



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1618

Date Filmed 2/28/85 Camera No. ---2

Cameraman JRL

85040512939

FEDERAL ELECTION COMMISSION

11618

Conciliation correspondence

Routing cards & slips

12 Day Report & Comments

Commissioners' objections

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

85040512940

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed George Deming
date 2/18/85

FEDERAL ELECTION COMMISSION

Conciliation correspondence

Routing cards & slips

12 Day Report & Comments

Commissioners' objections

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

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- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed

George Deming

date

2/18/85

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1618
Californians for Better Leadership)
Keith R. Welch, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 10, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1618:

1. Accept the conciliation agreement with the Californians for Better Leadership and Keith R. Welch, as treasurer, submitted with the General Counsel's Report signed January 7, 1985.
2. Approve the proposed letter attached to the General Counsel's Report signed January 7, 1985.
3. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

1-11-85
Date

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

Received in Office of Commission Secretary: 1-8-85, 10:28
Circulated on 48 hour tally basis: 1-8-85, 4:00

85040512942



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1985

Keith R. Welch, Treasurer
Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, California 95814

RE: MUR 1618

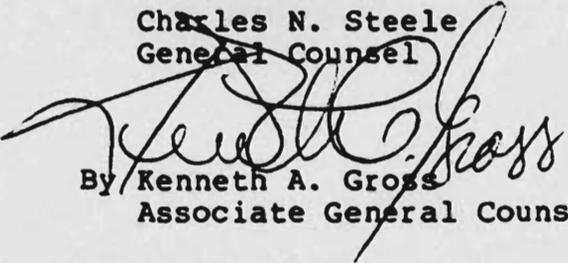
Dear Mr. Welch:

On January 10, 1985, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040512943

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Californians for Better) MUR 1618
 Leadership)
 Keith R. Welch, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Californians for Better Leadership and Keith R. Welch, as treasurer, ("the Committee" or "Respondent") violated 2 U.S.C. § 441b by accepting corporate contributions.

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

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

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

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

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

1. Respondent, the Committee is a political committee within the meaning of 2 U.S.C. § 431(4)(A).

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2. Teri Smith was treasurer of the Committee from October 27, 1981, through October 5, 1982.

3. Nixie Hughes was treasurer of the Committee from October 6, 1982, through August 31, 1984.

4. Keith R. Welch is the treasurer of the Committee at the present time.

5. The Committee registered with the Commission on October 27, 1981 as the Brown Out Committee, an unauthorized independent expenditure committee opposing the nomination and election of Edmund G. Brown, Jr. to the U.S. Senate.

6. On April 26, 1982, the Committee changed its name to the Californians for Better Leadership.

7. The Commission conducted an audit of the Committee's records covering the period from October 27, 1981 through December 31, 1982.

8. The Committee accepted 24 corporate contributions totalling \$2,220.

9. The Committee has refunded 9 corporate contributions totalling \$1,050.

10. The Committee has not refunded 15 corporate contributions totalling \$1,170.

V. Respondent violated 2 U.S.C. § 441b by accepting corporate contributions totalling \$2,220.

VI. Respondent shall pay a civil penalty to the Treasurer of the United States in the amount of Five Hundred Dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A). Respondent shall refund all corporate contributions.

85040512945

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

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

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: *Kenneth A. Gross*
Kenneth A. Gross
Associate General Counsel

January 14, 1985
Date

FOR THE RESPONDENT:

[Signature]

12-10-84
Date

85040512947



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Keith R. Welch, Treasurer
Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, California 95814

RE: MUR 1618

Dear Mr. Welch:

On _____, the Commission accepted the conciliation agreement signed by you, and a civil penalty in settlement of a violation of 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

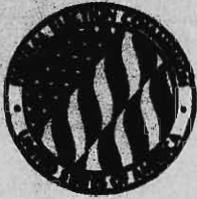
Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

GD
1/11/85

85040512948



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel ^{AK}
 DATE: January 8, 1985
 SUBJECT: MUR 1618 General Counsel's Report

The attached is submitted as an Agenda document
 for the Commission Meeting of _____
 Open Session _____
 Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

85040512949



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 6, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AD*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1618 - CALIFORNIANS FOR BETTER LEADERSHIP

Please review the attached Request for Additional Information which is to be sent to the Californians for Better Leadership for the 1984 July Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Monday, September 10, 1984. Thank you.

COMMENTS:

The debt owed should be \$10. Please let me know if they come back with something different.

*George Demougéot
9/7/84*

Attachment

85040512950



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 6, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: GEORGE DEMOUGEOT

FROM: SHAWN WOODHEAD *AD*
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 1618 - CALIFORNIANS FOR BETTER LEADERSHIP

Please review the attached Request for Additional Information which is to be sent to the Californians for Better Leadership for the 1984 July Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:00 p.m. on Monday, September 10, 1984. Thank you.

COMMENTS:

Attachment

85040512951



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Keith Welch, Treasurer
Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

Identification Number: C99003485

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Welch:

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

-Your previous report, the April Quarterly, discloses a \$100 debt owed to Montgomery Oil Company. This report, however, lists the amount owed as \$10. Please clarify this discrepancy and amend your report accordingly.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa Stolaruk
Senior Reports Analyst
Reports Analysis Division

85040512952

RECEIVED AT THE FEO

84 APR 30

PI: 11

*MUR 1618
Demougeot*

April 26, 1984

Mr. George Demougeot
Staff Member
Federal Election Commission
Washington, D.C. 20463

APR 30 1984 13:21

Re: MUR 1618

Dear Mr. Demougeot:

As per our telephone conversation of this date, it is my understanding that partnership contributions to political committees involving federal offices are permissible and not a violation of the provisions of the Federal Election Campaign Act of 1971 as amended.

For the record, M & V Company is a General Partnership and not a Corporation. I trust that this will clear us of the allegation and finding that the contribution to Californians for Better Leadership in the amount of \$250.00 was a violation of the law.

Sincerely yours,



Martin J. Zaninovich
Partner
M & V Company
P.O. Box 1059
Delano, CA 93216

MJZ/cs

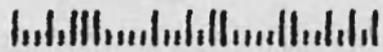
85040512953

M & V COMPANY
P.O. BOX 1059
DELANO, CA 93216



85040512954

Mr. George Demougeot
Staff Member
Federal Election Commission
Washington, D.C. 20463





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Gold Coast Produce
P.O. Drawer BB
Gonzales, California 93926

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

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If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040512956

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Gold Coast Produce

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Gold Coast Produce.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Gold Coast Produce has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Gold Coast Produce violated 2 U.S.C. § 441b, but to take no further action.

8 5 0 4 0 5 1 2 9 5 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Postage and Fees Paid
by for Private Use \$300



Postage and Fees Paid
Federal Election Commission

850405129

UNDELIVERABLE TO ADDRESSEE
RETURN TO POST OFFICE



Gold Coast Produce
P.O. Drawer BB
Gonzales, California 93926



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Graham Ranch
2807 Bayshore Avenue
Ventura, California 93003

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

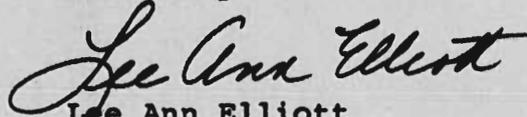
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040512959

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040512960

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Graham Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Graham Ranch.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Graham Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Graham Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040512961

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300



FORWARDING ORDER EXPIRED

Graham Ranch
2807 Bayshore Avenue
Ventura, California 93003



Postage and Fees Paid
Federal Election Commission

8504051296



RECEIVED AT THE FEC
600# 228
84 APR 30 49: 00

ORCHARD SERVICES



Since 1953
IRRIGATION ENGINEERING and SUPPLY
P. O. Box 764, 399 Linden Ave., Carpinteria, CA 93013
805-684-4796 • 805-684-3225

April 24, 1984

MJR 1618
Demougeot

Federal Election Commission
Washington, D.C. 20463
Attention: Mr. George Demougeot

Re: MJR 1618

Dear Mr. George Demougeot

C & N Enterprises is not a corporation and therefore could not have violated section 4416(a) Title 2, United States Code by making a corporate contribution to a political committee.

Hoping this clears the matter up I am

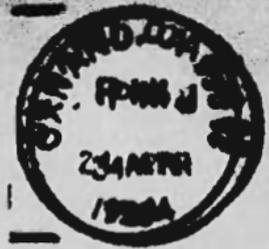
Sincerely,

Charles A. McNeill, Jr.
Charles A. McNeill, Jr.

85040512963

RICHARD SERVICES

INVESTIGATION ENGINEERING and SUPPLY
Box 764 • Carpinteria, CA 93013



Federal Election Commission
Washington, D.C. 20463

Attention: Mr. George Demougeot

8594051296



85040512965

Coct 2249
April 9, 1984
73 Pearson Ave
Piedmont, Calif
1946111

Federal Election Commission
Washington, D.C. 20463

att - large document
Re: Mar 1618

Gentlemen:

We are in receipt of your letter of Apr. 11, 1984 in which it is stated that the Tracy Ranch Co. violated a provision of the Federal Election Campaign Act of 1971.

We wish to advise you that the Tracy Ranch Co. is not a corporation but is a partnership with undivided interest for the individuals involved.

Kindly advise me as to your action on this matter.

Sincerely,
Mrs. Mark McDonald
Tracy Ranch Co.

040512966



84 APR 24 4 8:



Federal Election Commission
Washington D.C.
20463

Att: George Demougeot.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

644 2/94

MUR 1618
Demougeot

April 11, 1984

Montgomery Farms
1814 Canal Street, P.O. Box 844
Merced, California 95341

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040512967

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Montgomery Farms

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Montgomery Farms.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Montgomery Farms has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Montgomery Farms violated 2 U.S.C. § 441b, but to take no further action.

85040512968

2194

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040512969

note!

WE DON'T KNOW HOW MANY TIMES WE HAVE TO WRITE YOU PEOPLE ON THIS SUBJECT -----
BUT, AGAIN, WE WANT TO POINT OUT THAT MONTGOMERY FARMS IS NOT A CORPORATION,
BUT IS A PARTNERSHIP COMPOSED OF MEMBERS OF THE MONTGOMERY FAMILY - CHILDREN
AND GRANDCHILDREN. THANK YOU FOR CORRECTING YOUR RECORDS.....

