



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2160  
DATE FILMED 10/2/87 CAMERA NO. 4  
CAMERAMAN GPC

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PUBLIC RECORD INDEX - MUR 2160

1. Memo, 3 Jan 86, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), Subj: Referral of the Republican Central Committee of Los Angeles County - Federal Committee (RCC-LA) w/atch (RAD Referral Package).
2. First General Counsel's Report, 24 Mar 86.
3. Memo, 26 Mar 86, Commissioner Thomas J. Josefiak to Commission Secretary, Subj: Withdrawal of Approval.
4. Memo, 26 Mar 86, Cmsn. Secretary to General Counsel, Subj: Objections to First G.C. Report.
5. Certification of Commission action, 2 Apr 86.
6. Ltr, dtd 9 Apr 86, Joan D. Aikens, (Chairman, FEC) to Leo J. Habel, (Treas, RCC-LA).
7. Statement of Designation of Counsel, 15 Apr 86, Charles H. Bell, Jr., designated counsel for L. J. Habel and RCC-LA.
8. Ltr, 29 Apr 86, C.H. Bell to FEC (Response).
9. Additional Response ltr, 19 May 86m, C.H. Bell to FEC.
10. General Counsel's Report, 17 July 86.
11. Memos, (2) 22 July 86, Cmsn Secretary to Gen Counsel, Subj: Objections to G.C. Report.
12. Certification of Commission action, 30 July 86.
13. Ltr, 6 Aug 86, Lawrence M. Noble (Deputy Gen. Counsel) to G.H. Bell, w/encl (Questions).
14. Ltr, 3 Oct 86, C.H. Bell to FEC, w/atch (Committee's Ledger sheets).
15. General Counsel's Report, 13 Apr 87.
16. Memo, 15 Apr 87, M.W. Emmons to L.M. Noble, Subj: Objection to G.C. Report.
17. Memo, 16 Apr 87, M.W. Emmons to L.M. Noble, Subj: Objections to G.C. Report.
18. Certification of Commission action, 23 Apr 87.
19. Ltr, dtd 28 Apr 87, L.M. Noble to C.H. Bell.

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20. General Counsel's Report, 10 July 87.
21. Memo, 15 July 87, Cmsn Secretary to Gen Counsel, Subj: Objection to G.C. Report, w/atch (comment sheet).
22. Certification of Commission action, 15 July 87.
23. Ltr, 17 July 87, L.M. Noble to C.H. Bell, w/atch (Executed Conciliation Agreement).

-END-

**NOTE:** In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

3 January 1986

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE REPUBLICAN CENTRAL COMMITTEE OF  
LOS ANGELES COUNTY - FEDERAL COMMITTEE

This is a referral of the Republican Central Committee of Los Angeles County - Federal Committee ("the Committee"). The Committee failed to file the 1984 April Quarterly, July Quarterly and October Quarterly Reports by Election Day, November 6, 1984, and conducted apparent federal activity from its non-federal account. According to the 1983-1984 RAD Review and Referral Procedures for Unauthorized Committees (Standards 3 and 7, respectively), further examination is required by your office.

Please note that the Committee did not meet the financial threshold for basic review until the submission of its 1984 Year End Report. If you have any questions, please contact Bill Baber at 376-2480.

Attachment

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REPORTS ANALYSIS REFERRAL  
TO  
OFFICE OF GENERAL COUNSEL

DATE: 3 January 1986

ANALYST: Bill Baber

I. COMMITTEE: Republican Central Committee of Los Angeles  
County - Federal Account (C00196899)  
Leo J. Habel, Treasurer  
(January 7, 1985 to Present)  
Carl J. Johnson, Treasurer  
(February 3, 1984 to January 7, 1985)  
1045 South Byram Street  
Los Angeles, CA 90015

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)  
11 CFR 104.5(c)(1)(i)(A)  
11 CFR 102.5(a)

III. BACKGROUND:

A. Failure to Timely File Reports  
2 U.S.C. §434(a)(4)(A)(i)  
11 CFR 104.5(c)(1)(i)(A)

The Republican Central Committee of Los Angeles County -Federal Account ("the Committee") failed to file the 1984 April Quarterly, July Quarterly and October Quarterly Reports in a timely manner. On December 10, 1984, the Committee filed a 30 Day Post-General Report which disclosed all activity from January 1, 1984 through November 27, 1984 (Attachment 2).

On August 21, 1985, a Request for Additional Information (RAI) was sent which asked for an explanation as to the tardiness of the Committee's filings (Attachment 3). The Committee's response of September 11, 1985 stated that their filing delay was due to the fact that they were "...unfamiliar with the intricacy of and interplay between FECA and California state campaign reporting requirements" (Attachment 4).

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REPUBLICAN CENTRAL COMMITTEE OF  
LOS ANGELES COUNTY-FEDERAL ACCOUNT  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

B. Federal And Non-Federal Activity  
11 CFR 102.5(a)

The Committee's 30 Day Post-General Report listed \$31,375.70 in operating expenditures (Attachment 2). The Committee's 1984 Year End Report listed \$27,623.75 in operating expenditures (Attachment 5). These expenditures were itemized as payments made to the Committee's non-federal account, and listed corresponding "sub-vendors."

An RFAI referencing the Year End Report was sent on August 14, 1985 and an RFAI referencing the 30 Day Post-General Report was sent on August 21, 1985 (Attachments 6 and 3). The RFAIs advised the Committee that a non-federal account was prohibited from financing activity in connection with federal elections and asked for a clarification of these expenditures. A Second Notice was sent for the Year End Report on September 5, 1985 (Attachment 7).

The Committee's agent, Charles H. Bell Jr., responded to the 30 Day Post-General RFAI on September 11, 1985 (Attachment 4). In the response, Mr. Bell stated that, "The federal committee's payments to the Central Committee's non-federal account were reimbursements for the allocable portion of payments for joint federal/state campaign activities." No response was received from the Committee referencing the Year End Report.

A Second Notice was sent for the 30 Day Post-General Report on September 12, 1985 which requested further clarification of the activities initially paid for by the non-federal account (Attachment 8).

The Commission received an amended 30 Day Post-General Report on October 23, 1985. The report showed that of the \$31,375.76 reported on Line 19 (Operating Expenditures), \$2,278.07 was itemized as "exempt exp.", and \$29,727.59 was itemized as "gen. op. exp." The report included a letter from Mr. Bell in which he stated, "In addition, the Committee currently is reviewing subsequently filed reports..." (Attachment 9).

On October 25, 1985, the Reports Analysis Division ("RAD") analyst called Mr. Bell. The RAD analyst informed Mr. Bell that the 30 Day Post-General Report had been received and that a similar response was also needed for the Year End Report. The RAD analyst also stated that the Commission includes exempt activities in its 11 CFR

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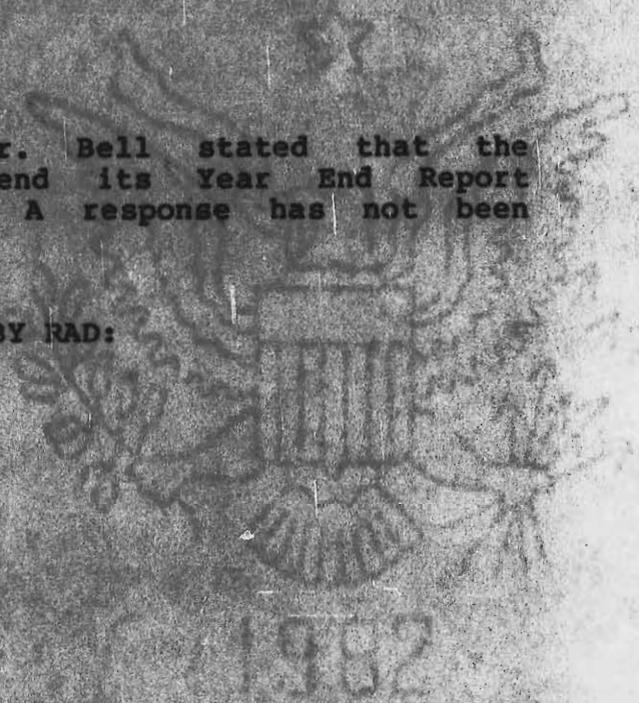
REPUBLICAN CENTRAL COMMITTEE OF  
LOS ANGELES COUNTY-FEDERAL ACCOUNT  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

102.5(a)(1) prohibitions. Mr. Bell stated that the Committee had planned to amend its Year End Report accordingly (Attachment 10). A response has not been received as of this date.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)DATE 31DEC85  
PAGE 1

## PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
REPUBLICAN CENTRAL COMMITTEE OF LOS ANGELES COUNTY-FEDERAL ACCOUNT				PARTY NON-QUALIFIED		ID #C00196899
1984	STATEMENT OF ORGANIZATION			3FEB84	2	84FEC/295/1441
	MISCELLANEOUS REPORT			11JUN84 TO FEB	34	84FEC/316/3439
	STATEMENT OF ORGANIZATION - AMENDMENT			6NOV84	2	84FEC/348/2022
	POST-GENERAL	32,194	31,375	1JAN84 -26NOV84	14	84FEC/353/4772
	POST-GENERAL - AMENDMENT	-	-	1JAN84 -26NOV84	9	85FEC/387/3339
	POST-GENERAL - AMENDMENT	32,194	31,375	1JAN84 -26NOV84	18	85FEC/390/2368
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -26NOV84	5	85FEC/386/2255
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -26NOV84	2	85FEC/387/3522
	YEAR-END	38,630	37,629	27NOV84 -31DEC84	12	85FEC/363/5322
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	3	85FEC/385/3871
	REQUEST FOR ADDITIONAL INFORMATION 2ND			27NOV84 -31DEC84	4	85FEC/387/2343
	TOTAL	70,824	0 68,998	0	105	TOTAL PAGES

All reports have been reviewed.

Debts Owed To As of 12/31/84: \$ 0  
 Debts Owed By As of 12/31/84: \$ 0  
 Cash-On-Hand As of 12/31/84 : \$ 1825

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)DATE 31DEC85  
PAGE 1

## PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
REPUBLICAN CENTRAL COMMITTEE OF LOS ANGELES COUNTY	FEDERAL ACCOUNT			PARTY NON-QUALIFIED		ID #C00196899
	1985 STATEMENT OF ORGANIZATION - AMENDMENT MID-YEAR REPORT	206,795	208,305	25JUN85 1JAN85 -30JUN85	2 51	85FEC/376/4974 85FEC/384/0785
	TOTAL	206,795	0 208,305	0	53	TOTAL PAGES

All reports have been reviewed.

Debts Owed To As of 6/30/85: \$ 0  
 Debts Owed By As of 6/30/85: \$ 0  
 Cash-On-Hand As of 6/30/85 : \$ 314

RECEIVED BY THE FEC

04 DEC 1984

REPUBLICAN CENTRAL COMMITTEE OF LOS ANGELES COUNTY

January Page

ALLEN ARBA

1. Name of Committee to File  
Republican Central Committee of Los Angeles County-Federal Account

Address (Number and Street)

1045 S. Byron St.

City, State and ZIP Code

Los Angeles, CA 90015

Check here if address is different than previously reported.

2. FEC Identification Number  
Pending

3.  This committee qualified as a non-federally controlled committee during the Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report  October 15 Quarterly Report

July 15 Quarterly Report  January 15 Year-End Report

July 31 Old Year Report (Non-Quarter Year End)

Monthly Report for \_\_\_\_\_

Twelve day report preceding \_\_\_\_\_

on \_\_\_\_\_ in the State of \_\_\_\_\_

Twelve day report following the General Election

on 11/6/84 in the State of California

Transition Report

(b) Is this Report an Amendment?

YES  NO

SUMMARY

6. Covering Period 1/1/84 through 11/26/84

8. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(b) and 8(c) for Column B)

7. Total Disbursements (from Line 20)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
8. (a) Cash on hand January 1, 19 <u>84</u>		\$ -0-
(b) Cash on Hand at Beginning of Reporting Period	\$ -0-	
(c) Total Receipts (from Line 10)	\$ 32,194.50	\$ 32,194.50
(d) Subtotal (add Lines 8(b) and 8(c) for Column A and Lines 8(b) and 8(c) for Column B)	\$ 32,194.50	\$ 32,194.50
7. Total Disbursements (from Line 20)	\$ 31,375.76	\$ 31,375.76
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 8(d))	\$ 819.74	\$ 818.74
9. Debts and Obligations Owed TO The Committee	None	
10. Debts and Obligations Owed BY the Committee	None	

I certify that I have examined this report and to the best of my knowledge and belief it is true, correct and complete.

Carl J. Johnson  
Signature

12-6-84  
Date

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9520  
Local 202-633-4225

NOTE: Submission of false, overstated, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

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STATE PARTY PAGE  
 Form No. 100

Name of Committee (Full)		Report Covering the Period	
Republican Central Committee		From: 1/1/56	To: 11/26/56
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. CONTRIBUTIONS (other than from individuals or persons other than political committees)			
(a) Individuals/Persons Other Than Political Committees	19,694.50	19,694.50	1966
(b) Political Party Committees			1966
(c) Other Political Committees	12,500.00	12,500.00	1966
(d) TOTAL CONTRIBUTIONS (other than from individuals or persons other than political committees)	32,194.50	32,194.50	1966
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
<b>A. TOTAL RECEIPTS (Add lines 11, 12, 13, 14, 15, 16 and 17)</b>	<b>32,194.50</b>	<b>32,194.50</b>	<b>18</b>
<b>II. DISBURSEMENTS</b>			
19. OPERATING EXPENDITURES	31,375.76	31,375.76	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (see Schedule B)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 et seq) (See Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
<b>B. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	<b>31,375.76</b>	<b>31,375.76</b>	<b>28</b>
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	32,194.50	32,194.50	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	32,194.50	32,194.50	31
32. TOTAL OPERATING EXPENDITURES from Line 19	31,375.76	31,375.76	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	31,375.76	31,375.76	34

R 7 0 4 0 3 3 5 4 9 3 0  
 R 4 0 3 3 5 4 9 3 0

Page 3 of 9  
 LOS ANGELES COUNTY REGISTER  
 This amount submitted for each  
 category of the General  
 Summary Page)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from this document and returned may not be used or used by any person for the purpose of making contributions or for any other purpose, other than the purpose stated above and address of any political committee to which the contribution was made.

Name of Committee (S.F. 42)			
<b>Republican Central Committee of Los Angeles County-State</b>			
A. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State Global Account 1048 S Byron St., L.A., CA 90015 subvendor: Federal Publication Co.	Purpose of Disbursement equipment rental	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 350.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code 321 Andover St, Burbank CA 91504	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Russell Transportation PO Box 457, Rosemead CA 91770	Purpose of Disbursement transportation for volunteers	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 218.42
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Long Beach Transit 1300 Gardena Ave, Long Beach CA	Purpose of Disbursement transportation for volunteers	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 182.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Pacific Busing, 1901 Blake Ave, Los Angeles CA 90039	Purpose of Disbursement transportation for volunteers	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 35.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Brock Bus Lines, 722 W Wilson Ave, Glendale CA 91203	Purpose of Disbursement transportation for volunteers	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 241.50
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Western Tours Inc., 722W Wilson Ave, Glendale CA 91203	Purpose of Disbursement transportation for volunteers	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 32.82
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Young Printers, 5514 York Blvd, Los Angeles CA 90042	Purpose of Disbursement printing of literature	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 194.20
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: LA Registrar Recorder 5514 York Blvd, LA CA 90042	Purpose of Disbursement precinct sheets and maps	Date (month, day, year) 11/3/84	Amount of Each Disbursement This Period 249.70
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			1,503.64
TOTAL This Period (last page this line - number only) .....			

