



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2237

Date Filmed 9/26/86 Camera No. --- 2

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5 Rotary clips (5); Memos from RAD - 2 copies (2);
1 Objection slips (5); 1 Staff initial of letter (2);
5 12 Day Report & Comment sheets (5);
p.3 of AC report (2) File Content Sheet (5);

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

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

Signed Patty Kelly
 Date 9/23/86



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1986

James York, Treasurer
Kilroy Industries Political
Action Committee
2250 East Imperial Highway
El Segundo, CA 90245

RE: MUR 2237
Kilroy Industries
Political Action
Committee and James York,
as treasurer

Dear Mr. York:

On September 9, 1986, the Commission found reason to believe that Kilroy Industries Political Action Committee and you, as treasurer, had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, on September 9, 1986, the Commission determined to take no further action and close its file. The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making contributions exceeding \$1,000 per election nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosure
Factual and Legal Analysis

86040513880

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Kilroy Industries Political) RAD Referral 86L-16 (2237)^M
Action Committee and)
James York, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 9, 1986, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in RAD Referral 86L-16:

1. Open a Matter Under Review (MUR).
2. Find reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the file.
3. Approve and send the factual and legal analysis attached to the General Counsel's report dated August 29, 1986.
4. Direct the Office of General Counsel to send an appropriate letter pursuant to the above actions.

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

Attest:

9-10-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

86 AUG 29 P 3: 56

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD: 86L-16
STAFF MEMBER:
Reilly

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

RESPONDENTS' NAMES: Kilroy Industries Political Action Committee
and James York, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(4)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

GENERATION OF THE MATTER

The Reports Analysis Division ("RAD") referred Kilroy Industries Political Action Committee and James York, as treasurer, ("the Committee") to the Office of the General Counsel on July 21, 1986.

SUMMARY OF ALLEGATIONS

The Committee allegedly made three \$5,000 contributions to two authorized political committees thereby exceeding the limitations of 2 U.S.C. § 441a(a)(1)(A).

FACTUAL AND LEGAL ANALYSIS

Based on a review of the Committee's 1986 April Quarterly Report, RAD determined that the Committee contributed \$10,000 to Californians for Senator Pete Wilson (\$5,000 to the 1988 primary and \$5,000 to the 1988 general) and \$5,000 to the Antonovich for Senate Committee (1986 primary). At the time of these

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contributions the Committee had been in existence for nine months, had accepted 30 contributions from 19 individuals, and had made contributions to only three political committees. The contributions in question were made in January and March of 1986, and reported on the Committee's 1986 April Quarterly Report. RAD sent the Committee a request for additional information ("RFAI") on June 4, 1986 regarding these possible excessive contributions. In response to the RFAI the Committee submitted copies of two refund checks totaling \$13,000 (\$4,000 from the Antonovich Committee, \$9,000 from the Wilson Committee). The Committee reported receiving these refunds on June 10 and 11, 1986, and noted these refunds on its 1986 July Quarterly report.

The Act permits multicandidate committees to make contributions of \$5,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(2)(A). A political committee qualifies as a multicandidate committee if it has been registered with the Commission for at least six months, has received contributions from more than 50 persons, and, except any state party organization, has made contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4). A political committee that does not meet this definition is a person within the meaning of 2 U.S.C. § 431(11). The Act limits persons to contributing \$1,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(1)(A).

In the instant case the Committee made three election contributions of \$5,000 to two authorized committees at a time

8 6 0 4 0 5 1 3 8 8 3

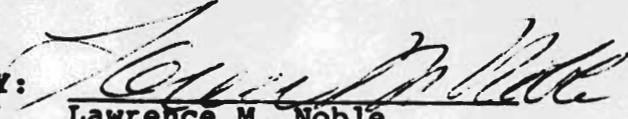
when it was restricted to contributing \$1,000 per election to such committees. Accordingly, this Office recommends that the Commission find that there is reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).^{*}/