MONTGOMERY FARMS

8 0 4 0 5 1 2 9 7 0 **MONTGOMERY FARMS**

GROWERS OF HIGHEST QUALITY CALIFORNIA FIGS
POST OFFICE BOX 844
MERCED CALIFORNIA 95341



Federal Election Commission

Washington, D. C. 20463

RECEIVED AT THE PEO
6 att 2241

84 APR 23 P 1: 04

HANSEN FARMS

POST OFFICE BOX 269
SALINAS, CALIF. 93902-0269

TELEPHONE - (408) 424-0501

April 17, 1984

*MUR 1618
Demougeot*

APR 23 P 2: 32

Federal Election Commission

Washington, D.C. 20463

Attn: George Demougeot

Re: MUR 1618

Dear Mr. Demougeot:

Hansen Farms is not a corporation. It is a fictitious name for Albert C. Hansen, as per attached document.

Very truly yours,

Albert C Hansen
Albert C. Hansen

85040512971

FILE NO. F5244-17 FILING FEE - \$10.00

OCT 20 3 55 PM 1976

ERNEST A. MAGGINI
COUNTY CLERK
DEPUTY

FICTITIOUS BUSINESS NAME STATEMENT

The following person(s) is doing business as:
(IS/ARE)

HANSEN FARMS

(FICTITIOUS BUSINESS NAME)

at (*) PO Box 269

Salinas, California 93901

(**) 1. ALBERT C. HANSEN
(FULL NAME - TYPE/PRINT)

PO Box 269
(ADDRESS)

Salinas, California 93901
(CITY)

2. _____
(FULL NAME - TYPE/PRINT)

(ADDRESS)

(CITY)

3. _____
(FULL NAME - TYPE/PRINT)

(ADDRESS)

(CITY)

4. _____
(FULL NAME - TYPE/PRINT)

(ADDRESS)

(CITY)

(***) This business is conducted by an individual

Signed Albert C Hansen

This statement was filed with the County Clerk of Monterey County on date indicated by file stamp above.

CERTIFICATION

I hereby certify that the foregoing is a correct copy of the original on file in my office.

ERNEST A. MAGGINI, County Clerk

By Kathryn Biley Deputy

EXPIRES DEC. 31, 1981

SEE REVERSE SIDE FOR INSTRUCTIONS

85040512972



HANSEN FARMS

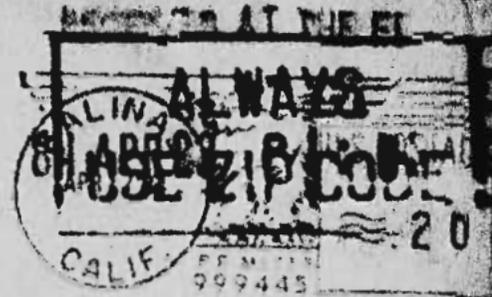
POST OFFICE BOX 269
SALINAS, CALIF. 93902-0269

850405129



BOSS

Attn: George Demougeot



Federal Election Commission
Washington, D.C. 20463



RECEIVED AT THE FED
Coff 203j

84 APR 23 9:14

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1618
Demougeot

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Hidden Hills Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Hidden Hills Ranch.

23 APR 27

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Hidden Hills Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Hidden Hills Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040512974



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Hidden Hills Ranch
3321 Sage Road
Fallbrook, California 92028

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040512973

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

April 19, 1984

Dear Mr. Demougeot,

Hidden Hills Ranch is not a Corporation. It is a single owner, private enterprise farm - when do you get the idea that it is a Corporation?

Sincerely -

Neil P. Walker

85040512976

J. R. Walker
327 Sage Road
Brook, Calif 92028



Federal Election Commission
Washington D.C. 20463

Attn: Mur #1618
Staff member
George Demougeat

40512

RECEIVED AT THE FEC
6/23/84 2030

84 APR 23 09:14

MUR No 1618
Demougeot

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Crown Properties

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Crown Properties.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Crown Properties has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Crown Properties violated 2 U.S.C. § 441b, but to take no further action.

85040512978

23 APR 26

8 5 0 4 0 5 1 2 9 7 9

-2-



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

April 11, 1984

Crown Properties
338 A Street
Hayward, California 94541

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

April 18, 1984

Mr. George Demougeot

Pursuant to our telephone conversation today, please accept this note as my response to MUR 1618.....GENE RAPP (DBA) CROWN PROPERTIES is not, and has NEVER been a corporation. I can see NO reason to believe that I have ever been a corporation. The DBA is filed in Alameda county as required by California law and never used the term CORP or INC. after the DBA name.

Sincerely,

Gene Rapp
Gene Rapp, DBA
Crown Properties

APP

Street • Hayward, Ca. 94541

8
5
0
4
0
5
1
2
9
8
0

Att: George Demougeot

Federal Election Commission
Washington, D.C. 20463



Beeth 2214

max 1618
Demougeot

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
April 16, 1984

Mr. George Demougeot
Federal Elections Commission
1325 K Northwest
Washington, D.C. 20463

Dear Mr. Demougeot:

This is in response to a letter we received on April 10, 1984 from Lee Ann Elliott, Chairman. Enclosed you will find material which we believe demonstrates our willingness and desire to bring this matter to a satisfactory conclusion.

APR 20 1984
55

Since we were notified of the problem in the initial audit report, we have made every effort to determine whether the contributions in question were in fact corporate. Where we have found them to be corporate, the committee has made restitution. Attached you will find copies of the cancelled refund checks to contributors who were determined to be corporate. Also, we have enclosed copies of refund checks that have not yet been cancelled by our bank; those copies will be forthcoming as we will receive them in our next bank statement.

Also enclosed you will find memorandums from a number of individuals who have certified to us that their original contribution was from a non-corporate source. Additionally, I should point out that 3 other individuals have told us this by phone but we have not yet received any written documentation.

To date, we have refunded \$1,160.00. We have determined that 7 checks totalling \$650.00 were in fact non-corporate. We have also determined that 5 checks totalling \$425.00 that showed in our records were caught by our original screening process, sent back and voided. This I believe demonstrates an important point. During the phase in which contributions were received, we were in fact making a good faith effort to determine possible corporate status. It's important to understand that the vast majority of our contributors were small farmers. These farmers in many instances do business under several different forms, i.e. partnerships, sole-proprietorships, and in some instances corporations, all with the same general name.

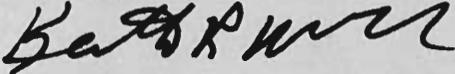
By the material provided to you, you can see we have reduced the amount in question by well more than half. It should be pointed out that the treasurers who were responsible for the records during the period under audit are no longer available. I have assumed responsibility for correcting the problem.

85040512981

I think it should be noted that during my tenure as treasurer, we have complied with all reporting requirements and have made substantial progress towards correcting the problem that developed through inadvertence rather than design. I hope this information will move us closer to resolution of the matter as always we stand ready to cooperate further.

If you have any further questions, please do not hesitate to contact myself or Susan Maybie at (916) 443-7951.

Sincerely,



Keith R. Welch
Treasurer

cc- Dan Boyle

KRW/sm

Enclosures

85040512982

REORDER ALOHA FORM 00-673-1
TO MAIL IN WINDOW ENVELOPE
FOLD AT GUIDE MARKS

Cypress Packaging & Supply Corp.
Phone (408) 633-2476
P.O. Box 1095
Castroville, California 95012

MAR 22 1984

MEM O-GRAM

URGENT - REPLY IMMEDIATELY
 NO REPLY REQUIRED

DATE: 3/19/84

SUBJECT:

TO
California's For Better Leadership
1127 - 11th Street - Suite 728
Merced, Ca. 95814

MESSAGE

TO Whom It May concern: regarding Check # 5981 dated 12/21/81, in the amount of \$25.00. The check, made out to, Brown Out Committee, was never cashed. We have been informed by our bank that they do not cash checks (or clear checks) that are over 180 days old. We have therefore written the check off our books.

REPLY

SIGNATURE

William C. Butts

DATE

RECIPIENT - RETAIN WHITE COPY - RETURN PINK COPY - TO MAIL IN WINDOW ENVELOPE - USE FOLD MARKS



PEART'S AUTO SUPPLY

212 EAST SIXTH STREET • MADERA, CALIFORNIA 93637

MADERA
PHONE 674-6754

FRESNO
PHONE 264-0414

March 19, 1984

Calif. for Better Leadership
1127 11th St. - Suite 728
Sacramento, Ca. 95814

To Whom it may concern -

84
984
2984
512984
40512984
85040512984
My check # 0969, 9-24-82 - for
\$100.00 to Brown Out, was returned
to me and voided out. We are a Corporation.

Yours truly,
Wilma O. Peart
Sec. Tr.

MAR 21 1984

85040512985

This check was returned to our firm as an illegal contribution and was voided.

SUNSET FARMS, INC.
722-4040 OR 426-6873
194 ARCHER DRIVE
SANTA CRUZ, CALIF. 95060

4712

DEC 29 1981

PAY TO THE ORDER OF

Brown Out Committed
The Sun

\$100.00

DOLLAR

County Bank

WEST SANTA CRUZ OFFICE
Phone No. 426-4212
1901 Mission Street
Santa Cruz, California 95060

For

⑆004712⑆ ⑆121101626⑆ 0700

Phelan & Taylor Produce Company

Shippers of California Vegetables P. O. BOX 488, OCEANO, CALIFORNIA 93448 • PHONE: (833) 488-2413

In Re: March 9, 1984
Check No. 2294
Dated July 9, 1982

Californians for Better Leadership
Keith Welch, Treasurer
1127 11th St., Suite 728
Sacramento, CA 95814

Dear Sir:

This is to state that our check No. 2294 in the amount of \$100.00 was returned to us uncashed, and it was voided by us and never cleared our bank.

Very truly yours,



Joe Tondre
Office Manager

85040512986

MAR 14 1984

Shipped in Season

Celery • Cauliflower • Romaine • Bell Peppers • Sugar Peas • Leaf Lettuce • Nappa • Bok Choy

MAR 15 1984



3501 STOCKDALE HIGHWAY, BAKERSFIELD, CALIFORNIA 93309 805-832-1111
MAILING ADDRESS: P. O. BOX 9999, BAKERSFIELD, CA 93399-1999

NORMAN C. SIEVING
VICE PRESIDENT - ADMINISTRATION

March 12, 1984

Californians for Better
Leadership
1127 - 11th Street
Suite 728
Sacramento, CA 95814

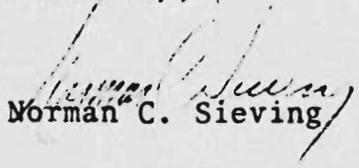
Re: Contribution
Brown Out Committee

Gentlemen:

Please be advised that Superior Farming Company did not make a contribution to the "Brown Out Committee" in 1982 as stated. Attached is a copy of the check which was never submitted for payment.

If you have any further questions please contact this office.

Sincerely,


Norman C. Sieving

sj

Enclosure

85040512987

8 5 0 4 0 5 1 2 9 8 8

MELLON BANK N.A.
MELLON SQUARE OFFICE
PITTSBURGH, PA.



