



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1119

Date Filmed 8/5/82 Camera No. --- 2

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 14, 1981

Assemblyman Cordova Committee  
610 Newport Center Drive  
Suite 1590  
Newport Beach, California 92660

RE: MUR 1119

Dear Treasurer:

You have previously been advised that your committee's contributions in 1978 to the Orange County Democratic Central Committee and United for Orange County appeared to violate 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. If you wish to submit any materials to appear on the public record, please do so within ten days.

If you have any questions, contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

62040342146



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Assemblyman Cordova Committee  
610 Newport Center Drive  
Suite 1590  
Newport Beach, California 92660

RE: MUR 1119

Dear Treasurer:

You have previously been advised that your committee's contributions in 1978 to the Orange County Democratic Central Committee and United for Orange County appeared to violate 2 U.S.C. § 433 and § 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

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If you have any questions, contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

*Copy  
8/13/81*

62040342147



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

Assemblyman Cordova Committee  
610 Newport Center Drive  
Suite 1590  
Newport Beach, California 92660

RE: MUR 1119

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However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within thirty days. If you wish to submit any materials to appear on the public record, please do so within ten days.

If you have any questions, contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

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15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Orange County Democratic ) MURs 1115 - 1123  
Central Committee, et al. )

AMENDED CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on August 11, 1981, do hereby certify that the Commission decided in a vote of 5-1 to take the following actions regarding MURs 1115 - 1123:

1. MUR 1115 - take no further action at this time against DSOC - Federal Candidates Fund for possible violation of 2 U.S.C. §433 pending an audit of OCDC.
2. MUR 1115 - refer OCDC to Audit for review pursuant to 2 U.S.C. §437g.
3. MUR 1116 - take no further action against United for Orange County's violations of 2 U.S.C. §§433 and 441a(f) and close the file.
4. MUR 1117 - take no further action against Californians for Brown's violations of 2 U.S.C. §433, §434 and §441a and close the file.
5. MUR 1118 - take no further action against the Committee to Re-Elect Patterson's violations of §441a(f) and close the file.
6. MUR 1119 - take no further action against Assemblyman Cordova Committee's violations of §433 and §434 and close the file.

(continued)

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CERTIFICATION  
MURs 1115 - 1123  
General Counsel's Report  
Dated July 29, 1981

Page 2

7. MUR 1120 - take no further action against  
Hannaford Re-Election Committee's violations  
of §441a(f) and close the file.
8. MUR 1121 - take no further action against  
Re-Elect Paul Ball Committee's violations  
of §§433 and 434 and close the file.
9. MUR 1122 - refer the Round Up '78 Committee  
to Audit for review pursuant to 2 U.S.C.  
§437g.
10. MUR 1123 - take no further action against  
Mobile Homes PAC's violations of §433 and  
§434 and close the file.

Commissioners Aikens, Harris, McGarry, Thomson, and Tiernan  
voted affirmatively. Commissioner Reiche dissented.

Attest:

8-12-81

Date

Lena L. Stafford

Recording Secretary

62040342150



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwc*  
FROM: MARJORIE W. EMMONS, JODY CUSTER *jc*  
OFFICE OF THE SECRETARY TO THE COMMISSION  
DATE: AUGUST 3, 1981  
SUBJECT: ADDITIONAL OBJECTION - MURs 1115/1123 General  
Counsel's Report dated 7-29-81; Received in  
OCS, 7-30-81, 12:57

You were notified previously of an objection by  
Commissioner Reiche.

Commissioner Aikens submitted an additional objection  
at 4:10, August 3, 1981.

This matter will be discussed in executive session  
on Tuesday, August 11, 1981.

02040342151



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS/JODY CUSTER *Jc*  
DATE: AUGUST 3, 1981  
SUBJECT: OBJECTION - MURs 1115/1123 General Counsel's  
Report dated 7-29-81; Received in OCS,  
7-30-81, 12:57

The above-named document was circulated on a 48  
hour vote basis at 4:00, July 30, 1981.

Commissioner Reiche submitted an objection at 3:47  
at 3:47, August 3, 1981.

This matter will be placed on the Executive Session  
Agenda for Tuesday, August 11, 1981.

62040342152

July 30, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Phyllis A. Kayson  
SUBJECT: MURs 1115 - 1123

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

Attachment

cc: Calahan

62040342153

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED THE CLERK

In the Matter of )  
Orange County Democratic )  
Central Committee, et. al )

MURS 1115 - 1123

81 JUL 30 12: 57

GENERAL COUNSEL'S REPORT

**SENSITIVE**

Background

These matters were generated as the result of information compiled by the Reports Analysis Division (RAD) during the ordinary course of review of Quarterly Reports. As the result of earlier recommendations made directly to the Commission by RAD, the Commission has previously found reason to believe that United for Orange County, the Orange County Democratic Central Committee, the Committee to Re-Elect Patterson, the Hannaford Re-Election Committee, the Mobile Homes PAC, and the Re-Elect Paul Bell Committee violated the Act.

Additionally, the Assemblyman Cordova Committee, Californians for Brown, and the Round Up '78 Committee were referred to OGC for failure to adequately respond to surface violation notifications from RAD.

The specific allegations are discussed separately, by respondent, below.

Orange County Democratic Central Committee  
("OCDCC") - MUR 1115

The Commission has found reason to believe that OCDCC violated (a) 2 U.S.C. § 434 by failing to adequately disclose its opening funds and failure to properly disclose the individuals involved in partnership contributions; (b) 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$8,330 from Californians for Brown '78;

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and (c) 2 U.S.C. § 441b by accepting contributions from corporations and labor unions.

RAD has also noted that OCDCC has apparently violated:

(a) 2 U.S.C. § 441a by making excessive contributions totalling \$5,000 to the Committee to Re-Elect Patterson to Congress as well as to the Hannaford Re-Election Committee; and (b) 2 U.S.C. § 441a(f) by receiving \$7,876 in excessive contributions from the Re-Elect Paul Bell Committee. (MURS 1115, 1117, 1119, 1121 and 1122 have in common the accounts of the Orange County Democratic State Central Committee).

At the time of the referral, all that was known about OCDCC's financial activity was that OCDCC apparently operated with three accounts - a restricted account containing corporate and union monies, a general account, and the "Chairs Committee" account which was established for purposes of segregating proceeds from fundraisers until all expenses for such events had been paid, at which time any remaining proceeds were placed in the general account. OCDCC's reports to the Commission apparently included the activities of both the general and the restricted accounts. It was not possible to determine the relationships of these accounts to the OCDCC's federal activity. Nor was it ascertained into which account the contributions from Californians for Brown '78, the Re-Elect Paul Bell Committee, and the contributions from an individual contributor, Richard J. O'Neill, were placed.

Therefore, on June 3, 1980, the Commission issued an order to OCDCC to clarify unanswered questions surrounding its financial activities as well as its purported affiliation with the California

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Democratic State Central Committee - Federal Account ("DSCC - Federal Account"). In light of the fact that DSCC - Federal Account denied affiliation with OCDCC, it was also issued an order concerning the affiliation issue.

In response to the order, DSCC - Federal Candidate Fund reiterated its previous position that it is not affiliated with OCDCC. OCDCC stated that the relationship between the two is contained in the California State Election Code. A review of the State Election Code Articles which outline membership in the State Central Committee and in the County Committees, does not indicate control, overlapping membership or any other indicia of affiliation between the two. Therefore, absent affiliation with DCSS - Federal Candidates Fund, OCDCC has violated 2 U.S.C. § 441a by making excessive contributions of \$5,000 to the Committee to Re-Elect Patterson to Congress and the Hannaford Re-Election Committee.

The Commission has also found reason to believe that OCDCC violated 2 U.S.C. § 441a(f) by accepting excessive contributions totalling \$8,330 from Californians for Brown and \$7,876 from the Re-Elect Bell Committee. While both contributors maintained that their contributions were earmarked for Registration and GOTV activities of OCDCC, it appears from the reports that the subject contributions were co-mingled with the federal monies held in the various accounts of OCDCC. In response to the Commission's Order, OCDCC filed amended reports but still failed to establish whether certain contributions and expenditures were made from the general account or the federal account and failed to provide the dollar amount expended in connection with GOTV activities.

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As discussed in detail with respect to United for Orange County (see discussion MUR 1116, which follows), the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates.

However, because the dollar amount expended in connection with GOTV activities has not been provided, it is impossible to ascertain what portion of the contributions from Brown and Bell were used in connection with federal elections.

The Commission has also found reason to believe that OCDCC violated § 434 for failure to report opening cash on hand and for failure to provide complete partnership itemizations. The amended reports do not provide any information which would negate the Commission's previous finding.

The Commission has previously found reason to believe that OCDCC has accepted corporate and union contributions which have been used in connection with federal elections. Again, OCDCC has not provided any information which refutes the Commission's finding.

OCDCC registered in September 1978 and according to a computer run of the Commission C index, OCDCC expended \$92,648 in connection with 1978 primary elections, \$32,730 in connection with the 1978 general election and additionally expended \$25,000 in 1980. In light of the fact that OCDCC is an ongoing Committee, has repeatedly failed to provide adequate disclosure information

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to the Commission and because unanswered questions regarding their financial activities remain, especially those questions pertaining to the restricted account, the Office of General Counsel recommends that the Commission refer this committee to the Audit Division for consideration of a 2 U.S.C. § 437g audit within the parameters of the findings previously made in this matter.

It is recommended that the Commission take no further action against DSCC - Federal Candidates Fund for possible violation of 2 U.S.C. § 433 pending an audit of OCDCC.

United for Orange County  
MUR 1116

The Commission has found reason to believe that United for Orange County violated (a) § 441a(f) by accepting an excessive contribution totalling \$14,000 from Californians for Brown '78 and (b) § 433 for failure to file a statement of organization.

Conversely, the Commission has found reason to believe that Californians for Brown violated 2 U.S.C. §§ 433, 434, and 441a in connection with making excessive contributions to a political committee while an unregistered committee.

In response to the Commission's findings of reason to believe that this committee may have violated 2 U.S.C. § 433 and § 441a(f), the committee's treasurer informed RAD that United for Orange County filed reports with the Commission by mistake. According to the treasurer, its voter registration activities were conducted exclusively at the state and local levels, particularly in support of Governor Brown's state campaign in 1978.

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On June 3, 1980, the Commission issued an Order to James Kozik, the committee's treasurer, in connection with its get-out-the-vote ("GOTV") activities. The respondent, through counsel, reiterated its previous position that United for Orange is not a political committee as defined by the Act. Jerry Simmons, counsel to the respondent, maintains that the committee was solely organized to conduct voter registration and GOTV activities in a non-partisan manner and its filing of reports with the Commission was an error by their accountant.

United for Orange spent \$30,794 in connection with voter registration and GOTV activities in 1978.

Pursuant to 2 U.S.C. § 433, a political committee is required to register with the Commission within ten days of becoming a political committee under the Act. A political committee is further required by 2 U.S.C. § 434 to file periodic reports of receipts and expenditures with the Commission.

The Commission has recognized in Advisory Opinion 1978-50 that GOTV and voter registration expenditures are considered administrative expenses and may be allocated in the same manner as administrative expenses. Pursuant to 11 C.F.R. § 106.1(e) party committees and other political committees which have established federal campaign committees shall allocate administrative expenses on a reasonable basis between their federal and non-federal accounts in proportion to the amount of funds expended on federal and non-federal elections, or on another reasonable basis. The Commission has further recognized in Advisory Opinions 1978-50, 1978-28, 1978-102, 1978-10, Re: AOR 1976-72, and its

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December 1977 guideline, that various methods may be "reasonable" for the allocation of the GOTV expenses of political committees. Additionally, the Commission has held in AO 1978-28 that the expenses of a political party organization for GOTV drives in a federal election year are, at least in part, for the purpose of influencing the election of persons to federal office even though the drive is not conducted expressly or exclusively on behalf of federal candidates. See also AO 1978-50 and AO 1978-10.