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

3/29/91
Date

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachments

1. RAD Referral
2. Factual and Legal Analysis
3. Letter

86040513884



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

18 July 1986

MEMORANDUM

TO: CHARLES N. STEEL
 GENERAL COUNSEL

THROUGH: JOHN C. SURINA
 STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE KILROY INDUSTRIES POLITICAL ACTION
 COMMITTEE

This is a referral of the Kilroy Industries Political Action Committee ("KIPAC"). The 1986 April Quarterly Report disclosed apparent excessive contributions made by KIPAC totalling \$8,000 to the Californians for Senator Pete Wilson committee and \$4,000 to the Mike Antonovich for U.S. Senate committee prior to qualifying as a multicandidate committee. For your information

If you have any questions on this matter, please contact Tamara K. Rollins at 376-2480.

Attachment

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 July 1986

ANALYST: Tamara K. Rollins

I. COMMITTEE: Kilroy Industries Political Action
Committee (C00195495)
James York, Treasurer
2250 East Imperial Highway
El Segundo, CA 90245

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(1)(A) and
11 CFR 110.1(a)(1)

III. BACKGROUND:

Apparent Excessive Contributions Made to Federal Candidates

The 1986 April Quarterly Report filed by the Kilroy Industries Political Action Committee ("KIPAC"), disclosed two (2) \$5,000 contributions to the Californians for Senator Pete Wilson committee ("Wilson Committee") on January 10, 1986 (\$5,000 for the 1988 primary election and \$5,000 for the 1988 general election) and a \$5,000 contribution to the Mike Antonovich for U.S. Senate Committee ("Antonovich Committee")^{*/} on March 26, 1986 for the 1986 primary election (Attachment 2).

A Request for Additional Information ("RFAI") was sent to KIPAC on June 4, 1986 (Attachment 3). The RFAI advised KIPAC that an individual or political committee, other than a multicandidate committee, is prohibited from making a contribution to a candidate for federal office in excess of \$1,000 per election. KIPAC was asked to notify the recipient committees and request a refund of the amount in excess of \$1,000.

On June 10, 1986 the Reports Analysis Division ("RAD") analyst received a call from Mr. John Carlson, Vice President of Kilroy Industries (Attachment 4). Mr. Carlson asked why the Commission had sent a letter to KIPAC concerning the apparent excessive contributions. The RAD analyst stated that KIPAC had not yet reached multicandidate

^{*/} On its reports, KIPAC uses the names Mike Antonovich for U.S. Senate and Antonovich for U.S. Senate when referring to the Antonovich Committee. The registered name is Antonovich for Senate.

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**KILROY INDUSTRIES POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

status and therefore could only contribute up to \$1,000 per election, per candidate. Mr. Carlson replied that KIPAC had more than fifty-one (51) contributors and had been registered with the Commission for over a year. The RAD analyst stated that, according to Commission records, KIPAC did not have fifty-one (51) contributors and had not made contributions to at least five (5) federal candidates by the time the apparent excessive contributions were made.

On June 23, 1986, KIPAC submitted a written response to the RFAI which stated that KIPAC had requested and received "... a refund from those two candidates involved for the amount exceeding \$1,000" and that it did not realize that it had to contribute to five federal candidates prior to qualifying as a multicandidate committee (Attachment 5). KIPAC also included photocopies of a \$4,000 refund check dated June 11, 1986 from the Antonovich Committee and a \$9,000 refund check dated June 10, 1986 from the Wilson Committee. Schedule A of KIPAC's 1986 July Quarterly Report disclosed the receipt of these refunds (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
KILROY INDUSTRIES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: KILROY INDUSTRIES						NON-PARTY NON-QUALIFIED ID #C00195495
1985	REQUEST FOR ADDITIONAL INFORMATION					1 85FEC/376/0795
	STATEMENT OF ORGANIZATION			23MAY85		2 85FEC/374/2759
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUL85		3 85FEC/378/0606
	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG85		2 85FEC/386/5382
	REQUEST FOR ADDITIONAL INFORMATION 2ND					2 85FEC/378/1709
	MID-YEAR REPORT	16,350	0	1MAR85 -30JUN85		6 85FEC/386/5384
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85		1 85FEC/386/3173
	YEAR-END	5,070	177	1AUG85 -31DEC85		4 86FEC/394/0626
1986	APRIL QUARTERLY	2,225	16,000	1JAN86 -31MAR86		5 86FEC/407/1739
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86		7 86FEC/418/0944
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86		3 86FEC/416/1019
	JULY QUARTERLY	14,250	0	1APR86 -30JUN86		5 86FEC/420/0710
	TOTAL	37,895	0 16,177			41 TOTAL PAGES