Superior Farming Company

3501 STOCKDALE HIGHWAY
BAKERSFIELD, CALIFORNIA 93309

NO. 125857

60-190
433

B# 3799
V# 24890

DATE

09/30/82

CHECK NO.

00125857

AMOUNT

*****100.00

PAY ONE HUNDRED AND 00/100 DOLLARS

TO
THE
ORDER
OF:

BROWN OIL COMMITTEE
PO BOX 1863
SACRAMENTO
CA

95809

VOID
These Are Agricultural Dollars

AN EQUAL OPPORTUNITY EMPLOYER

⑈ 125857⑈ ⑆043301601⑆ 000⑈7886⑈

Revised 10/27/82

MAR 15 1984

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
March 16, 1984

APR 12 1984

J. L. Enterprises
Lynn Gianolini
Box 1449
Greenfield, CA 93927

Dear Mrs. Gianolini:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what I discussed with you today.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contribution checks received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations registered with the same name as were listed on these contribution checks. Your check # 491 in the amount of \$100.00 drawn on J. L. Enterprises account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation it is a:

Husband & wife ownership
TYPE OF ENTITY

Lynn Gianolini
AUTHORIZED SIGNATURE

Thank you so very much for your cooperation in this matter.

Sincerely,

Susan Maybie
Susan Maybie

85040512989

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
March 16, 1984

Nancy Graham
Graham Ranches
2807 Bayshore Avenue
Ventura, CA 93003

Dear Ms. Graham:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what I discussed with you.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contribution checks received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations registered with the same name as were listed on these contribution checks. Your check #564 dated 9-20-82 in the amount of \$25.00 drawn on Graham Ranches account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation it is a:

Partnership
type of entity

Nancy J. Graham
authorized signature

Thank you so very much for your cooperation in this matter.

Sincerely,

Susan Maybie
Susan Maybie

95040512990

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
April 5, 1984

APR 11 1984

Hansen Farms
P.O. Box 269
Salinas, California 93902

Dear Mr. Hansen:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what I discussed with your secretary today.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contributions received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations listed with the same name as were listed on these contribution checks. Your check #30169 in the amount of \$100.00 drawn on Hansen Farms account was one of the contributions in question.

Since your secretary indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation, it is a

Sole -proprietorship

TYPE OF ENTITY

Al Hansen

AUTHORIZED SIGNATURE

Thank you so very much for your cooperation in this matter.

Sincerely,

Susan Maybie

Susan Maybie
(916) 443-7951

85040512991

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
March 14, 1984

Martin Zaninovich
M & V Company
P.O. Box 1059
Delano, CA 93216

Dear Mr. Zaninovich:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what Karin Watson discussed with you.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contribution checks received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations registered with the same name as were listed on these contribution checks. Your check dated 9-21-82 in the amount of \$250.00 drawn on M & V Company account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

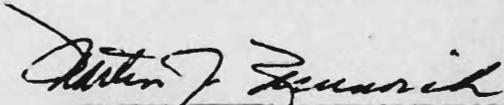
The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

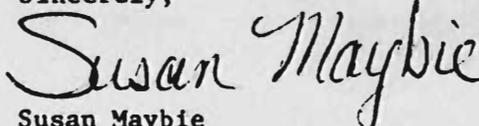
My company is NOT a corporation it is a :

General Partnership
Type of entity


Authorized signature

Thank you so very much for your cooperation in this matter.

Sincerely,


Susan Maybie

85040512992

BROWN OUT COMMITTEE
Partnership Contributions Instructions

BROWN OUT COMMITTEE is a Political Committee registered with the Federal Election Commission (FEC) pursuant to the Federal Election Campaign Act. This Act and Regulations of the FEC require that the following information and instructions be obtained from partnerships making contributions to BROWN OUT COMMITTEE.

BROWN OUT COMMITTEE is instructed that this partnership contribution is to be attributed to the partners as follows:

85040512993

1. Full name Martin J. Zaninovich 50 % (or \$ 125.00)
Mailing address P.O. Box 1059 Occupation Partner
Delano, CA 93216 Employer M & V Company

2. Full name Vincent M. Zaninovich 50 % (or \$ 125.00)
Mailing address P.O. Box 1059 Occupation Partner
Delano, CA 93216 Employer M & V Company

3. Full name _____ _____ % (or \$ _____)
Mailing address _____ Occupation _____

Employer _____

4. Full name _____ _____ % (or \$ _____)
Mailing address _____ Occupation _____

Employer _____

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
March 19, 1984

MAR 22 1984

Montgomery Farms
Robert McCuley
P.O. Box 844
Merced, CA 95341

Dear Mr. McCuley:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what I discussed with you today.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contributions received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations listed with the same name as were listed on these contribution checks. Your check #1365 in the amount of \$25.00 drawn on Montgomery Farms Dried Figs account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
2. partnership
 a. type of partnership *Family - 45 years*
 b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation it is a

Family Partnership
TYPE OF ENTITY

Robert M. McCuley
AUTHORIZED SIGNATURE

Thank you so very much for your cooperation in this matter.

Sincerely,
Susan Maybie
Susan Maybie
(916) 443-7951

85040512994

OK

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
February 16, 1984

Harris Farms
David B. Harris
7424 So. Lac Jac Avenue
Parlier, CA 93648

Dear Mr. Harris:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what Karin Watson discussed with you.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contribution checks received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations registered with the same name as were listed on these contribution checks. Your check # 13050 dated 9-27-82 in the amount of \$ 100.00 drawn on Harris Farms, Inc. account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation it is a:

Partnership
type of entity

David B Harris
authorized signature

Thank you so very much for your cooperation in this matter.

Sincerely,

Keith R. Welch
Keith R. Welch
Acting Treasurer

85040512995

ok.
Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814
February 16, 1984

Argi-Enterprise
Rose B. Jewett
P.O. Box 868
Santa Paula, CA 93060

Dear Ms. Jewett:

I am writing in response to a recent telephone conversation from my office regarding Californians for Better Leadership (Brown Out Committee). Your cooperation in this matter is most earnestly appreciated. I would like to briefly recap what Karin Watson discussed with you.

During a recent routine audit by the Federal Elections Commission, an auditor of the FEC was unable to determine the corporate status of a few of the contribution checks received. Though our contribution return card clearly stated that corporate checks were illegal the auditor found there to be California corporations registered with the same name as were listed on these contribution checks. Your check # 4141 dated 1-11-82 in the amount of \$ 50.00 drawn on Agri-Enterprise account was one of the contributions in question.

Since you have indicated that this contribution was not made from a corporate entity, this letter is being sent to re-affirm that information.

The affore mentioned check is a contribution from:

- 1.) sole-proprietorship
- 2.) partnership
 - a. type of partnership
 - b. other

Please indicate in the space below what type of entity your company is.

My company is NOT a corporation it is a:

Sole-proprietorship
type of entity

Rose B. Jewett
authorized signature

Thank you so very much for your cooperation in this matter.

Sincerely,

Keith R. Welch

Keith R. Welch
Acting Treasurer

85040512996

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 001

6 6 2 6 6 6 6 6 6 6 6 6

March 15 19 84

99-3882
1211

PAY TO THE ORDER OF

*Pacific Farm Company****

\$ *500.00*

*Five hundred and 00/100

DOLLARS


Sacramento Valley Bank
Member FDIC
901 Street Sacramento CA 95814

PAID
MAR 20 84

Susan Maybie

FOR refunded contribution

⑆ 0 2 6 6 3 8 2 9 3 ⑆ 2 0 1 1 2 6 5 7 ⑆ 7 1 ⑆

0000050000

8 5 0 4 0 5 1 2 9 9 7

MR '84' 19 | 11-35
PAY ANY BANK, P.E.O.
BANK of AMERICA, NY & SA
SAN FRANCISCO, CA. 94

MAR 19 94

127 PAY ANY BANK, P.E.O.
BANK OF AMERICA
1775 SA
REMOVAL CALIFORNIA
RESUBMIT

127
Pacific Farm Company
2 6 2 6

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 003

0 2 1 6 9 9 2 0

March 15 1984 90-3889
1211

PAID

PAY TO THE ORDER OF

*Turlock Fruit Company

\$ *100.00*

*One hundred and 00

MAR 20 1984

DOLLARS

Sacramento Valley Bank
Member FDIC
901 11th Street Sacramento CA 95814

SACRAMENTO VALLEY BANK
90-3889 90-3889

Swan Maybie

FOR refunded contribution

⑆121138893⑆ 20MAR 1984⑆

⑆0000010000⑆

8 5 0 4 0 5 1 2 9 9 9

11-57
Turlock Branch #637
San Francisco, Calif.
1210
MAR 23 84 6 2
FIRST INTERSTATE BANK
PAY ANY BANK, P.E.G.
American National Bank
00-897

MR 84 23

PAY ANY BANK P.E.G.
FICA-SP
PROCESSED

FOR DEPOSIT ONLY
637 PAY TO THE ORDER OF 637
First Interstate Bank
FORMERLY UNITED CALIFORNIA BANK
TURLOCK FRUIT CO, INC.
6378-17361