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84033334776

Page 2 of 9 for  
 LINE NUMBER 11  
 (Use spaces indicated for each  
 category of the Detailed  
 Summary Page)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)  
**Republican Central Committee of Los Angeles County-Federal Account**

870340:35992

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Postal Instant Press 601 Mariposa Ave LA CA 90045	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	121.05
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Sus Hutchinson, 6600 W Warner Ave #97, Huntington Beach CA	salary-precinct Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	420.00
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ideal Rubber Stamp, 600 S. Main St., Los Angeles CA 90014	precinct supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	306.53
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bader & Assoc., 1150 Hillcrest Dr, Pomona CA 91768	registration Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	350.00
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Brunfield Gallagher 3401 Westend Ave., Nashville, Tenn. 37203	campaign buttons Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	21.00
Republican Central Committee of Los Angeles County-State & Local Account subvendor: US Postmaster, Del Norte Station, Los Angeles Ca 90015	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	1,229.14
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ken Fredericks Printing 2542 Midvale Ave., Los Angeles CA	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	46.32
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Copy Art, 1017 Fair Oaks Ave., So Pasadena CA 91030	Xeroxing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	53.98
Republican Central Committee of Los Angeles County-State & Local Account subvendor: J Frank Bales, 421 N Yorwood St Ste 100, Glendale CA	transportation Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	77.11
G. TOTAL of Disbursements This Page (optional)			2,625.13
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 5 of 9  
 Line Number 19  
 (Also attach statement for each category of the General Summary Page)

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

Name of Committee (in Full)

Republican Central Committee of Los Angeles County-State & Local Account			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Johnnie Morgan, 4002 Burbank AV, Burbank CA	reimbursement for travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	6.93
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Kelly Self Help Paper 1441 E 16th St., LA CA	paper supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/3/84	54.97
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Frank Zuniga, 22152 Valerio St., Canoga Park CA 91303	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/3/84	147.70
Republican Central Committee of Los Angeles County-State & Local Account subvendor: J Crosby, 211 Pasadena Ave. So Pasadena CA 91030	reimbursement for supplies and postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/3/84	7.71
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Louise Leigh, 11022 1/2 Mc Girk Av., El Monte CA 91731	reimbursement of postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/3/84	41.42
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Glenn Thornhill, 8108 Zelzah Ave., Reseda CA 91335	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	23.41
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Orozco Travel Service 202 S Broadway, L.A. CA 90012	travel for precinct volunteer captain Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	103.60
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ashley Pugliese, 15153 La Maida St, Sherman Oaks CA 91403	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	73.99
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Nancy Wheeler, 632 Kenwood Burbark CA 91505	reimbursement for precinct supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	43.14
SUBTOTAL of Disbursements This Page (optional)			502.87
TOTAL This Period (last page (this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 6 of 6  
 LOS ANGELES COUNTY  
 Also sign and attach to each  
 copy of the Original  
 Summary Page

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

Name of Committee (in Full)  
**Republican Central Committee of Los Angeles County - Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Kris Vosburgh, 2137 20th St Santa Monica CA 90405	precinct coordinator Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/5/84	630.00
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Cola Bottling Co., 1134 S Central Ave. LA CA 90021	Purpose of Disbursement cokes for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 10.76
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Mae Ricks, 6552 Victoria Ave., Los Angeles Ca 90043	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 245.26
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bert Rebeaud, 6021 Carlton St, Los Angeles CA 90028	Purpose of Disbursement salary-fundraising supervisor Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 757.19
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Hagos Adhomon, 6127 West Blvd., Los Angeles Ca 90043	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 200.56
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Wallelegna Alemu, 1615 Buter Av., Los Angeles CA 90025	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 167.17
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Gayle Boswell, 7703 Hollywood Bl #1, Hollywood CA 90046	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 75.39
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Mary Bustamante, 446 W 14th Street San Pedro CA 90731	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 377.46
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Marilyn Chamberlin, 6312 Ironleaf Ave Whittier Ca 90601	Purpose of Disbursement salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 235.75
SUBTOTAL of Disbursements This Page (optional)			2,699.54
TOTAL This Period (last page (no line number only)			

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Page 5 of 9 for  
 Late August 1984  
 Also appear attached for each  
 category of the Detailed  
 Summary Page

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)			
<b>Republican Central Committee of Los Angeles County - Federal Account</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Robert Fowler, 4125 Rosewood, Los Angeles CA 90007	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 256.90
<b>B. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Philip Gayton 450 Kernore #411, Los Angeles CA 90020	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 557.16
<b>C. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Yohannes Ghabriwot 3700 Century Bl #106, Inglewood CA	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 216.49
<b>D. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Abe Giday, 1358 Burnside #8, Los Angeles CA	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 274.74
<b>E. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Seloman Gultis, 527 S, Hobart #402, Los Angeles CA	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 215.30
<b>F. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Nebiat Tessema, 1910 N Maranna, Los Angeles CA 90032	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 145.53
<b>G. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Rhonda Hall, 800 E 115th Street, Los Angeles CA 90059	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 195.28
<b>H. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Yasin Jabir, 776 N Van Ness, #24, Los Angeles CA 90038	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 79.69
<b>I. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County - State & Local Account subvendor: Tej Kharbanda, 1736 Kirkman St #222, Los Angeles CA	<b>Purpose of Disbursement</b> salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 11/15/84	<b>Amount of Each Disbursement This Period</b> 191.06
<b>J. TOTAL of Disbursements This Page (optional)</b>			2,132.15
<b>TOTAL This Period (see page this line number only)</b>			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 8 of 8 for  
 LOS ANGELES  
 This expense statement for each  
 category of the Standard  
 Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to which contributions from such committee.			
Name of Committee (in Full)			
Republican Central Committee of Los Angeles County-Federal Account			
A. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bran McKee, 1750 Longwood Los Angeles CA 90019	Purpose of Disbursement <b>Salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 217.62
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Palmer Scheppe, 1720 Pacific Ave#107, Venice CA 90291	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 112.51
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Roland Scott, 2847 1/2 S Bronson, Los Angeles Ca 90018	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 130.52
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: William Stanley, 1234-34 Caluenga Bl, Los Angeles Ca 90038	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 495.12
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Richard Stoll, PO Box 3625 Los Angles CA 90036	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 171.06
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Sandra Stoll, 1441-2nd St Los Angeles CA	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 125.18
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Chan Tu, 606 S 6th, St., Alhambra, CA 91801	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 84.08
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Vivienne Veazy, 708 W. 76th Street, Los Angeles CA 90044	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 161.24
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Shirley Waldman, 1479 S Rexford Dr, Los Angeles, CA 90035	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 383.27
SUBTOTAL of Disbursements This Page (optional)			1880.60
TOTAL This Period (set page (the line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 9 of 9  
 (This schedule should be attached to each copy of the Original Summary Page)

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Name of Committee (in Full)			
Republican Central Committee of Los Angeles (County-Federal Account)			
A. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Karen Westmoreland, 1109 E 89th St, Los Angeles CA 90002	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 147.15
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Reba Wilson, 758 S Ardmore Ave, Los Angeles CA 90005	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 211.94
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Yigardu Zedaya, 554 Brett St., Inglewood CA 90302	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 42.31
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County, State&Local Account subvendor: Abdulkadir Ziad, 686 S St. Andrews, Los Angeles CA 90005	Purpose of Disbursement <b>salary-fundraising</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 205.65
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Phyllis Schmits, 1196 Canon Granada Hills CA 91344	Purpose of Disbursement <b>secretary salary-precinct</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 1596.83
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Philip Woodford, 5304 Falkirk Ave, Riverside CA 92506	Purpose of Disbursement <b>salary-precinct organizer</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 1430.24
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: David White, 2870 N Towne Ave #181, Pomona CA 91767	Purpose of Disbursement <b>precinct-salary organizer</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 1457.32
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Frank Zuniga, 22152 Valerio Street, Canoga Park CA 91303	Purpose of Disbursement <b>salary-precinct organizer</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 1434.43
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State&Local Account subvendor: Ashley Pugliese, 15153 La Mauda St, Sherman Oaks CA 91403	Purpose of Disbursement <b>salary-precinct organizer</b> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/15/84	Amount of Each Disbursement This Period 268.86
SUBTOTAL of Disbursements This Page (optional)			6,794.73
TOTAL This Period (see page 1 and line number only)			

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Page 10 of 11 for  
 LOS ANGELES  
 Also attach a statement for each  
 category of the General  
 Summary Page

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)  
**Republican Central Committee of Los Angeles County-Local Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Glenn Thornhill, 8108 Zelzah Ave, Reseda CA 91335	Salary-product director	11/15/84	2069.23
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Javier Rodriguez, 428 Solando Av, Los Angeles CA 90012	salary-product organizing	11/15/84	909.09
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Employment Development Dept., PO Box 54567, Los Angeles CA	State disability insurance	11/15/84	170.72
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Employment Development Dept., PO Box 54567, Los Angeles CA	withholding of state income taxes	11/15/84	493.88
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Federal Reserve Bank, PO Box 54947, Terminal Annex, LA CA	FICA tax withheld	11/15/84	1270.21
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Federal Reserve Bank, PO Box 54947, Terminal Annex, LA CA	withholding of federal income tax	11/15/84	2368.97
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Employment Development Dept. PO BOX 54567, LA CA 90054-4567	employer payroll taxes	11/15/84	1863.51
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: GTE, 3470 8309 Wilshire Bl Los Angeles, CA	telephone expense	11/15/84	17.55
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Republican Central Committee of Los Angeles County-State/Local Account subvendor: Pacific Bell, Van Nuys CA 91388	telephone expenses	11/21/84	2720.86
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL (if disbursements This Page optional)			11,884.02
TOTAL This Period (on page this line number only)			

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Page 9 of 9 for  
 Line Item 11  
 This amount should be used  
 against the Budget  
 Authority Page

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)			
Republican Central Committee of Los Angeles County-Federal Account			
A. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Kenneth Fredericks Printing, 2542 Midvale Ave, LA CA	Purpose of Disbursement printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/21/84	Amount of Each Disbursement This Period 53.79
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Byram Investments/Karen Poindexter, 5040 Crown Ave, La Canada	Purpose of Disbursement Rent Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/26/84	Amount of Each Disbursement This Period 350.06
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: David White, 2870 N Towne Ave #181, Pomona CA 91767	Purpose of Disbursement reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 473.05
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Philip Woodford, 5304 Falkirk Av, Riverside, CA 92506	Purpose of Disbursement reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 290.30
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Phyllis Schmitz, 11969 Cameo Pl, Granada Hills, CA 91344	Purpose of Disbursement reimbursement of supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 15.56
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Marcia Tooke, 1249 Descanso La Canada CA 91011	Purpose of Disbursement reimbursement of food purchased for volunteer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 165.20
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State/Local Account subvendor: Sharon Wadsworth, PO Box 6286, W1 Monte CA 91734	Purpose of Disbursement reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 5.18
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. TOTAL of Disbursements This Page (optional)			1,353.08
TOTAL This Period (next page this line number only)			11,375.76

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20543

EQ-2

Carl J. Johnson, Treasurer  
Republican Central Committee  
of Los Angeles County -  
Federal Account  
1045 South Byram Street  
Los Angeles, CA 90015

AUG 21 1985

Identification Number: C00196899

Reference: 30 Day Post-General Report (1/1/84-11/26/84)

Dear Mr. Johnson:

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:

BB  
-The Commission notes that your committee failed to file the 1984 April Quarterly, July Quarterly, and October Quarterly Reports in a timely manner. Please provide an explanation for the tardiness of your filings. Although the Commission may initiate legal or audit action, your prompt response will be taken into consideration. 2 U.S.C. §434(a)

-Schedule B supporting Line 19 discloses transfers to the Republican Central Committee of Los Angeles County-State & Local Account which appears to be an account maintained by your committee for non-Federal activity (see attached example).

BB  
You are advised that 11 CFR 102.5 prohibits a non-Federal account from financing activity in connection with Federal elections. If any of the disbursements disclosed on Schedule B supporting Line 19 were made to influence the election or defeat of specific Federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 21, or as coordinated expenditures on Schedule P supporting Line 23. See 11 CFR 104.3(b) (3) and 106.1.

Please be advised that a state or local party committee may pay for certain "exempt activities" without the payments being considered contributions or expenditures pursuant to 11 CFR 100.7(b)(9),(15),(17), and 100.9(b)(10),(16),(18). These activities include: the preparation and distribution of sample ballots, slate

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cards, and palm cards (naming three or more candidates for public office); payments for campaign materials (such as pins, bumper stickers, handbills, and brochures) that are distributed by volunteers in connection with activity on behalf of the party's nominees; and payments for the costs incurred in conducting voter registration and get-out-the-vote activities (including phone banks, if operated by volunteers) conducted on behalf of the party's Presidential and Vice Presidential nominees. (See pages 11 and 12 of the Campaign Guide for Political Party Committees).

Please provide further clarifying information regarding the aforementioned transactions. Although the Commission may initiate legal action regarding the activities conducted by your non-Federal account, any clarifying information that you can provide will be taken into consideration.

-Schedule A of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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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,



*B. Baber*  
Bill Baber  
Reports Analyst  
Reports Analysis Division

1111100055102

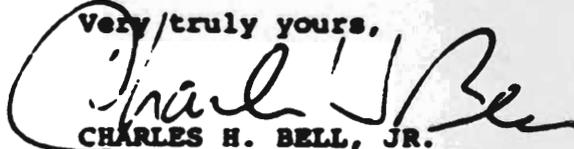


Item 3: The committee realizes that some expenditures itemized on Schedule B, pages 1-9, and on line 19, made may have included payments for certain "exempt activities" under 11 CFR 100.7(b) (9), (15), (17) and 100.8(b) (10), (16) and (18). However, the committee voluntarily has chosen to overreport by disclosing all such payments. If under this circumstance an amended report must be filed to reduce the disclosure, please contact both the Treasurer and the undersigned.

Item 4: This \$12,500.00 contribution from Reagan-Bush '84 was a transfer for party-building activities (volunteer-operated telephone banks) performed by the Los Angeles County Republican Central Committee - Federal Account for get-out-the-vote activities in connection with the 1984 Presidential election. It should be noted that a subsequent transfer of \$10,000 was made to the Committee's non-federal account and reported on the subsequent report (11/27/84 - 12/31/84) although that transfer was not denoted on line 27 of the report. Accordingly, if it is necessary to amend the subsequent report to reflect this transfer, the Treasurer will do so. I will contact you by telephone to discuss this in further detail.

I hope this is fully responsive to your inquiry. Please contact me if you have any further questions or recommendations relative to items 3 and 4 above.

Very truly yours,

  
CHARLES H. BELL, JR.