(b)'

All reports except the 1986 July Quarterly Report have received review.

Ending cash-on-hand as of 6/30/86: \$21,718

Outstanding debts as of 6/30/86: \$0

ATTACHMENT 1

SCHEDULE B

ITEMIZED DISBURSEMENTS

ATTACHMENT 2

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 21

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)

Kilroy Industries Political Action Committee

C00195495

1986 April Quarterly Rpt.

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Californians for Senator Pete Wilson c/o Joyce Valdez & Associates 811 W. 7th Street, #320 Los Angeles, CA 90017	Contribution to Pete Wilson, Senate Candidate, CA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	1/10/86	\$5,000
Californians for Senator Pete Wilson c/o Joyce Valdez & Associates 811 W. 7th St., #320 Los Angeles, CA 90017	Contribution to Pete Wilson, Senate Candidate, CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	1/10/86	\$5,000
Glenn Anderson Campaign Committee P.O. Box 1426 Long Beach, CA 90801	Contribution to Glenn Anderson, House Candidate, 32nd District, CA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	2/25/86	\$1,000
Mike Antonovich for U.S. Senate c/o Hall of Administration 300 W. Temple St., #869 Los Angeles, CA 90012	Contribution to Mike Antonovich, Senate Candidate, CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	3/26/86	\$5,000
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
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
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
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
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

\$16,000

\$16,000

115)

357340717



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2
JUN 4 1986

James York, Treasurer
Kilroy Industries Political
Action Committee
2250 East Imperial Highway
El Segundo, CA 90245

Identification Number: C00195495

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. York:

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) 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 excessive contribution(s), your prompt action in obtaining a refund 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 within fifteen (15) days of the date of this letter. If you need

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ATTACHMENT 3
page 2 of 2

assistance, please feel free to contact me on our toll-free
number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Tammy Rollins

Tammy Rollins
Reports Analyst
Reports Analysis Division

86040613891

1(7)

ANALYST: Tamara Rollins

CONVERSATION WITH: John Carlson, Vice President

COMMITTEE: Kilroy Industries PAC

DATE: June 10, 1986

SUBJECT(S): Unqualified Multicandidate Status in Relation to the Excessive Contributions Made by Kilroy Industries to Principal Campaign Committees

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Mr. Carlson called to ask about the letter the Commission had sent to his committee concerning the excessive contributions Kilroy Industries PAC made to two (2) candidate committees during the April Quarterly 1986 reporting period. He stated that he did not understand why he had received the letter advising his committee to seek refunds for the excessive contributions. I stated that according to our records Kilroy Industries had not yet attained multicandidate status and therefore could only contribute \$1,000 per election. He replied that his committee had more than 51 contributors and had been registered with the Commission for over a year. I stated that according to our records Kilroy Industries did not have 51 contributors and had not made contributions to at least five (5) federal candidates prior to making the excessive contributions.

Mr. Carlson said he would provide the list of contributors and give to one (1) more federal candidate in order that his committee could qualify for multicandidate status. I advised him to seek refunds for the excessives that his committee had already made and send the Commission photocopies of the checks. He replied that he would amend his report and provide all the necessary information that the Commission had requested.

1(8)



KILROY INDUSTRIES

36 JUN 23 12:10

John G. Carlson
Vice President

June 18, 1986

Ms. Tammy Rollins
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Reference: Identification No. C00193495

Dear Ms. Rollins:

This is in response to your letter of June 4, 1986 regarding our April Quarterly Report.