01020101

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 004

March 16 19 84 ⁹⁰⁻³⁸⁸⁹₁₂₁₁

PAID
SACRAMENTO VALLEY BANK
90-3889 90-3889

PAY TO THE ORDER OF

*Claussen Farms, Inc. \$ *25.00*

*Twenty-five and 00/100 ***** DOLLARS

Sacramento Valley Bank
Member FDIC
901 1 Street Sacramento CA 95814

FOR refunded contribution

Swan Maybie

⑆121138893⑆ 20⑆12157⑆7⑆ ⑈0000002500⑈

85040513000

MR 21
REG. 88888
1210-0037-4

11-24
STOCKTON, CALIFORNIA
WELLS FARGO BANK, N.A.
MAR 20 84 5 70
PACIFIC AVE. OFFICE
REG. PAY ANY BANK REG.
570

MR 20
PROCESSED
WELLS FARGO BANK
SAN FRANCISCO, CA
PAY ANY BANK

for deposit only

⑆12157⑆7⑆

⑆12157⑆7⑆

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 005

1 9 2 1 2 2 6 9 0 2 0

March 26 10 84

90-3889
1211

PAY TO THE ORDER OF Superior Farming Company **

\$ *50.00*

*Fifty dollars and no/100 ***** DOLLARS

Sacramento Valley Bank
Member FDIC
1001 Street Sacramento CA 95814

PAID

MAR 30 84

Susan Maybie

FOR REFUNDED CONTRIBUTION

0:1211 8843: 20 57 7

0000005000

SACRAMENTO VALLEY BANK

8 5 0 4 0 5 1 3 0 0 1

MR 8 30
1210-0037-4
MAR 30 84

MAR 29 '84

16-4 2 562
562 2 10-4

5 7 1 7 1

FOR DEPOSIT ONLY
BANK OF AMERICA
SECURITY FEDERAL SAVINGS BANK
SUPERIOR FARMING CO.
CURRENT ACCOUNT
007-083

8080828

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No.006

March 26 19 84 90 3889
1211

PAY
TO THE
ORDER OF

Grow Art***

\$ *150.00*

*One hundred fifty dollars and no/100*****DOLLARS



FOR Refund Contribution

Susan Maybie

⑆121138893⑆ 20⑈12157⑈7⑈

8504

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 007

March 26 1984 903889
1211

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*Amistad Ranches**

\$ *25.00*

*Twenty-five dollars and no/100***** DOLLARS



FOR REFUND CONTRIBUTIONS

Susan Maybie

⑆121138893⑆ 20⑆12157⑆7⑆

3004

TO Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 008

April 2 19 84 90 3889
1211

TO THE ORDER OF

*Gold Coast Produce***

\$100.00*

One hundred dollars and no/100*** DOLLARS


Sacramento Valley Bank
National Association
921 L Street Sacramento CA 95814

FOR Refund contribution

Susan Maybie

⑆121138893⑆ 20⑆12157⑆7⑆

0503130

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 009

April 2 19 84 90 3889
1211

PAY TO THE ORDER OF *Springville Ranch Co.*** \$ *100.00*

*One hundred dollars and no/100***** DOLLARS



Susan Maybie

FOR Re fund contribution

⑆121138893⑆ 20⑈12157⑈7⑈

8513006

Californians for Better Leadership
1127 11th Street, Suite 728
Sacramento, CA 95814

No. 010

April 12 1984 903889
1211

PAY TO THE ORDER OF

*Alba C. Houston Orchard Co.***** \$ *10.00*

*Ten and 00/100***** DOLLARS



FOR REFUNDED CONTRIBUTION

Susan Maybie

⑆121138893⑆ 20⑆12157⑆7⑆

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84 APR 20 AM: 32

GEORGE DEMOUGEOT
Federal Elections Commission
1325 K Northwest
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1618
Californians for Better Leadership,)
)
et. al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 3, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1618:

1. Find reason to believe the Californians for Better Leadership and Keith R. Welch, as treasurer, violated 2 U.S.C. § 441b.
2. Approve and authorize the sending of the factual and legal analysis and letter to Californians for Better Leadership as attached to the First General Counsel's Report dated March 30, 1984.
3. Find reason to believe that Montgomery Farms, Graham Ranch, Harris Farms, M and V Company, Tracy Ranch Co., Montgomery Oil Co., Rushing Minerals, Hanes Ranch, Superior Farming Co., Peart's Auto Supply, Courtesy Ambulance, Inc., Roy Otterson Ranch, Pacific Farm Co., Gold Coast Produce, Fawcett Farms, Inc., Phelan & Taylor Produce Co., NH₃ Service Co., Produce West, Inc., Springville Ranch Co., Golden West Packing Co., Yamamota Farms, Hansen Farms, J.L. Enterprises, California Orchard Co., Salinas Land Co., Amistad Ranches, Agri Enterprise, Sunset Farms, Inc., Grow Art, Crown Properties, Turlock Fruit Co., Hohener Meat Co., Inc., Hidden Hill Ranch, C & N Enterprises, Cypress Packaging, Luquinox Co., and Claussen Farms, Inc. violated 2 U.S.C. § 441b, but take no further action and close the file as to them.

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4. Approve and authorize the sending of the factual and legal analysis and letter to each of the corporations listed in recommendation 3 above as submitted with the First General Counsel's Report dated March 30, 1984.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

4-3-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

85040513009

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

3-30-84, 9:20
3-30-84, 2:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Keith R. Welch, Treasurer
Californians for Better Leadership
1127 11th Street
Suite 728
Sacramento, California 95814

RE: MUR 1618

Dear Mr. Welch:

On 1984, the Federal Election Commission determined that there is reason to believe that the Californians for Better Leadership ("the Committee") and you, as treasurer of the Committee, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting corporate contributions. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

85040513010

Letter to Keith R. Welch
Page 2

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

- For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement


4-4-84

R 5 0 4 0 5 1 3 0 1 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Keith R. Welch, Treasurer
Californians for Better Leadership
1127 11th Street
Suite 728
Sacramento, California 95814

RE: MUR 1618

Dear Mr. Welch:

On April 3, 1984, the Federal Election Commission determined that there is reason to believe that the Californians for Better Leadership ("the Committee") and you, as treasurer of the Committee, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting corporate contributions. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

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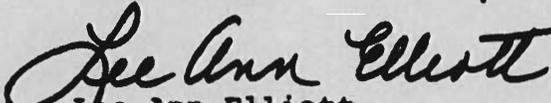
Letter to Keith R. Welch
Page 2

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,


Lee Ann Elliott,
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040513013

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Californians for Better Leadership,
Keith R. Welch, Treasurer

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Audit Division discovered during a review of Californians for Better Leadership ("the Committee") contributor records that it appeared the Committee had received 40 contributions from 37 corporate sources totalling \$3,495.

When apprised of the possible corporate contributions, the Committee's custodian of records stated that when the Committee received a contribution which appeared to be from a possible incorporated entity, the Committee contacted the contributor by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding these contacts.

The Audit staff recommended that the Committee provide evidence which showed the contributions were not prohibited or refund the contributions to the contributors. Subsequently, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations and describing the debts as possible corporate contributions. The Committee has also indicated that it is attempting to verify whether or not these are in fact corporate contributions.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political

85040513014

committee to receive a corporate contribution. It appears that the Committee accepted contributions from 37 corporations. Accordingly, this Office recommends that the Commission find reason to believe that the Committee and Keith R. Welch, as treasurer, violated 2 U.S.C. § 441b.

Most of the corporate contributions are \$100 or less. Further, Audit noted that the Committee solicited the corporations for contributions. Accordingly, the Office of General Counsel is recommending that the Commission find reason to believe that each of the corporations violated 2 U.S.C. § 441b, but to take no further action. This should put them on notice of the prohibitions against corporate contributions. A list of the corporations and the amount each contributed is as follows:

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<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. Piedmont, CA	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Hanes Ranch Boonville, CA	9/25/82	10.00	12/17/73

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	\$ 50.00 100.00	7/19/68
10. Peart's Auto Supply Madera, CA	9/24/82	100.00	1/30/62
11. Courtesy Ambulance, Inc. Fresno, CA	9/17/82	50.00	7/1/76
12. Roy Otterson Ranch Willows, CA	12/29/81 9/24/82	50.00 100.00	10/25/62
13. Pacific Farm Co. Firebaugh, CA	7/7/82	500.00	6/21/46
14. Gold Coast Produce Gonzales, CA	7/2/82	100.00	5/16/79
15. Fawcett Farms, Inc. Los Banos, CA	7/8/82	25.00	10/1/74
16. Phelan & Taylor Produce Co. Oceano, CA	7/9/82	100.00	12/31/54
17. NH ₃ Service Co. Salinas, CA	6/29/82	100.00	1/16/67
18. Produce West, Inc. Salinas, CA	6/30/82	100.00	7/1/75
19. Springville Ranch Co. Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamota Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
25. Salinas Land Co. King City, CA	3/24/82	200.00	12/31/17

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<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
26. Amistad Ranches Courtland, CA	1/20/82	\$ 25.00	2/10/69
27. Agri Enterprise Santa Paula, CA	1/11/82	50.00	8/23/77
28. Sunset Farms, Inc. Santa Cruz, CA	12/29/81	100.00	3/22/71
29. Grow Art Salinas, CA	11/9/81 12/30/81	50.00 100.00	3/28/63
30. Crown Properties Hayward, CA	10/26/81	25.00	3/16/62
31. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
32. Hohener Meat Co., Inc. San Leandro, CA	10/27/81	100.00	12/16/57
33. Hidden Hill Ranch Fallbrook, CA	12/29/81	25.00	12/27/76
34. C & N Enterprises Carpenteria, CA	12/24/81	50.00	5/21/75
35. Cypress Packaging & Supply Corp. Castroville, CA	12/21/81	25.00	5/8/78
36. Luquinox Co. Orange, CA	12/17/81	25.00	3/17/64
37. Claussen Farms, Inc. Stockton, CA	12/16/81	25.00	4/11/77



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Springville Ranch Co.
90 E. Pleasant Valley Road
Camarillo, California 93010

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

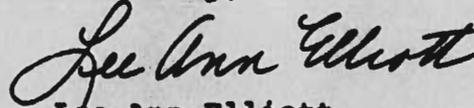
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

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If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513019

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Springville Ranch Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Springville Ranch Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Springville Ranch Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Springville Ranch Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Golden West Packing Co.
P.O. Box 955
Imperial Beach, California 92032

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

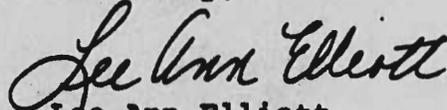
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

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If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Golden West Packing Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Golden West Packing Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Golden West Packing Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Golden West Packing Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513023



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

**Yamamoto Farms
1220 Wood Road
Oxnard, California 93033**

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513024

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513025

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Yamamoto Farms

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Yamamoto Farms.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Yamamoto Farms has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Yamamoto Farms violated 2 U.S.C. § 441b, but to take no further action.

85040513026



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Hansen Farms
P.O. Box 269
Salinas, California 93902

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513027

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513028

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Hansen Farms

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Hansen Farms.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Hansen Farms has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Hansen Farms violated 2 U.S.C. § 441b, but to take no further action.

85040513029



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

J. L. Enterprises
Box 1449
Greenfield, California 93927

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513030

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513031

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: J. L. Enterprises

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from J. L. Enterprises.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that J. L. Enterprises has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that J. L. Enterprises violated 2 U.S.C. § 441b, but to take no further action.

85040513032



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

California Orchard Co.
P.O. Box 0
King City, California 93930

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513033

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513034

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: California Orchard Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from California Orchard Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that California Orchard Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that California Orchard Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513035



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Salinas Land Company
P.O. Box 0
King City, California 93930

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

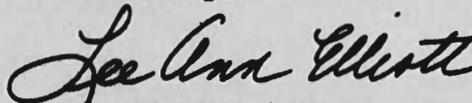
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513036

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513037

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Salinas Land Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Salinas Land Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Salinas Land Company has made a corporate contribution to Californians for Better Leadership in the amount of \$200. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Salinas Land Company violated 2 U.S.C. § 441b, but to take no further action.