CHB:deh

cc: Mr. Carl J. Johnson

950337/1104



**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 201)**

Name of Committee or Full Name of Candidate: **Republican Central Committee of Los Angeles County-Federal Account**

Report Covering the Period From: **11/27/04** To: **12/31/04**

	COLLECTED Total This Period	COLLECTED Other for Year-To-Date	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loan) FROM:</b>			
(a) Individual Persons Other Than Political Committees	38,630.15	58,324.65	116a
(b) Political Party Committees			116b
(c) Other Political Committees		12,500.00	116c
<b>(d) TOTAL CONTRIBUTIONS (other than loan) (Add 116a, 116b and 116c)</b>	<b>38,630.15</b>	<b>70,824.65</b>	<b>116d</b>
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>			12
<b>13. ALL LOANS RECEIVED</b>			13
<b>14. LOAN REPAYMENTS RECEIVED</b>			14
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)</b>			15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			16
<b>17. OTHER RECEIPTS (Interest, Income, etc.)</b>			17
<b>18. TOTAL RECEIPTS (Add 116d, 12, 13, 14, 15, 16 and 17)</b>	<b>38,630.15</b>	<b>70,824.65</b>	<b>18</b>
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>	27,623.75	58,999.51	19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>			20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			21
<b>22. INDEPENDENT EXPENDITURES (See Schedule E)</b>			22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 401 (c)(4) (See Schedule F))</b>			23
<b>24. LOAN REPAYMENTS MADE</b>			24
<b>25. LOANS MADE</b>			25
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>			
(a) Individual/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
<b>(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))</b>			<b>26(d)</b>
<b>27. OTHER DISBURSEMENTS</b>	10,000.00	10,000.00	27
<b>28. TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>	<b>37,623.75</b>	<b>68,999.51</b>	<b>28</b>
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loan) from Line 116d</b>	38,630.15	70,824.65	29
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>			30
<b>31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)</b>	38,630.15	70,824.65	31
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>	27,623.75	58,999.51	32
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>			33
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</b>	27,623.75	58,999.51	34









**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

Name of Committee (in Full)  
**Republican Central Committee of Los Angeles County-Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Dolores Davis 11283 Canton Dr., Studio City, CA 91674	salary-fundraising	11/30/84	31.49
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/15/84	56.25
		12/21/84	11.79
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Glenn Thornhill, 8108 Balzah Ave., Reseda, CA 91335	salary-product director	12/15/84	109.19
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Employment Development Dept PO Box 54567, Los Angeles, CA	withholding of state income taxes	12/15/84	.53
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/21/84	24.13
		12/31/84	52.43
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor:	state income taxes cont'd	12/15/84	89.15
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/15/84	22.19
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Community Bank, 3124 San Fernando Rd., Los Angeles, CA 90065	withholding of federal income taxes	12/15/84	3.50
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/15/84	192.46
		12/15/84	597.52
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor:	federal income taxes cont'd	12/21/84	270.93
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84	171.90
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Community Bank, 3124 San Fernando Road, Los Angeles, CA 90065	FICA taxes withheld	12/15/84	8.21
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/15/84	231.15
		12/15/84	388.01
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor:	FICA taxes withheld cont'd	12/21/84	332.87
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Linda Saner 4125 Rosewood Los Angeles, CA 90006	salary-fundraising	12/15/84	5.38
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			2,599.08
TOTAL This Period (last page this line number only) .....			

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

Name of Committee (in Full)

**Republican Central Committee of Los Angeles County-Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Pacific Bell, Van Nuys CA 91388	telephones Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84 12/31/84	6.73 11.92
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Nielsen, Hodgson, Ferrinelli & Waller, 1636 15th St., Sacramento CA	Purpose of Disbursement legal expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/28/84	241.50
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Pacific Bell, Van Nuys CA 91388	Purpose of Disbursement telephones Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/15/84	663.83
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: So. Calif. Gas Co., PO Box C., Monterey Park, CA 91756	Purpose of Disbursement Gas Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84	37.11
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Dept. of Water & Power PO Box 30334, Los Angeles, CA 90099	Purpose of Disbursement Utilities Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84	244.78
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Copy Art, 1017 Fair Oaks Ave., South Pasadena, CA 91206	Purpose of Disbursement Copying Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84	27.76
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Bert Rebeaud, 6021 Carlton #20, Los Angeles, CA 90028	Purpose of Disbursement Supplies & Salary - Fundraising Supervisor Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	12/31/84 12/31/84	10.86 529.27
SUBTOTAL of Disbursements This Page (enter J)			1,773.76
TOTAL This Period (next page this line number only)			

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Page 7 of 7 for  
 LINE NUMBER 20  
 (Use separate schedules for each  
 category of the Budgeted  
 Summary Page)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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

Name of Committee (in Full)			
<b>Republican Central Committee of Los Angeles County-Federal Account</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Republican Central Committee of Los Angeles County-State & Local Account subvender: J. Frank Sales, 421 E Kerwood St., Ste 100, Glendale CA 91206	<b>Purpose of Disbursement</b> Moving Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b> 12/31/84	<b>Amount of Each Disbursement This Period</b> 72.10
<b>B. Full Name, Mailing Address and ZIP Code</b> Unitized under \$200	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b> 149.67
<b>C. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>SUBTOTAL of Disbursements This Page (optional)</b> .....			221.77
<b>TOTAL This Period (last page this line number only)</b> .....			27,623.75



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

AUG 14 1985

Carl J. Johnson, Treasurer  
Republican Central Committee  
of Los Angeles County -  
Federal Account  
1045 South Byram Street  
Los Angeles, CA 90015

Identification Number: C00196899

Reference: 1984 Year End Report (11/27/84-12/31/84)

Dear Mr. Johnson :

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

-Schedule B supporting Line 19 discloses transfers to the Republican Central Committee of Los Angeles County-State & Local Account which appears to be an account maintained by your committee for non-Federal activity (see attached example).

BB [You are advised that 11 CFR 102.5 prohibits a non-Federal account from financing activity in connection with Federal elections. If any of the disbursements disclosed on Schedule B supporting Line 19 were made to influence the election or defeat of specific Federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 21, or as coordinated expenditures on Schedule F supporting Line 23. See 11 CFR 104.3(b)(3) and 106.1.

Please be advised that a state or local party committee may pay for certain "exempt activities" without the payments being considered contributions or expenditures pursuant to 11 CFR 100.7(b)(9),(15),(17) and 100.8(b)(10),(16),(18). These activities include: the preparation and distribution of sample ballots, slate cards, and palm cards (naming three or more candidates for public office); payments for campaign materials (such as pins, bumper stickers, handbills, and brochures) that are distributed by volunteers in connection with activity on behalf of the party's nominees; and payments for the costs incurred in conducting voter registration and get-out-the-vote

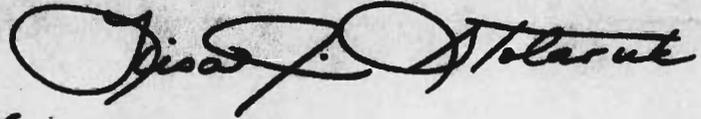
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activities (including phone banks, if operated by volunteers) conducted on behalf of the party's Presidential and Vice Presidential nominees. (See pages 11 and 12 of the Campaign Guide for Political Party Committees).

Please provide further clarifying information regarding the aforementioned transactions. Although the Commission may initiate legal action regarding the activities conducted by your non-Federal account, any clarifying information that you can provide will be taken into consideration.

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,



 Bill Baber  
Reports Analyst  
Reports Analysis Division

87040655115



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

September 5, 1985

Leo J. Habel, Treasurer  
Republican Central Committee  
of Los Angeles County -  
Federal Account  
1045 South Byram Street  
Los Angeles, CA 90015

Identification Number: C00196899

Reference: 1984 Year-End Report (11/27/84-12/31/84)

Dear Mr. Habel:

This letter is to inform you that as of September 4, 1985, the Commission has not received your response to our request for additional information, dated August 14, 1985. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Bill Baber on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

8704055116



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

September 12, 1985

Leo J. Habel, Treasurer  
Republican Central Committee  
of Los Angeles County -  
Federal Account  
1045 South Byram Street  
Los Angeles, CA 90015

Identification Number: C00196899

Reference: 30 Day Post-General Report (1/1/84-11/26/84)

Dear Mr. Habel:

On August 21, 1985 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your September 11, 1985 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

BB  
[ -You have indicated that the reimbursements to the Republican Central Committee of Los Angeles County - State and Local Account were for "joint federal/state campaign activities." Thus, your non-Federal account appears to have financed activity in connection with a Federal election, which is prohibited by 11 CFR 102.5(a). In order to clarify this matter, please provide the dates and amounts of the activities originally paid for by your non-Federal account. ]

You have also stated "that some expenditures . . . made may have included payments for certain 'exempt activities' under 11 CFR 100.7(b)(9), (15), (17) and 100.8(b)(10), (16) and (18)." Please amend your report by categorizing these payments as either: a) general operating expenditures; b) exempt activities; c) in-kind contributions; and/or d) coordinated expenditures. Under 11 CFR 106.1, expenditures made on behalf of more than one candidate are required to be ". . . attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived." (Emphasis added.)

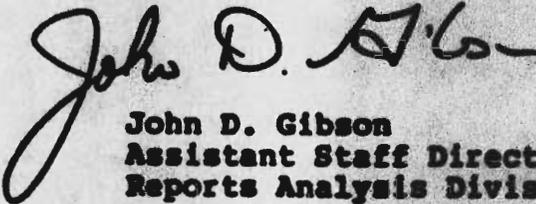
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Although the Commission may initiate legal action regarding the activities conducted by your non-Federal account, any clarifying information that you can provide will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Bill Baber on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

87040555118

85 OCT 23 11:33 AM

LAW OFFICES OF  
**NIELSEN, HODGSON, PARRINELLO & MUELLER**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO  
680 CALIFORNIA STREET, SUITE 2850  
SAN FRANCISCO, CALIFORNIA 94108  
TELEPHONE (415) 588-6800

1030 FIFTEENTH STREET, SUITE 250  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 446-8788

FILE NUMBER

October 22, 1985

5897.02

EXPRESS MAIL

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Elections Commission  
Washington, D.C. 20463

Re: Identification Number: C00196899  
30 Day Post-General Report  
(1/1/84-11/26/84)

Dear Mr. Gibson:

The following letter and amended report are submitted in response to your September 12, 1985 letter.

Your letter states that the committee's "non-federal account appears to have financed activity in connection with a federal election." However, such expenditures were for operating expenditures and overhead, and were specifically allocated between the federal and non-federal accounts, pursuant to 11 CFR §106.1(e). Inasmuch as that section permits the federal account to reimburse the non-federal account for the allocable share of such expenditures. (See also FEC Campaign Guide for Party Committees, page 15), we disagree that such activity violated 11 CFR 102.5(a). Our review indicated that all or substantially all of the reimbursed expenses were made by the Central Committee's State and Local Account within the 2 months preceding the reimbursement.

The second part of your letter requested amendment of the report to categorize payments among the four categories noted. This has been done, per the enclosed.

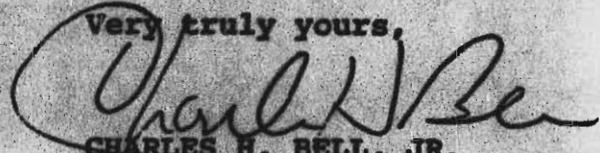
Please note specifically that no expenditures were required to be attributed to any federal candidates. Only incidental benefit was attributable to any individual candidates or the activity involved was specifically exempt under 11 CFR 100.7(b)(9), (15) (17) or 11 CFR 100.8(b)(10), (16) or (18).

In addition, the Committee currently is reviewing subsequently-filed reports to conform to the description of expenditures noted in your letter and above.

87040555119

Mr. John D. Gibson  
October 22, 1985  
Page 2

Please contact me or Mr. Habel if you have any questions.

Very truly yours,  
  
CHARLES H. BELL, JR.

CHB:ss  
Encl.  
cc: Mr. Leo Habel  
Ms. Lynn Walker

87040655120



DETAILED SUMMARY PA  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)

Name of Committee (in Full)	Report Covering the Period:		
	From: 1/1/94	To: 11/26/94	
Republican Central Committee of Los Angeles County- Federal Account	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .	19,694.50	19,694.50	11(a)
(b) Political Party Committees . . . . .			11(b)
(c) Other Political Committees . . . . .	12,500.00	12,500.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .	32,194.50	32,194.50	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .			12
13. ALL LOANS RECEIVED . . . . .			13
14. LOAN REPAYMENTS RECEIVED . . . . .			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .			16
17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .			17
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .</b>	<b>32,194.50</b>	<b>32,194.50</b>	<b>18</b>
<b>II. DISBURSEMENTS</b>			
19. OPERATING EXPENDITURES . . . . .	31,375.76	31,375.76	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES . . . . .			21
22. INDEPENDENT EXPENDITURES (see Schedule E) . . . . .			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . . (2 U.S.C. § 441 et al) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE . . . . .			24
25. LOANS MADE . . . . .			25
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .			26(a)
(b) Political Party Committees . . . . .			26(b)
(c) Other Political Committees . . . . .			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .			26(d)
27. OTHER DISBURSEMENTS . . . . .			27
<b>28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .</b>	<b>31,375.76</b>	<b>31,375.76</b>	<b>28</b>
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .	32,194.50	32,194.50	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .	32,194.50	32,194.50	31
32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .	31,375.76	31,375.76	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .	31,375.76	31,375.76	34

8704055122

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)

**Republican Central Committee of Los Angeles County-Federal Account**

8704055123

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account 1045 S Byram St., L.A. CA 90015 subvendor: Admiral Production Co.	equipment rental Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	11/5/84	350.00
B. Full Name, Mailing Address and ZIP Code 321 Andover #D, Burbank CA 91504	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Russell Transportation PO Box 457, Rosemead CA 91770	Purpose of Disbursement transportation for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 218.42
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Long Beach Transit 1300 Gardenia Ave, Long Beach CA	Purpose of Disbursement transportation for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 182.00
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Pacific Busing, 1901 Blake Ave, Los Angeles CA 90039	Purpose of Disbursement transportation for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 35.00
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Brock Bus Lines, 722 W Wilson Ave, Glendale CA 91203	Purpose of Disbursement transportation for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 241.50
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Western Tours Inc., 722W Wilson Ave, Glendale CA 91203	Purpose of Disbursement transportation for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 32.82
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Young Printers, 5514 York Blvd, Los Angeles Ca 90042	Purpose of Disbursement printing of literature Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 194.20
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: LA Registrar Recorder 5514 York Blvd, LA CA 90042	Purpose of Disbursement precinct sheets and maps Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	Date (month, day, year) 11/5/84	Amount of Each Disbursement This Period 249.70
SUBTOTAL of Disbursements This Page (optional) .....			1,503.64
TOTAL This Period (last page this line number only) .....			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Account

8704055124

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Postal Instant Press 601 Mariposa Ave LA CA 90005	printing  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	121.05
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Sue Hutchinson, 6600 W Warner Ave #97, Huntington Beach CA	salary-precinct organizer  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	420.00
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ideal Rubber Stamp, 600 S. Main St., Los Angeles CA 90014	precinct supplies  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	306.53
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bader & Assoc., 1150 Hillcrest Dr, Pomona CA 91768	registration  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	350.00
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Brumfield Gallagher 3401 Westend Ave., Nashville, Tenn. 37203	campaign buttons  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	11/5/84	21.00
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: US Postmaster, Del Norte Station, Los Angeles CA 90015	postage  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	1,229.14
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ken Fredericks Printing 2542 Midvale Ave., Los Angeles CA	printing  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	11/5/84	46.32
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Copy Art, 1017 Fair Oaks Ave., So Pasadena CA 91030	Xeroxing  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/5/84	53.98
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: J Frank Bales, 421 N Kenwood St Ste 100, Glendale CA	transportation  Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): exempt exp.	11/5/84	77.11
SUBTOTAL of Disbursements This Page (optional) .....			2,625.13
TOTAL This Period (last page this line number only) .....			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Johnnie Morgan, 4002 Burbank AV, Burbank CA	reimbursement for travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	6.93
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Kelly Self Help Paper 1441 E 16th St., IA CA	paper supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	54.97
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Frank Zuniga, 22152 Valerio St., Canoga Park CA 91303	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	147.70
Republican Central Committee of Los Angeles County-State & Local Account subvendor: J Crosby, 211 Pasadena Ave, So Pasadena CA 91030	reimbursement for supplies and postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	7.71
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Louise Leigh, 11022 1/2 Mc Girk Av., El Monte CA 91731	reimbursement of postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	41.42
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Glenn Thornhill, 8108 Zelzah Ave., Reseda CA 91335	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	23.41
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Orozco Travel Service 202 S Broadway, L.A. CA 90012	travel for precinct volunteer captain Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	103.60
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Ashley Pugliese, 15153 La Maida St, Sherman Oaks CA 91403	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	73.99
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Nancy Wheeler, 632 Kenwood Burbank CA 91505	reimbursement for precinct supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	43.14
SUBTOTAL of Disbursements This Page (optional) .....			502.87
TOTAL This Period (last page this line number only) .....			