Your review of our Report expressed concern about our Political Action Committee making a contribution to a candidate for Federal office in excess of \$1,000 per election since we did not yet qualify as a multi-candidate committee. In our telephone conversation you explained that to qualify as a multi-candidate committee and to contribute up to \$5,000 per candidate per election, we first had to contribute to at least five federal candidates. Therefore, per your instructions, I have asked for and received a refund from those two candidates involved for the amount exceeding \$1,000. A photocopy of these refund checks is enclosed. As I mentioned on the phone, we plan to contribute to more than five candidates for Federal office this year but I did not realize that we had to have already contributed to five before we could qualify as a multi-candidate committee and exceed the \$1,000 limit. Thank you for clarifying this for me.

In summary, we have received the refunds you requested. A photocopy of these checks and an amended Schedule B is enclosed. We will, on our next report, file the names of the five candidates for Federal office we supported, thus qualifying us as a multi-candidate committee.

(4)

Ms. Tanny Hollins
Federal Election Committee
June 10, 1966
Page Two

Again, thank you for all your assistance.

Sincerely,

John G. Carlson

John G. Carlson

Enclosures

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ANTONOVICH FOR U.S. SENATE
100 E. HARVARD, STE. 200 010-020-1100
GLENDALE, GA 0100

6006

NOV 1996

Pay to the order of KILSOY INDUSTRIES INC.

June 11 1996

\$ 4000.00

FOUR THOUSAND ONLY

DOLLARS



Valley National Bank
MEMBER FDIC
200 N. DIXIE HWY. GLENDALE, GA 01000000

Debra J. Antonovich
Robert E. Crow

FOR CONTRIBUTION REFUND

⑆006008⑆ ⑆122218657⑆ 010-122338⑆

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1(1)

MILLER/ROOS & CO.
POLITICAL REPORTING CONSULTANTS

Robert E. Miller, Jr., CPA
C. Mary Roos, CPA

RECEIVED
JUN 13 1986
John G. Carlson

June 11, 1986

Kilroy Industries Political Action Committee
2250 East Imperial Highway, #1200
El Segundo, California 90245

Re: Contribution to Californians for Senator Pete Wilson

Attention: Mr. John Carlson

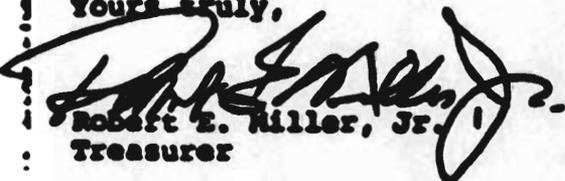
Gentlemen:

We enclose check #1960 in the amount of \$9,000 which represents a return of contribution, as you requested.

It is our understanding Kilroy Industries PAC did not qualify as a multi-candidate committee at the time the contribution was made, hence we are returning that portion which is not acceptable. As we discussed by telephone, the \$9,000 will again be contributed when the committee qualifies as a multi-candidate committee.

On behalf of Senator Pete Wilson we wish to thank you for your willingness to support his campaign effort.

Yours truly,


Robert E. Miller, Jr.
Treasurer

REN/la

11(2)

860418093996

CALIFORNIANS FOR SENATOR PETE WILSON
1200 THIRD AVE., SUITE 200
SAN DIEGO, CALIFORNIA 92101

EXPLANATION	AMOUNT

01960

PAY

The sum of 9000.00

DOLLARS

TO THE ORDER OF	DATE	DESCRIPTION	CHECK NO.	CHECK AMOUNT
<i>502</i> <i>Ch. Square Co. credit</i>				

Ch. Square Co. credit
DATE OF CHECK
NO. AND \$ CHECK - SAN DIEGO, CA 92101

John Carter

001960 61222358216 004-304053

15858480913897

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SCHEDULE A

ITEMIZED RECEIPTS

1986 JULY QUARTERLY REPORT

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit cash. Excludes from such or 11/1/85.