It appears that the method of allocation set forth in Advisory Opinion 1978-102 is the method most appropriate for the allocation of the GOTV expenses of the United for Orange during 1978. The Commission determined in AO 1978-102 that a reasonable basis of allocation for GOTV activity is to determine the ratio of the number of federal candidates seeking election in the areas where get-out-the-vote activity is conducted, to the total number of all candidates, federal, state, and local, seeking office in the areas where get-out-the-vote activity is conducted. Thus, the application of this formula to the GOTV activity conducted by United for Orange and the committees to whom United for Orange made transfers in 1978 for GOTV activity results in the determination that an amount of \$3,240 is the amount attributable to federal activity that year.

This figure is derived from information received from the registrar of voters which indicates that the general election ballots in Orange County included a total of thirty-eight democratic candidates, four of which were federal candidates. Counsel for the respondent states that there were also numerous non-partisan

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city and county races in Orange County in 1978. Thus, total Committee expenditures of \$30,794 divided by the total number of candidates equal \$810 per candidate multiplied by four (the number of democratic federal candidates) equal \$3,240 total federal activity conducted by United for Orange.

In regard to this allocation, it should be noted that if the total number of local candidates were known and the total amount expended on exempted activities were known, the federal allocation would become smaller.

In view of the fact that the federal GOTV activity of United for Orange was only \$3,240 and since United did not engage in any other federal activity during 1978, it is recommended that the Commission take no further action against United for Orange.

It is recommended, however, that the Commission advise United for Orange, through the attached letter, that in the future, it must take care to allocate GOTV activities to federal elections if the activities are conducted in a federal election year or are on behalf of federal candidates.

Californians for Brown  
MUR 1117

The Commission has previously advised Californians for Brown '78 that it appeared to have violated 2 U.S.C. §§ 433, 434 and 441a by making excessive contributions totalling \$8,330 to Orange County Democratic Central Committee (1115) and \$14,000 to United for Orange County (1116).

The Brown Committee maintains that the subject contributions to the above committees were expressly intended for voter registration and GOTV activities at the State and local levels.

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The Brown Committee has stated that their contributions were misreported as being received in connection with federal elections.

Even though it is not known at this time whether the Brown Committee's contributions were deposited into non-federal accounts, the respondent contends that the subject contributions were earmarked for State and local activity.

Therefore, the intent of the respondent should be considered a mitigating factor and it is recommended that the Commission take no further action against Californians for Brown and close the file.

Committee to Re-Elect Patterson  
MUR 1118

and

Hannaford Re-Election Committee  
MUR 1120

As previously stated, the Commission has found reason to believe the Orange County Democratic State Central Committee violated 2 U.S.C. § 441a by making excessive contributions totalling \$5,000 to the Committee to Re-Elect Patterson to Congress as well as the Hannaford Re-Election Committee.

Conversely, both the Patterson and Hannaford Committees were found to have violated 2 U.S.C. § 441a(f) by accepting the subject excessive contributions. In light of the fact that both recipient committees were incorrectly advised by the contributor that it was affiliated with the State Central Committee and able to make the excessive contributions, since the contributions were accepted in connection with the 1978 election, and since the respondent committees are now terminated, it is recommended that

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the Commission take no further action with respect to the § 441a(f) violations and close the files.

Assemblyman Cordova Committee  
MUR 1119

The Assemblyman Cordova Committee contributed \$1,365 to the Orange County Democratic Central Committee during 1978.

Since the Committee exceeded \$1,000 in contributions, RAD advised the Committee that it appeared to have violated 2 U.S.C. §§ 433 and 434 for failure to report and register as a political committee with the Commission. No response was ever made by the respondent committee. However, in light of the small amount of the excessive contribution, the fact that it was made in 1978, and because the committee is not likely to again be active in federal elections, it is recommended that the Commission take no further action and close the file.

Re-Elect Paul Bell Committee  
MUR 1121

The Re-Elect Paul Bell Committee contributed \$7,876 to the Orange County Democratic Central Committee (OCDCC) in 1978.

Since the Committee exceeded \$1,000 in contributions, RAD advised the Committee that it appeared to have violated 2 U.S.C. § 433 and § 434 for failure to report and register as a political committee with the Commission. On March 20, 1979, the Commission found reason to believe that such violations had been committed.

The Bell Committee then sent a letter to OCDCC requesting a refund of the excessive portion of the contribution. The Bell Committee was advised that OCDCC could not make the requested refund because it was in debt. The Bell Committee then indicated

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to RAD that it would request an advisory opinion to determine whether a repayment plan with OCDCC would be appropriate to bring the Committee into compliance with the Act. According to Commission records, no AOR was ever submitted by the respondent.

In light of the fact that the subject violation occurred in 1978 and because the respondent is not likely to be involved in federal elections in the future, it is recommended that the Commission take no further action and close the files.

Round Up '78 Committee  
(AKA Chairs Committee) - MUR 1122

The Round Up '78 Committee was referred to OGC by RAD for making a contribution of \$5,300 to the Orange County Democratic Central Committee.

Since the Committee exceeded \$1,000 in contributions, RAD advised the committee that it appeared to have violated 2 U.S.C. § 433 and § 434 for failure to report and register as a political committee with the Commission. In response, it was discovered that the Chairs Committee was an account established by the chairman of OCDCC to hold fundraising proceeds until such time as all expenses for the fundraiser had been paid. The balance was then transferred to the OCDCC General Account.

An AOR was submitted by OCDCC concerning the Chairs account but an advisory opinion was not issued because this issue was part of a compliance matter and because the subject transactions had already occurred.

Because the Chairs Committee is actually an account of OCDCC which OGC has recommended be referred to Audit, it is recommended that this matter also be reviewed by Audit at that time.

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Mobile Homes PAC  
MUR 1123

The Mobile Homes PAC, as an unregistered committee, contributed \$5,000 to United for Orange County (MUR 1116), \$1,000 to Nate Holden Campaign Committee, and \$950 to Roos for Assemblyman Committee.

Since the Committee exceeded \$1,000 in contributions, RAD advised the committee that it appeared to have violated 2 U.S.C. § 433 and § 434 for failure to report and register as a political committee with the Commission. The Commission, on July 13, 1979, found reason to believe that such violations had been committed. The Committee responded by stating that the subject contributions were expressly earmarked for Voter Registration and GOTV at the state and local levels.

In light of the fact that these contributions were not intended for use in connection with federal elections, the recipient Committees erred, and since the violation is not likely to be repeated in the future, it is recommended that no further action be taken and close the file.

Recommendations

It is recommended that the Commission:

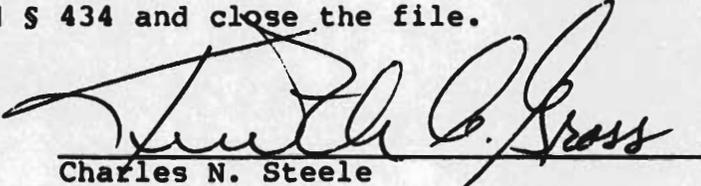
1. MUR 1115 - take no further action against DSCC - Federal Candidates Fund;
2. MUR 1115 - refer OCDCC to audit for review pursuant to 2 U.S.C. § 437g;
3. MUR 1116 - take no further action against United for Orange County's violations of 2 U.S.C. §§ 433 and 441a(f) and close the file;

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- Page 13
4. MUR 1117 - take no further action against Californians for Brown's violations of 2 U.S.C. § 433, § 434 and § 441a and close file;
  5. MUR 1118 - take no further action against the Committee to Re-Elect Patterson's violation of § 441a(f) and close the file;
  6. MUR 1119 - take no further action against Assemblyman Cordova Committee's violations of § 433 and § 434 and close the file;
  7. MUR 1120 - take no further action against Hannaford Re-Election Committee's violations of § 441a(f) and close the file;
  8. MUR 1121 - take no further action against Re-Elect Paul Bell Committee's violations of §§ 433 and 434 and close file;
  9. MUR 1122 - refer the Round Up '78 Committee to Audit for review pursuant to 2 U.S.C. § 437g; and
  10. MUR 1123 - take no further action against Mobile Homes PAC's violations of § 433 and § 434 and close the file.

Date

July 29, 1981

  
Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Attachments

Notification Letters (19 total pages)

62040342166



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS/JODY CUSTER *Jc*  
DATE: APRIL 21, 1981  
SUBJECT: MURs 1115-1123 - Interim Investigative Report #4  
dated 4-16-81; Signed 4-17-81; Received in  
OCS 4-17-81, 3:41

The above-named document was circulated to the  
Commission on a no-objection basis at 11:00, April 20, 1981.

There were no objections received in the Office  
of the Commission Secretary to the Interim Investigative  
Report at the time of the deadline.

62040342167

April 17, 1981

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Blissa T. Garr  
SUBJECT: MURs 1115-1123

Please have the attached Interim Invest Report  
distributed to the Commission on PINK PAPER. Thank you.

02040342168

RECEIVED  
OFFICE OF THE  
COMM. SECRETARY

81 APR 17 P3: 41

**SENSITIVE**

MURs 1115-1123,

- In the Matter of )
- Democratic State Central Committee )
- of California )
- Orange County Democratic Central )
- Committee (MUR 1115) )
- United For Orange County (MUR 1116) )
- Californians for Brown '78 (MUR 1117) )
- Committee to Re-Elect Patterson to )
- Congress (MUR 1118) )
- Assemblyman Cordova Committee )
- (MUR 1119) )
- Hannaford Re-Election Committee )
- (MUR 1120) )
- Re-Elect Bell Committee (MUR 1121) )
- Round-Up '78 (AKA: Chairs Committee) )
- (MUR 1122) )
- Mobile Home Parks Political Action )
- Committee (MUR 1123) )

INTERIM INVESTIGATIVE REPORT #4

Central to alleged violations in these MURs are the finances of the Orange County Democratic Central Committee (OCDCC) and United for Orange County (UOC), and the relationships, if any, between OCDCC, UOC and the Democratic State Central Committee of California (DSCCC). On May 29, 1980, the Commission voted to defer action pending receipt of information solicited in orders to be sent to the respective treasurers of each of these three organizations. On June 2, 1980, the orders were sent. Those addressed to the treasurers of OCDCC and DSCCC apparently were not received. New orders were sent on July 14, 1980. Responses received to the orders raise the possibility that OCDCC and UOC may not be political committees as defined by 2 U.S.C. §431(4)(c).

Therefore, additional information was requested from the Registrar of Voters (Orange County, California) and has recently been received by the Office of General Counsel. A final

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recommendation, based on the ballot information, will be made to the Commission shortly.

17 April 1988  
Date

  
Charles N. Steele  
General Counsel

62040342170



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*  
FROM: MARJORIE W. EMMONS / MARGARET CHANEY ~~MM~~  
DATE: NOVEMBER 10, 1980  
SUBJECT: MURs 1115 - 1123, Interim Investigative Report  
#3, dated 11-4-80; Signed 11-5-80; Received  
in OCS 11-6-80, 12:27

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, November 6, 1980.

There were no objections to the Interim Investigative Report.

62040342171

November 6, 1980

**MEMORANDUM TO:** Marjorie W. Emmons  
**FROM:** Elissa T. Garr  
**SUBJECT:** MURs 1115-1123

Please have the attached Interim Invest Report distributed to the Commission. Thankyou.

62040342172

RECEIVED  
FEDERAL ELECTION COMMISSION  
80 NOV 6 12: 27

BEFORE THE FEDERAL ELECTION COMMISSION  
November 4, 1980

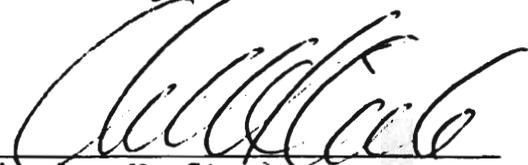
In the Matter of	)	
Democratic State Central Committee	)	
of California	)	
Orange County Democratic Central	)	
Committee (MUR 1115)	)	
United For Orange County (MUR 1116)	)	MURs 1115-1123
Californians for Brown '78 (MUR 1117)	)	
Committee to Re-Elect Patterson to	)	
Congress (MUR 1118)	)	
Assemblyman Cordova Committee	)	
(MUR 1119)	)	
Hannaford Re-Election Committee	)	
(MUR 1120)	)	
Re-Elect Bell Committee (MUR 1121)	)	
Round-Up '78 (AKA: Chairs Committee)	)	
(MUR 1122)	)	
Mobile Home Parks Political Action	)	
Committee (MUR 1123)	)	

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INTERIM INVESTIGATIVE REPORT #3

The operations and finances of the Orange County Democratic Central Committee (OCDCC) are central to the possible violations by other respondent's in these MURs. Upon analysis, the lengthy response of OCDCC to an order from the Commission was inadequate to answer many of the outstanding questions about OCDCC's structure. The Office of General Counsel is developing a further proposed order to be sent to OCDCC to clarify remaining issues.