8704055105

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Kris Vosburgh, 2137 20th St Santa Monica CA 90405	precinct coordinator Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): <del>concept exp.</del>	11/5/84	630.00
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Cola Bottling Co., 1334 S Central Ave. LA CA 90021	cokes for volunteers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	10.76
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Mae Ricks, 6552 Victoria Ave., Los Angeles Ca 90043	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	245.26
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bert Rebeaud, 6021 Carlton #20, Los Angeles CA 90028	salary-fundraising supervisor Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	757.19
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Hagos Adhomon, 6127 West Blvd., Los Angeles Ca 90043	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	200.56
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Wallelegene Alemu, 1615 Buter Av., Los Angeles CA 90025	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	167.17
Republican Central Committee of Los Angeles County-State & Local Account Subvendor: Gayle Boswell, 7703 Hollywood Bl #1, Hollywood CA 90046	salary- fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	75.39
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Mary Bustamente, 446 W 14th Street San Pedro CA 90731	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	377.46
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Marillyn Chamberlin, 6312 Greenleaf Ave Whittier Ca 90601	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	235.75
SUBTOTAL of Disbursements This Page (optional) .....			2,699.54
TOTAL This Period (last page this line number only) .....			

870405120

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)

**Republican Central Committee of Los Angeles County-Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Robert Fowler, 4125 Rosewood, Los Angeles CA 90007	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	256.90
B. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Philip Gayton 450 Kernmore #411, Los Angeles CA 90020	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/15/84	557.16
C. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Yohannes Ghebrhiwot 3700 CenturyBl #106, Inglewood CA	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen. op. exp.	11/15/84	216.49
D. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Abe Gidey, 1358 Burnside #8, Los Angeles CA	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	274.74
E. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Seloman Gultie, 527 S, Hobart #402, Los Angeles CA	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	215.30
F. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Nebiat Tessema, 1910 N Maranna, Los Angeles CA 90032	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	145.53
G. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Rhonda Hall, 800 E 115th Street, Los Angeles CA 90059	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	195.28
H. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: Yasin Jabir, 776 N Van Ness, #24, Los Angeles CA 90038	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	79.69
I. Full Name, Mailing Address and ZIP Code Republican Central Committee of Los Angeles County-State & Local Account subvendor: TejKharbanda, 1736 Workman St #222, Los Angeles CA	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	191.06
SUBTOTAL of Disbursements This Page (optional) .....			2,132.15
TOTAL This Period (last page this line number only) .....			

87040555127

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Accounty

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Bran Mokrea, 1750 Longwood Los Angeles CA 90019	Salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	217.62
Republican Central Committee of Los Angeles County-State&Local Account subvendor: Palmer Scheppe, 1720 Pacific Ave#107, Venice CA 90291	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	112.51
Republican Central Committee of Los Angeles County-State&Local Account subvendor: Roland Scott, 2847 1/2 S Bronson, Los Angeles Ca 90018	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	130.52
Republican Central Committee of Los Angeles County-State&Local Account subvendor: William Stanley, 1234-34 Caluenga Bl, Los Angeles Ca 90038	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	495.12
Republican Central Committee of Los Angeles County-State & local Account subvendor: Richard Stoll, PO Box 3625 Los Angles CA 90036	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	171.06
Republican Central Committee of Los Angeles County-State&Local Account subvedor: Sandra Stoll, 1441-2nd St Los Angeles CA	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	125.18
Republican Central Committee of Los Angeles County-State&Local Account subvendor: Chan Tu, 606 S 6th, St., Alhambra, CA 91801	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	84.08
Republican Central Committee of Los Angeles County-State&Local Account subvendor: Vivienne Veazy, 708 W. 76th Street, Los Angeles CA 90044	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	161.24
Republican Central Committee of Los Angeles County-State&Local Account subvendor: Shirley Waldman, 1479 S Rexford Dr, Los Angeles, CA 90035	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	383.27

SUBTOTAL of Disbursements This Page (optional) ..... 1880.60

TOTAL This Period (last page this line number only) .....

870405128

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Karen Westmoreland, 1109 E 89th St, Los Angeles CA 90002	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	147.15
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Reba Wilson, 758 S Ardmore Ave, Los Angeles CA 90005	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	211.94
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Yigardu Zedeye, 554 Brett St., Inglewood CA 90302	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	42.31
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Abdulkadir Ziad, 686 S St.Andrews, Las Angeles CA 90005	salary-fundraising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	205.65
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Phyllis Schmitz, 1196 Cameo Granada Hills CA 91344	secretary salary-precinct Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1596.83
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Philip Woodford, 5304 Falkirk Ave, Riverside CA 92506	salary-precinct organizer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1430.24
Republican Central Committee of Los Angeles County-State&Local Account subvendor:David White, 2870 N Towne Ave #181, Pomona CA 91767	precinct-salary organizer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1457.32
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Frank Zuniga, 22152 Valerio Street, Canoga Park CA 91303.	salary-precinct organizer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1434.43
Republican Central Committee of Los Angeles County-State&Local Account subvendor:Ashley Pugliese, 15153 Ia Maida St, Sherman Oaks CA 91403	salary-precinct organizer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	268.86
SUBTOTAL of Disbursements This Page (optional) .....			6,794.73
TOTAL This Period (last page this line number only) .....			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)

Republican Central Committee of Los Angeles County-Federal Account

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State&Local Account subvondor:Glenn Thornhill, 8108 Zelzah Ave, Reseda CA 91335	Salary-precinct director Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	2069.23
Republican Central Committee of Los Angeles County-State&Local Account subvondor:Javier Rodriguez, 428 Solando Av, Los Angeles CA 90012	salary-precinct organizer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	909.09
Republican Central Committee of Los Angeles County-State&Local Account subvondor:Employment Development Dept., POBox 54567, Los Angeles CA	State disability insurance Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	170.72
Republican Central Committee of Los Angeles County-State&Local Account subvondor:Employment Development Dept. PO Box 54567, Los Angeles CA	withholding of state income taxes Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	493.88
Republican Central Committee of Los Angeles County-State&Local Account subvondor:Federal Reserve Bank, PO Box 54947, Terminal Annex, LA CA	FICA tax withheld Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1270.21
Republican Central Committee of Los Angeles County-State &Local Account subvondor:Federal Reserve Bank, PO Box 54947, Terminal Annex, LA CA	withholding of federal income tax Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	2368.97
Republican Central Committee of Los Angeles County-State & Local Account subvondor:Employment Development Dept. POBOX 54567, LA CA 90054-4567	employer payroll taxes Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	1863.51
Republican Central Committee of Los Angeles County-State &Local Account subvondor:GTE, 3470 #309 Wilshire Bl Los Angeles, CA	telephone expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/15/84	17.55
Republican Central Committee of Los Angeles County-State & Local Account subvondor:Pacific Bell, Van Nuys CA 91388	telephone expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/21/84	2720.86
SUBTOTAL of Disbursements This Page (optional) .....			11,884.02
TOTAL This Period (last page this line number only) .....			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

Name of Committee (in Full)  
**Republican Central Committee of Los Angeles County-Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Kenneth Fredericks Printing, 2542 Midvale Ave, LA CA	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/21/84	53.79
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Byron Investments/ Karen Poindexter, 5040 Crown Ave, La Canada	Rent Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/26/84	350.00
Republican Central Committee of Los Angeles County-State & Local Account subvendor: David White, 2870 N Towne Ave #181, Pomona CA 91767	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	473.05
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Philip Woodford, 5304 Falkirk Av, Riverside, CA 92506	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	290.30
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Phyllis Schmitz, 11969 Cimco Pl, Granada Hills, CA 91344	reimbursement of supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	15.56
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Marcia Tooke, 1249 Descanso La Canada CA 91011	reimbursement of food purchased for volunteer Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	165.20
Republican Central Committee of Los Angeles County-State & Local Account subvendor: Sharon Wadsworth, PO Box 6286, W Monte CA 91734	reimbursement of travel expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): gen.op.exp.	11/5/84	5.18
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) ..... 1,354.03  
 TOTAL This Period (next page this line number only) ..... 31,320.70

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TELECON

Committee: Republican Central Committee of Los Angeles County  
Charles Bell, Agent

Analyst : Bill Baber

Date : October 25, 1985

Subject : Response to Request for Additional Information

I called Mr. Bell and informed him that the Commission had received his response of October 22, 1985 referencing the 30 Day Post General Report. Although the committee's written response indicated that the committee did not believe that its activities were in violation of 11 CFR 102.5, the amended report disclosed the federal account reimbursing the state and local account for apparent exempt activities.

I informed Mr. Bell that 11 CFR 102.5 prohibits the state/local account from conducting federal activity and that exempt activity, by its nature, is considered to be federally-related. Mr. Bell asked if it would be permissible to pay for the committee's activities with two checks, i.e., the federal account would pay its share of the activities directly to the vendor, and the state and local account would pay the vendor directly for its share of the activities. I said that this would be permissible.

I further informed Mr. Bell that if he wanted greater clarification regarding this matter, that he could submit an Advisory Opinion Request.

I reminded Mr. Bell that we needed a similar response to the committee's 1984 Year End Report and he stated that he would respond accordingly.

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

RECEIVED  
OFFICE OF THE  
**SENSITIVE**  
SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

85 MAR 25 A 9: 33  
RAD *Rad.*  
MUR 86L-1  
STAFF MEMBER:  
John Drury

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Republican Central Committee of  
Los Angeles County-Federal Account  
Leb J. Habel, Treasurer

RELEVANT STATUTE: 11 C.F.R. § 102.5(a), 11 C.F.R.  
§ 106.1(e), 2 U.S.C. § 441b, and  
2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS  
CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES  
CHECKED: NA

GENERATION OF MATTER

The Republican Central Committee of Los Angeles County--  
Federal Account ("Committee") and Leo J. Habel, as treasurer,  
were referred to the Office of General Counsel by the Reports  
Analysis Division for failing to file the 1984 April, July, and  
October Quarterly Reports in a timely manner. On December 10,  
1984, the Committee filed a 30 Day Post General Report which  
disclosed all activity from January 1, 1984 - November 27, 1984.

Additionally, the Committee was referred for conducting  
apparent federal activity from its non-federal account. The  
Committee's 1984 30 Day Post General Report listed \$31,375.70 in  
operating expenditures, while the 1984 Year End Report listed  
\$27,623.75. These expenditures were itemized as payments made to

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the Committee's non-federal account and listed corresponding sub-vendors.

**SUMMARY OF ALLEGATIONS**

RFAIs sent to the Committee regarding the 30 Day Post and Year End Reports advised that a non federal account was prohibited from financing federal activity. The Committee's agent, Charles H. Bell, Jr., responded to the 30 Day Post General RFAI and advised that the Committee's payments to its non-federal account "were reimbursements for the allocable portion of payments for joint federal/state campaign activities." Mr. Bell further stated that he believed such disbursements were for operating expenditures and overhead and thus permissible pursuant to 11 C.F.R. § 106.1(e). No response was received referencing the Year End Report.

On October 23, 1985, the Commission received the Committee's Amended 30 Day Post General Report which showed that of the \$31,375.76 reported on Line 19 (Operating Expenditures), \$2,278 was itemized as "exempt exp." and \$29,727.59 was itemized as "gen. op. exp.". The Commission did not receive an Amended Year End Report.

**LEGAL AND FACTUAL ANALYSIS**

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate are required to file in any calendar year in which a regularly scheduled election is held, quarterly reports which are to be

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filed no later than the 15th day after the last day of a calendar quarter. For the quarter ending December 31st, the report shall be filed no later than January 31st of the following calendar year. The Committee failed to file its 1984 April, July, and October Quarterly Reports. Although it did file a 1984 30 Day Post General Report which disclosed all financial activity covered by the April, July, and October Quarterly Reports, the Committee nevertheless, appears to have violated 2 U.S.C. § 434(a)(4)(A)(i).

Pursuant to 11 C.F.R. § 102.5, any committee which finances political activity in connection with both federal and nonfederal elections shall only deposit funds subject to the prohibitions and limitations of the Act into its federal account. Further, § 102.5 prohibits a non-federal account from financing any activity in connection with Federal elections. Although the Committee's written response indicates that it did not believe its activities were in violation of 11 C.F.R. § 102.5, the Amended 30 Day Post General Report disclosed that the federal account reimbursed the state and local account for apparent exempt activity. While a payment from the federal account to the non-federal account does not raise problems in that it was not as a reimbursement, it raises the question of the payment by the non-federal account on behalf of the federal account. It is that transaction that possibly violates § 102.5(a). Because 11 C.F.R. § 102.5(a) prohibits the state and local account from conducting

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any federal financial activity, it appears that the Committee violated 11 C.F.R. § 102.5(a).

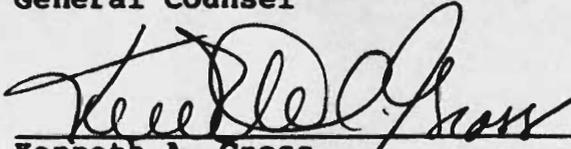
Under 2 U.S.C. § 441b, it is unlawful for any political committee knowingly to accept or receive any contribution from a corporation or labor organization. Under California law, a committee may receive such contributions. Thus, it appears possible that the respondents violated § 441b. Accordingly, this Office is recommending a finding of reason to believe that a violation of § 441b occurred.

**RECOMMENDATION**

1. Open a MUR.
2. Find reason to believe that the Republican Central Committee of Los Angeles - Federal Account, and Leo J. Habel, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), 2 U.S.C. § 441b, and 11 C.F.R. § 102.5(a).
3. Approve the attached letter and legal and factual analysis.

Charles N. Steele  
General Counsel

March 24, 1986  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. Referral
2. Proposed letter and legal and factual analysis

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Attachment(s) 1, 2  
to First General Counsel's Report  
have been removed from this  
position in Public Record File.  
See Index Item(s) 1, 6



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

22 MAR 25 P 3: 55

*Redi*  
*3:55 pm*  
*3/26/86*  
*[Signature]*

MEMORANDUM - MARCH 26, 1986

TO: COMMISSION SECRETARY  
FROM: COMMISSIONER JOSEPIAK  
RE: RAD Referral 86L-1, signed March 24, 1986

Please be advised that I am withdrawing my vote of approval on March 25, 1986 and am hereby objecting to the recommendation.

DATE: 3/26/86

SIGNATURE: [Signature]

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ ARNITA D. HESSION *A.D.H.*  
DATE: MARCH 26, 1986  
SUBJECT: RAD Referral 86L-1; First General Counsel's Report

The above-named document was circulated to the Commission on March 25, 1986.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner Josefiak	_____ x _____
Commissioner McDonald	_____
Commissioner McGarry	_____

This matter will be placed on the Executive Session agenda for April 1, 1986.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Republican Central Committee of  
Los Angeles County-Federal  
Account  
Leo J. Habel, Treasurer

)  
)  
) RAD Referral 86L-1 (M2160)  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 1, 1986, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the Republican Central Committee of Los Angeles - Federal Account, and Leo J. Habel, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), 2 U.S.C. § 441b, and 11 C.F.R. § 102.5(a).
3. Approve the letter and legal and factual analysis attached to the General Counsel's report dated March 24, 1986.

Commissioners Aikens, Elliott, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioner Josefiak dissented.

Attest:

4-2-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 9, 1986

Leo J. Habel, Treasurer  
Republican Central Committee of  
Los Angeles County--Federal Account  
1045 S. Byram Street  
Los Angeles, California 90015

RE: MUR 2160  
Republican Central Committee  
of Los Angeles County-Federal  
Account

Dear Mr. Habel:

On April 1, 1986, the Federal Election Commission determined that there is reason to believe that the Republican Central Committee of Los Angeles County-Federal Account and you as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), 2 U.S.C. § 441b, and 11 C.F.R. § 102.5(a). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further,

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Leo J. Habel, Treasurer  
Page 2

requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

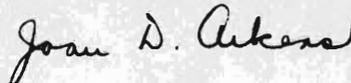
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and 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 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 John Drury, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens  
Chairman

Enclosures

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

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C-283

86 APR 22 AM: 25

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2160

NAME OF COUNSEL: Charles H. Bell, Jr.