85040513038



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Anistad Ranches
P.O. Box C
Courtland, California 95615

RE: MUR 1618

Dear-Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513039

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513040

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Amistad Ranches

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Amistad Ranches.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Amistad Ranches has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Amistad Ranches violated 2 U.S.C. § 441b, but to take no further action.

85040513041



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Agri-Enterprise
117 N. 10th Street
P.O. Box 868
Santa Paula, California 93060

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513042

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513043

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Agri-Enterprise

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Agri-Enterprise.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Agri-Enterprise has made a corporate contribution to Californians for Better Leadership in the amount of \$50. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Agri-Enterprise violated 2 U.S.C. § 441b, but to take no further action.

85040513044



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Sunset Farms, Inc.
194 Archer Drive
Santa Cruz, California 95060

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

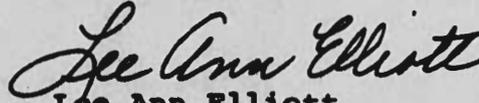
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513045

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513046

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Sunset Farms, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Sunset Farms, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Sunset Farms, Inc has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Sunset Farms, Inc. violated 2 U.S.C. § 441b, but to take no further action.

85040513047



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Grow-Art
650 Ranch View Lane
Salinas, California 93906

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513048

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513049

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Grow-Art

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Grow-Art.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Grow-Art has made a corporate contribution to Californians for Better Leadership in the amount of \$150. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Grow-Art violated 2 U.S.C. § 441b, but to take no further action.

85040513050



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Crown Properties
338 A Street
Hayward, California 94541

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513051

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513052

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Crown Properties

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Crown Properties.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Crown Properties has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Crown Properties violated 2 U.S.C. § 441b, but to take no further action.

85040513053



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Turlock Fruit Company
P.O. Box 7
Turlock, California 95380

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

45040513054

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513055

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougnot
(202) 523-4000

RESPONDENT: Turlock Fruit Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Turlock Fruit Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Turlock Fruit Company has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Turlock Fruit Company violated 2 U.S.C. § 441b, but to take no further action.

85040513056



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Hobener Meat Company, Inc.
2500 Davis Street
San Leandro, California 94577

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

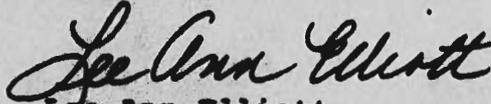
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513057

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513058

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Hohener Meat Company, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Hohener Meat Company, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Hohener Meat Company, Inc. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Hohener Meat Company, Inc. violated 2 U.S.C. § 441b, but to take no further action.

85040513059



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Hidden Hills Ranch
3321 Sage Road
Fallbrook, California 92028

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513060

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513061

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Hidden Hills Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Hidden Hills Ranch.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Hidden Hills Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Hidden Hills Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040513062



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

C and N Enterprises
P.O. Box 764
Carpinteria, California 93013

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513063

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: C and N Enterprises

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from C and N Enterprises.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that C and N Enterprises has made a corporate contribution to Californians for Better Leadership in the amount of \$50. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that C and N Enterprises violated 2 U.S.C. § 441b, but to take no further action.

85040513065



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Cypress Packaging & Supply Corp.
11455 Del Monte Street, P.O. Box 1095
Castroville, California 95012

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513066

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

R 5 0 4 0 5 1 3 0 6 7

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Cypress Packaging & Supply Corp.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Cypress Packaging & Supply Corp.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Cypress Packaging & Supply Corp. has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Cypress Packaging & Supply Corp. violated 2 U.S.C. § 441b, but to take no further action.

85040513068



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Liquinox Company
221 W. Meats Avenue
Orange, California 92665

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

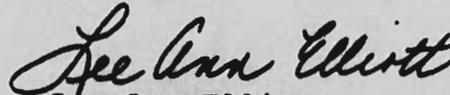
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513069

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

R 5 0 4 0 5 1 3 0 7 0

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Liquinox Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Liquinox Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Liquinox Company has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Liquinox Company violated 2 U.S.C. § 441b, but to take no further action.

R 5 0 4 0 5 1 3 0 7 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Claussen Farms, Inc.
4946 W. Undine Road
Stockton, California 95206

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

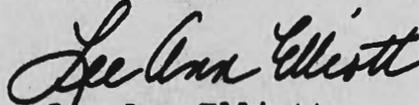
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

25040513072

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513073

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Claussen Farms, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Claussen Farms, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Claussen Farms, Inc. has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Claussen Farms, Inc. violated 2 U.S.C. § 441b, but to take no further action.

85040513074



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Montgomery Oil Co.
5899 West Imperial Hwy.
Los Angeles, California 90045

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513075

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513076

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Montgomery Oil Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Montgomery Oil Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Montgomery Oil Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$10. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Montgomery Oil Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513077



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Rushing Minerals
2630 K
Bakersfield, California 93301

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

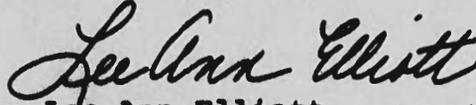
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513078

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513079

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Rushing Minerals

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Rushing Minerals.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Rushing Minerals has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Rushing Minerals violated 2 U.S.C. § 441b, but to take no further action.

85040513080



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Hanes Ranch
P.O. Box 528
Booneville, California 95415

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

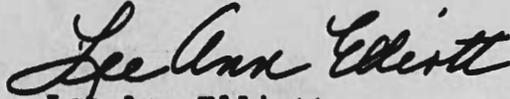
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513091

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513082

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Hanes Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Hanes Ranch.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Hanes Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$10. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Hanes Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040513083



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Superior Farming Co.
3501 Stockdale Hwy.
Bakersfield, California 93309

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513084

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513085

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Superior Farming Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Superior Farming Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Superior Farming Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$150. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Superior Farming Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513086



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Peart's Auto Supply
216 E 6th
Madera, California 93638

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513087

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513088

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Peart's Auto Supply

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Peart's Auto Supply.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Peart's Auto Supply has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Peart's Auto Supply violated 2 U.S.C. § 441b, but to take no further action.

85040513089



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Montgomery Farms
1814 Canal Street, P.O. Box 844
Merced, California 95341

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513090

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513091

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Montgomery Farms

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Montgomery Farms.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Montgomery Farms has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Montgomery Farms violated 2 U.S.C. § 441b, but to take no further action.

85040513092

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513094

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Graham Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Graham Ranch.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Graham Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Graham Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040513092



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Harris Farms
7424 So. Lac Jac Avenue
Parlier, California 93648

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513096

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513097

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Harris Farms

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Harris Farms.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Harris Farms has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Harris Farms violated 2 U.S.C. § 441b, but to take no further action.

85040513098



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

M and V Company
P.O. Box 1059
Delaño, California 93215

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513099

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513100

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: M and V Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from M and V Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that M and V Company has made a corporate contribution to Californians for Better Leadership in the amount of \$250. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that M and V Company violated 2 U.S.C. § 441b, but to take no further action.

85040513101



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Tracy Ranch Co.
7 Sharon Avenue
Piedmont, California 94611

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513102

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513103

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Tracy Ranch Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Tracy Ranch Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Tracy Ranch Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Tracy Ranch Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513104



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Courtesy Ambulance, Inc.
P.O. Box 415
Fresno, California 93708

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

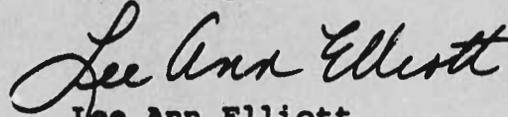
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513105

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513106

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Courtesy Ambulance, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Courtesy Ambulance, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Courtesy Ambulance, Inc. has made a corporate contribution to Californians for Better Leadership in the amount of \$50. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Courtesy Ambulance, Inc. violated 2 U.S.C. § 441b, but to take no further action.

85040513107



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Roy Otterson Ranch
Route 1, box 307-A
Willows, California 95988

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

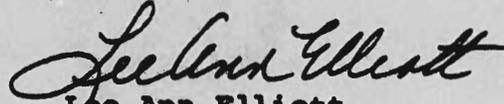
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513108

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513109

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Roy Otterson Ranch

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Roy Otterson Ranch.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Roy Otterson Ranch has made a corporate contribution to Californians for Better Leadership in the amount of \$150. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Roy Otterson Ranch violated 2 U.S.C. § 441b, but to take no further action.

85040513110



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Pacific Farm Company
1047 M Street
Firebaugh, California 93622

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

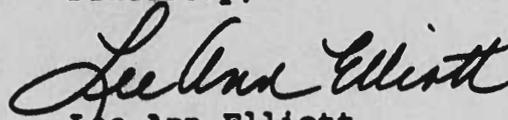
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513111

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513112

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Pacific Farm Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Pacific Farm Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Pacific Farm Company has made a corporate contribution to Californians for Better Leadership in the amount of \$500. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Pacific Farm Company violated 2 U.S.C. § 441b, but to take no further action.

85040513113



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Gold Coast Produce
P.O. Drawer BB
Gonzales, California 93926

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513114

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513115

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Gold Coast Produce

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Gold Coast Produce.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Gold Coast Produce has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Gold Coast Produce violated 2 U.S.C. § 441b, but to take no further action.

85040513116



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

Fawcett Farms, Inc.
P.O. Box 231
Los Banos, California 93635

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

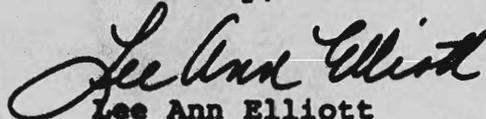
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513117

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513118

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Fawcett Farms, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Fawcett Farms, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Fawcett Farms, Inc has made a corporate contribution to Californians for Better Leadership in the amount of \$25. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Fawcett Farms, Inc. violated 2 U.S.C. § 441b, but to take no further action.

95040513119



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Phelan & Taylor Produce Co.
P.O. Box 458
Oceano, California 93445-0458

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

05040513120

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513121

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Pheland & Taylor Produce Co.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Phelan & Taylor Produce Co.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Phelan & Taylor Produce Co. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Pheland & Taylor Produce Co. violated 2 U.S.C. § 441b, but to take no further action.

85040513122



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 11, 1984

NH₃ Service Company
P.O. Box 388
Salinas, California 93902

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513123

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513124

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: NH₃ Service Company

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from NH₃ Service Company.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that NH₃ Service Company has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that NH₃ Service Company violated 2 U.S.C. § 441b, but to take no further action.

85040513125



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Produce West, Inc.
19000 Portola Drive, Suite 107
Salinas, California 93908

RE: MUR 1618

Dear Sir or Madam:

On April 3, 1984, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

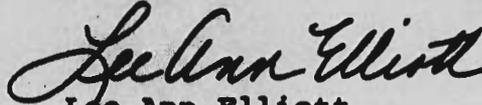
The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

85040513126

If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

85040513127

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: Produce West, Inc.