NAME OF COMMITTEE (in Full)
Kilroy Industries Political Action Committee C80195495

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 86034200713

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Californians for Senator Pete Wilson 1200 Third Avenue, Suite 700 San Diego, California 92101	Not Applicable	6/10/86	\$9,000
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Refund of Contribution	Occupation	Aggregate Year-to-Date > \$ 9,000	
Antonovich for U.S. Senate 109 East Harvard, Suite 200 Glendale, California 91205	Not Applicable	6/11/86	\$4,000
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Refund of Contribution	Occupation	Aggregate Year-to-Date > \$ 4,000	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL	11(4)	\$13,000
TOTAL		\$13,000

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____
STAFF MEMBER & TEL. NO.
Patty Reilly
(202) 376-8200

RESPONDENTS: Kilroy Industries Political Action Committee and
James York, as treasurer

SUMMARY OF ALLEGATIONS

It is alleged that Kilroy Industries Political Action Committee and James York, as treasurer, ("the Committee") made three \$5,000 contributions to two political committees thereby exceeding the limitations of 2 U.S.C. § 441a(a)(1)(A).

FACTUAL BASIS AND LEGAL ANALYSIS

Based on a review of the Committee's 1986 April Quarterly Report, the Commission's Reports Analysis Division ("RAD") determined that the Committee contributed \$10,000 to Californians for Senator Pete Wilson (\$5,000 to the 1988 primary and \$5,000 to the 1988 general) and \$5,000 to the Antonovich for Senate Committee (1986 primary). At the time of these contributions the Committee had been in existence for nine months, had accepted 30 contributions from 19 individuals, and had made contributions to only three political committees. The contributions in question were made in January and March of 1986, and reported on the Committee's 1986 April Quarterly Report. RAD sent the Committee a request for additional information ("RFAI") on June 4, 1986 regarding these possible excessive contributions. In response to the RFAI the Committee submitted copies of two refund checks totaling \$13,000 (\$4,000 from the Antonovich Committee, \$9,000

ATTACHMENT # 2(1)

86040513899

from the Wilson Committee). The Committee reported receiving these refunds on June 10 and 11, 1986 and noted these refunds on its 1986 July Quarterly report.

The Act permits multicandidate committees to make contributions of \$5,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(2)(A). A political committee qualifies as a multicandidate committee if it has registered with the Commission for at least six months, has received contributions from more than 50 persons, and except any state party organization, has made contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4). A political committee that does not meet this definition is a person within the meaning of 2 U.S.C. § 431(11). The Act limits persons to contributing \$1,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(1)(A).

In the instant case the Committee made three election contributions of \$5,000 to two authorized committees at a time when it was restricted to contributing \$1,000 per election to such committees. Accordingly, this Office recommends that the Commission find that there is reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).

86040513900



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**James York, Treasurer
Kilroy Industries Political Action Committee
2250 East Imperial Highway
El Segundo, California 90245**

**RE: MUR
Kilroy Industries Political
Action Committee and James
York, as treasurer**

Dear Mr. York:

On _____, 1986, the Federal Election Commission determined that there is reason to believe the Kilroy Industries Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. Statements should be submitted under oath.

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

ATTACHMENT # 3(1)

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that it may complete its investigation of the matter. Further, 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 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 Patty Reilly, attorney 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

86040513902



FEDERAL ELECTION COMMISSION
 WASHINGTON, D C 20463

18 July 1986

MEMORANDUM

TO: CHARLES N. STEEL
 GENERAL COUNSEL

THROUGH: JOHN C. SURINA
 STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE KILROY INDUSTRIES POLITICAL ACTION
 COMMITTEE

This is a referral of the Kilroy Industries Political Action Committee ("KIPAC"). The 1986 April Quarterly Report disclosed apparent excessive contributions made by KIPAC totalling \$8,000 to the Californians for Senator Pete Wilson committee and \$4,000 to the Mike Antonovich for U.S. Senate committee prior to qualifying as a multicandidate committee. For your information

 If you have any questions on this matter, please contact Tamara K. Rollins at 376-2480.