ADDRESS: Nielsen, Hodgson, Parinello & Mueller  
1030 Fifteenth St., Suite 250  
Sacramento, CA 95814

TELEPHONE: (916) 446-6752

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CLERK OF THE  
GENERAL COUNSEL

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

4/15/86  
Date

Leo J. Habel  
Signature

RESPONDENT'S NAME: Leo J. Habel

ADDRESS: 1045 S. Byram St.  
Los Angeles, CA 90015

HOME PHONE: (213) 596-3461

BUSINESS PHONE: (213) 741-6368

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86 MAY 2 18:18

LAW OFFICES OF  
**NIELSEN, HODGSON, PARRINELLO & MUELLER**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
1030 FIFTEENTH STREET, SUITE 250  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 446-6752

SAN FRANCISCO  
850 CALIFORNIA STREET, SUITE 2850  
SAN FRANCISCO, CALIFORNIA 94108  
TELEPHONE (415) 989-6800

FILE NUMBER

April 29, 1986

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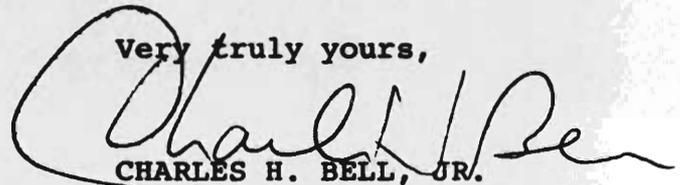
Mr. John Drury  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2160

Dear Mr. Drury:

Pursuant to our telephone conversation today and to 11 C.F.R. § 111.18(d), on behalf of Respondents Republican Central Committee of Los Angeles County-Federal Account and Leo J. Habel, Treasurer, this is to request that pre-probable cause conciliation be pursued in this matter.

Very truly yours,



CHARLES H. BELL, JR.

CHB:ss  
cc: Mr. Leo J. Habel  
Mr. Robert Whitmore

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GENERAL COUNSEL

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86 MAY 22 P12:22

LAW OFFICES OF  
**NIELSEN, HODGSON, PARRINELLO & MUELLER**  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO  
650 CALIFORNIA STREET, SUITE 2650  
SAN FRANCISCO, CALIFORNIA 94108  
TELEPHONE (415) 989-6800

1030 FIFTEENTH STREET, SUITE 250  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 448-6752

May 19, 1986

RECEIVED  
GENERAL COUNSEL  
57.01  
86 MAY 22 P 3:39

Mr. John Drury  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2160  
Republican Central Committee of Los Angeles  
County-Federal Account

Dear Mr. Drury:

The following is submitted in response to the letter from Joan D. Aikens, Chairman, Federal Election Commission, and the General Counsel's Factual and Legal Analysis attached thereto, concerning the above-referenced matter under review.

By separate letter, the Respondents have requested pre-probable cause conciliation with respect to this matter.

The following is submitted as further and mitigating information in connection with the alleged violations:

1. Section 434(a)(4)(A)(i) Allegations:

The allegations are that the Committee failed to file three (3) quarterly reports (for April, July and October) during the 1984 election year disclosing federal campaign activity.

Response: The allegations are correct. The Committee filed only a 30 day post-general campaign report. This report disclosed all information required to be disclosed on the quarterly reports which had not been filed.

The reasons for the failure to file, which are submitted in mitigation, are as follows:

The Committee essentially had been dormant in 1983 and 1984. All personal funds raised were placed in an individual contribution account which was used by the Committee. However, because the activity of the Committee vis a vis federal campaigns was limited to generic get-out-the-vote and voter registration, the Treasurer believed no reportable activity was involved.

In late October, 1984, the Committee was asked to participate with Reagan-Bush '84 in a funded telephone bank effort

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and received a transfer from the Reagan-Bush '84 Committee to fund the project. After reviewing the requirements for federal committee reporting for party committees engaged in general federal and state campaign activity, it was determined that the Committee in fact had a federal filing obligation. Because of the press of the election and the need to obtain proper forms which the Treasurer did not have and prepare the reports, the Committee treasurer decided to file a single post-election report, which would aggregate all previously unreported activity.

All contributions and expenditures were then promptly reported. Substantially all the contributions received were under \$200; substantially all the expenditures were for administrative overhead and generic voter registration and get-out-the-vote activities.

In conclusion, the failure to file the 3 quarterly reports was totally inadvertent. (It is our perception in dealing with a number of local party committees that many do not understand that generic support activity for all the party's federal and state candidates may entail filing under the Federal Election Campaign Act).

2. Section 441b/11 C.F.R. 102.5 Allegation:

The allegation is that the Committee's non-federal account utilized corporate contributions in connection with a federal election, because the federal committee's allocated portion of certain expenses for "exempt activities" was not paid directly from the federal account but was a reimbursement from the federal account to the non-federal account.

Response: The Committee acknowledges that the federal portion of expenses for certain "exempt activities" (for generic voter registration and get-out-the-vote in support of all Republican federal and state candidates in the 1984 general election) was not paid directly to the vendor or payee; instead, the committee's non-federal account paid such bills and was reimbursed by the committee's federal account for its allocable portion under 11 C.F.R. § 106.1.

The Committee believed that the provisions for reimbursement by a committee's federal account to its non-federal account for the allocable share of administrative and overhead costs (11 C.F.R. § 102.5) also applied to its share of certain "exempt expenditures."

Reasonable support for this proposition can be found in the Federal Election Commission's excellent "Campaign Guide For Political Party Committees" (March, 1984), at page 15, where under

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the heading "Allocating Federal/Non-Federal Expenses" in the general discussion, it is noted that:

"A Committee that has established both a Federal account and a non-Federal account (see page 9) must allocate certain expenses between the accounts on a reasonable basis. 106.1(e). Each account may separately pay its own share of expenses. The Federal account's share of expenses must be paid for from funds subject to the prohibitions and limits of the Act. Expenses of the non-Federal account, on the other hand, may be defrayed with corporate and labor funds if they are permissible under State law.

"Alternatively, the non-federal account may pay the total amount and be reimbursed by the Federal account for its share. However, the non-Federal account may not reimburse the Federal account, since non-Federal funds may not be deposited in the Federal account. 102.5(a)(1)(i). Note that the Federal account should report its reimbursements to the non-Federal account as operating expenditures." (Emphasis added)

In the immediately following sections, the "Campaign Guide" notes that general overhead, voter drive and exempt activity expenses must be allocated between federal and non-federal accounts. Nowhere in that section is there any caveat that the federal account may not reimburse the non-federal account for any of such expenditures. Indeed, the clear implication of this section is to the contrary.

Even assuming it is not permissible to reimburse from the federal to the non-federal account for certain "exempt expenditures" but it is permissible to do so with respect to administrative and overhead expenses, the Committee was unaware of the distinction and acted in good faith consistent with its understanding of the law.

It should be noted that the federal account promptly reimbursed the non-federal account for its portion of expenses for administrative, voter drive and exempt expenditures from funds subject to the prohibitions and limits of the Federal Election Campaign Act.

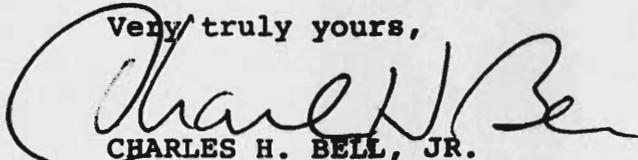
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Mr. John Drury  
May 19, 1986  
Page 4

3. Conclusion

For the foregoing reasons, the Committee believes no fine should be imposed for the foregoing alleged violations. The Committee is completely willing to stipulate that it will comply fully and timely with filing requirements and the provisions of 2 U.S.C. §441b, 11 C.F.R. 102.5(a) and 106.1(e) in the future.

Very truly yours,



CHARLES H. BELL, JR.

CHB:ss

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
Republican Central Committee	)	
of Los Angeles County -	)	MUR 2160
Federal Account; and	)	
Leo J. Habel, Treasurer	)	

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 JUN 17 1986 2:13

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On April 1, 1986, the Commission found reason to believe that the Republican Central Committee of Los Angeles County - Federal Account, and Leo J. Habel, Treasurer, ("Respondents") had violated 2 U.S.C. § 434(a)(4)(A)(i), § 441b, and 11 C.F.R. § 102.5(a) by failing to file their April, July, and October Quarterly Reports for 1984. In addition, since respondents had paid for "exempt activities" with funds from the committee's non-federal account, and because California permits corporations and labor unions to contribute to state campaigns, the Commission found reason to believe that there was a violation of § 441b.

On April 9, this Office informed the respondents of this finding, and received a request for pre-probable cause conciliation on May 2. In a telephone conference in mid-May, counsel stated that the non-federal account did contain contributions from corporations. However, this Office is unable to determine the proportion of corporate funds in the non-federal account. Therefore, without further investigation, it is difficult to establish the extent of the § 441b violation or the appropriate civil penalty.

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For this reason, the Office of General Counsel recommends that the Commission deny respondents' request for pre-probable cause conciliation. Counsel has agreed to submit information detailing the amount of contributions from corporate sources in the non-federal account at the time of the payments by the non-federal account on behalf of the federal account. For this reason, the use of compulsory process appears unnecessary. Instead, a set of questions accompanies the proposed letter to the respondents. Upon receipt of such information, this Office will be better able to determine and recommend an appropriate civil penalty.

**II. RECOMMENDATION**

1. Deny the request of the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, treasurer, for conciliation at this time.
2. Approve the attached letter with questions.

Charles N. Steele  
General Counsel

7/17/86  
Date

BY:   
Lawrence M. Noble  
Deputy General Counsel

**Attachments:**

1. Respondents' Request
2. Respondents' Reply to RTB Notification
3. Letter to Respondents with Questions

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Attachment(s) 1, 2, 3  
to GENERAL COUNSEL'S REPORT  
have been removed from this  
position in Public Record File.  
See Index Item(s) 8, 9, 13



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *CAF*  
DATE: JULY 22, 1986  
SUBJECT: OBJECTION TO MUR 2160 - GENERAL COUNSEL'S REPORT  
SIGNED JULY 17, 1986

The above-named document was circulated to the Commission on Friday, July 18, 1986 at 2:00 P.M.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, July 29, 1986.

8704055152



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *CAM*  
DATE: JULY 22, 1986  
SUBJECT: OBJECTION TO MUR 2160 - GENERAL COUNSEL'S REPORT  
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Commissioner Aikens	<u>          X          </u>
Commissioner Elliott	<u>                          </u>
Commissioner Harris	<u>                          </u>
Commissioner Josefiak	<u>                          </u>
Commissioner McDonald	<u>                          </u>
Commissioner McGarry	<u>                          </u>

This matter will be placed on the Executive Session agenda for Tuesday, July 29, 1986.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Republican Central Committee ) MUR 2160  
of Los Angeles County - )  
Federal Account; and )  
Leo J. Habel, Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 29, 1986, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 2160:

1. Deny the request of the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, treasurer, for conciliation at this time.
2. Approve the letter with questions attached to the General Counsel's report dated July 17, 1986, subject to the following amendments:
  - a) amendment of the letter as recommended by Commissioner McGarry; and
  - b) amendment of the questions to include a time frame and to delete the words, for exempt activities, in line six of the first paragraph.

Commissioners Elliott, Harris, McDonald, and McGarry voted affirmatively for the decision; Commissioners Aikens and Josefiak dissented.

Attest:

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

7-30-86

Date

*Corrected  
8/4/86*

87040655154



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

*glam*

August 6, 1986

Charles H. Bell, Jr., Esquire  
1030 Fifteenth Street  
Suite 250  
Sacramento, CA 95814

RE: MUR 2160  
Republican Central Committee  
of Los Angeles County - Federal  
Account; and Leo J. Habel,  
Treasurer

Dear Mr. Bell:

Per your telephone conversation of June 6, 1986, with John Drury, you agreed to provide the Commission with information regarding the source of funds deposited in your clients' non-federal account. You are hereby requested to submit this information in answer to the enclosed questions.

Until you have provided the Commission with the above information, assuming it is complete, the Commission will be unable to grant your request for pre-probable cause conciliation. If the information is incomplete, it will be necessary to conduct further investigation. If you have any questions, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

Enclosure  
Questions

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### QUESTIONS

Reports filed in 1984 and 1985 for the federal account of the Republican Central Committee of Los Angeles County ("the Committee") and Leo J. Habel, treasurer, ("the respondents"), as well as correspondence from the respondents indicate that the Committee's non-federal account financed activity in connection with federal elections by making expenditures on behalf of the Committee's federal account.

1. State the date and amount of each such expenditure by the Committee's non-federal account.
2. For each expenditure, list the total amount of funds on hand in the non-federal account.
3. For each expenditure, identify the amount in the non-federal account attributable to corporations or labor organizations.

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000#1698  
**HAND DELIVERED**  
OCT 7 1986

LAW OFFICES OF  
**NIELSEN, HODGSON, PARRINELLO & MUELLER**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO  
680 CALIFORNIA STREET, SUITE 2080  
SAN FRANCISCO, CALIFORNIA 94108  
TELEPHONE (415) 989-6800

1030 FIFTEENTH STREET, SUITE 250  
SACRAMENTO, CALIFORNIA 95814  
TELEPHONE (916) 446-8788

FILE NUMBER

October 3, 1986

5897.01

FEDERAL EXPRESS

Mr. John Drury  
Office of General Counsel  
Federal Election Commission  
Washington, D.C. 20563

Re: MUR 2170

66 OCT 7 P 4: 29  
GENERAL COUNSEL

Dear Mr. Drury:

Please find enclosed the material you have requested to complete your analysis of this matter.

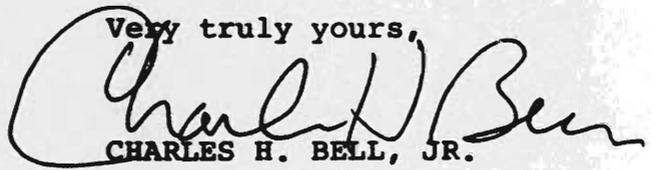
First, the delay was occasioned by the need to prepare the material manually, which took longer than anticipated because of the pendency of the 1986 elections.

Second, we concur that the expenses reported would not be "exempt expenditures" and should have been general operations and overhead.

Third, the Republican Central Committee of Los Angeles County maintained two separate State accounts. The Committee to Elect State and Local Candidates contained corporate funds. None of those funds were used to pay the costs which were reimbursed by the federal account. The committee's non-federal account which made the payments in question (for precinct operations) contained no corporate or labor union contributions. Furthermore, it is my understanding that the non-federal account contained no funds that would have exceeded the federal contribution limits.

Please find enclosed the Committee's ledger sheets which reflects its analysis of the transactions.

If you have any further questions, please contact me.

Very truly yours,  
  
CHARLES H. BELL, JR.

CHB:ss  
Encl.