5 November 1980  
Date

  
Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: SEPTEMBER 26, 1980  
SUBJECT: MURs 1115 - 1123, Interim Investigative Report #2,  
dated 9-22-80; Signed 9-24-80; Received in  
OCS 9-24-80, 3:35

The above-named document was circulated to the  
Commission on a no-objection basis at 11:00, September 25, 1980.

There were no objections to the Interim Investigative  
Report at the time of the deadline.

82040342174

September 24, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MURs 1115-1123

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

62040342175

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION  
September 22, 1980

80 SEP 24 P 3: 36

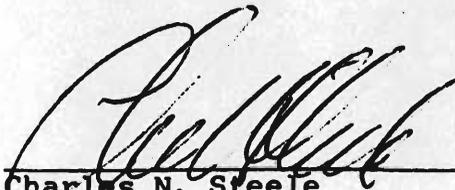
In the Matter of	)	
	)	
Democratic State Central Committee	)	
of California	)	
Orange County Democratic Central	)	
Committee (MUR 1115)	)	
United For Orange County (MUR 1116)	)	MURs 1115-1123
Californians for Brown '78 (MUR 1117)	)	
Committee to Re-Elect Patterson to	)	
Congress (MUR 1118)	)	
Assemblyman Cordova Committee	)	
(MUR 1119)	)	
Hannaford Re-Election Committee	)	
(MUR 1120)	)	
Re-Elect Bell Committee (MUR 1121)	)	
Round-Up '78 (AKA: Chairs Committee)	)	
(MUR 1122)	)	
Mobile Home Parks Political Action	)	
Committee (MUR 1123)	)	

02040342176

INTERIM INVESTIGATIVE REPORT #2

It was necessary in August to send a third copy of the Commission's order to the Treasurer of the Democratic State Central Committee of California (DSCCC). The Office of General Counsel has finally received responses to the Commission's orders from both DSCCC and the Orange County Democratic Central Committee. These responses are being analyzed.

29 Sept 1980  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *JC*  
DATE: AUGUST 19, 1980  
SUBJECT: MURs 1115 - 1123, Interim Investigative  
Report #1, dated 8-14-80; Received  
in OCS 8-15-80, 11:11

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, August 18, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

62040342177

August 15, 1980

**MEMORANDUM TO:** Marjorie W. Hanson

**FROM:** Elissa T. Carr

**SUBJECT:** MURs 1115-1123

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

8 2 0 4 0 3 4 2 1 7 8

80 AUG 15 AM: 11

In the Matter of )  
 Democratic State Central Committee )  
 of California )  
 Orange County Democratic Central )  
 Committee (MUR 1115) )  
 United For Orange County (MUR 1116) )  
 Californians for Brown '78 (MUR 1117) )  
 Committee to Re-Elect Patterson to )  
 Congress (MUR 1118) )  
 Assemblyman Cordova Committee )  
 (MUR 1119) )  
 Hannaford Re-Election Committee )  
 (MUR 1120) )  
 Re-Elect Bell Committee (MUR 1121) )  
 Round-Up '78 (AKA: Chairs Committee) )  
 (MUR 1122) )  
 Mobile Home Parks Political Action )  
 Committee (MUR 1123) )

MURs 1115-1123

INTERIM INVESTIGATIVE REPORT #1

Central to alleged violations in these MURs are the finances of the Orange County Democratic Central Committee (OCDCC) and United for Orange County (UOC), and the relationships, if any, between OCDCC, UOC and the Democratic State Central Committee of California (DSCCC). On May 29, 1980, the Commission voted to defer action pending receipt of information solicited in orders to be sent to the respective treasurers of each of these three organizations. On June 2, 1980, the orders were sent. Those addressed to the treasurers of OCDCC and DSCCC apparently were not received. New orders were sent on July 14, 1980. The Office of General Counsel has recently received a response from the Treasurer of UOC. When this response has been analyzed and the other responses have been received we will report further to the Commission.

14 August 1980  
Date

  
 Charles N. Steele  
 General Counsel

62040342179



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 2, 1980

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

Jacqueline A. Jessie  
Treasurer  
Orange County Democratic Central Committee  
12612 Ohmer Way  
Garden City, California 92641

RE: MUR 1115

Dear Ms. Jessie:

On June 11, July 19, and August 3, 1979, your committee was notified that the Commission had found reason to believe that your committee may have violated 2 U.S.C. §§ 441a, 441b and 434. You were given an opportunity to demonstrate that no further action should be taken in this matter.

In addition, on August 14, and October 16, 1979, your committee was informed that additional apparent violations of the Federal Election Campaign Act had been discovered during reviews of the committee's October 10, 10 Day Pre-General and Year End reports for 1978.

The responses received from the committee have not provided complete information or explanations regarding the possible violations of which the committee has been informed. Therefore, the matter has been referred to the Office of General Counsel for investigation.

You will find enclosed a set of written questions and requests for documents plus an Order of the Commission. The Order requires that the requested answers and documents be supplied to the Commission within 10 days of your receipt of the Order.

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

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Letter to: Jacqueline A. Jessie  
Page 2  
MUR 1115

For your information we are enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. If you have any questions, please contact Anne K. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,



Charles N. Steele  
General Counsel

**Enclosures**

Order to Answer Written Questions and  
to Produce Documents  
Written Questions and Requests for Production  
of Documents Under Order  
Procedures

02040342181

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: Jacqueline A. Jessie  
Treasurer  
Orange County Democratic  
Central Committee  
12612 Ohmer Way  
Garden City, California 92641

RE: MUR 1115

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and to supply certain documents.

The answers must be submitted under oath, and both the answers and the documents must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on *June 3*, 1980.

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

ATTEST:

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary to the Commission

02040342182

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS UNDER ORDER

TO: Jacqueline A. Jessie  
Treasurer,  
Orange County Democratic  
Central Committee

RE: MUR 1115

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and provide the documents requested.

You are required to submit your answers within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- A. Provide a list of all bank accounts utilized by the Orange County Democratic Central Committee (hereinafter "the Committee") from January 1, 1978, to the present, including the identifying names given by the Committee to any such accounts.
- B. Identify the nature of the sources of all funds placed in each Committee bank account during 1978; i.e., individual contributors, corporations, unions, etc.
- C. Identify all recipients of political contributions made from each Committee bank account during 1978.
- D. Identify the accounts from which expenditures were made by the Committee for voter registration and get-out-the-vote activities during 1978.
- E. Identifying all candidates of the Democratic party in the general election of 1978 for federal, state and local offices in or representing Orange County.
- F. Provide copies of all voter registration/get-out-the-vote printed materials used by OCDCC during the 1978 general election.

62040312183

Jacqueline A. Jessie

Page 2

Written Questions/Request for Production of Documents

- G. State the total amount spent by the Committee on voter registration/get-out-the-vote activities with regard to the general election campaign of 1978.
- H. Provide a description of the relationship between the Committee and the California Democratic Party-State Central Committee (hereinafter "the State Committee"). The description should cover any role the State committee had in the initial organizing of the Committee; the amounts of funds transferred by the State committee to the Committee; the involvement of the State committee in the Committee's activities from January, 1978 to the present, including its decisions concerning the support of candidates; the names of any common officers or employees; and any additional information which would support the Committee's claim of affiliation with the State committee. Supply copies of all correspondence between the Committee and the State committee in these regards.
- I. Provide copies of the Committee's constitution and by-laws or other related documents which explain the Committee's organization and purposes.

82040342184



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 2, 1980

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

Ms. Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund  
9454 Wilshire Blvd., Suite 209  
Beverly Hills, California 90212

RE: MUR 1115

Dear Ms. Collier:

On September 13, 1979, you were notified that the Commission had found reason to believe that your committee has violated 2 U.S.C. § 433. You were given an opportunity to demonstrate that no further action should be taken in this matter.

No response has been received by the Commission. Therefore the matter has been referred to the Office of General Counsel for further investigation.

You will find enclosed a set of written questions, plus an Order of the Commission. This Order requires that the requested answers be supplied to the Commission within 10 days of your receipt of the Order.

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

For your information we enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. Should you have any questions, please call Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele  
General Counsel

Enclosures

- Order to Answer Written Questions and to Produce Documents
- Written Questions and Request for Production of Documents Under Order
- Procedures

62040342185

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund  
9454 Wilshire Blvd., Suite 209  
Beverly Hills, California 90212

RE: MUR 1115

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

The answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on *June 3*, 1980.

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

ATTEST:

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary to the Commission

62040342186

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR DOCUMENTS UNDER ORDER

TO: Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund

RE: MUR 1115

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below.

You are required to submit your answer within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- 82040312187
- A. Provide a description of the relationship between the California Democratic State Central Committee (hereinafter "DSCC") and the Orange County Democratic Central Committee (hereinafter "OCDCC"). This description should cover any role which DSCC and the Fund had in the initial organizing of OCDCC, the amounts of funds transferred by DSCC to OCDCC, the involvement of DSCC in OCDCC's activities from January, 1978, to present, including OCDCC's decisions concerning the support of candidates; the names of any common officers or employees; and any additional information which would support or counteract OCDCC's claim of affiliation with DSCC. Supply copies of all correspondence between DSCC and OCDCC in these regards.
  - B. Do the California Democratic State Central Committee and its Federal Candidates Fund affirm affiliation with the Orange County Democratic Central Committee?



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 2, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

James Kozik  
Treasurer  
United for Orange County  
23712 Via San Gil  
Mission Viejo, California 92675

RE: MUR 1116

Dear Mr. Kozik:

On February 27 and March 30, 1979, your committee was notified that the Commission had found reason to believe that your committee has violated 2 U.S.C. §§ 441a and 433. You were given an opportunity to demonstrate that no further action should be taken in this matter.

The responses received from your committee, including your letter of March 20, 1980, have not provided complete information regarding the activities which may constitute the violations about which the committee has been informed. Therefore the matter has been referred to the Office of General Counsel for further investigation.

The specific matter of concern to the Commission is whether the voter registration and get-out-the-vote activities undertaken by the committee in 1978 benefited candidates for federal office and, if so, how much of the committee's expenditures should be allocated to such federally-related activity. If such an allocation resulted in federally-related expenditures in excess of \$1000, the committee became a political committee for purposes of the Federal Election Campaign Act and thus covered by the registration and reporting requirements and the contribution and expenditure limitations contained therein.

With regard to the above issue, you will find enclosed a set of written questions and requests for documents, plus an Order of the Commission. This Order requires that the requested answers and documents be supplied to the Commission within 10 days of your receipt of the Order.

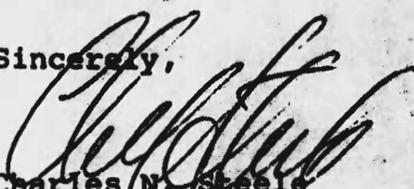
02040312188

Letter to: James Kozik  
Page 2  
MUR 1116

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

For your information we are enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. Should you have any questions, please call Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosures

Order to Answer Written Questions and  
Produce Documents  
Written Questions and Requests for  
Production of Documents Under Order  
Procedures

02040342189

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: James Kozik  
Treasurer  
United for Orange County  
23712 Via San Gil  
Mission Viejo, Calif. 92675

RE: MUR 1116

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to the Order and to provide certain documents.

The answers provided must be submitted under oath, and both the answer and documents must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on *June 3*, 1980.

*Max L. Friedersdorf*  
Max L. Friedersdorf  
Chairman

ATTEST:

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary to the Commission

02040342190

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS UNDER ORDER

TO: James Kozik  
Treasurer  
United for Orange County

RE: MUR 1116

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below.