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from Produce West, Inc.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that Produce West, Inc. has made a corporate contribution to Californians for Better Leadership in the amount of \$100. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that Produce West, Inc. violated 2 U.S.C. § 441b, but to take no further action.

8 5 0 4 0 5 1 3 1 2 8

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT MAR 30 A 9: 20

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 3/30/84-9:15

MUR 1618
STAFF MEMBER(S)
George Demougeot

SENSITIVE

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAME: Californians for Better Leadership
Keith R. Welch, Treasurer
Montgomery Farms
Graham Ranch
Harris Farms
M and V Company
Tracy Ranch Co.
Montgomery Oil Co.
Rushing Minerals
Hanes Ranch
Superior Farming Co.
Peart's Auto Supply
Courtesy Ambulance, Inc.
Roy Otterson Ranch
Pacific Farm Co.
Gold Coast Produce
Fawcett Farms, Inc.
Phelan & Taylor Produce Co.
NH₃ Service Co.
Produce West, Inc.
Springville Ranch Co.
Golden West Packing Co.
Yamamoto Farms
Hansen Farms
J. L. Enterprises
California Orchard Co.
Salinas Land Co.
Amistad Ranches
Agri Enterprise
Sunset Farms, Inc.
Grow Art
Crown Properties
Turlock Fruit Co.
Hohener Meat Co., Inc.
Hidden Hill Ranch
C & N Enterprises
Cypress Packaging
Luquinox Co.
Claussen Farms, Inc.

RELEVANT STATUTE: 2 U.S.C. § 441b

INTERNAL REPORTS CHECKED: Audit Referral

FEDERAL AGENCIES CHECKED: None

95040513130

GENERATION OF MATTER

On January 18, 1984, the Commission approved the referral of this Audit matter to OGC. This matter is based on an Audit of Californians For Better Leadership ("the Committee"). The audit covered October 27, 1981 through December 31, 1982.

SUMMARY OF ALLEGATIONS

Audit discovered during a review of the Committee's contributor records that it appeared the Committee had received 40 contributions from 37 corporate sources totalling \$3,495.

When apprised of the possible corporate contributions, the Committee's custodian of records stated that when the Committee received a contribution which appeared to be from a possible incorporated entity, the Committee contacted the contributor by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding these contacts.

The Audit staff recommended that the Committee provide evidence which showed the contributions were not prohibited or refund the contributions to the contributors. Subsequently, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations and describing the debts as possible corporate contributions. The Committee has also indicated that it is attempting to verify whether or not these are in fact corporate contributions.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political

85040513131

committee to receive a corporate contribution. It appears that the Committee accepted contributions from 37 corporations. Accordingly, this Office recommends that the Commission find reason to believe that the Committee and Keith R. Welch, as treasurer, violated 2 U.S.C. § 441b.

Most of the corporate contributions are \$100 or less. Further, Audit noted that the Committee solicited the corporations for contributions. Accordingly, the Office of General Counsel is recommending that the Commission find reason to believe that each of the corporations violated 2 U.S.C. § 441b, but to take no further action. This should put them on notice of the prohibitions against corporate contributions. A list of the corporations and the amount each contributed is as follows:

5040513132

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. Piedmont, CA	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Hanes Ranch Boonville, CA	9/25/82	10.00	12/17/73

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	\$ 50.00 100.00	7/19/68
10. Peart's Auto Supply Madera, CA	9/24/82	100.00	1/30/62
11. Courtesy Ambulance, Inc. Fresno, CA	9/17/82	50.00	7/1/76
12. Roy Otterson Ranch Willows, CA	12/29/81 9/24/82	50.00 100.00	10/25/62
13. Pacific Farm Co. Firebaugh, CA	7/7/82	500.00	6/21/46
14. Gold Coast Produce Gonzales, CA	7/2/82	100.00	5/16/79
15. Fawcett Farms, Inc. Los Banos, CA	7/8/82	25.00	10/1/74
16. Phelan & Taylor Produce Co. Oceano, CA	7/9/82	100.00	12/31/54
17. NH ₃ Service Co. Salinas, CA	6/29/82	100.00	1/16/67
18. Produce West, Inc. Salinas, CA	6/30/82	100.00	7/1/75
19. Springville Ranch Co. Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamota Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
25. Salinas Land Co. King City, CA	3/24/82	200.00	12/31/17

85040513133

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
26. Amistad Ranches Courtland, CA	1/20/82	\$ 25.00	2/10/69
27. Agri Enterprise Santa Paula, CA	1/11/82	50.00	8/23/77
28. Sunset Farms, Inc. Santa Cruz, CA	12/29/81	100.00	3/22/71
29. Grow Art Salinas, CA	11/9/81 12/30/81	50.00 100.00	3/28/63
30. Crown Properties Hayward, CA	10/26/81	25.00	3/16/62
31. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
32. Hohener Meat Co., Inc. San Leandro, CA	10/27/81	100.00	12/16/57
33. Hidden Hill Ranch Fallbrook, CA	12/29/81	25.00	12/27/76
34. C & N Enterprises Carpenteria, CA	12/24/81	50.00	5/21/75
35. Cypress Packaging & Supply Corp. Castroville, CA	12/21/81	25.00	5/8/78
36. Luquinox Co. Orange, CA	12/17/81	25.00	3/17/64
37. Claussen Farms, Inc. Stockton, CA	12/16/81	25.00	4/11/77

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RECOMMENDATIONS

1. Find reason to believe the Californians for Better Leadership and Keith R. Welch, as treasurer, violated 2 U.S.C. § 441b.
2. Approve and authorize the sending of the attached factual and legal analysis and letter to Californians

for Better Leadership.

3. Find reason to believe that Montgomery Farms, Graham Ranch, Harris Farms, M and V Company, Tracy Ranch Co., Montgomery Oil Co., Rushing Minerals, Hanes Ranch, Superior Farming Co., Peart's Auto Supply, Courtesy Ambulance, Inc., Roy Otterson Ranch, Pacific Farm Co., Gold Coast Produce, Fawcett Farms, Inc., Phelan & Taylor Produce Co., NH₃ Service Co., Produce West, Inc., Springville Ranch Co., Golden West Packing Co., Yamamoto Farms, Hansen Farms, J. L. Enterprises, California Orchard Co., Salinas Land Co., Amistad Ranches, Agri Enterprise, Sunset Farms, Inc., Grow Art, Crown Properties, Turlock Fruit Co., Hohener Meat Co., Inc., Hidden Hill Ranch, C & N Enterprises, Cypress Packaging, Luquinox Co., and Claussen Farms, Inc. violated 2 U.S.C. § 441b, but take no further action and close the file as to them.
4. Approve and authorize the sending of the attached factual and legal analysis and letter to each of the corporations listed in recommendation 3 above.

Charles N. Steele
General Counsel

March 29, 1984
Date

Kenneth A. Gross
BY: Kenneth A. Gross
Associate General Counsel

85040513135

Attachments

- I. Proposed letter to Californians for Better Leadership
- II. General Counsel's Factual and Legal Analysis to Californians for Better Leadership.
- III. Proposed letter to corporations.
- IV. General Counsel's Factual and Legal Analysis to corporations.

85040513136

ATTACHMENT

①

I



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Keith R. Welch, Treasurer
Californians for Better Leadership
1127 11th Street
Suite 728
Sacramento, California 95814

RE: MUR 1618

Dear Mr. Welch:

On 1984, the Federal Election Commission determined that there is reason to believe that the Californians for Better Leadership ("the Committee") and you, as treasurer of the Committee, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting corporate contributions. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

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FEDERAL ELECTION COMMISSION

3

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougot
(202) 523-4000

RESPONDENT: Californians for Better Leadership,
Keith R. Welch, Treasurer

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The Audit Division discovered during a review of Californians for Better Leadership ("the Committee") contributor records that it appeared the Committee had received 40 contributions from 37 corporate sources totalling \$3,495.

When apprised of the possible corporate contributions, the Committee's custodian of records stated that when the Committee received a contribution which appeared to be from a possible incorporated entity, the Committee contacted the contributor by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding these contacts.

The Audit staff recommended that the Committee provide evidence which showed the contributions were not prohibited or refund the contributions to the contributors. Subsequently, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations and describing the debts as possible corporate contributions. The Committee has also indicated that it is attempting to verify whether or not these are in fact corporate contributions.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political

85040513138

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4060.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040513139

committee to receive a corporate contribution. It appears that the Committee accepted contributions from 37 corporations. Accordingly, this Office recommends that the Commission find reason to believe that the Committee and Keith R. Welch, as treasurer, violated 2 U.S.C. § 441b.

Most of the corporate contributions are \$100 or less. Further, Audit noted that the Committee solicited the corporations for contributions. Accordingly, the Office of General Counsel is recommending that the Commission find reason to believe that each of the corporations violated 2 U.S.C. § 441b, but to take no further action. This should put them on notice of the prohibitions against corporate contributions. A list of the corporations and the amount each contributed is as follows:

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<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. Piedmont, CA	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Hanes Ranch Boonville, CA	9/25/82	10.00	12/17/73

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<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	\$ 50.00 100.00	7/19/68
10. Peart's Auto Supply Madera, CA	9/24/82	100.00	1/30/62
11. Courtesy Ambulance, Inc. Fresno, CA	9/17/82	50.00	7/1/76
12. Roy Otterson Ranch Willows, CA	12/29/81 9/24/82	50.00 100.00	10/25/62
13. Pacific Farm Co. Firebaugh, CA	7/7/82	500.00	6/21/46
14. Gold Coast Produce Gonzales, CA	7/2/82	100.00	5/16/79
15. Fawcett Farms, Inc. Los Banos, CA	7/8/82	25.00	10/1/74
16. Phelan & Taylor Produce Co. Oceano, CA	7/9/82	100.00	12/31/54
17. NH ₃ Service Co. Salinas, CA	6/29/82	100.00	1/16/67
18. Produce West, Inc. Salinas, CA	6/30/82	100.00	7/1/75
19. Springville Ranch Co. Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamota Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
25. Salinas Land Co. King City, CA	3/24/82	200.00	12/31/17

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<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
26. Amistad Ranches Courtland, CA	1/20/82	\$ 25.00	2/10/69
27. Agri Enterprise Santa Paula, CA	1/11/82	50.00	8/23/77
28. Sunset Farms, Inc. Santa Cruz, CA	12/29/81	100.00	3/22/71
29. Grow Art Salinas, CA	11/9/81 12/30/81	50.00 100.00	3/28/63
30. Crown Properties Hayward, CA	10/26/81	25.00	3/16/62
31. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
32. Hohener Meat Co., Inc. San Leandro, CA	10/27/81	100.00	12/16/57
33. Hidden Hill Ranch Fallbrook, CA	12/29/81	25.00	12/27/76
34. C & N Enterprises Carpenteria, CA	12/24/81	50.00	5/21/75
35. Cypress Packaging & Supply Corp. Castroville, CA	12/21/81	25.00	5/8/78
36. Luquinox Co. Orange, CA	12/17/81	25.00	3/17/64
37. Claussen Farms, Inc. Stockton, CA	12/16/81	25.00	4/11/77



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RE: MUR 1618
[Name of Respondent]

Dear _____:

On _____, 198__, the Commission found reason to believe that your corporation had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file as it pertains to your corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that any corporate contribution made in connection with a federal election is a violation of 2 U.S.C. § 441b and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's factual and legal analysis which formed a basis for the Commission's finding is attached for your information.

