding this matter, please contact Erik Koeppen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Stephen E. Baney, Treasurer
Harsco Corporation Political Action Committee
350 Poplar Church Road
Camp Hill, PA 17011

OCT 17 2001

Identification Number: C00084145

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Mr. Baney:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo

entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Erik W. Kooppen

Erik W. Kooppen
Reports Analyst
Reports Analysis Division

288

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER 23

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

NAME OF COMMITTEE (In Full)

Harsco Corporation Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code People With Hart % People For English P.O. Box 1940 Erie, PA 16507	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	4-28-00	1,000.00
B. Full Name, Mailing Address and ZIP Code Santorum 2000 - Reception P.O. Box 553 Harrisburg, PA 17108	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	4-28-00	1,000.00
C. Full Name, Mailing Address and ZIP Code Santorum 2000 - Golf Outing P.O. Box 553 Harrisburg, PA 17108	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	4-28-00	1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 3,000.00

TOTAL This Period (last page this line number only) 3,000.00

WK

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

Harsco Corporation Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Friends of Don Sherwood 81 Warrent Street Tunkhannock, PA 18657	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	8/13/99	600.00
B. Santorum 2000 1113 Whitner Road Reading, PA 19605	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	9/7/99	2,000.00
C. People with Hart c/o People for English P. O. Box 1940 Erie, PA 16507	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	9/17/99	500.00
D. Dreier for Congress P.O. Box 1110 Covina, CA 91722	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	10/12/99	500.00
E. Greenleaf for Congress P.O. Box 22433 Philadelphia, PA 19110-2433	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	10/15/99	500.00
F. Nesland for Congress P.O. Box 1250 Carlisle, PA 17013	Contribution Disbursement for: [ ] Primary [x] General [ ] Other (specify)	11/23/99	1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 5,100.00

TOTAL This Period (last page this line number only) 5,100.00

SCHEDULE B — ITEMIZED DISBURSEMENTS

PAGE 6 OF 6

FOR LINE NUMBER 23

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

NAME OF COMMITTEE (In Full)
Harsco Corporation Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Monroe County Republican Committee Kreeitz Professional Building PO Box 391 Stroudsburg, PA 18360	Contribution Disbursement for: Primary [X] General Other (specify)	3/5/99	250.00
EWK Santorum 2000 PO Box 583 Harrisburg, PA 17108	Contribution Disbursement for: Primary [X] General Other (specify)	4/13/99	1,000.00
Steve Largent For Congress Committee 8424 East 41st Street Suite B-10 Tulsa, OK 74114	Contribution Disbursement for: Primary [X] General Other (specify)	5/14/99	250.00
EWK Santorum 2000 C/O Daniel Baron Buchanan Ingersoll 30 North Third Street 8th Floor Harrisburg, PA 17101	Contribution Disbursement for: Primary [X] General Other (specify)	5/18/99	1,000.00
People For English Committee PO Box 1940 Erie, PA 16507-0940	Contribution Disbursement for: Primary [X] General Other (specify)	6/11/99	300.00
Voinovich For Senate Committee 25801 Chagrin Blvd. Ste. 200 Cleveland, OH 44122	Contribution Disbursement for: Primary [X] General Other (specify)	6/15/99	(1,000.00)
Gov. George H. Bush Presidential Exploratory Committee PO Box 796 Harrisburg, PA 17108-0769	Contribution Disbursement for: Primary [X] General Other (specify)	6/18/99	5,000.00
	Purpose of Disbursement Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Purpose of Disbursement Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 6,800.00

TOTAL This Period (last page this line number only) 6,800.00

FEC FORM 3X

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☑	Hand Delivered	Date of Receipt 1-3-02
☐	First Class Mail	POSTMARKED
☐	Registered/Certified Mail	POSTMARKED (R/C)
☐	No Postmark	
☐	Postmark Illegible	
☐	Received from the House office of Records and Registration	Date of Receipt
☐	Received from the Senate Office of Public Records	Date of Receipt
☐	Other (Specify):	Postmarked _____ and/or Date of Receipt
☐	Electronic Filing	

PREPARER

1-3-02
DATE PREPARED

(6/2000)