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1984

ANSWERS TO QUESTIONS 1, 2 & 3

COLUMN - WRITE

DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CORPORATIONS OR LABOR UNIONS
7/6	DAVID WHITE REIMBURSEMENT OF TRAVEL EXPENSES	16104	5636	5636	6345210	- 0 -
7/6	PHIL WOODFORD REIMBURSEMENT OF TRAVEL EXPENSES	10000	3500	3500	6345210	(THERE WERE NO CORPORATE OR LABOR UNION CONTRIBUTIONS DEPOSITED IN THE FEDERAL ACCOUNT OF THE ORGANIZATION)
7/6	PHYLLIS SCHMITZ REIMBURSEMENT OF SUPPLIES	3303	1163	1163	6345210	UNION CONTRIBUTIONS
7/9	PHYLLIS SCHMITZ REIMBURSEMENT OF SUPPLIES	878	307	307	7310904	DEPOSITED IN THE FEDERAL ACCOUNT OF THE ORGANIZATION
7/12	J. FRANK BALES TRANSPORTATION	22032	7711	7711	6877200	DEPOSITED IN THE FEDERAL ACCOUNT OF THE ORGANIZATION
7/13	PHYLLIS SCHMITZ SALARY - PRECINCT SECRETARY	95458	33410	33410	6589095	LOS ANGELES COUNTY ANY
7/13	PHILIP WOODFORD SALARY - PRECINCT ORGANIZER	47860	16751	16751	6589095	LOS ANGELES COUNTY ANY
7/13	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	6589095	LOS ANGELES COUNTY ANY
7/13	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	59578	20844	20844	6589095	LOS ANGELES COUNTY ANY
7/13	JAVIER RODRIGUEZ SALARY - PRECINCT ORGANIZER	25937	9079	9079	6589095	LOS ANGELES COUNTY ANY
7/23	MARGAIA TOOLEY REIMBURSEMENT OF FOOD PURCHASED FOR VOLUNTEERS	6750	2363	2363	7536009	COMMITTEE
7/23	SHARON WADSWORTH REIMBURSEMENT OF TRAVEL EXPENSES	1480	518	518	7536009	COMMITTEE
7/23	ATT - TELEPHONE EXPENSE	570	201	201	7536009	COMMITTEE
7/30	POSTAL INSTANT PRESS PRINTING	34586	12105	12105	7614146	COMMITTEE
7/31	J. HANIE E. MORGAN REIMBURSEMENT FOR TRAVEL EXPENSES	1982	693	693	6843423	- 0 -
7/31	JAVIER RODRIGUEZ SALARY - PRECINCT ORGANIZER	46761	16366	16366	6843423	- 0 -
7/31	PHYLLIS SCHMITZ SALARY - PRECINCT SECRETARY	47860	16751	16751	6843423	- 0 -
7/31	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	59578	20844	20844	6843423	- 0 -
7/31	DAVID WHITE SALARY - PRECINCT DIRECTOR	48702	17046	17046	6843423	- 0 -
		578147	202334	202334		

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COLUMN - WRITE

DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT QUASIREIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT OF THE ATTRIBUTABLE TO NON-FEDERAL OR LAOACR UN...
7/31	PHILIP WOODFORD SALARY PRECINCT ORGANIZER	47860	16751	16751	6843423	-0-
7/31	FRANK ZUNIGA SALARY PRECINCT ORGANIZER	104510	36580	36580	6843423	-0-
7/31	COCA COLA BOTTLING CO COKE FOR VOLUNTEERS	3076	1076	1076	6843423	-0-
7/31	US POSTMASTER POSTAGE	18501	6475	6475	6843423	-0-
8/3	BRUNFIELD GALANER CAMPAIGN BUTTONS	6000	2100	2100	6762099	-0-
8/8	KEYS REIMBURSEMENT PAPER SUPPLIES	9425	3299	3299	7540421	-0-
8/8	GTE TELEPHONE EXPENSE	4440	1554	1554	7540421	-0-
8/8	PETTY CASH MISC. EXPENSE	3668	1283	1283	7540421	-0-
8/8	DAVID WHITE REIMBURSEMENT OF TRAVEL EXPENSES	37421	13097	13097	7540421	-0-
8/8	FRANK ZUNIGA REIMBURSEMENT OF TRAVEL EXPENSES	24200	8470	8470	7540421	-0-
8/8	PHILIP WOODFORD REIMBURSEMENT OF TRAVEL EXPENSES	34888	12211	12211	7540421	-0-
8/15	JAVIER RODRIGUEZ SALARY PRECINCT ORGANIZER	46761	16366	16366	3558311	-0-
8/15	PHYLIS SCHMIDT SALARY PRECINCT SECRETARY	47860	16751	16751	3558311	-0-
8/15	DAVID WHITE SALARY PRECINCT ORGANIZER	48702	17046	17046	3558311	-0-
8/15	PHILIP WOODFORD SALARY PRECINCT ORGANIZER	47860	16751	16751	3558311	-0-
8/15	FRANK ZUNIGA SALARY PRECINCT ORGANIZER	46761	16366	16366	3558311	-0-
8/15	GLENN THORNHILL SALARY PRECINCT DIRECTOR	68019	23797	23797	3558311	-0-
8/16	JANE CROCKY REIMBURSEMENT FOR SUPPLIES & POSTAGE	2203	771	771	3641380	-0-
8/16	PHYLIS SCHMIDT REIMBURSEMENT OF SUPPLIES	245	86	86	3641380	-0-
		1180547	413164	413164		

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COLUMN - WRITE

DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CORPORATIONS OR LABOR UNIONS
8/30	REGISTRAR DE VOTERS PRECINCT SHEETS AND MAPS	7000	2450	2450	3383004	-0-
8/24	ADMIRAL PRODUCTIONS EQUIPMENT RENTAL	100000	35000	35000	4412237	-0-
8/30	YOUNG PRINTERS - PRINTING OF LITERATURE	55487	19420	19420	4088642	-0-
8/30	PETTY CASH MISC. EXPENSE	5870	2061	2061	4088642	-0-
8/30	REGISTRAR DE VOTERS PRECINCT SHEETS + MAPS	11340	3968	3968	4088642	-0-
8/31	RUSSELL TRANSPORTATION TRANSPORTATION FOR CO. VOLUNTEERS	59056	20670	20670	3976900	-0-
8/31	LONG BEACH TRANSIT TRANSPORTATION FOR VOLUNTEERS	52000	18200	18200	3976900	-0-
8/31	PACIFIC BUSING CO. TRANSPORTATION FOR VOLUNTEERS	10000	3500	3500	3976900	-0-
8/31	BRACK BUS LINES TRANSPORTATION FOR VOLUNTEERS	69000	24150	24150	3976900	-0-
8/31	JAVIER RODRIGUEZ SALARY - PRECINCT ORGANIZER	46761	16360	16360	3976900	-0-
8/31	PHYLLIS SCHMITZ SALARY - PRECINCT SECRETARY	47860	16751	16751	3976900	-0-
8/31	GLENN THORNTON SALARY - PRECINCT DIRECTOR	67363	23573	23573	3976900	-0-
8/31	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	3976900	-0-
8/31	PHILIP WOODFORD SALARY - PRECINCT ORGANIZER	47860	16751	16751	3976900	-0-
8/31	FRANK ZUNIGA SALARY - PRECINCT ORGANIZER	46761	16360	16360	3976900	-0-
8/31	US POSTMASTER POSTAGE	15339	5369	5369	3976900	-0-
9/5	DAVID WHITE REIMBURSEMENT OF TRAVEL EXPENSES	30245	10586	10586	3663595	-0-
9/5	PHILIP WOODFORD REIMBURSEMENT OF TRAVEL EXPENSES	19420	6797	6797	3663595	-0-
9/11	MARCA TOOKEY REIMBURSEMENT OF FOOD PURCHASED FOR VOLUNTEERS	40452	14157	14157	4812494	-0-
		1961083	686345	686345		

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COLUMN - WRITE

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT
9/11	FRANK ZUNIGA REIMBURSEMENT OF TRAVEL EXPENSES	18000	6300	6300	4812494	-0-
9/14	JAVIER RODRIGUEZ SALARY - PRECINCT ORGANIZER	46761	16366	16366	2988484	-0-
9/14	PHILLIS SCHMITZ SALARY - PRECINCT SECRETARY	47860	16751	16751	2988484	-0-
9/14	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	67363	23573	23573	2988484	-0-
9/14	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	2988484	-0-
9/14	PHILIP DODD FORD SALARY - PRECINCT ORGANIZER	47860	16751	16751	2988484	-0-
9/14	FRANK ZUNIGA SALARY - PRECINCT ORGANIZER	46761	16366	16366	2988484	-0-
7/20	US POSTMASTER POSTAGE	260000	91000	91000	3283708	-0-
9/26	RUSSELL TRANSPORTATION CO - FOR VOLUNTEERS	3348	1172	1172	2611410	-0-
7/26	LOUISE LEIGH REIMBURSEMENT OF POSTAGE	11836	4142	4142	2611410	-0-
9/26	DAVID WHITE REIMBURSEMENT OF TRAVEL EXPENSES	11335	3967	3967	2611410	-0-
7/26	COMART XEROXING	15425	5398	5398	2611410	-0-
9/26	GLENN THORNHILL REIMBURSEMENT OF TRAVEL EXPENSES	5948	1906	1906	2611410	-0-
9/28	KEN FREDERICKS PRINTING SERVICES - PRINTING	13233	4632	4632	2822762	-0-
9/28	WESTERN TOURS INC - TRANSPORTATION FOR VOLUNTEERS	9375	3282	3282	2822762	-0-
9/28	JAVIER RODRIGUEZ SALARY - PRECINCT ORGANIZER	46761	16366	16366	2822762	-0-
9/28	PHILLIS SCHMITZ SALARY - PRECINCT SECRETARY	47860	16751	16751	2822762	-0-
9/28	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	67363	23573	23573	2822762	-0-
9/28	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	2822762	-0-
		2825076	988733	988733	-	14

COLUMN - WRITE

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT DEERENDITURE PAID BY THE COMMITTEES NON FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT REIMBURSED FROM THE FEDERAL FUNDS	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT
9/28	PHILIP WOODFORD SALARY PRECINCT ORGANIZER	47860	16751	16751	2822762	-0-
9/28	FRANK ZUNIGA SALARY PRECINCT ORGANIZER	46761	16366	16366	2822762	-0-
9/30	US POSTMASTER POSTAGE	12706	4447	4447	2468709	-0-
10/2	TOM BADER + ASSOC. REGISTRATION	100000	35000	35000	2686212	-0-
10/4	GLENN THORNHILL REIMBURSEMENT OF TRAVEL EXPENSES	464	162	162	2586097	-0-
10/9	DAVID WHITE REIMBURSEMENT OF TRAVEL EXPENSES	40053	14019	14019	2666271	-0-
10/9	PHILIP WOODFORD REIMBURSEMENT OF TRAVEL EXPENSES	18635	6523	6523	2666271	-0-
10/11	SUE HURT HANSON SALARY - PRECINCT ORGANIZER	60000	21000	21000	2918510	-0-
10/15	PHYLLIS SCHMIDT SALARY - PRECINCT SECRETARY	47860	16751	16751	1573564	-0-
10/15	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	67363	23573	23573	1573564	-0-
10/15	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	1573564	-0-
10/15	PHILIP WOODFORD SALARY - PRECINCT ORGANIZER	47860	16751	16751	1573564	-0-
10/15	FRANK ZUNIGA SALARY - PRECINCT ORGANIZER	46761	16366	16366	1573564	-0-
10/18	KELLY SELF HELP PAPER PAPER SUPPLIES	6283	2198	2198	2109646	-0-
10/18	REGISTRAR-RECORDER PRECINCT SHEETS + MAPS IDEAL RUBBER STAMP MFGRS. INC.	41865	14631	14631	2109646	-0-
10/18	PRECINCT SUPPLIES	50609	17713	17713	2109646	-0-
10/18	ASHLEY PUGLIESE REIMBURSEMENT OF TRAVEL EXPENSES	8360	2926	2926	2109646	-0-
10/22	IDEAL RUBBER STAMP MFGRS. INC. PRECINCT SUPPLIES	36971	12940	12940	2198042	-0-
10/22	CRUZCO TRAVEL SERVICE TRAVEL FOR PRECINCT VOLUNTEER OFFICERS	29600	10360	10360	2198042	-0-
		3583729	1254255	1254255	-	14

COLUMN - WRITE

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT OF THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO LABOR UNIONS
10/29	SUE HUTCHINSON SALARY - PRECINCT ORGANIZER	60000	21000	21000	4781102	-0-
10/29	REGISTRAR OF VOTERS PRECINCT SHEETS + MAPS	6790	2377	2377	4781102	-0-
10/29	REGISTRAR OF VOTERS PRECINCT SHEETS + MAPS	4410	1544	1544	4205858	-0-
10/31	GLENN THORNHILL REIMBURSEMENT OF TRAVEL EXPENSES	779	273	273	2364504	-0-
10/31	ASHLEY PUGLIESE REIMBURSEMENT OF TRAVEL EXPENSES	12780	4473	4473	2364504	-0-
10/31	PETTY CASH MISC. EXPENSE	2770	970	970	2364504	-0-
10/31	KRIS VOSBURG PRECINCT COORDINATOR	180000	63000	63000	2364504	-0-
10/31	ASHLEY PUGLIESE SALARY - PRECINCT ORGANIZER	38408	13443	13443	2364504	-0-
10/31	PHYLLIS SCHMITZ SALARY - PRECINCT SECRETARY	47860	16751	16751	2364504	-0-
10/31	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	67363	23573	23573	2364504	-0-
10/31	DAVID WHITE SALARY - PRECINCT ORGANIZER	48702	17046	17046	2364504	-0-
10/31	PHILIP WOODFORD SALARY - PRECINCT ORGANIZER	47860	16751	16751	2364504	-0-
10/31	FRANK ZUNIGA SALARY - PRECINCT ORGANIZER	46761	16366	16366	2364504	-0-
10/31	US POSTMASTER POSTAGE	44637	15623	15623	2364504	-0-
11/15	ASHLEY PUGLIESE SALARY - PRECINCT ORGANIZER	38408	13443	13443	2993661	-0-
11/15	GLENN THORNHILL SALARY - PRECINCT DIRECTOR	67363	23573	23573	2993661	-0-
11/15	PHYLLIS SCHMITZ SALARY - PRECINCT SECRETARY	25760	9016	9016	2993661	-0-
11/15	PHILIP WOODFORD SALARY - PRECINCT ORGANIZER	25760	9016	9016	2993661	-0-
11/15	DAVID WHITE SALARY - PRECINCT ORGANIZER	26760	9364	9364	2993661	-0-
		4376900	1531857	1531857		

14

COLUMN - WRITE

87040555164

DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CORPORATIONS OR LABOR UNIONS
" 15	FRANK ZUNIGA SALARY PRECINCT ORGANIZER	24760	8667	8667	2993661	-0-
" 15	HAGOS ADHANOM SALARY FUNDRAISING	20056	20056	20056	2993661	-0-
" 15	WALLELENE ALEMU SALARY FUNDRAISING	16717	16717	16717	2993661	-0-
" 15	GAYLE BOSWELL SALARY FUNDRAISING	7539	7539	7539	2993661	-0-
" 15	MARY BUSTAMANTE SALARY FUNDRAISING	37746	37746	37746	2993661	-0-
" 15	MARILYN CHAMBERLAIN SALARY FUNDRAISING	23575	23575	23575	2993661	-0-
" 15	ROBERT FOWER SALARY FUNDRAISING	25690	25690	25690	2993661	-0-
" 15	PHILIP GAYTON SALARY FUNDRAISING	55716	55716	55716	2993661	-0-
" 15	YANAMEE GHEBRHINET SALARY FUNDRAISING	21649	21649	21649	2993661	-0-
" 15	ARE GIDEY SALARY FUNDRAISING	27474	27474	27474	2993661	-0-
" 15	SELMAN SULTIE SALARY FUNDRAISING	21530	21530	21530	2993661	-0-
" 15	MERIAM TESSEMA SALARY FUNDRAISING	14553	14553	14553	2993661	-0-
" 15	RHONDA HALL SALARY FUNDRAISING	19528	19528	19528	2993661	-0-
" 15	YASIN JABIR SALARY FUNDRAISING	7969	7969	7969	2993661	-0-
" 15	TES KHARABANDA SALARY FUNDRAISING	19106	19106	19106	2993661	-0-
" 15	GRAN MOKREA SALARY FUNDRAISING	21762	21762	21762	2993661	-0-
" 15	BERT REBEAUD SALARY FUNDRAISING SUPERVISOR	75719	75719	75719	2993661	-0-
" 15	MAE RIKKS SALARY FUNDRAISING	24526	24526	24526	2993661	-0-
" 15	ROLAND SCOTT SALARY FUNDRAISING	13052	13052	13052	2993661	-0-
		4255567	1994431	1994431		