You are required to submit your answers within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- A. Provide copies of the constitution and by-laws of United for Orange County (hereinafter "the Committee") and any other relevant documents explaining the Committee's organization and purposes.
- B. Provide a list of all bank accounts used by United for Orange County during 1978.
- C. Identify the nature of the sources of all funds placed in each Committee bank account during 1978, i.e., contributions from individual, contributions from corporations, etc.
- D. Identify all recipients of political contributions made from each Committee bank account during 1978.
- E. State the total amount spent by the Committee on voter registration and get-out-the-vote activities with regard to the general election of 1978.
- F. Identify the accounts from which expenditures were made by the Committee for voter registration and get-out-the-vote activities during 1978.
- G. Identify all candidates of the Democratic Party in the general elections of 1978 for local, state and federal offices in or representing Orange County.
- H. Provide copies of all voter registration/get-out-the-vote printed materials used by United for Orange County during the general election of 1978

02040342191



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*  
DATE: JUNE 2, 1980  
SUBJECT: ORDERS IN RELATION TO MURS 1115 & 1116

The attached orders, approved by a vote of 6-0 on  
May 29, 1980, have been signed and sealed this date.

620403442192

ATTACHMENTS:  
Orders (3)  
Kozik, Jessie, & Collier

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MURs 1115-1123

- Democratic State Central Committee of California
- Orange County Democratic Committee (MUR 1115)
- United for Orange County (MUR 1116)
- Californians for Brown '78 (MUR 1117)
- Committee to Re-Elect Patterson to Congress (MUR 1118)
- Assemblyman Cordova Committee (MUR 1119)
- Hannaford Re-Election Committee (MUR 1120)
- Re-Elect Bell Committee (MUR 1121)
- Round-Up '79 (AKA: Chairs Committee) (MUR 1122)
- Mobile Home Parks Political Action Committee (MUR 1123)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 29, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MURs 1115-1123:

1. Defer action pending receipt of information solicited in the Orders attached to the First General Counsel's Report dated May 27, 1980.
2. Approve and send the Orders and letters as attached to the above-named report.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

5/30/80  
Date

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary to the Commission

Received in Office of the Commission Secretary: 5-27-80, 10:51  
Circulated on 48 hour vote basis: 5-27-80, 4:00

02040342193

May 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

F DM: Elissa T. Garr

SUBJECT: MURs 1115-1123

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

62040342194



2. that several corporate and union contributions were made to OCDCC in violation of 2 U.S.C. § 441b;
3. that an individual contributor violated 2 U.S.C. § 441a by making an excessive contribution to OCDCC;
4. that the Assemblyman Cordova Committee violated 2 U.S.C. §§ 433 and 434 by making a contribution to OCDCC without registering with and reporting to the Commission;
5. and that Californians for Brown '78 violated 2 U.S.C. § 441a, 433 and 434 by making excessive contributions to OCDCC and to United for Orange County and by not registering with and reporting to the Commission.

Earlier RTB Findings

As the result of earlier recommendations made directly to the Commission by the Reports Analysis Division, the Commission has already found reason to believe that OCDCC may have violated

1. 2 U.S.C. § 434 by failing adequately to disclose its opening funds and to disclose properly the individuals involved in partnership contributions;
2. 2 U.S.C. § 441a(f) by accepting excessive contributions from Californians for Brown '78; and
3. 2 U.S.C. § 441b by accepting contributions from corporations and labor unions.

Upon the recommendation of the Reports Analysis Division, the Commission has also found reason to believe

1. that the Democratic State Central Committee of California violated 2 U.S.C. § 433 by failing to report its affiliation with OCDCC;
2. that United for Orange violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Californians for Brown '78;
3. that the Mobile Home Parks PAC violated 2 U.S.C. §§ 433 and 434 by failing to register with and report to the Commission after making contributions to United for Orange County and to two candidates for federal and state office;
4. that the Re-Elect Paul Bell Committee violated 2 U.S.C. §§ 433 and 434 by failing to register with and report to the Commission after making contribution to OCDCC;
5. that Round-Up '78 (now the Chairs Committee) violated 2 U.S.C. §§ 433 and 434 by failing to register with and report to the Commission after making contributions to OCDCC; and

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6. that the Hannaford Re-Election Committee and the Committee to Re-Elect Patterson violated 2 U.S.C. § 441a(f) by accepting excessive contributions from OCDCC.

#### FACTUAL AND LEGAL ANALYSIS

A. MURs 1115, 1117, 1119, 1121 and 1122 have in common the activities and accounts of the Orange County Democratic Central Committee. Although many efforts have been made by the Reports Analysis Division to obtain clear and complete explanations of OCDCC's financial structure and transactions, particularly during 1978, no official, written explanation has been forthcoming. All that is known is that OCDCC has apparently operated with three accounts - a restricted account containing corporate and union monies, a general account, and the "Chairs Committee" account which was established for purposes of segregating proceeds from fundraisers until all expenses for such events had been paid, at which time any remaining proceeds were placed in the general account. OCDCC's reports to the Commission have apparently included the activities of both the general and the restricted accounts. It has not been possible to determine the relationships of these accounts to the OCDCC's federal activity. Nor has it been ascertained into which account the contributions from Californians for Brown '78, the Re-Elect Paul Bell Committee, and the contributions from an individual contributor, Richard J. O'Neill, have been placed.

Californians for Brown '78 insists that its contribution was intended for voter registration/get-out-the-vote activity at the state and local levels. (See Attachment III-b.) However, no information has been supplied in support of an actual division in OCDCC's 1978 activities and accounts between state/local elections and federal elections. In light of the Commission's policy that voter registration/get-out-the-vote activities during a federal election year are to be deemed as having been carried out for purposes of influencing the persons contacted to vote for all candidates of a political party, it can be assumed that a portion of OCDCC's voter registration/get-out-the-vote activities involved federal campaigns. (See AO's 1978-28 and 1978-50).

It is the opinion of the Office of General Counsel that more information is needed from OCDCC before decisions can be made concerning possible violations of the Act by that committee or by Californians for Brown '78, the Assemblyman Cordova Round-Up '78, or by individual, corporate and union contributors. Therefore it is recommended that pursuant to 2 U.S.C. § 437d(a)(1) an order be issued to OCDCC for answers to the questions attached hereto.

B. MURs 1115, 1118 and 1120 involve the acceptance by the Committee to Re-Elect Patterson to Congress and the Hannaford Re-Election Committee of \$5,000 each in contributions from OCDCC in 1978. On February 28, 1979, upon the recommendation

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of the Reports Analysis Division, the Commission found reason to believe that violations of 2 U.S.C. § 441a on the parts of these two candidate committees had occurred.

In response to the RTB finding, these committees and OCDCC have all asserted that OCDCC is a multi-candidate committee by virtue of affiliation with the California Democratic Party State Central Committee and therefore qualified to make \$5,000 contributions to federal candidates. OCDCC has submitted an amendment to its statement of organization claiming such affiliation. (See Attachment I-f.) However, differing opinions on this issue have been expressed by the former and present treasurers of OCDCC. (See Attachments I-g, h and i.) The State Central Committee has not replied to inquiries as to its agreement or disagreement with OCDCC's claim. Upon the recommendation of the Reports Analysis Division, the Commission on September 13, 1979, found reason to believe that the Democratic State Central Committee's Federal Candidates Fund has violated 2 U.S.C. § 433.

11 C.F.R. § 110.3(b)(2)(ii) states that

"(a)ll contributions made by the political committees established, financed, maintained, or controlled by a State party committee and by subordinate State party committees shall be presumed to be made by one political committee."

In the present instance it is unclear, absent confirmation by the California Democratic State Central Committee, whether that committee established, maintains, finances or controls OCDCC. The reports filed by OCDCC do not itemize transfers from the state committee. Therefore, it is the opinion of the Office of General Counsel that additional information is needed before decisions can be made concerning the disposition of MURs 1118 and 1120. It is recommended that any order issued to OCDCC for further information include questions related to that committee's relationship to the California Democratic Party-State Central Committee. Such questions are included in the proposed inquiry attached hereto. It is also recommended that, pursuant to 2 U.S.C. § 437d(a)(1), an order be issued to the California State Central Committee for answers to questions concerning that committee's relationship with OCDCC.

C. MURs 1116 and 1123 involve the activities of United for Orange County, a political committee allegedly unaffiliated with the Orange County Democratic Central Committee. In response to the Commission's findings of reason to believe that this committee may have violated 2 U.S.C. §§ 433 and 441a(f), the committee's treasurer has informed the Reports Analysis Division that United for Orange County filed reports with the Commission by mistake. According to the treasurer, its voter registration activities were conducted exclusively at the state and local levels, particularly in support of Governor Brown's state campaign in 1978. Later, in a telegram dated May 21, 1979, and a letter dated March 20, 1980, the treasurer repeated this assertion. He has stated that the Committee's reports are being amended; but no such amendments have been received by the Commission. (See Attachments II-b, c and d.)

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Again, it is the opinion of the Office of General Counsel that additional information is needed concerning the accounts and activities of United for Orange County before decisions can be made concerning possible violations of the Act by this committee, by Mobile Park Homes PAC, by Californians for Brown '78, and by OCDCG. Therefore, the Office of General Counsel recommends that, pursuant to 2 U.S.C. § 437d(a)(1), an order be issued to United for Orange County for answers to the questions attached hereto.

Recommendation

1. Defer action pending receipt of information solicited in the attached Orders.
2. Approve and send the attached Orders and letters.

Attachments

I-IX. Referrals from Reports Analysis Division

- X. Letter to Jacqueline A. Jessie
- a. Order To Answer Written Questions and To Produce Documents
  - b. Written Questions and Request To Produce Documents

- XI. Letter to James Kozik
- a. Order To Answer Written Questions and To Produce Documents
  - b. Written Questions and Request To Produce Documents

- XII. Letter to Loretta Collier
- a. Order to Answer Written Questions and To Produce Documents
  - b. Written Questions and Request to Produce Documents

XIII. Authorization to Issue Orders

62040342199

REFER TO INSTRUCTIONS ON REVERSE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

ATTACHMENT I-a

DATE 12/27/79 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Worf  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW [Signature]  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Orange County Democratic Central Committee C00100677

TREASURER: Jacqueline Jessie

1115

ADDRESS: 12612 Ohmer Way -  
Garden Grove, CA 92641

AFFILIATE(S): Possible D.S.C.C. Federal Candidates Fund (See Attachment 19)

ALLEGATION(S): CITE: ATTACHMENT(S):  
Please see attached page for Allegations

DATE INITIATED: 7/10/78

MANNER IN WHICH REVIEW WAS INITIATED:

Normal review  Other:  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM May 23, 1978 TO June 30, 1979

TOTAL RECEIPTS \$ 83,581 TOTAL EXPENDITURES \$ 140,528

CASH ON HAND \$ 3,196 (as of 6/30/79) DEBTS \$ 5,000 owed by committee (as of 6/30/79)

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

Request for Additional Information (July 10, 1978) mailed 10/2/78 3  
 Request for Additional Information (October 10, 1978) mailed 11/24/78 5  
 3SVI/78-39 (July 10, 1978) mailed 12/26/78, returned 1/11/79, remailed 3/27/79 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

Telecon: Gore with Secretary of State (9/26/78) refer to att. 10 2  
 Telecon: Gore with Secretary of State (10/16/78) refer to att. 10 4  
 Telecon: Stolaruk with Jessie (3/23/79) 9  
 Telecon: Stolaruk with Secretary of State (3/29/79) 11

REASON(S) FOR REFERRAL: ATTACHMENT

Inadequate response to July 10, 1978 RFAI (12/1/78) 6  
 Inadequate response to October 10, 1978 RFAI (1/1/79) 8  
 Response to 3SVI/78-39 (5/22/79) legitimacy undetermined (Refer to att. 24,33) 19  
 Please see continuation of Reason(s) for Referrals

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION:

Request for Additional Information sent to D.S.C.C. Federal Candidate Fund (6/18/79) 24  
Please see continuation of Other Relevant Information  
PREVIOUS UGL/AUDIT REFERRALS FROM RAD:

None

62040342200

RESULTS OF REVIEW, continued  
Orange County Democratic Central Committee

<u>Results of Review</u>	<u>Attachment</u>
3SV1/78-76 (July 10 & October 10, 1978) mailed 3/27/79	10
3SV2/78-76 mailed 6/11/79 returned 7/1/79, remailed 7/6/79	22
3SV1/79-15 (October 10, 1978) mailed 5/2/79	15
3SV2/79-15 and 3RQ2/79-46 (July 10 & October 10, 1978) mailed 7/19/79 returned 8/14/79, remailed 8/14/79	26
3SV1/79-27 (10 Day Pre-General & Year End, 1978) mailed 5/23/79 remailed 6/25/79	20
3SV1/79-54 (October 10, 10 Day Pre-General and Year End, 1978) mailed 5/31/79	21
3SV2/79-54 mailed 8/3/79	29
3SV1/79-146 (October 10, 10 Day Pre-General and Year End, 1978) mailed 10/16/79	35
RTB has not been found for 3SV1/79-27 and 3SV1/79-146	

02040342201

Reasons for Referral, continued  
Orange County Democratic Central Committee

Reasons for Referral

Attachment

No response to 3SV1/78-76 or 3SV2/78-76

No response to 3SV1/79-15, 3SV2/79-15 or 3RQ2/79-46

No response to 3SV1/79-27

No response to 3SV1/79-54 or 3SV2/79-54

Inadequate response to 3SV1/79-146 (10/30/79)

37

02040342202

COMMUNICATIONS WITH CANDIDATES/COMMITTEES, continued  
Orange County Democratic Central Committee

<u>Communications with Candidates/Committees</u>	<u>Attachment</u>
Telecon: Stolaruk with Jessie (4/12/79)	12
Telecon: Stolaruk with Jessie (4/19/79)	13
Telecon: Stolaruk with Adler (5/1/79)	14
Telecon: Stolaruk with Jessie (5/7/79)	16
Telecon: Stolaruk with Jessie (5/14/79)	17
Telecon: Krouse with Gilbert (5/21/79)	18
Memo to Files: Stolaruk (6/11/79)	23
Memo to Files: Greevy (6/25/79)	25
Telecon: Stolaruk with Jessie (7/26/79)	27
Memo to Files: Greevy (7/26/79)	28
Memo to Files: Greevy (8/14/79)	30
Telecon: Stolaruk with Jessie (9/6/79)	32

62040342203

Allegation

Failure to adequately disclose source of initial cash on hand

Cite

2 U.S.C. 434b

Attachments

3, 6

Allegation

Failure to properly attribute non-corporate business contributions

Cite

2 U.S.C. 434

Attachments

5, 8

Allegation

Excessive contributions to Federal candidates

Cite

2 U.S.C. 441a

Attachment

7

02040342204

Allegation

Receipt of prohibited contributions

Cite

2 U.S.C. 441b

Attachments

10, 20

Allegation

Excessive receipts from unregistered committees

Cite

2 U.S.C. 441a

Attachments

15, 35

Allegation

Excessive contributions received from an individual

Cite

2 U.S.C. 441a

Attachment

21

OF ORANGE COUNTY, CALIFORNIA

79 MAY 25 PM 12:47

ATTACHMENT I-f

May 22, 1979

Mr. Ron Krause  
Federal Elections Commission  
Franklin Square Building  
1325 "K" Street, Washington D.C. 20463

Re: C00100677

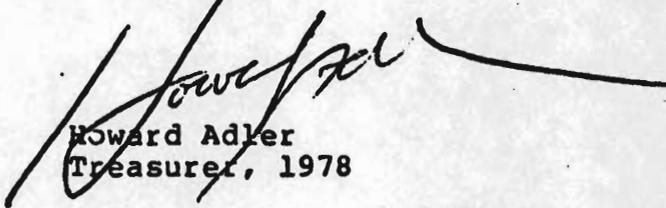
Dear Mr. Krause:

Please be advised that at all times during 1978, the Orange County Democratic Central Committee was affiliated with the California Democratic Party - State Central Committee.

This affiliation proscribes to all of the precepts of the election code of California.

Please consider this letter as an amendment to the Statement of Organization filed by me on behalf of the Democratic Party of Orange County.

Sincerely,

  
Howard Adler  
Treasurer, 1978

HA/sr

cc: Ms. Lisa Stolaruk

82040342205

326 NORTH BROADWAY, SANTA ANA, CALIFORNIA 92701  
TELEPHONE: (714) 835-7460

DATE: 4/19/79

TIME: 5:00

COMMITTEE: Orange County Dem. Central Committee

PERSON SPOKEN TO: Jackie Jessie

FEC'R: Wes Stotard

SUBJECT: Assorted problems

Ms. Jessie called with several questions about SV's that were sent, specifically the M letters. She knew nothing about limitations or the Act & Regs as a whole. She said that she has gotten calls from newspapers about the M letters, and that she was not informed by the FEC of these violations. I explained that the FEC sends the M letters only to the contributing committees. I also explained the \$1,000 threshold as well as the prohibition against corp. & labor contributions. She said that the Committee has a "restricted" account in which they put corporate contributions. She said that this account is not used for Federal activity because it has "dirty" money in it. I asked why the Cmte. is reporting these receipts if in fact the \$1,000 was not received by the Fed. acct. She paused and said that she thinks that the Cmte. is reporting the activity in both accounts, but that she was not totally sure because an accounting firm files out the reports. I requested that she familiarize herself with the Cmte.'s bookkeeping system and find out exactly what the Cmte. has been reporting to the FEC. I explained that the more she knows, and is able to relate to me, the better able I will be to advise.

committed. I asked that she call me back once she  
has all of the information together.

Ms. Jossie was very easy to talk with, and she was  
insistent in her assertions that she wants to comply w/ the  
law. I also believe that she was totally ignorant of the  
law, and its limitations & prohibitions - she honestly did  
not know.

She also asked me about affiliation. She said that  
by statute, they are affiliated with the California Dem.  
State Central Cmte (non-registered), and they don't  
transfer funds, or consult with them about cmte. operations -  
they are independent of them. I said that I didn't agree.  
I thought they were affiliated by our ~~state~~ definition. I asked  
her, however, about their relationship to United for Orange. She  
said that they were totally separate & distinct entities &  
they are not involved at all in their operations.

DATE: 5/1/79TIME: 1:10COMMITTEE: Orange County Dem. Central CommitteePERSON SPOKEN TO: Donald Adler (714) 541-5227FIC'R: Diana MolarukSUBJECT: 3S.VI/78-39

Mr. Adler called me in response to 3S.VI/78-39 which dealt with 2 \$5000 contributions to Patterson & Hanford. Orange County was notified that, since they had not yet acquired multi-candidate status, they could not contribute in excess of \$1,000 per candidate, per election.

Mr. Adler told me that they are affiliated with the D.S.C.C. Federal Candidates Fund in Beverly Hills, but that he neglected to claim affiliation on the Center's Statement of Organization. He said that he contacted the State Central Cmte. prior to transferring the money to the candidates, and they informed him that they had not contributed any money to the candidates. Adler surmised that by virtue of affiliation the 2 committees had a joint limitation. I told him that Orange County and the State Central Cmte. had to amend their Statements of Organization to claim mutual affiliation. Once we receive this documentation, we can resolve the

DATE: 5/7/72

TIME: 3:30

COMMITTEE: Orange County Democratic Central Committee

PERSON SPOKEN TO: Jackie Jessie (714) 632-8111

FEC'R: Jim Stoltz

SUBJECT: Receipt of SV

I called Ms. Jessie to alert her to the fact that we sent her a letter (no one was at the office to sign for certified mail.) She said she'd check into it.

J.J. asked me if I had spoken w/Howard Adler & whether I had sent him form 3's. I said yes on both counts. She asked me whether the Lanningford-Patterson matter had been resolved. I ~~told her the~~ reiterated the information Adler & I had (see Telecon 5/1). J.J. said that it was very odd that Adler said that Orange County & the State Cent. Cmte. were affiliated. She had asked him that question before and he stated that they were NOT affiliated. Then J.J. asked me whether they were affiliated. I said that I couldn't answer that question and advised her to consult with the other members of the Committee.

NOTE: The phone number for the Committee (Orange County), (714) 835-7460, was out of service. Ms. Jessie said that they were moving the phones. The number at the top of the Telecon is Ms. Jessie's work number.

REPORTS ANALYSIS REFERRAL SHEET

DATE 12-27-78 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Warfel  
 THROUGH: STAFF DIRECTOR A.A. Cross COMPLIANCE REVIEW [Signature]  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: United for Orange C00104430

TREASURER: James Kosik

ADDRESS: 4341 Birch Street, Suite 207  
Newport Beach, CA 92660

AFFILIATE(S): Information not available

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Failure to file Statement of Organization 2 U.S.C. 433 3  
 Excessive contribution received from an unregistered committee 2 U.S.C. 441a 2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

Normal review  Other:  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM July 1, 1978 TO October 23, 1978

TOTAL RECEIPTS \$ 34,490 TOTAL EXPENDITURES \$ 33,021

CASH ON HAND \$ 869 (as of 10/23/78) DEBTS \$ 1,000 owed by the committee (as of 10/23/78)

HISTORY:

RESULTS OF REVIEW:

3SV1/78-75 (October 10 Report) 12/26/78 ATTACHMENT 2  
 3SV2/73-75 (October 10 Report) 2/27/79 ATTACHMENT 4  
 3SV1/78-31 mailed 1/30/79 ATTACHMENT 3  
 3SV2/78-81 mailed 3/20/79, returned 4/22/79, re-mailed 4/23/79 ATTACHMENT 5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

Telecon: Stolaruk with Kosik (4/25/79) ATTACHMENT 7  
 Memo to Files: Greevy (4/23/79) ATTACHMENT 6

REASON(S) FOR REFERRAL:

Inadequate response to 3SV1/78-76 and 3SV2/78-75 (6/21/79) ATTACHMENT 8  
 No response to 3SV1/78-81 or 3SV2/78-81

OTHER PENDING ACTIONS INITIATED BY RAD:

3SV1/78-65 (December 26, 1978) Excessive contribution letter to Californians for Brown '78 ATTACHMENT 9  
 RAD is preparing a referral to OGC on Californians for Brown '78

OTHER RELEVANT INFORMATION:

An additional \$3,000 was received by United for Orange from Californians for Brown on 10/11/78. The additional amount was not included on the surface PREVIOUS OGC/AUDIT REFERRALS FROM RAD: violation. (Attachment #10)

NONE

02040342210

DATE: 4/25/79TIME: 2:10COMMITTEE: United for Orange CountyPERSON SPOKEN TO: James Kosik, Treasurer (714) 549-8646FEC'R: Oliver HotarukSUBJECT: SV's

I contacted Mr. Kosik today to speak with him about the SV's that were sent and why they were not responded to.

Mr. Kosik said that the letters were just forwarded to him last night from the Santa Ana address, and that he has contacted Jules Glazer's accounting firm to "clean up" the reports.

Briefly, Mr. Kosik said that United for Orange was registered with the Commission erroneously, because the voter registration activity that was conducted was exclusively for state/local activity (particularly for Gov. Brown). He said that he has records to prove it.

I asked that he forward a letter to the FEC in the interim, stating that the center is working toward responding to the SV's. I gave Mr. Kosik my phone number & he said that he would give it to Mr. Glazer, since he will be working with the reports. A letter is forthcoming.

Western Union

Telegram

LLA240 WAB503(1627)(4-068972E141)PD 05/21/79 1627 ATTACHMENT II-C

ICS IPMRNCZ CSP

1979 MAY 22 PM 12:23

7149498646 TDRN NEWPORT BEACH CA 77 05-21 0427P EST

PMS MS LISA STOLARUK CARE FEDERAL ELECTION COMMISSION, RDM RPT

DLY BY MGM, DLR 1325 K NW

WASHINGTON DC 20463

DEAR MS STOLARUK

PLEASE BE ADVISED THAT THE STATEMENTS FILED BY UNITED FOR ORANGE COUNTY WITH THE F.E.C. ARE INCORRECT AND ARE PRESENTLY BEING AMENDED. NUMEROUS ITEMS REPORTED RECEIVED F.E.C. WERE STATE RELATED AND SHOULD NOT HAVE BEEN INCLUDED IN OUR REPORT.

I AM SCHEDULED TO MEET WITH THE ACCOUNTANT FOR U.F.O.C. AND WILL ADVISE YOU OF THE TIME REQUIRED TO AMEND OUR REPORT.