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If you have any questions, please direct them to George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosure
General Counsel's Factual and Legal Analysis

85040513144

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. 1618
Staff Member(s) & Tel. No.
George Demougnot
(202) 523-4000

RESPONDENT:

SOURCE OF MUR: INTERNALLY GENERATED

SUMMARY OF ALLEGATIONS

During a review of Californians for Better Leadership's contributor records, the Audit Division noted a corporate contribution from _____.

FACTUAL AND LEGAL ANALYSIS

Section 441b(a) of Title 2, United States Code, states that it is unlawful for any corporation to make or for any political committee to receive a corporate contribution. It appears that _____ has made a corporate contribution to Californians for Better Leadership in the amount of _____. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that _____ violated 2 U.S.C. § 441b, but to take no further action.

85040513145

BEFORE THE FEDERAL ELECTION COMMISSION

Meek 1618

In the Matter of)	
)	A83-87
Final Audit Report -)	
Californians for Better)	
Leadership)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 18, 1984, the Commission approved by a vote of 4-0 the Final Audit Report of the Californians for Better Leadership and referral of Exhibit A to the Office of General Counsel, as attached to the Audit Division's January 12, 1984 Memorandum to the Commissioners.

Commissioners Aikens, Elliott, Harris and McGarry voted affirmatively in this matter; Commissioners McDonald and Reiche did not cast a vote.

Attest:

1-18-84
Date

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

85040513146

AR84-5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

A83-87
January 19, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA ¹⁵
[Signature]

FROM: BOB COSTA

SUBJECT: CALIFORNIANS FOR BETTER LEADERSHIP

On January 18, 1984, the Commission approved the final audit report (see Attachment I) of the above named committee. This final report includes a matter which was referred to your office as a result of the approval by the Commission (see Exhibit A).

Should you have any questions regarding this memorandum, please contact Dan Boyle or Ray Lisi at 523-4155.

Attachments as stated

85040513147



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Attachment I

A83-87

REPORT OF THE AUDIT DIVISION
ON THE
CALIFORNIANS FOR BETTER LEADERSHIP

I. Background

A. Overview

This report is based on an audit of the Californians For Better Leadership ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Secretary of Senate on October 27, 1981 as Brown Out Committee, an unauthorized independent expenditure committee opposing the nomination and election of the Honorable Edmund G. Brown, Jr. to the U.S. Senate. On April 26, 1982, the Committee changed its name to Californians For Better Leadership. The Committee maintains its headquarters in Sacramento, California.

The audit covered the period October 27, 1981 through December 31, 1982. The Committee reported an opening cash on hand balance on October 27, 1981 of \$-0-; total receipts for the period of \$89,623.25; total disbursements for the period of \$87,722.31; and a closing cash balance on December 31, 1982 of \$1,900.94.

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This report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report and were available to Commissioners and appropriate staff for review.

B. Key Personnel

The Treasurers of the Committee during the period of the audit were Ms. Teri Smith from October 27, 1981 through October 5, 1982; and Ms. Nixie Hughes from October 6, 1982 to the present.

C. Scope

The audit included such tests as verification of total reported receipts and disbursements and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

D. Other Matters

A certain matter noted during the audit was referred to the Office of General Counsel.

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II. Audit Finding and Recommendation

A. Receipt of Prohibited Contributions

Section 441b(a) of Title 2, United States Code, in part, states that it is unlawful for any corporation to make a contribution in connection with any election to any political office.

During the review of contributor records it was determined that the Committee received 40 contributions from 37 corporate sources totaling \$3,495.

According to the Committee's custodian of records, when a contribution was received which indicated it was from a possible incorporated entity, the contributor was contacted by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding the contacts.

The Audit staff recommended in the interim audit report that the Committee provide evidence which shows the contributions were not prohibited or refund the contributions to the contributors. After consultation with the Audit staff regarding its response options, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations describing the nature of debt as possible corporate contribution.

According to the treasurer, the Committee is in the process of contacting each of these contributors in an effort to obtain a contributor statement verifying the non corporate status of the account upon which the contribution was drawn. Upon completion of this verification process, the Committee will attempt to raise the necessary funds to refund the remaining corporate contributions and make payment on any and all debts incurred during the process.

Recommendation

This matter is referred to the Office of General Counsel.

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Californians for Better Leadership

Schedule of Possible Corporate Contributions

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company — Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. — Piedmont, CA	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. — Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Hanes Ranch Boonville, CA	9/25/82	10.00	12/17/73
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	50.00 100.00	7/19/68
10. Peart's Auto Supply Madera, CA	9/24/82	100.00	1/30/62
11. Courtesy Ambulance, Inc. Fresno, CA	9/17/82	50.00	7/1/76
12. Roy Otterson Ranch Willows, CA	12/29/81 9/24/82	50.00 100.00	10/25/62
13. Pacific Farm Co. Firebaugh, CA	7/7/82	500.00	6/21/46

Californians for Better Leadership

Schedule of Possible Corporate Contributions

<u>Name of Contributor</u> <u>City and State</u>	<u>Date of</u> <u>Check</u>	<u>Amount of</u> <u>Check</u>	<u>Date of</u> <u>Incorporation</u>
14. Gold Coast Produce Gonzales, CA	7/2/82	\$ 100.00	5/16/79
15. Fawcett Farms, Inc. Los Banos, CA	7/8/82	25.00	10/1/74
16. Phelan & Taylor Produce Co. Oceano, CA	7/9/82	100.00	12/31/54
17. NH ₃ Service Co. Salinas, CA	6/29/82	100.00	1/16/67
18. Produce West, Inc. Salinas, CA	6/30/82	100.00	7/1/75
19. Springville Ranch Co. Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamota Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
25. Salinas Land Co. King City, CA	3/24/82	200.00	12/31/17
26. Amistad Ranches Courtland, CA	1/20/82	25.00	2/10/69
27. Agri Enterprise Santa Paula, CA	1/11/82	50.00	8/23/77

Californians for Better Leadership
Schedule of Possible Corporate Contributions

<u>Name of Contributor</u> <u>City and State</u>	<u>Date of</u> <u>Check</u>	<u>Amount of</u> <u>Check</u>	<u>Date of</u> <u>Incorporation</u>
28. Sunset Farms, Inc. Santa Cruz, CA	12/29/81	\$ 100.00	3/22/71
29. Grow Art Salinas, CA	11/9/81 12/30/81	50.00 100.00	3/28/63
30. Crown Properties Hayward, CA	10/26/81	25.00	3/16/62
31. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
32. Hohener Meat Co., Inc. San Leandro, CA	10/27/81	100.00	12/16/57
33. Hidden Hill Ranch Fallbrook, CA	12/29/81	25.00	12/27/76
34. C & N Enterprises Carpenteria, CA	12/24/81	50.00	5/21/75
35. Cypress Packaging & Supply Corp. Castroville, CA	12/21/81	25.00	5/8/78
36. Luquinox Co. Orange, CA	12/17/81	25.00	3/17/64
37. Claussen Farms, Inc. Stockton, CA	12/16/81	25.00	4/11/77
Total		<u>\$3,495.00</u>	

All are active except #2 on page 1.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Callahan Curry
OC
Docket
#2

SENSITIVE

MEMORANDUM TO: THE COMMISSION
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*
DATE: JANUARY 23, 1984
SUBJECT: REFERRAL TO OGC -- MUR 1618
CALIFORNIANS FOR BETTER LEADERSHIP

The attached has been circulated for your
information.

85040513154

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

Mur 1618

In the Matter of
Final Audit Report -
Californians for Better
Leadership

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A83-87

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 18, 1984, the Commission approved by a vote of 4-0 the Final Audit Report of the Californians for Better Leadership and referral of Exhibit A to the Office of General Counsel, as attached to the Audit Division's January 12, 1984 Memorandum to the Commissioners.

Commissioners Aikens, Elliott, Harris and McGarry voted affirmatively in this matter; Commissioners McDonald and Reiche did not cast a vote.

Attest:

1-18-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

95040513155

AR84-5
MUR 1618



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

A83-87
January 19, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA ¹⁵
[Signature]

FROM: BOB COSTA

SUBJECT: CALIFORNIANS FOR BETTER LEADERSHIP

On January 18, 1984, the Commission approved the final audit report (see Attachment I) of the above named committee. This final report includes a matter which was referred to your office as a result of the approval by the Commission (see Exhibit A).

Should you have any questions regarding this memorandum, please contact Dan Boyle or Ray Lisi at 523-4155.

Attachments as stated

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84 JAN 20 P 2: 32
RECEIVED
COMMUNICATIONS SECTION



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment I

A83-87

REPORT OF THE AUDIT DIVISION
ON THE
CALIFORNIANS FOR BETTER LEADERSHIP

I. Background

A. Overview

85040513157
This report is based on an audit of the Californians For Better Leadership ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Secretary of Senate on October 27, 1981 as Brown Out Committee, an unauthorized independent expenditure committee opposing the nomination and election of the Honorable Edmund G. Brown, Jr. to the U.S. Senate. On April 26, 1982, the Committee changed its name to Californians For Better Leadership. The Committee maintains its headquarters in Sacramento, California.

The audit covered the period October 27, 1981 through December 31, 1982. The Committee reported an opening cash on hand balance on October 27, 1981 of \$-0-; total receipts for the period of \$89,623.25; total disbursements for the period of \$87,722.31; and a closing cash balance on December 31, 1982 of \$1,900.94.

This report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report and were available to Commissioners and appropriate staff for review.

B. Key Personnel

The Treasurers of the Committee during the period of the audit were Ms. Teri Smith from October 27, 1981 through October 5, 1982; and Ms. Nixie Hughes from October 6, 1982 to the present.