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DATE	TYPED EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT FREQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CORPORATIONS OR LABOR UNIONS
11/15	PALMER SCHWEPP SALARY FUNDRAISING	11251	11251	11251	2993661	-0-
11/15	WILLIAM STANLEY SALARY FUNDRAISING	49512	49512	49512	2993661	-0-
11/15	RICHARD STOLL SALARY FUNDRAISING	17106	17106	17106	2993661	-0-
11/15	SANDY STOLL SALARY FUNDRAISING	12518	12518	12518	2993661	-0-
11/15	CHAN TU SALARY FUNDRAISING	8408	8408	8408	2993661	-0-
11/15	YVONNE VEARY SALARY FUNDRAISING	16124	16124	16124	2993661	-0-
11/15	SHIRLEY WALDMAN SALARY FUNDRAISING	38327	38327	38327	2993661	-0-
11/15	KAREN WESTMORELAND SALARY FUNDRAISING	14715	14715	14715	2993661	-0-
11/15	REBA WILSON SALARY FUNDRAISING	21194	21194	21194	2993661	-0-
11/15	YIGARD ZEBEY SALARY FUNDRAISING	4231	4231	4231	2993661	-0-
11/15	ABDULKADIR ZIAD SALARY FUNDRAISING	20565	20565	20565	2993661	-0-
11/21	KEN FREDERICKS PRINTING PRINTING	5379	5379	5379	2765011	-0-
11/21	PACIFIC TELEPHONE TELEPHONE EXPENSES	272086	272086	272086	2765011	-0-
11/26	BYRAM INVESTMENT RENT	200000	35000	35000	2732811	-0-
7/13	EMPLOYMENT DEVELOPMENT	3220	1127	1127	6589095	-0-
7/31	DEPT-STATE DISABILITY	4053	1418	1418	6343423	-0-
8/15	INSURANCE	3603	1261	1261	3558311	-0-
9/31	"	3603	1261	1261	3976900	-0-
9/14	"	3603	1261	1261	2988454	-0-
9/28	"	3603	1261	1261	2822702	-0-
10/15		3040	1064	1064	1573564	-0-
10/31		3490	1222	1222	2364504	-0-
11/15		8683	7197	7197	2993661	-0-
		5583881	2537919	2537919		

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CORPORATIONS OR LABOR UNIONS
7/13	COMMUNITY BANK	33033	11561	11561	6589095	-0-
7/31	EMPLOYER PAYROLL	41580	14552	14552	6843423	-0-
8/15	TAXES	36960	12935	12935	3558311	-0-
8/31	"	36960	12935	12935	3976900	-0-
9/14	"	36960	12935	12935	2988484	-0-
9/28	"	36960	12935	12935	2822762	-0-
10/15	"	31185	10915	10915	1573564	-0-
10/31	"	35805	12532	12532	2364504	-0-
11/15	"	100294	85051	85051	2993661	-0-
7/13	EMPLOYMENT DEVELOPMENT	9109	3188	3188	6589095	-0-
7/31	DEPT-WITHOLDING OF	10533	3687	3687	6843423	-0-
8/15	STATE INCOME TAX	11481	4018	4018	3558311	-0-
8/31	"	11522	4033	4033	3976900	-0-
9/14	"	11522	4033	4033	2988484	-0-
9/28	"	11522	4033	4033	2822762	-0-
10/15	"	9757	3415	3415	1573564	-0-
10/31	"	10850	3798	3798	2364504	-0-
11/15	"	21988	19183	19183	2993661	-0-
7/13	COMMUNITY BANK	43681	15288	15288	6589095	-0-
7/31	WITHOLDING OF FEDERAL	49990	17497	17497	6843423	-0-
8/15	INCOME TAXES	52150	18253	18253	3558311	-0-
8/31	"	52765	18468	18468	3976900	-0-
9/14	"	52765	18468	18468	2988484	-0-
9/28	"	52765	18468	18468	2822762	-0-
10/15	"	43542	15240	15240	1573564	-0-
10/31	"	50241	17583	17583	2364504	-0-
11/15	"	111519	97632	97632	2993661	-0-
7/13	COMMUNITY BANK	23953	8384	8384	6589095	-0-
7/31	FICA TAXES WITHHELD	30153	10554	10554	6843423	-0-
8/15	"	26803	9381	9381	3558311	-0-
8/31	"	26803	9381	9381	3976900	-0-
9/14	"	26803	9381	9381	2988484	-0-
9/28	"	26803	9381	9381	2822762	-0-
10/15	"	22615	7915	7915	1573564	-0-
10/31	"	25965	9088	9088	2364504	-0-
11/15	"	64609	53556	53556	2993661	-0-
		128165829	3137576	3137576		

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ANSWER TO QUESTIONS 1, 2 & 3

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURES PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND AT THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT TO BE CREDITED TO CONTRIBUTORS OR PAID
11/30	GLENN THORNTON SALARY PRESIDENT DIRECTOR	31198	10919	10919	1861207	-0-
11/30	HARRIS ADAMSON SALARY FUNDRAISING	8228	8228	8228	1861207	THESE WERE INCORPORATED OR LAOCH
11/30	WALLEEGONE ALEMU SALARY FUNDRAISING	12844	12844	12844	1861207	UNION CONTRIBUTIONS
11/30	GAYLE BOSWELL SALARY FUNDRAISING	609	609	609	1861207	DEPOSITED THE FEDERAL
11/30	MARY BUSTAMANTE SALARY FUNDRAISING	25642	25642	25642	1861207	OR THE NON-FEDERAL
11/30	MARILYN CHAMBERLAIN SALARY FUNDRAISING	11613	11613	11613	1861207	ACCOUNT OF THE REPUBLICAN
11/30	ROBERT FOWLER SALARY FUNDRAISING	14697	14697	14697	1861207	CENTRAL COMMITTEE OF
11/30	PHILIP SHAYTON SALARY FUNDRAISING	40193	40193	40193	1861207	LOS ANGELES COUNTY, CALIF.
11/30	VAUGHN DEARBORN SALARY FUNDRAISING	10710	10710	10710	1861207	CONTRIBUTION
11/30	ALEXIS J SALARY FUNDRAISING	17724	17724	17724	1861207	WENT INTO SEPARATE
11/30	SELMAN G SALARY FUNDRAISING	11549	11549	11549	1861207	COMMITTEE THE LANCET
11/30	HEIDI SALARY FUNDRAISING	4112	4112	4112	1861207	SELECTED FEDERAL
11/30	YASIN JABIR SALARY FUNDRAISING	3372	3372	3372	1861207	FOR PREVIOUS ACTIVITY
11/30	TEJ KHARGANDA SALARY FUNDRAISING	853	853	853	1861207	-0-
11/30	DRAN MCKREH SALARY FUNDRAISING	10852	10852	10852	1861207	-0-
11/30	BERT REHERD SALARY FUNDRAISING	27409	27409	27409	1861207	-0-
11/30	MARK CKS SALARY FUNDRAISING	9704	9704	9704	1861207	-0-
11/30	ROLAND SOTT SALARY FUNDRAISING	2749	2749	2749	1861207	-0-
		261104	24085	24085		

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTRIBUTABLE TO CONTRACTS OR AGREEMENTS
11/30	WILLIAM STANLEY SALARY FUNDRAISING	21542	21542	21542	1861207	-0-
11/30	RICHARD STOLL SALARY FUNDRAISING	6061	6061	6061	1861207	-0-
11/30	SANDY STOLL SALARY FUNDRAISING	7831	7831	7831	1861207	-0-
11/30	CHAN TU SALARY FUNDRAISING	1479	1479	1479	1861207	-0-
11/30	VIVIENNE VEZDY SALARY FUNDRAISING	8916	8916	8916	1861207	-0-
11/30	SHIRLEY WALDMAN SALARY FUNDRAISING	20191	20191	20191	1861207	-0-
11/30	KAREN WESTMORELAND SALARY FUNDRAISING	8269	8269	8269	1861207	-0-
11/30	REBA WILSON SALARY FUNDRAISING	11695	11695	11695	1861207	-0-
11/30	WISHADU ZEDEYE SALARY FUNDRAISING	9748	9748	9748	1861207	-0-
11/30	ABDULKADIR ZIAD SALARY FUNDRAISING	10372	10372	10372	1861207	-0-
11/30	DOLGRES DAVIS SALARY FUNDRAISING	3149	3149	3149	1861207	-0-
11/30	US POSTMASTER POSTAGE	91457	91457	91457	1861207	-0-
12/14	BERT REEDLINE REIMBURSEMENT FOR SUPPLIES	1086	1086	1086	1628170	-0-
12/14	MAGAS ADHANOM SALARY FUNDRAISING	24915	24915	24915	1628170	-0-
12/14	LILLIELEGENE ALEMU SALARY FUNDRAISING	20668	20668	20668	1628170	-0-
12/14	GAYLE BOSWELL SALARY FUNDRAISING	3657	3657	3657	1628170	-0-
12/14	MARY BUSTAMANTE SALARY FUNDRAISING	35395	35395	35395	1628170	-0-
12/14	MERLENE CAMPBELL SALARY FUNDRAISING	16980	16980	16980	1628170	-0-
12/14	ROBERT FOWLER SALARY FUNDRAISING	25311	25311	25311	1628170	-0-
		589826	589547	589547		

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT
12/14	PHILIP GAYTON SALARY FUNDRAISING	52441	52441	52441	1628170	-0-
12/14	YOHANES GHEORGHINT SALARY FUNDRAISING	13784	13784	13784	1628170	-0-
12/14	ABE GIDEY SALARY FUNDRAISING	23073	23073	23073	1628170	-0-
12/14	SELDMAN GULTIE SALARY FUNDRAISING	16174	16174	16174	1628170	-0-
12/14	NEBOAT TESSEMA SALARY FUNDRAISING	13052	13052	13052	1628170	-0-
12/14	RONDA HALL SALARY FUNDRAISING	12995	12995	12995	1628170	-0-
12/14	YASIN SAER SALARY FUNDRAISING	25503	25503	25503	1628170	-0-
12/14	TET KHARBAZAN SALARY FUNDRAISING	16934	16934	16934	1628170	-0-
12/14	KEEN MORREN SALARY FUNDRAISING	14327	14327	14327	1628170	-0-
12/14	LINDA SHNER SALARY FUNDRAISING	538	538	538	1628170	-0-
12/14	BERT REED SALARY FUNDRAISING	143970	143970	143970	1628170	-0-
12/14	MIL KICKS SALARY FUNDRAISING	23010	23010	23010	1628170	-0-
12/14	WILLIAM STOLL SALARY FUNDRAISING	37897	37897	37897	1628170	-0-
12/14	RICHARD STOLL SALARY FUNDRAISING	6213	6213	6213	1628170	-0-
12/14	STUDY STOLL SALARY FUNDRAISING	9785	9785	9785	1628170	-0-
12/14	CHARL SALARY FUNDRAISING	5913	5913	5913	1628170	-0-
12/14	VIVIANE VEALY SALARY FUNDRAISING	15027	15027	15027	1628170	-0-
12/14	SHIRLEY WELMAN SALARY FUNDRAISING	27101	27101	27101	1628170	-0-
12/14	KAREN WESTMORELAND SALARY FUNDRAISING	11273	11273	11273	1628170	-0-
		1058836	1038557	1038557		

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE'S NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT TO COVER DEFERRED
12/14	REBA WILSON SALARY FUNDRAISING	9642	9642	9642	1628170	-0-
12/14	YEARDU ZEDEYS SALARY FUNDRAISING	16393	16393	16393	1628170	-0-
12/14	ABDULLADIR ZIAD SALARY FUNDRAISING	113211	113211	113211	1628170	-0-
12/14	DOLORES DAVIS SALARY FUNDRAISING	5625	5625	5625	1628170	-0-
12/15	PACIFIC BELL TELEPHONES	66383	66383	66383	1768954	-0-
12/21	HAEOS ADHAMOM SALARY FUNDRAISING	16305	16305	16305	1653012	-0-
12/21	KALE BOSWELL SALARY FUNDRAISING	3935	3935	3935	1653012	-0-
12/21	MARY BUSTAMANTE SALARY FUNDRAISING	2861	2861	2861	1653012	-0-
12/21	MARILYN CHAMBERLAIN SALARY FUNDRAISING	16976	16976	16976	1653012	-0-
12/21	DOLORES DAVIS SALARY FUNDRAISING	1179	1179	1179	1653012	-0-
12/21	ROBERT FOWLER SALARY FUNDRAISING	20913	20913	20913	1653012	-0-
12/21	PHILIP GAYEN SALARY FUNDRAISING	52038	52038	52038	1653012	-0-
12/21	YVONNE EGHEGHEGNOT SALARY FUNDRAISING	11553	11553	11553	1653012	-0-
12/21	JOE GIDEY SALARY FUNDRAISING	18822	18822	18822	1653012	-0-
12/21	SELOMAN GULIE SALARY FUNDRAISING	11643	11643	11643	1653012	-0-
12/21	RHONDA HALL SALARY FUNDRAISING	10028	10028	10028	1653012	-0-
12/21	YASIN JACIR SALARY FUNDRAISING	7023	7023	7023	1653012	-0-
12/21	TE KHARZAN SALARY FUNDRAISING	14030	14030	14030	1653012	-0-
12/21	DRAN MOKREH SALARY FUNDRAISING	11413	11413	11413	1653012	-0-
		1394609	1374230	1374230		

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DATE	TYPE OF EXPENDITURE	TOTAL AMOUNT OF EXPENDITURE PAID BY THE COMMITTEE NON-FEDERAL ACCOUNT	FEDERAL PORTION OF THE EXPENDITURE	AMOUNT SUBSEQUENTLY REIMBURSED FROM THE FEDERAL ACCOUNT	FUNDS ON HAND IN THE NON-FEDERAL ACCOUNT	AMOUNT IN THE NON-FEDERAL ACCOUNT ATTACHED TO CERTAIN ORIGINATING
12/21	MAE RICKS SALARY FUNDRAISING	19152	19152	19152	1653012	-0-
12/21	WILLIAM STANLEY SALARY FUNDRAISING	42459	42459	42459	1653012	-0-
12/21	RICHARD STOLL SALARY FUNDRAISING	17071	17071	17071	1653012	-0-
12/21	SANDY STOLL SALARY FUNDRAISING	12550	12550	12550	1653012	-0-
12/21	NEELAT TESSEMA SALARY FUNDRAISING	9193	9193	9193	1653012	-0-
12/21	CHAN TU SALARY FUNDRAISING	2957	2957	2957	1653012	-0-
12/21	VIVIENNE VEARY SALARY FUNDRAISING	9171	9171	9171	1653012	-0-
12/21	SHIRLEY WALLEN SALARY FUNDRAISING	4016	4016	4016	1653012	-0-
12/21	KAREN WESTMORELAND SALARY FUNDRAISING	14599	14599	14599	1653012	-0-
12/21	REGINA WILSON SALARY FUNDRAISING	15925	15925	15925	1653012	-0-
12/21	ISARON ZERZIF SALARY FUNDRAISING	14692	14692	14692	1653012	-0-
12/21	HEIDI VILKADAR ZIF SALARY FUNDRAISING	6442	6442	6442	1653012	-0-
12/20	BYRAM INVESTMENT RENT	200000	35000	35000	16005965	-0-
12/28	NIELSEN HODGSON BARRINELLO & MUELLER LEGAL EXPENSES	24150	24150	24150	1740162	-0-
12/31	PACIFIC BELL TELEPHONES	1923	672	672	1118546	-0-
12/31	BERT KOBAL SALARY FUNDRAISING	52927	52927	52927	1118546	-0-
12/31	US POSTAGES POSTAGE	567764	567764	567764	1118546	-0-
12/31	COPY ART COPYING	7934	2772	2772	1118546	-0-
12/31	J. FRANK BAILEY MOVING	20600	7210	7210	1118546	-0-
		2475489	2270217	2270217		

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
Republican Central Committee	)	MUR 2160
of Los Angeles County - Federal	)	
Account and Leo J. Habel, as	)	
treasurer	)	

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**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On April 1, 1986, the Commission found reason to believe that the Republican Central Committee of Los Angeles County - Federal Account ("RCLA") and Leo J. Habel, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and 441(b) and 11 C.F.R. § 102.5(a). The basis for these findings was a referral from the Reports Analysis Division ("RAD") alleging that RCLA failed to file its 1984 April, July, and October Quarterly reports in a timely manner, and that the Republican Central Committee of Los Angeles County's state account ("state account"), which can accept corporate and union contributions, under California law, made expenditures on behalf of RCLA. In response to the Commission's finding, respondents acknowledged that the state account had made expenditures for "exempt activities," such as voter registration and get-out-the-vote drives for all Republican candidates, and that RCLA had subsequently reimbursed the state account for the federal portion of said expenses. Respondents had previously reported that they had reimbursed the state account \$2,278 for payments made by the state account for exempt expenditures on behalf of federal candidates.