THANK YOU FOR YOUR ASSISTANCE AND UNDERSTANDING IN THIS MATTER.

JIM KOSIK 4341 BIRCH ST SUITE 207 NEWPORT BEACH CA 92660

NNNN

BF-1201 (RS-69)

0 2 0 4 0 3 4 2 2 1 2

Western Union Telegram

79 MAY 22 PM 12:23

RECEIVED  
FEDERAL ELECTION  
COMMISSION

FEDERAL ELECTION  
COMMISSION

23712 Via San Gil Mission Viejo, California 92675

'80 MAR 25 PM 12:30

March 20, 1980

Mr. Thomas J. Haselhorst  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Dear Mr. Haselhorst:

Please be advised that United For Orange County has not operated as a state campaign committee since November 1978. United For Orange County was permanently terminated in November 1978.

Also be advised that United For Orange County was a State Committee and in no way conducted any activity that would require filing with the F.E.C. In 1978, our accountant made a mistake and filed with the F.E.C. Since 1978, I have written over 12 letters explaining this, hopefully this letter will be the last.

If you have any questions, by mailing address is:

23712 Via San Gil  
Mission Viejo, CA 92675

Thank you for your help in this matter.

Sincerely,

*James F. Kosik*  
James F. Kosik

JFK:lss

02040342213

REPORTS ANALYSIS REFERRAL SHEET

DATE 1/1/79 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Norfel  
 THROUGH STAFF DIRECTOR ALL COMPLIANCE REVIEW [Signature]  
 FROM ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Californians for Brown '78

TREASURER: Caroline Fox

ADDRESS: 630 Chateau Place  
Los Angeles, CA 90005

AFFILIATE(S): N/A

ALLEGATION(S): Failure to register and report as a political committee  
 Excessive Contributions Made  
 Note: Contributing Committee not informed of 441a violation in letter

CITE: 2 U.S.C. 455 & 454  
 2 U.S.C. 441a

ATTACHMENT(S): 1  
 1

DATE INITIATED: 12/26/78

MANNER IN WHICH REVIEW WAS INITIATED:

Normal review  Other;  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A

TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A

CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:

RESULTS OF REVIEW: 3SV1/78-65 (mailed 12/26/78, no certified card received. Re-mailed to new address 5/23/79) ATTACHMENT 1

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

Telecon: Stolaruk with Brown headquarters (3/27/79) 2  
 Telecon: Stolaruk with Political Reform Division (10/19/79) 4

REASON(S) FOR REFERRAL: Inadequate response to 3SV1/78-65 (6/5/79) ATTACHMENT 3

OTHER PENDING ACTIONS INITIATED BY RAD: NONE ATTACHMENT

OTHER RELEVANT INFORMATION: Referrals for recipient committees for excessive contributions included in this packet of referrals: Orange County Democratic Central Committee PREVIOUS OGC/AUDIT REFERRALS FROM RAD: United for Orange County NONE

02040342214

# CALIFORNIANS BROWN '78

May 30, 1979

Ms. Linda Stolaruk  
Federal Elections Commission  
1325 K Street, NW  
Washington, DC 20463

RE: 3SVI/78-65

Dear Ms. Stolaruk;

Regarding the letter from Orlando B. Potter dated December 26, 1978, I wish to restate that Californians for Brown '78 is not a political committee under federal law, per Ms. Fox's telephone conversation with Chadwick R. Gore in January, 1979.

Jim Kossack of the United for Orange County and the Orange County Democratic Central Committee indicated to me that the people preparing the reports did not know of the requirements concerning segregating income related to federal vs. local elections. He also indicated that amendments will be filed on both these reports to correct this. He emphasized that none of the money expended by our committee was used in any manner for any federal campaign.

The amounts expended by Californians for Brown '78 were intended for, and used for, expenses regarding registration of voters and a "get out the vote" campaign, and both efforts were directed toward state and local candidates. Therefore, Californians for Brown '78 is not liable for filing reports under the Federal Elections Commission.

If you have any further questions, I would be happy to help you.

Sincerely,



MARK ROBERT LUBOW  
Treasurer

\*\*\* NOTE: A TELECON CAN NOT BE LOCATED FOR THE CONVERSATION MENTIONED IN THIS RESPONSE.

630 Shatto Place • Los Angeles, California 90005

62040342215

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/22/78 ANALYST Mike Filler  
 TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Suzanne Wilson  
 THROUGH: STAFF DIRECTOR ALC COMPLIANCE REVIEW [Signature]  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: COMMITTEE TO RE-ELECT PATTERSON TO CONGRESS-C00036905  
 TREASURER: Scott A. Smith  
 ADDRESS: 1200 N. Main St.  
 Santa Ana, California 92701

118

AFFILIATE(S): Patterson For Congress  
 ALLEGATION(S): Receipt of excessive committee contribution  
 CITE: 2 U.S.C. 441a

ATTACHMENT(S)  
2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:  
 Normal Review     Other:  
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM May 23, 1978 TO June 26, 1978  
 TOTAL RECEIPTS \$ 9,158 TOTAL EXPENDITURES \$ 3,065  
 CASH ON HAND \$ 24,901 DEBTS \$ -0-

HISTORY:

- RESULTS OF REVIEW: ATTACHMENT
- Surface violation letter for receipt of apparent excessive committee contribution on the 30 Day Post Primary Report sent on December 11, 1978. 3
  - No response received on first notice; therefore RTB notice sent on Feb. 28, 1979. 4
  - Response received on May 25, 1979 from Orange County Dem Central Cmte claiming affiliation with California Dem Party State Central Cmte. 6
- COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
- Ron Krouse with Congressman Patterson's office on May 21, 1979. 5

REASON(S) FOR REFERRAL: ATTACHMENT  
 California Democratic State Central Cmte does not disclose affiliation with Orange County DCC: therefore the \$5,000 contribution to the Cmte to Re-Elect Patterson to Congress may be in excess of the limits.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

OTHER RELEVANT INFORMATION: ATTACHMENT  
 The RTB notice sent to the Cmte to Re-Elect Patterson to Congress was returned and stamped "refused."

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

62040342216

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

RAD 1119

DATE 11/18/79 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Warfel  
 THROUGH: STAFF DIRECTOR SLG/DBM COMPLIANCE REVIEW [Signature]  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Assemblyman Cordova Committee

TREASURER:

ADDRESS: 610 Newport Center Drive  
 Suite 1500  
 Newport Beach, CA 92660  
 AFFILIATE(S) N/A

1119

ALLEGATION(S): Failure to register and report as a political committee  
 CITE: 2 U.S.C. 433 & 434  
 ATTACHMENT(S):

DATE INITIATED:  
 MANNER IN WHICH REVIEW WAS INITIATED: 5/23/79  
 Normal review  Other:  
 Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
 TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
 CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:  
 RESULTS OF REVIEW:  
 3SV1/79-26 (first sent 5/23/79, no certified card received; remailed 6/25/79 certified; returned 7/30/79; remailed to new address 7/30/79; certified card received) RTB has not been recommended. ATTACHMENT 1

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
 Memo to Files: Greevy (6/25/79) 2  
 Memo to Files: Greevy (7/30/79) 3

REASON(S) FOR REFERRAL: ATTACHMENT  
 No response to 3SV1/79-26

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
 NONE

OTHER RELEVANT INFORMATION:  
 NONE  
 PREVIOUS OGC/AUDIT REFERRALS FROM RAD:  
 NONE

02040342217

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/29/79 ANALYST Mike Fitter  
 TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Suzanne Wilson  
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: HANNAFORD RE-ELECTION COMMITTEE  
 TREASURER: Alex C. Horowitz  
 ADDRESS: P.O. Box 4055  
 Long Beach, California 90804

1120

AFFILIATE(S): Citizens For Hannaford Committee  
 ALLEGATION(S): CITE:

ATTACHMENT(S)

Receipt of excessive committee contribution 2 U.S.C. 441a

2

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM May 23, 1978 TO June 26, 1978

TOTAL RECEIPTS \$ 32,952 TOTAL EXPENDITURES \$ 8,845

CASH ON HAND \$ 109,056 DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

- Surface violation letter for receipt of apparent excessive committee contribution on the 30 Day Post Primary Report sent on December 11, 1978. 3
- No response received on first notice; therefore RTB notice sent on FEB.28,1979. 5
- Response received on March 12, 1979 from Hannaford's committee stating that Orange County assured them that the \$5,000 contribution was allowable. 7

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

- Ron Krouse with Hannaford Re-Election Committee on December 21, 1978. 4
- Ron Krouse with " " " on March 5, 1979. 6

REASON(S) FOR REFERRAL:

ATTACHMENT

California Democratic State Central Cmte does not disclose affiliation with Orange County DCC; therefore the \$5,000 contribution to the Hannaford Re-Election Committee may be in excess of the limits.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

OTHER RELEVANT INFORMATION:

ATTACHMENT

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

02040342218

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/28/89 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Verfel  
 THROUGH: STAFF DIRECTOR SLC COMPLIANCE REVIEW [Signature]  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Re-Elect Paul Bell Committee  
 TREASURER: Burney Little  
 ADDRESS: 610 Newport Center Drive, Suite 991  
Newport Beach, California 92652  
 AFFILIATE(S): N/A

1121

ALLEGATION(S): CITE: ATTACHMENT(S)  
 Failure to register and report 2 U.S.C. 433 & 434 2  
 as a political committee  
 Excessive Contribution Made 2 U.S.C. 441a 2  
 Note: Contributing Committee not informed of 441a violation in letter

DATE INITIATED: 1/31/79  
 MANNER IN WHICH REVIEW WAS INITIATED: ATTACHMENT  
 Normal review  Other:  
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
 TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
 CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:  
 RESULTS OF REVIEW: ATTACHMENT  
 3SV1/78-84 (1/31/79) 2  
 3SV2/78-84 (3/20/79) 3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT  
 Telecon: Gore with Political Reform Division (10/19/78) 1  
 Telecon: Stolaruk with Bell (4/5/79) 4  
 Telecon: Stolaruk with Bell (5/7/79) 6  
 Telecon: Stolaruk with Bell (5/24/79) 7  
 Telecon: Stolaruk with Political Reform Division (10/19/79) 8

REASONS FOR REFERRAL: ATTACHMENT  
 Inadequate response to 3SV1/78-84 and 3SV2/78-84 (4/18/79) 5  
 (Refund from Orange County Democratic Central Committee has not taken place).