Attachment

86040513903

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 18 July 1986

ANALYST: Tamara K. Rollins

I. COMMITTEE: Kilroy Industries Political Action
Committee (C00195495)
James York, Treasurer
2250 East Imperial Highway
El Segundo, CA 90245

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(1)(A) and
11 CFR 110.1(a)(1)

III. BACKGROUND:

Apparent Excessive Contributions Made to Federal Candidates

The 1986 April Quarterly Report filed by the Kilroy Industries Political Action Committee ("KIPAC"), disclosed two (2) \$5,000 contributions to the Californians for Senator Pete Wilson committee ("Wilson Committee") on January 10, 1986 (\$5,000 for the 1988 primary election and \$5,000 for the 1988 general election) and a \$5,000 contribution to the Mike Antonovich for U.S. Senate Committee ("Antonovich Committee")^{*/} on March 26, 1986 for the 1986 primary election (Attachment 2).

A Request for Additional Information ("RFAI") was sent to KIPAC on June 4, 1986 (Attachment 3). The RFAI advised KIPAC that an individual or political committee, other than a multicandidate committee, is prohibited from making a contribution to a candidate for federal office in excess of \$1,000 per election. KIPAC was asked to notify the recipient committees and request a refund of the amount in excess of \$1,000.

On June 10, 1986 the Reports Analysis Division ("RAD") analyst received a call from Mr. John Carlson, Vice President of Kilroy Industries (Attachment 4). Mr. Carlson asked why the Commission had sent a letter to KIPAC concerning the apparent excessive contributions. The RAD analyst stated that KIPAC had not yet reached multicandidate

^{*/} On its reports, KIPAC uses the names Mike Antonovich for U.S. Senate and Antonovich for U.S. Senate when referring to the Antonovich Committee. The registered name is Antonovich for Senate.

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**KILROY INDUSTRIES POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

status and therefore could only contribute up to \$1,000 per election, per candidate. Mr. Carlson replied that KIPAC had more than fifty-one (51) contributors and had been registered with the Commission for over a year. The RAD analyst stated that, according to Commission records, KIPAC did not have fifty-one (51) contributors and had not made contributions to at least five (5) federal candidates by the time the apparent excessive contributions were made.

On June 23, 1986, KIPAC submitted a written response to the RFAI which stated that KIPAC had requested and received "... a refund from those two candidates involved for the amount exceeding \$1,000" and that it did not realize that it had to contribute to five federal candidates prior to qualifying as a multicandidate committee (Attachment 5). KIPAC also included photocopies of a \$4,000 refund check dated June 11, 1986 from the Antonovich Committee and a \$9,000 refund check dated June 10, 1986 from the Wilson Committee. Schedule A of KIPAC's 1986 July Quarterly Report disclosed the receipt of these refunds (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
KILROY INDUSTRIES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: KILROY INDUSTRIES						NON-PARTY NON-QUALIFIED ID #C00195495
1985	REQUEST FOR ADDITIONAL INFORMATION			23MAY85	1	85FEC/376/0795
	STATEMENT OF ORGANIZATION			11JUL85	2	85FEC/374/2759
	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG85	3	85FEC/378/0606
	STATEMENT OF ORGANIZATION - AMENDMENT				2	85FEC/386/5382
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	85FEC/378/1709
	MID-YEAR REPORT	16,350	0	1MARS -30JUN85	6	85FEC/386/5384
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3175
	YEAR-END	5,070	177	1AUG85 -31DEC85	4	86FEC/394/6626
1986	APRIL QUARTERLY	2,225	16,000	1JAN86 -31MARS86	5	86FEC/407/1739
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MARS86	7	86FEC/410/0944
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MARS86	3	86FEC/416/1019
	JULY QUARTERLY	14,250	0	1APR86 -30JUN86	5	86FEC/420/0710
	TOTAL	37,895	0	16,177	0	41 TOTAL PAGES

All reports except the 1986 July Quarterly Report have received review.