C. Scope

The audit included such tests as verification of total reported receipts and disbursements and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

D. Other Matters

A certain matter noted during the audit was referred to the Office of General Counsel.

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II. Audit Finding and Recommendation

A. Receipt of Prohibited Contributions

Section 441b(a) of Title 2, United States Code, in part, states that it is unlawful for any corporation to make a contribution in connection with any election to any political office.

During the review of contributor records it was determined that the Committee received 40 contributions from 37 corporate sources totaling \$3,495.

According to the Committee's custodian of records, when a contribution was received which indicated it was from a possible incorporated entity, the contributor was contacted by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding the contacts.

The Audit staff recommended in the interim audit report that the Committee provide evidence which shows the contributions were not prohibited or refund the contributions to the contributors. After consultation with the Audit staff regarding its response options, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations describing the nature of debt as possible corporate contribution.

According to the treasurer, the Committee is in the process of contacting each of these contributors in an effort to obtain a contributor statement verifying the non corporate status of the account upon which the contribution was drawn. Upon completion of this verification process, the Committee will attempt to raise the necessary funds to refund the remaining corporate contributions and make payment on any and all debts incurred during the process.

Recommendation

This matter is referred to the Office of General Counsel.

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Californians for Better Leadership

Schedule of Possible Corporate Contributions

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. Piedmont, CA.	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Eanes Ranch Boonville, CA	9/25/82	10.00	12/17/73
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	50.00 100.00	7/19/68
10. Peart's Auto Supply Madera, CA	9/24/82	100.00	1/30/62
11. Courtesy Ambulance, Inc. Fresno, CA	9/17/82	50.00	7/1/76
12. Roy Otterson Ranch Willows, CA	12/29/81 9/24/82	50.00 100.00	10/25/62
13. Pacific Farm Co. Firebaugh, CA	7/7/82	500.00	6/21/46

Californians for Better Leadership

Schedule of Possible Corporate Contributions

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
14. Gold Coast Produce Gonzales, CA	7/2/82	\$ 100.00	5/16/79
15. Fawcett Farms, Inc. Los Banos, CA	7/8/82	25.00	10/1/74
16. Phelan & Taylor Produce Co. Oceano, CA	7/9/82	100.00	12/31/54
17. NE ₃ Service Co. — Salinas, CA	6/29/82	100.00	1/16/67
18. Produce West, Inc. — Salinas, CA	6/30/82	100.00	7/1/75
19. Springville Ranch Co. — Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamoto Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
25. Salinas Land Co. King City, CA	3/24/82	200.00	12/31/17
26. Amistad Ranches Courtland, CA	1/20/82	25.00	2/10/69
27. Agri Enterprise Santa Paula, CA	1/11/82	50.00	8/23/77

Californians for Better Leadership

Schedule of Possible Corporate Contributions

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0. Crown Properties Hayward, CA	10/26/81	25.00	3/16/62
1. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
2. ^N Behener Meat Co., Inc. ^S San Leandro, CA	10/27/81	100.00	12/16/57
3. ^M Hidden Hill Ranch ^P Pallbrook, CA	12/29/81	25.00	12/27/76
4. ^L C & N Enterprises ^C Carpenteria, CA	12/24/81	50.00	5/21/75
5. ^O Cypress Packaging & Supply Corp. ^V Castroville, CA	12/21/81	25.00	5/8/78
6. ^O Luquinox Co. ^O Orange, CA	12/17/81	25.00	3/17/64
7. ^C Claussen Farms, Inc. Stockton, CA	12/16/81	25.00	4/11/77
Total		<u>\$3,495.00</u>	

All are active except #2 on page 1.

SENSITIVE

*Obs
Archit
#1*



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date and Time Transmitted: MONDAY, 1-16-84, 11:00

COMMISSIONER: McGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, JANUARY 18, 1984, 11:00

SUBJECT: FINAL AUDIT REPORT - CALIFORNIANS FOR BETTER LEADERSHIP, Memorandum to the Commissioners dated January 12, 1984

85040513163

- () I approve the recommendation
- () I object to the recommendation

COMMENTS: _____

Date: _____ Signature: _____

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 13 P 3: 05

A83-87

January 12, 1984

MEMORANDUM

TO: THE COMMISSIONERS
THROUGH: JOHN C. SURINA
STAFF DIRECTOR
FROM: BOB COSTA
SUBJECT: CALIFORNIANS FOR BETTER LEADERSHIP

Attached please find the final audit report on the above subject committee. Also attached at Exhibit A is a matter being referred to the Office of General Counsel. This report is being circulated to the Commission on a tally vote basis. Upon notice of Commission approval, the report will be held for public release pending notification of Committee receipt of its informational copy.

If you have any questions regarding this report, please do not hesitate to contact Dan Boyle or Ray Lisi at 523-4155.

Attachments as stated

85040513164



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

Attachment I

A83-87

REPORT OF THE AUDIT DIVISION
ON THE
CALIFORNIANS FOR BETTER LEADERSHIP

I. Background

A. Overview

This report is based on an audit of the Californians For Better Leadership ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Secretary of Senate on October 27, 1981 as Brown Out Committee, an unauthorized independent expenditure committee opposing the nomination and election of the Honorable Edmund G. Brown, Jr. to the U.S. Senate. On April 26, 1982, the Committee changed its name to Californians For Better Leadership. The Committee maintains its headquarters in Sacramento, California.

The audit covered the period October 27, 1981 through December 31, 1982. The Committee reported an opening cash on hand balance on October 27, 1981 of \$-0-; total receipts for the period of \$89,623.25; total disbursements for the period of \$87,722.31; and a closing cash balance on December 31, 1982 of \$1,900.94.

85040513165

This report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in this report and were available to Commissioners and appropriate staff for review.

B. Key Personnel

The Treasurers of the Committee during the period of the audit were Ms. Teri Smith from October 27, 1981 through October 5, 1982; and Ms. Nixie Hughes from October 6, 1982 to the present.

C. Scope

The audit included such tests as verification of total reported receipts and disbursements and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

D. Other Matters

A certain matter noted during the audit was referred to the Office of General Counsel.

85040513166

II: Audit Finding and Recommendation**A. Receipt of Prohibited Contributions**

Section 441b(a) of Title 2, United States Code, in part, states that it is unlawful for any corporation to make a contribution in connection with any election to any political office.

During the review of contributor records, it was determined that the Committee received 40 contributions from 37 corporate sources totaling \$3,495.

According to the Committee's custodian of records, when a contribution was received which indicated it was from a possible incorporated entity, the contributor was contacted by letter or telephone to verify the corporate/non-corporate status. The Committee, for the most part, could not provide any documentation regarding the contacts.

The Audit staff recommended in the interim audit report that the Committee provide evidence which shows the contributions were not prohibited or refund the contributions to the contributors. After consultation with the Audit staff regarding its response options, the Committee submitted a disclosure report showing these contributions on Schedule D as debts and obligations describing the nature of debt as possible corporate contribution.

According to the treasurer, the Committee is in the process of contacting each of these contributors in an effort to obtain a contributor statement verifying the non corporate status of the account upon which the contribution was drawn. Upon completion of this verification process, the Committee will attempt to raise the necessary funds to refund the remaining corporate contributions and make payment on any and all debts incurred during the process.

Recommendation

This matter is referred to the Office of General Counsel.

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Californians for Better Leadership

Schedule of Possible Corporate Contributions

<u>Name of Contributor City and State</u>	<u>Date of Check</u>	<u>Amount of Check</u>	<u>Date of Incorporation</u>
1. Montgomery Farms Merced, CA	9/20/82	\$ 25.00	8/29/77
2. Graham Ranch Ventura, CA	9/20/82	25.00	10/19/76 dissolved 11/30/82
3. Harris Farms Parlier, CA	9/27/82	100.00	3/9/54
4. M and V Company Delano, CA	9/21/82	250.00	10/5/77
5. Tracy Ranch Co. Piedmont, CA	10/3/82	100.00	7/5/49
6. Montgomery Oil Co. Bakersfield, CA	10/21/82	10.00	9/10/80
7. Rushing Minerals Bakersfield, CA	9/25/82	100.00	11/30/76
8. Hanes Ranch Boonville, CA	9/25/82	10.00	12/17/73
9. Superior Farming Co. Bakersfield, CA	12/22/81 9/30/82	50.00 100.00	7/19/68
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Californians for Better Leadership

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19. Springville Ranch Co. Camarillo, CA	7/1/82	100.00	1/24/80
20. Golden West Packing Co. Imperial Beach, CA	7/12/82	100.00	12/22/64
21. Yamamota Farms Oxnard, CA	7/20/82	100.00	12/30/77
22. Hansen Farms Salinas, CA	7/19/82	100.00	9/2/80
23. J. L. Enterprises Greenfield, CA	7/8/82	100.00	3/15/73
24. California Orchard Co. King City, CA	3/24/82	100.00	11/10/19
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Californians for Better Leadership

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31. Turlock Fruit Co. Turlock, CA	10/19/81	100.00	3/5/79
32. Hohener Meat Co., Inc. San Leandro, CA	10/27/81	100.00	12/16/57
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Total		<u><u>\$3,495.00</u></u>	

All are active except #2 on page 1.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date and Time Transmitted: MONDAY, 1-16-84, 11:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, JANUARY 18, 1984, 11:00

SUBJECT: FINAL AUDIT REPORT - CALIFORNIANS FOR BETTER LEADERSHIP, Memorandum to the Commissioners dated January 12, 1984

85040513171

- I approve the recommendation
- I object to the recommendation

COMMENTS: _____

Date: _____ Signature: _____

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JAN 13 P 3: 05

A83-87

January 12, 1984

MEMORANDUM

TO: THE COMMISSIONERS
THROUGH: JOHN C. SURINA
STAFF DIRECTOR
FROM: BOB COSTA
SUBJECT: CALIFORNIANS FOR BETTER LEADERSHIP

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If you have any questions regarding this report, please do not hesitate to contact Dan Boyle or Ray Lisi at 523-4155.

Attachments as stated

85040513172



A83-87

REPORT OF THE AUDIT DIVISION
ON THE
CALIFORNIANS FOR BETTER LEADERSHIP

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D. Other Matters

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85040513174

II. Audit Finding and Recommendation

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Recommendation

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85040513175

Californians for Better Leadership
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Californians for Better Leadership
Schedule of Possible Corporate Contributions

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Californians for Better Leadership
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Total		<u>\$3,495.00</u>	

All are active except #2 on page 1.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

85040513179

THIS IS THE BEGINNING OF MUR # 1618

Date Filmed 2/28/85 Camera No. ---1

Cameraman JRL