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
 NONE

OTHER RELEVANT INFORMATION:  
 Referral for recipient committee for excessive contributions is included in this packet of referrals: Orange County Democratic  
 PREVIOUS OGC/AUDIT REFERRALS FROM RAD: Central Committee  
 NONE

62040342219

REPORTS ANALYSIS-REFERRAL SHEET

DATE 12/2/79 ANALYST Lisa Stolaruk  
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel  
 THROUGH: STAFF DIRECTOR BLC COMPLIANCE REVIEW BLC  
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS BLC

CANDIDATE/COMMITTEE: Round Up '78 (AKA: Chairs Committee)  
 TREASURER: Jackie Jessie (see Jessie letter of September 10, 1979, Attachment 6)  
 ADDRESS: 822 North Broadway Santa Ana, CA 92701 7122  
 AFFILIATE(S): N/A

ALLEGATION(S): Failure to register and report as a political committee  
 CITE: 2 U.S.C. 433 & 434  
 ATTACHMENT(S): 1

DATE INITIATED: 5/23/79  
 MANNER IN WHICH REVIEW WAS INITIATED:  
 Normal review  Other:  
 Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
 TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
 CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:  
 RESULTS OF REVIEW: 3SV1/79-30 (5/23/79) ATTACHMENT 3  
 3SV2/ 79-30 (8/14/79) 4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:  
 Telecon: Stolaruk with Jessie (5/14/79) ATTACHMENT 2  
 Telecon: Stolaruk with Jessie (9/6/79) 5

REASON(S) FOR REFERRAL: ATTACHMENT  
 No response to 3SV1/79-30 or 3SV2/79-30

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT  
 NONE

OTHER RELEVANT INFORMATION:  
 Letter of Request for an Advisory Opinion on behalf of Orange County Democratic Central Committee (9/10/79) Attachment # 6  
 PREVIOUS OGC/AUDIT REFERRALS FROM RAD:  
 NONE

82040342220

REPORTS ANALYSIS REFERRAL SHEET

DATE 12/22/79 ANALYST Mark Kleiman  
TO: Office of General Counsel TEAM CHIEF Steve Hiss  
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Mobile Home Parks Political Action Committee  
TREASURER: John Phillips  
ADDRESS: 23861 El Toro Road  
El Toro, CA 92630  
AFFILIATE(S): None

1123

ALLEGATION(S): Failure to register. Failure to file Reports of Receipts and Expenditures. DATE INITIATED: 4-16-79  
CITE: 2 U.S.C. 433 2 U.S.C. 434  
ATTACHMENT(S) #1, #2, #7

MANNER IN WHICH REVIEW WAS INITIATED:  
 Normal Review  Other:  
 Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO

TOTAL RECEIPTS \$ TOTAL EXPENDITURES \$

CASH ON HAND \$ DEBTS \$

HISTORY:  
RESULTS OF REVIEW: Failure to register letter sent 4-16-79 ATTACHMENT #1  
Reason To Believe letter sent 7-13-79 #2

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #3  
Telecon: 8-9-79 #4  
Telecon: 8-28-79 #5  
Telecon: 9-4-79 #6  
Telecon: 10-11-79

REASON(S) FOR REFERRAL: No response Reason To Believe SEE ATTACHMENT #2

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Additional transfer out to Roos For Assembly Committee #2 ATTACHMENT #7  
Cross-reference with referrals for United For Orange County and Californians For Brown

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

02040342221



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

ATTACHMENT 1

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

Jacqueline A. Jessie  
Treasurer  
Orange County Democratic Central Committee  
12612 Ohmer Way  
Garden City, California 92641

RE: MUR 1115

Dear Ms. Jessie:

On June 11, July 19, and August 3, 1979, your committee was notified that the Commission had found reason to believe that your committee may have violated 2 U.S.C. §§ 441a, 441b and 434. You were given an opportunity to demonstrate that no further action should be taken in this matter.

In addition, on August 14, and October 16, 1979, your committee was informed that additional apparent violations of the Federal Election Campaign Act had been discovered during reviews of the committee's October 10, 10 Day Pre-General and Year End reports for 1978.

The responses received from the committee have not provided complete information or explanations regarding the possible violations of which the committee has been informed. Therefore, the matter has been referred to the Office of General Counsel for investigation.

You will find enclosed a set of written questions and requests for documents plus an Order of the Commission. The Order requires that the requested answers and documents be supplied to the Commission within 10 days of your receipt of the Order.

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

0204034222

Letter to: Jacqueline A. Jessie  
Page 2  
MUR 1115

For your information we are enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele  
General Counsel

**Enclosures**

Order to Answer Written Questions and  
to Produce Documents  
Written Questions and Requests for Production  
of Documents Under Order  
Procedures

62040342223

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: Jacqueline A. Jessie  
Treasurer  
Orange County Democratic  
Central Committee  
12612 Ohmer Way  
Garden City, California 92641

RE: MUR 1115

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and to supply certain documents.

The answers must be submitted under oath, and both the answers and the documents must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on April , 1980.

Robert O. Tiernan  
Chairman

ATTEST:

Marjorie W. Emmons  
Secretary to the Commission

82040342224

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS UNDER ORDER

TO: Jacqueline A. Jessie  
Treasurer,  
Orange County Democratic  
Central Committee

RE: MUR 1115

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below and provide the documents requested.

You are required to submit your answers within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- A. Provide a list of all bank accounts utilized by the Orange County Democratic Central Committee (hereinafter "the Committee") from January 1, 1978, to the present, including the identifying names given by the Committee to any such accounts.
- B. Identify the nature of the sources of all funds placed in each Committee bank account during 1978; i.e., individual contributors, corporations, unions, etc.
- C. Identify all recipients of political contributions made from each Committee bank account during 1978.
- D. Identify the accounts from which expenditures were made by the Committee for voter registration and get-out-the-vote activities during 1978.
- E. Identifying all candidates of the Democratic party in the general election of 1978 for federal, state and local offices in or representing Orange County.
- F. Provide copies of all voter registration/get-out-the-vote printed materials used by OCDCC during the 1978 general election.

0204034225

Jacqueline A. Jessie

Page 2

Written Questions/Request for Production of Documents

- G. State the total amount spent by the Committee on voter registration/get-out-the-vote activities with regard to the general election campaign of 1978.
- H. Provide a description of the relationship between the Committee and the California Democratic Party-State Central Committee (hereinafter "the State Committee"). The description should cover any role the State committee had in the initial organizing of the Committee; the amounts of funds transferred by the State committee to the Committee; the involvement of the State committee in the Committee's activities from January, 1978 to the present, including its decisions concerning the support of candidates; the names of any common officers or employees; and any additional information which would support the Committee's claim of affiliation with the State committee. Supply copies of all correspondence between the Committee and the State committee in these regards.
- I. Provide copies of the Committee's constitution and by-laws or other related documents which explain the Committee's organization and purposes.

62040342226



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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

James Kozik  
Treasurer  
United for Orange County  
23712 Via San Gil  
Mission Viejo, California 92675

RE: MUR 1116

Dear Mr. Kozik:

On February 27 and March 30, 1979, your committee was notified that the Commission had found reason to believe that your committee has violated 2 U.S.C. §§ 441a and 433. You were given an opportunity to demonstrate that no further action should be taken in this matter.

The responses received from your committee, including your letter of March 20, 1980, have not provided complete information regarding the activities which may constitute the violations about which the committee has been informed. Therefore the matter has been referred to the Office of General Counsel for further investigation.

The specific matter of concern to the Commission is whether the voter registration and get-out-the-vote activities undertaken by the committee in 1978 benefited candidates for federal office and, if so, how much of the committee's expenditures should be allocated to such federally-related activity. If such an allocation resulted in federally-related expenditures in excess of \$1000, the committee became a political committee for purposes of the Federal Election Campaign Act and thus covered by the registration and reporting requirements and the contribution and expenditure limitations contained therein.

With regard to the above issue, you will find enclosed a set of written questions and requests for documents, plus an Order of the Commission. This Order requires that the requested answers and documents be supplied to the Commission within 10 days of your receipt of the Order.

02040342227

Letter to: James Kozik  
Page 2  
MUR 1116

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

For your information we are enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. Should you have any questions, please call Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele  
General Counsel

Enclosures

Order to Answer Written Questions and  
Produce Documents  
Written Questions and Requests for  
Production of Documents Under Order  
Procedures

02040342228

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: James Kozik  
Treasurer  
United for Orange County  
23712 Via San Gil  
Mission Viejo, Calif. 92675

RE: MUR 1116

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to the Order and to provide certain documents.

The answers provided must be submitted under oath, and both the answer and documents must be forwarded to the Commission within ten (10) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on April , 1980.

\_\_\_\_\_  
Robert O. Tiernan  
Chairman

ATTEST:

\_\_\_\_\_  
Marjorie W. Emmons  
Secretary to the Commission

0204034229

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS UNDER ORDER

TO: James Kozik  
Treasurer  
United for Orange County

RE: MUR 1116

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below.

You are required to submit your answers within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- A. Provide copies of the constitution and by-laws of United for Orange County (hereinafter "the Committee") and any other relevant documents explaining the Committee's organization and purposes.
- B. Provide a list of all bank accounts used by United for Orange County during 1978.
- C. Identify the nature of the sources of all funds placed in each Committee bank account during 1978, i.e., contributions from individual, contributions from corporations, etc.
- D. Identify all recipients of political contributions made from each Committee bank account during 1978.
- E. State the total amount spent by the Committee on voter registration and get-out-the-vote activities with regard to the general election of 1978.
- F. Identify the accounts from which expenditures were made by the Committee for voter registration and get-out-the-vote activities during 1978.
- G. Identify all candidates of the Democratic Party in the general elections of 1978 for local, state and federal offices in or representing Orange County.
- H. Provide copies of all voter registration/get-out-the-vote printed materials used by United for Orange County during the general election of 1978

02040342230



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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

Ms. Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund  
9454 Wilshire Blvd., Suite 209  
Beverly Hills, California 90212

RE: MUR 1115

Dear Ms. Collier:

On September 13, 1979, you were notified that the Commission had found reason to believe that your committee has violated 2 U.S.C. § 433. You were given an opportunity to demonstrate that no further action should be taken in this matter.

No response has been received by the Commission. Therefore the matter has been referred to the Office of General Counsel for further investigation.

You will find enclosed a set of written questions, plus an Order of the Commission. This Order requires that the requested answers be supplied to the Commission within 10 days of your receipt of the Order.

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

For your information we enclosing a brief description of the Commission's procedures for handling possible violations of the Federal Election Campaign Act. Should you have any questions, please call Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele  
General Counsel

Enclosures

Order to Answer Written Questions and to  
Produce Documents  
Written Questions and Request for Production of  
Documents Under Order  
Procedures

62040342231

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

ORDER TO ANSWER WRITTEN QUESTIONS  
AND TO PRODUCE DOCUMENTS

TO: Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund  
9454 Wilshire Blvd., Suite 209  
Beverly Hills, California 90212

RE: MUR 1115

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of  
its investigation in the above captioned matter, the Federal  
Election Commission hereby orders you to submit written answers  
to the questions attached to this Order.

The answers must be submitted under oath and must be  
forwarded to the Commission within 10 days of your receipt  
of this Order.

WHEREFORE, the Chairman of the Federal Election Commission  
has hereunto set his hand on April , 1980.

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Robert O. Tiernan  
Chairman

ATTEST:

---

Marjorie W. Emmons  
Secretary to the Commission

62040342232

UNITED STATES OF AMERICA  
FEDERAL ELECTION COMMISSION

WRITTEN QUESTIONS AND REQUEST FOR DOCUMENTS UNDER ORDER

TO: Loretta Collier, Treasurer  
California Democratic State Central  
Committee Federal Candidates Fund

RE: MUR 1115

In accordance with the attached Order of the Federal Election Commission issued under the authority of 2 U.S.C. § 437d(a)(1) as part of a lawful investigation being conducted under the authority of 2 U.S.C. § 437g(a)(2), please submit written answers to the questions below.

You are required to submit your answer within ten (10) days of your receipt of these questions.

Please set forth your answers on a separate sheet and return the answers with an original affidavit attesting to the truth of the answers; the affidavit must be sworn and notarized.

- 0 2 0 4 0 3 4 2 2 3 3
- A. Provide a description of the relationship between the California Democratic State Central Committee (hereinafter "DSCC") and the Orange County Democratic Central Committee (hereinafter "OCDCC"). This description should cover any role which DSCC and the Fund had in the initial organizing of OCDCC, the amounts of funds transferred by DSCC to OCDCC, the involvement of DSCC in OCDCC's activities from January, 1978, to present, including OCDCC's decisions concerning the support of candidates; the names of any common officers or employees; and any additional information which would support or counteract OCDCC's claim of affiliation with DSCC. Supply copies of all correspondence between DSCC and OCDCC in these regards.
  - B. Do the California Democratic State Central Committee and its Federal Candidates Fund affirm affiliation with the Orange County Democratic Central Committee?