Ending cash-on-hand as of 6/30/86: \$21,718

Outstanding debts as of 6/30/86: \$0

SCHEDULE B

ITEMIZED DISBURSEMENTS

ATTACHMENT 2

Use separate sheet for each category of the Detailed Summary Page	PAGE	OF
	1	1
FOR LINE NUMBER		
21		

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)

Kilroy Industries Political Action Committee

C00195495

1986 April Quarterly Rpt.

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Californians for Senator Pete Wilson c/o Joyce Valdez & Associates 811 W. 7th Street, #320 Los Angeles, CA 90017	Contribution to Pete Wilson, Senate Candidate, CA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1988	1/10/86	\$5,000
Californians for Senator Pete Wilson c/o Joyce Valdez & Associates 811 W. 7th St., #320 Los Angeles, CA 90017	Contribution to Pete Wilson, Senate Candidate, CA Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) 1988	1/10/86	\$5,000
Glenn Anderson Campaign Committee P.O. Box 1426 Long Beach, CA 90801	Contribution to Glenn Anderson, House Candidate, 32nd District, CA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	2/25/86	\$1,000
Mike Antonovich for U.S. Senate c/o Hall of Administration 500 W. Temple St., #869 Los Angeles, CA 90012	Contribution to Mike Antonovich, Senate Candidate, CA Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 1986	3/26/86	\$5,000
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
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
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
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
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			\$16,000
TOTAL			\$16,000

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 3
page 1 of 2

RQ-2
JUN 4 1986

James York, Treasurer
Kilroy Industries Political
Action Committee
2250 East Imperial Highway
El Segundo, CA 90245

Identification Number: C00195495

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. York:

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) 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 excessive contribution(s), your prompt action in obtaining a refund 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 within fifteen (15) days of the date of this letter. If you need

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assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Tanny Rollins

Tanny Rollins
Reports Analyst
Reports Analysis Division

86040513909

ANALYST: Tamara Rollins

CONVERSATION WITH: John Carlson, Vice President

COMMITTEE: Kilroy Industries PAC

DATE: June 10, 1986

SUBJECT(S): Unqualified Multicandidate Status in Relation to the Excessive Contributions Made by Kilroy Industries to Principal Campaign Committees

Mr. Carlson called to ask about the letter the Commission had sent to his committee concerning the excessive contributions Kilroy Industries PAC made to two (2) candidate committees during the April Quarterly 1986 reporting period. He stated that he did not understand why he had received the letter advising his committee to seek refunds for the excessive contributions. I stated that according to our records Kilroy Industries had not yet attained multicandidate status and therefore could only contribute \$1,000 per election. He replied that his committee had more than 51 contributors and had been registered with the Commission for over a year. I stated that according to our records Kilroy Industries did not have 51 contributors and had not made contributions to at least five (5) federal candidates prior to making the excessive contributions.

Mr. Carlson said he would provide the list of contributors and give to one (1) more federal candidate in order that his committee could qualify for multicandidate status. I advised him to seek refunds for the excessives that his committee had already made and send the Commission photocopies of the checks. He replied that he would amend his report and provide all the necessary information that the Commission had requested.

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KILROY INDUSTRIES

REC
26 JUN 86 12:10

John G. Carlson
Vice President

June 18, 1986

Ms. Tammy Rollins
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Reference: Identification No. C00195495

Dear Ms. Rollins:

This is in response to your letter of June 4, 1986 regarding our April Quarterly Report.

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Your review of our Report expressed concern about our Political Action Committee making a contribution to a candidate for Federal office in excess of \$1,000 per election since we did not yet qualify as a multi-candidate committee. In our telephone conversation you explained that to qualify as a multi-candidate committee and to contribute up to \$5,000 per candidate per election, we first had to contribute to at least five federal candidates. Therefore, per your instructions, I have asked for and received a refund from those two candidates involved for the amount exceeding \$1,000. A photocopy of these refund checks is enclosed. As I mentioned on the phone, we plan to contribute to more than five candidates for Federal office this year but I did not realize that we had to have already contributed to five before we could qualify as a multi-candidate committee and exceed the \$1,000 limit. Thank you for clarifying this for me.