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On May 2, 1986, respondent requested pre-probable cause conciliation. The Commission rejected this request on July 29, 1986, and approved the issuance of questions to RCLA as recommended by this Office, subject to certain amendments. The answers to said questions were received on October 7, 1986. (See Attachment 1).

**II. LEGAL AND FACTUAL ANALYSIS**

According to respondents, "the Committee's non-federal account which made the payments in question (for precinct operations) contained no corporate or labor union contributions." This statement was supported by a ledger kept by the state account. (Attachment 1).

Under the Act, no political committee may accept corporate or labor union contributions. 2 U.S.C. § 441b. Where an organization, such as the Republican Central Committee of Los Angeles, has established both a federal and a non-federal account, "only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account." 11 C.F.R. § 102.5(a)(1)(i). In this case, no prohibited funds were deposited into RCLA. The same regulation also states that "No transfers may be made to such federal account from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-federal elections." Id. No transfers were made to RCLA from the state account.

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Finally, the regulation states that "all disbursements, contributions, expenditures, and transfers by the committee in connection with any federal election shall be made from its federal account." Id. In this case, disbursements and expenditures in connection with federal elections were made from the non-federal account, which was later reimbursed by RCLA.

The activity paid for by the state account (with subsequent reimbursement by RCLA) involved voter registration and get-out-the-vote drives in support of all Republican candidates in the 1984 general election. Republican candidates for President and for the U.S. Congress were among those benefitted by these drives. Under the Commission's regulations,

(3) Payments made for the cost of certain voter registration and get-out-the-vote activities conducted by State or local party organizations on behalf of any Presidential or Vice-Presidential candidate(s) are exempt from the definition of a contribution or an expenditure under 11 C.F.R. § 100.7(b)(17) and 100.8(b)(18). If the State or local party organization includes references to any candidate(s) seeking nomination or election to the House of Representatives or Senate of the United States the portion of the cost of such activities allocable to such candidate(s) shall be considered a contribution to or an expenditure on behalf of such candidate(s), unless such reference is incidental to the overall activity. If such reference is incidental to the overall activity, such costs shall not be considered a contribution to or expenditure on behalf of any candidate(s).

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11 C.F.R. § 106.1(c). The respondent's acknowledgement in response to the notification of the Commission's finding of reason to believe, that the efforts in question were in support of all Republican candidates, including federal candidates, indicates that the references to such candidates were not "incidental." It appears in the present case that the state account, by paying for a get-out-the-vote drive on behalf of a Presidential candidate and a Congressional candidate, made an exempted expenditure and an expenditure in connection with a federal election, respectively.

Under the Commission's regulations,

(1) Each organization, including a party committee, which finances political activity in connection with both federal and non-federal elections and which qualifies as a political committee under 11 C.F.R. § 100.5 [may]:

(i) Establish a separate federal account in a depository in accordance with 11 C.F.R. Part 103. Such account shall be treated as a separate federal political committee which shall comply with the requirements of the Act including the registration and reporting requirements of 11 C.F.R. Parts 102 and 104. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account. All disbursements, contributions, expenditures and transfers by the committee in connection with any federal election shall be made from its federal account. No transfers may be made to such federal account from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-federal elections. Administrative expenses shall be allocated pursuant to 11 C.F.R. Part 106 between such federal

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account and any other account maintained by such committee for the purpose of financing activity in connection with non-federal elections....

11 C.F.R. § 102.5(a). (Emphasis added). In this case, administrative expenses were allocated between the federal and state accounts. It also appears that the state account, which was established in accordance with the foregoing section for use in connection with non-federal elections, made disbursements and expenditures in connection with federal elections, in violation of 11 C.F.R. § 102.5(a), due to its paying for voter registration and get-out-the-vote drives for Presidential and Congressional candidates. The fact that RCLA later reimbursed the state account may mitigate but does not eradicate the clear violation of the regulation committed when the state account made its disbursements and expenditures in connection with federal elections. Also, the absence from the state account of funds prohibited by the Act does not obviate this violation.

On the other hand, the evidence that the state account did not accept prohibited funds does lead this Office to recommend that the Commission take no further action concerning the alleged violation of 2 U.S.C. § 441b. It is undisputed, however, that respondents violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file three Quarterly reports in a timely manner. Accordingly, this Office recommends that the Commission now agree to

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15

respondent's request to enter into pre-probable cause  
conciliation.

Remainder of p.6, all p.7, part p.8  
deleted. See 24 USC 5437g (a)(4)(B)(i).

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EXPLANATORY CHART

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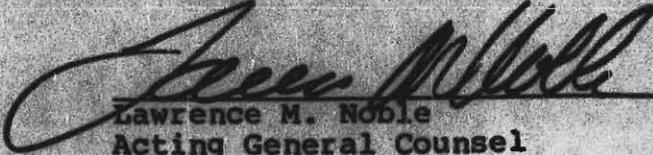
**RECOMMENDATIONS**

1. Take no further action against the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer, concerning the alleged violation of 2 U.S.C. § 441b.
2. Enter into conciliation with the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer, prior to a finding of probable cause to believe.

157

3. Approve and send the attached conciliation agreement.
4. Approve and send the attached letter.

Date 4/12/87

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Response to Interrogatories
2. Proposed Conciliation Agreement
3. Proposed letter to respondents

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Attachment(s) 1, 3  
to GENERAL Counsel's Report  
have been removed from this  
position in Public Record File.  
See Index Item(s) 14, 19



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ JERYL L. WARREN *JW*  
DATE: APRIL 15, 1987  
SUBJECT: OBJECTION TO MUR 2160 - GENERAL COUNSEL'S  
REPORT  
SIGNED APRIL 13, 1987

The above-captioned document was circulated to the Commission on April 14, 1987 at 11:00.

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

Commissioner Aikens \_\_\_\_\_  
Commissioner Elliott \_\_\_\_\_ X  
Commissioner Josefiak \_\_\_\_\_ X  
Commissioner McDonald \_\_\_\_\_  
Commissioner McGarry \_\_\_\_\_  
Commissioner Thomas \_\_\_\_\_

This matter will be placed on the Executive Session agenda for April 22, 1987.

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE  
 ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JERYL L. WARREN *gn*

DATE: APRIL 16, 1987

SUBJECT: OBJECTION TO MUR 2160 - GENERAL COUNSEL'S  
 REPORT  
 SIGNED APRIL 13, 1987

The above-captioned document was circulated to the Commission on April 14, 1987 at 11:00.

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

Commissioner Aikens	<u>          X          </u>
Commissioner Elliott	<u>          X          </u>
Commissioner Josefiak	<u>          X          </u>
Commissioner McDonald	<u>          X          </u>
Commissioner McGarry	<u>          X          </u>
Commissioner Thomas	<u>                          </u>

This matter will be placed on the Executive Session agenda for April 22, 1987.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Republican Central Committee of ) MUR 2160  
Los Angeles County - Federal )  
Account and Leo J. Habel, as )  
treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 22, 1987, do hereby certify that the Commission took the following actions in MUR 2160:

1. Decided by a vote of 5-1 to take no further action against the Republican Central Committee of Los Angeles - Federal Account and Leo J. Habel, as treasurer, concerning the alleged violation of 2 U.S.C. § 441b.

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

2. Decided by a vote of 5-1 to take no further action against the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer, concerning the alleged violation of 11 C.F.R. § 102.5(a).

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

(continued)

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3. Decided by a vote of 5-0 to take the following actions in MUR 2160:
- a) Approve the conciliation agreement attached to the General Counsel's report dated April 13, 1987, subject to the following amendments:
  
  
  
  
  
  
  
  
  
  
  - b) Direct the Office of General Counsel to send an appropriate letter.

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for the motion; Commissioner McGarry was not present at the time of the vote.

Attest:

4-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 28, 1987

Charles H. Bell, Jr., Esquire  
Nielsen, Hodgson, Parrinello, & Mueller  
1030 Fifteenth Street, Suite 250  
Sacramento, California 95814

RE: MUR 2160  
Republican Central Committee  
of Los Angeles County -  
Federal Account and Leo J.  
Habel, as treasurer

Dear Mr. Bell:

On April 1, 1986, the Commission found reason to believe that the Republican Central Committee of Los Angeles County - Federal Account, and Leo J. Habel, as treasurer, violated 2 U.S.C. §§ 441b and 434(a)(4)(A)(i) and 11 C.F.R. § 102.5(a). On April 22, 1987, the Commission decided to take no further action concerning the alleged violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5. At your request, the Commission also determined on April 22, 1987, to enter into negotiations directed towards reaching a conciliation agreement in settlement of the alleged violations of 2 U.S.C. § 434(a)(4)(A)(i) in this matter prior to a finding of probable cause to believe.

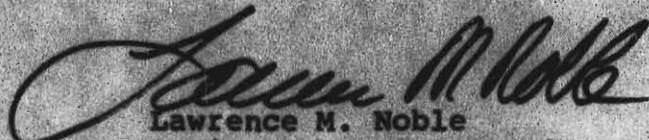
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement,

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Charles H. Bell, Jr., Esquire  
Page 2

please contact Charles Snyder, the attorney assigned to this  
matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

97 JUL 10 4:33:39

COMMUNICATIONS SECTION

In the Matter of	)	
	)	
Republican Central Committee of	)	MUR 2160
Los Angeles County - Federal	)	
Account and Leo J. Habel, as	)	
Treasurer	)	

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

Attached is a conciliation agreement which has been signed by Charles H. Bell, Jr., legal counsel for the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer ("respondents").

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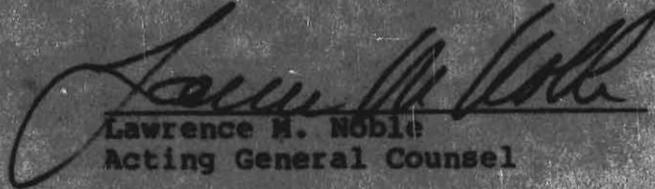
The proposed agreement submitted by respondents contains no other changes from the agreement proposed by the Commission. Respondents have not yet submitted a civil penalty check.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer.

2. Close the file.
3. Approve the attached letter.

Date 7/10/87

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Conciliation Agreement
2. Letter to Respondent

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Attachment(s) 1, 2  
to GENERAL Counsel's Report  
have been removed from this  
position in Public Record File.  
See Index Item(s) 23.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

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

DATE: JULY 15, 1987

SUBJECT: COMMENTS TO MUR 2160 - GENERAL COUNSEL'S REPORT  
SIGNED JULY 10, 1987

Attached is a copy of Commissioner Thomas's  
vote sheet with comments regarding the above-captioned matter.

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Attachment:  
copy of vote sheet

BALLOT

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: MONDAY, JULY 13, 1987 11:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEPIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, JULY 15, 1987 11:00

SUBJECT: MUR 2160 - General Counsel's Report  
Signed July 10, 1987

87 JUL 15 11:11  
COMMUNICATIONS SECTION

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- I approve the recommendation
- I object to the recommendation

COMMENTS: Letter should have referred to obligation to send penalty check.

DATE: 7/15/87 SIGNATURE [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 DATE AND TIME SHOWN ABOVE.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Republican Central Committee of	)	MUR 2160
Los Angeles County - Federal	)	
Account and Leo J. Habel, as	)	
Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 15, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2160:

1. Accept the conciliation agreement with the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer, as recommended in the General Counsel's Report signed July 10, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed July 10, 1987.

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

Attest:

7-15-87  
Date

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

Received in the Office of Commission Secretary:	Fri.,	7-10-87,	3:39
Circulated on 48 hour tally basis:	Mon.,	7-13-87,	11:00
Deadline for vote:	Wed.,	7-15-87,	11:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 17, 1987

Charles H. Bell, Jr., Esquire  
Nielsen, Hodgson, Parrinello & Mueller  
1030 Fifteenth Street, Suite 250  
Sacramento, California 95814

RE: MUR 2160  
Republican Central Committee  
of Los Angeles County -  
Federal Account and  
Leo J. Habel, as Treasurer

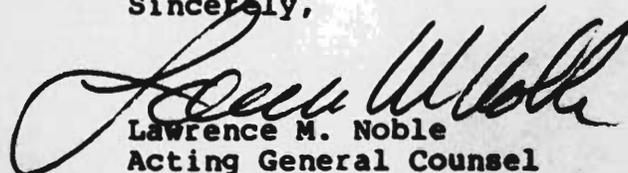
Dear Mr. Bell:

On July 15, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Republican Central Committee ) MUR 2160  
of Los Angeles County - )  
Federal Account and )  
Leo J. Habel, as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that the Republican Central Committee of Los Angeles County - Federal Account and Leo J. Habel, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i), by failing to file their April, July, and October 1984 Quarterly reports in a timely manner.

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

I. The Commission has jurisdiction over the Respondents, and the subject 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. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent the Republican Central Committee of Los Angeles County - Federal Account is a political committee established by the Republican Central Committee of Los Angeles County.

2. Respondent Leo J. Habel is the treasurer of said political committee.

3. Respondents failed to file their (1984) April, July, and October quarterly reports in a timely manner. Respondents filed a post-election report on December 10, 1984, that covered the period of activity that would have been covered by the aforesaid quarterly reports.

V. Respondents' failure to file their April, July, and October quarterly reports in a timely manner was in violation of 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Seven Hundred and Fifty Dollars (750.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

IX. Respondents 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.

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

FOR THE COMMISSION:

BY: *Lawrence M. Noble*  
Lawrence M. Noble  
Acting General Counsel

7/16/87  
Date

FOR THE RESPONDENTS:

*Charles H. Bell, Jr.*  
(Name) CHARLES H. BELL, JR.  
(Position) Legal Counsel

June 3, 1987  
Date

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

THIS IS THE END OF MUR # 2160

DATE FILMED 10/2/87 CAMERA NO. 4

CAMERAMAN GRC

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FEDERAL ELECTION COMMISSION  
WASHINGTON D C 20463

M12-21-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2160 .

93040670194

GCC # 4235

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 AUG 26 PM 1:27

CHECK NO. 13410 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2.160(Drury) AND NAME Republican Central Committee of  
Los Angeles County - Federal Accountant  
Leo J. Habel, as treasurer

WAS RECEIVED ON 8/26/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Debra A. Trimiew DATE 8/26/87

1075089

GCC # 4238

REPUBLICAN PARTY



LOS ANGELES COUNTY

511 West Mission Street, South Pasadena, California 91030 · (818) 441-5800 · Robert S. Whitmore, Jr., Chairman

August 20, 1987

Mr. Charles Snyder  
Office of General Counsel  
Federal Election Commission  
1325 K Street. NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 AUG 26 PM 1:26

RE: CASE MUR 2160

Dear Mr Snyder:

Enclosed is a check in the amount of \$750.00, pursuant to the agreement reached with our attorney Chuck Bell.

Feel free to call me at (818) 441-5806, if I can be of any assistance in this matter.

Sincerely,

*Fred T. Arjani*  
Fred T. Arjani  
Controller.

Enclosure

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