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

**AUTHORIZATION TO ISSUE ORDERS**

The Commission hereby authorizes the issuance of Orders to Answer Written Questions to the following persons in connection with MURs 1115 and 1116:

Jacqueline A. Jessie, Treasurer  
Orange County Democratic  
Central Committee  
12612 Ohmer Way  
Garden City, California 92641

James Kozik, Treasurer  
United for Orange County  
23712 Via San Gil  
Mission Viejo, California 92675

Loretta Collier, Treasurer  
Democratic State Central Committee  
Federal Candidate Fund  
9454 Wilshire Blvd., Suite 209  
Beverly Hills, California 90212

\_\_\_\_\_  
Robert O. Tiernan  
Chairman

\_\_\_\_\_  
Max L. Friedersdorf  
Vice Chairman

\_\_\_\_\_  
Joan D. Aikens  
Commissoiner

\_\_\_\_\_  
John W. McGarry  
Commissioner

\_\_\_\_\_  
Thomas E. Harris  
Commissioner

\_\_\_\_\_  
Frank P. Reiche  
Commissioner

6 2 0 4 0 3 4 2 2 3 4

REPORTS ANALYSIS REFERRAL SHEET *Lisa Stolaruk*

DATE 2/27/79 ANALYST Lisa Stolaruk  
TO: Office of General Counsel TEAM CHIEF Bobby Werfel  
THROUGH: STAFF DIRECTOR BLG FOR OGM COMPLIANCE REVIEW [Signature]  
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Assemblyman Cordova Committee

1119

TREASURER:

ADDRESS: 610 Newport Center Drive  
Suite 1590  
Newport Beach, CA 92660  
AFFILIATE(S) N/A

ALLEGATION(S): Failure to register and report as a political committee  
CITE: 2 U.S.C. 433 & 434  
ATTACHMENT(S):

DATE INITIATED:  
MANNER IN WHICH REVIEW WAS INITIATED: 5/23/79  
 Normal review  Other:  
 Special Project: ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM N/A TO N/A  
TOTAL RECEIPTS \$ N/A TOTAL EXPENDITURES \$ N/A  
CASH ON HAND \$ N/A DEBTS \$ N/A

HISTORY:

RESULTS OF REVIEW: 3SV1/79-26 (first sent 5/23/79, no certified card received; remailed 6/25/79 certified; returned 7/30/79; remailed to new address 7/30/79; certified card received) RTB has not been recommended. ATTACHMENT 1

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: Memo to Files: Greevy (6/25/79) ATTACHMENT 2  
Memo to Files: Greevy (7/30/79) 3

REASON(S) FOR REFERRAL: No response to 3SV1/79-26 ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: NONE ATTACHMENT

OTHER RELEVANT INFORMATION: NONE  
PREVIOUS OGC/AUDIT REFERRALS FROM RAD: NONE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1979

Treasurer  
Assemblyman Cordova Committee  
PO Box 17933  
Irvine, California 92713

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Orange County Democratic Central Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

62040342236

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Lisa Stolaruk, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,



Orlando B. Potter  
Staff Director

Enclosure  
Certified Mail:  
Return Receipts Requested

62040342237

ITEMIZED RECEIPTS  
 (Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

141  
 11-3-6  
 9-3-6  
 0 A P 03 31-7 9-3-7 P  
 6-2 0 A P 03 31-7 9-3-7 P

Name of Candidate or Committee in Full			
ORANGE COUNTY DEMOCRATIC CENTRAL COMMITTEE			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
RELECT PAUL DELL COMM. # 771-437		8/14/78 9/1/78 9/14/78	550- 1000- 1050-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2940-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
CALIFORNIANS FOR BROWN 7100 W. OLYMPIC BLVD. LOS ANGELES, CA. 90015 # 751-372		8/6/78 9/8/78 9/20/78	3000- 330- 3500-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 6530-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
COMMITTEE TO RELECT DENNIS MAUGERS 17302 GURNEY LN HUNTINGTON BEACH, CA. 92647	# 742 367	9/5/78	80-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 190-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
ASSEMBLYMAN CORDOVA COMM. # 760-437		9/8/78	350-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 365-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
ORANGE COUNTY DISTRICT COUNCIL OF CARPENTERS 3602 W. 5 ST. SANTA ANA, CA.		9/1/78	2000-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 4750-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
TRW-CALIF. COMMITTEE STATE GOOD GOVT. FUND # 711206 1 SPACE PARK, REDONDA BEACH, CA. 92078		7/31/78	41-
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year To Date ... \$ 41-		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec this Period
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$		
SUBTOTAL of receipts this page (optional) .....			\$ 12241
TOTAL this period (last page this line number only) .....			\$ 12241

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution in-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 2 for  
Line Number 15B

(Use Separate Schedules for  
each numbered line)

Commission  
Street, N.W.  
Washington, D.C. 20463

0729043013102125390

Name of Candidate or Committee in Full			
ORANGE COUNTY DEMOCRATIC CENTRAL COMMITTEE			
Full Name, Mailing Address and ZIP Code RE-ELECT PAUL BEAL COMM. 610 NEWPORT CENTER DR. #990 NEWPORT BEACH, CA. 92660	Principal Place of Business 10 # 771437	Date (month, day, year) 10/30/78	Amount of each Receipt this Period 250-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 7876-		
Full Name, Mailing Address and ZIP Code CALIFORNIANS FOR THE CHIEF JUSTICE 2049 CENTURY PARK E. #1100 LOS ANGELES CA. 90067	Principal Place of Business CAROL AGATE, TREAS	Date (month, day, year) 11/1/78	Amount of each Receipt this Period 500-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500-		
Full Name, Mailing Address and ZIP Code ASSEMBLYMAN COROONA COMM. P.O. BOX 17933 IRVINE, CA. 92713	Principal Place of Business 10 # 760-437	Date (month, day, year) 11/2/78 11/7/78	Amount of each Receipt this Period 500- 500-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1363-		
Full Name, Mailing Address and ZIP Code COMM. TO RE-ELECT DENNIS STANGERS 17302 GURNEY LN. HUNTINGTON BEACH CA 92647	Principal Place of Business 10 # 742367	Date (month, day, year) 10/27/78	Amount of each Receipt this Period 250-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 480-		
Full Name, Mailing Address and ZIP Code COMM. TO RE-ELECT PATTERSON TO CONGRESS 1200 N. MAIN ST. SANTA ANA, CA. 92701	Principal Place of Business 10 # HR 053996	Date (month, day, year) 10/27/78	Amount of each Receipt this Period 750-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 750-		
Full Name, Mailing Address and ZIP Code COMMITTEE TO RETAIN IRIS STANISKEY 3067 - 5 <sup>TH</sup> AVE SAN DIEGO, CA.	Principal Place of Business 10 # 761029	Date (month, day, year) 10/27/78	Amount of each Receipt this Period 500-
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500-		
Full Name, Mailing Address and ZIP Code No. on PROP. 6 885 HOLLY DR BELMONT, CA.	Principal Place of Business 10 # 771651	Date (month, day, year) 10/17/78	Amount of each Receipt this Period 500-
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500-		
SUBTOTAL of receipts this page (optional) . . . . .			\$ 3750-
TOTAL this period (last page this line number only) . . . . .			\$

PAID BY *Ken 3501/79-26*

1. The following service is requested (check one).  
 Show to whom and date delivered ..... c  
 Show to whom, date, and address of delivery ..... c  
 RESTRICTED DELIVERY  
 Show to whom and date delivered ..... c  
 RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery \$ .....  
 (CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:  
*Caroline*  
*CA*

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE  Addressee  Authorized agent

4. DATE OF DELIVERY | POSTMARK

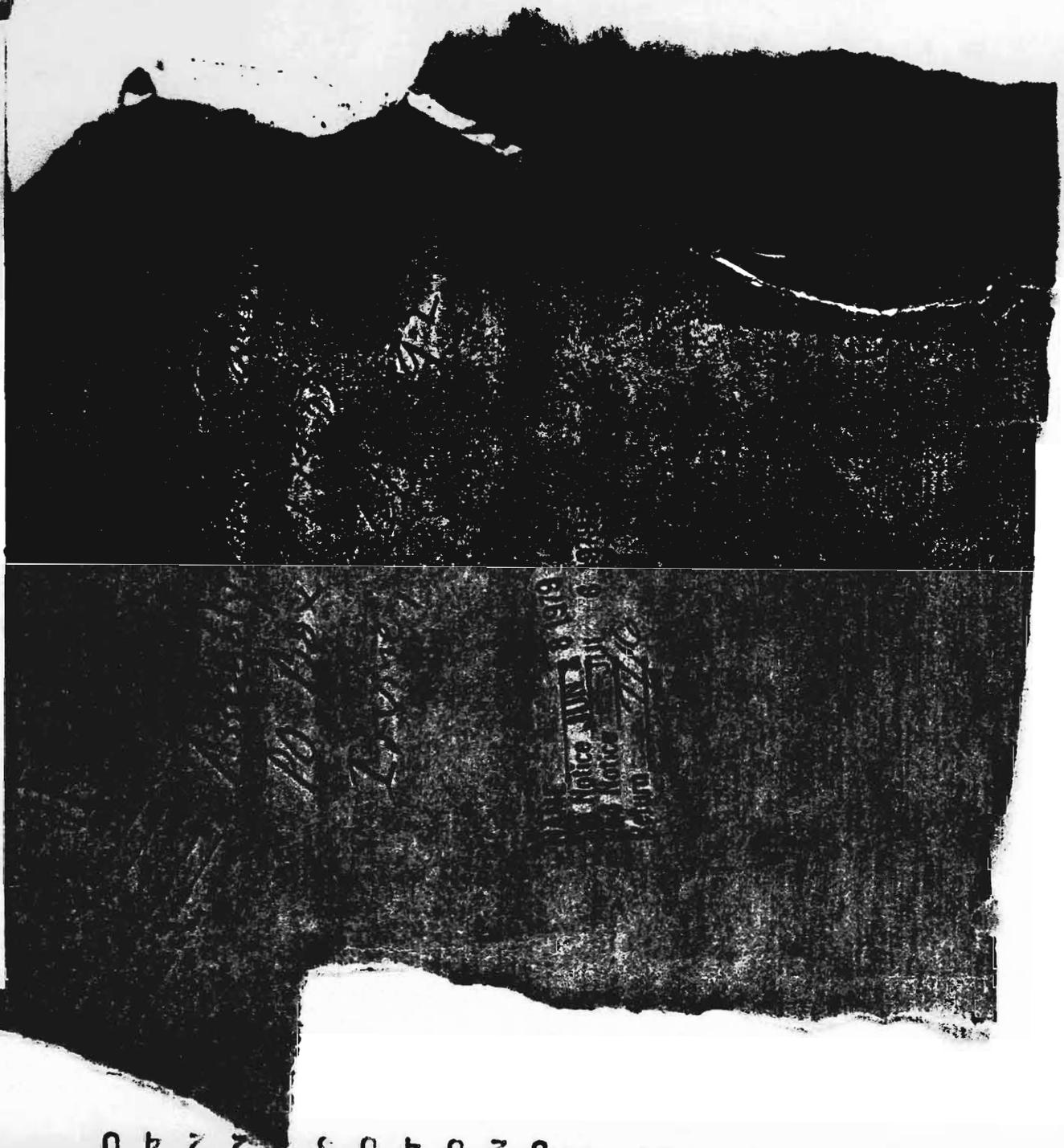
5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND REGISTERED MAIL

*5/25*

★GPO: 1977-0-240-885



0 2 0 4 0 3 2 2 4 0

Memo to the File:

Dug Greevy

6/25/79

Assemblyman Cordova Committee 3SV1/79-26

Orange County Democratic Central Committee 3SV1/79-27

The letters above were sent on <sup>5</sup>6/23/79. As of this date, no certified receipt cards have been received. The actual letters sent have not been returned.

The suspense date for these committees' responses was 6/23/79

At the direction of Peggy Sims, I am sending copies of these letters to the committees. These copies will be sent certified.

82040342241

Memo to the File:

Assemblyman Cordova Committee  
Dug Greevy  
3SV1/79-26  
7/30/79

The copy which was sent out on 6/25/79 was returned.

Lisa called the CA Board of Elections. They stated that the committee has changed its name and address, as follow:

Cordova Senate Committee  
610 Newport Center Drive  
Suite 1590  
Newport Beach, CA 92660

The copy and materials will be sent to that address today, certified.

82040342242

*Dug Greevy* 3SV1/79-26

PS FORM 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).  
 Show to whom and date delivered ..... \$  
 Show to whom, date, and address of delivery ..... \$  
 RESTRICTED DELIVERY  
Show to whom and date delivered ..... \$  
 RESTRICTED DELIVERY  
Show to whom, date, and address of delivery. \$  
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*Cordova*  
*CA*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Authorized agent  
*Kim St. Amant*

4. DATE OF DELIVERY  
*8-6-79*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:  
—

NEWPORT BEACH, CA  
AUG 6 9  
R/R  
USE CLERK'S INITIALS

7/30

☆GPO 1977-0-249-595



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1119

Date Filmed 8-5-52 Camera No. --- 2

Camerman SPC

6 2 0 4 0 3 4 2 4 3