In summary, we have received the refunds you requested. A photocopy of these checks and an amended Schedule B is enclosed. We will, on our next report, file the names of the five candidates for Federal office we supported, thus qualifying us as a multi-candidate committee.

ANTONOVICH FOR U.S. SENATE
100 E. HARVARD, STE. 200 410-222-1100
DUNEDIN, FL 33525

6008

100-1227

June 11, 2006

PAY TO THE ORDER OF KILBOY INDUSTRIES INC.

\$ 4000.00

FIVE THOUSAND ONLY

DOLLARS

 Valley National Bank
MEMBER FDIC
200 N. GARDNER ST., DUNEDIN, FL 33525

Debbie Lepore
Robert E. Crow

FOR CONTRIBUTION REIMB

⑆000008⑆ 41222186576 010-222338⑆

86040513913
367241909:7

MILLER/ROOS & CO.
POLITICAL REPORTING CONSULTANTS

Robert E. Miller, Jr., CPA
C. Mary Roos, CPA

RECEIVED
JUN 13 1986
John G. Carlson

June 11, 1986

Kilroy Industries Political Action Committee
2250 East Imperial Highway, #1200
El Segundo, California 90245

Re: Contribution to Californians for Senator Pete Wilson

Attention: Mr. John Carlson

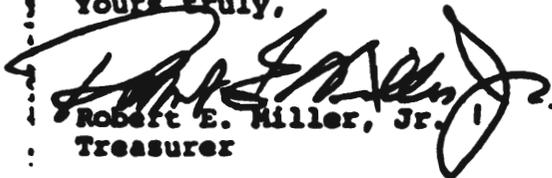
Gentlemen:

We enclose check #1960 in the amount of \$9,000 which represents a return of contribution, as you requested.

It is our understanding Kilroy Industries PAC did not qualify as a multi-candidate committee at the time the contribution was made, hence we are returning that portion which is not acceptable. As we discussed by telephone, the \$9,000 will again be contributed when the committee qualifies as a multi-candidate committee.

On behalf of Senator Pete Wilson we wish to thank you for your willingness to support his campaign effort.

Yours truly,


Robert E. Miller, Jr.
Treasurer

REN/la

860410501914
861341R0949

CALIFORNIANS FOR SENATOR PETE WILSON
1200 THIRD AVE., SUITE 700
SAN DIEGO, CALIFORNIA 92101

EXPLANATION	AMOUNT

01960

PAY TO THE ORDER OF *The sum of 9000.00 Dols.*

DOLLARS

TO THE ORDER OF	DATE	DESCRIPTION	CHECK NO.	CHECK AMOUNT
<i>Kelley Industries All California</i>	<i>4/16</i>	<i>State of Calif.</i>	<i>1112</i>	<i>9000.00</i>

*2350 E. Imperial Highway
Chico, CA 95926*

STATE OF CALIFORNIA
San Jose & Fresno - San Diego, San Bernardino

Attn: John Carlson

⑆001960⑆ ⑆122235821⑆ 004-304063⑆

15 219 08140809

SCHEDULE A

ITEMIZED RECEIPTS

1986 JULY QUARTERLY REPORT

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 16

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

NAME OF COMMITTEE (in Full)

Kilroy Industries Political Action Committee

C00195495

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Californians for Senator Pete Wilson 1200 Third Avenue, Suite 700 San Diego, California 92101	Not Applicable	6/10/86	\$9,000
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Refund of Contribution	Occupation	Aggregate Year-to-Date > \$ 9,000	
B. Full Name, Mailing Address and ZIP Code Antonovich for U.S. Senate 109 East Harvard, Suite 200 Glendale, California 91205	Not Applicable	6/11/86	\$4,000
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Refund of Contribution	Occupation	Aggregate Year-to-Date > \$ 4,000	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

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86034200713

SUBTOTAL

\$13,000

TOTAL

\$13,000

86040513917



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2237

Date Filmed 9/26/86 Camera No. --- 2

Cameraman AS