FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2261

DATE FILMED 2/13/87 CAMERA NO. 4

CAMERAMAN AS

3 7 1 1 1 7 3 3

FEDERAL ELECTION COMMISSION

Internal Memoranda, Duplicate copies

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):

____	(1) Classified Information	____	(6) Personal privacy
✓	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed Frances B. Hagan

date 2 6-84

FEC 9-21-77

plem

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 30, 1986

Maryann Norris, Treasurer
Norris for Congress
215 Palisades Drive
Santa Barbara, CA 93109-1943

RE: MUR 2261
Norris for Congress Committee
Maryann Norris, as treasurer

Dear Ms. Norris:

On October 10, 1986, the Commission notified the Norris for Congress Committee and its treasurer of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on December 18, 1986, determined that on the basis of the information in the complaint, and information provided by your committee, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

cc: Mr. Wayne Norris

plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 30, 1986

Gwen Tillemans, Chairman
Committee to Re-elect Lagomarsino
to Congress
P.O. Box 23
Santa Barbara, CA 93102

Re: MUR 2261

Dear Ms. Tillemans:

The Federal Election Commission reviewed the allegations of your complaint dated October 7, 1986, and determined that on the basis of the information provided in your complaint and information provided by the Respondents, there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 30, 1986

Mr. Wayne Norris
Norris for Congress
215 Palisades Drive
Santa Barbara, CA 93109-1943

RE: MUR 2261
Wayne Norris

Dear Mr. Norris:

On October 10, 1986, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on December 18, 1986, determined that on the basis of the information in the complaint, and information you provided, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2261
Wayne B. Norris	)	
Norris for Congress Committee	)	
Maryann Norris, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 18, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2261:

1. Find no reason to believe that the Norris for Congress Committee and Maryann Norris, as treasurer, violated 2 U.S.C. § 441d.

2. Find no reason to believe that Wayne Norris violated 2 U.S.C. § 441d.

3. Close the file.

4. Send the letters, as recommended in the General Counsel's Report signed December 15, 1986.

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

Attest:

12-18-86
Date

Cheryl A. Flemming
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	12-16-86,	10:49
Circulated on 48 hour tally basis:	Tues.,	12-16-86,	4:00
Deadline for vote:	Thurs.,	12-18-86,	4:00

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Wayne B. Norris	)	MUR 2261
Norris for Congress Committee	)	
Maryann Norris, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The complaint filed in this matter alleged that Respondents violated 2 U.S.C. § 441d by failing to identify in campaign advertisements the persons who paid for the communication. This matter was initially reported to the Commission in a Expedited First General Counsel's Report.

Complainant provided copies of two small newspaper advertisements without disclaimers that apparently appeared May 29 and June 3, 1986. The California primary was held June 3, 1986. Complainant also alleged that the disclaimer was omitted from "political matter obtained during the Santa Barbara County Fair at the Democratic Headquarters Booth July 25, 1986, (wooden nickel)."

In response to the complaint, Candidate Wayne Norris stated that at the time the two ads were placed, he had not reached the $5,000 threshold for candidate status and "Since I was not a "candidate" under the meaning of the Act, I did not read the booklet on the Act before the primary election; I simply did not think it applied to me until I was a "candidate." The candidate stated that one ad in question cost $104.16 and the other $42.35.

Mr. Norris stated that the wooden nickels, bearing the inscription "It's time for a change - Norris for Congress - A new

kind of Democrat," were ordered by phone from a novelty company. He asserted that they do not require a disclaimer "because the FEC booklet specifically excludes 'Bumper stickers, pins, buttons or similar small items.'" Mr. Norris also provided a September 6, 1986, advertisement which included the "Paid for by the Norris for Congress Committee" disclaimer.

II. FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441d states that whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any . . . direct mailing . . ., such communication if paid for and authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee, or (2) if paid for by other persons but authorized by a candidate, an authorized political committee of the candidate or its agents, shall clearly state that the communication is paid for by such other persons and authorized by such committee.

2 U.S.C. § 431(2) defines the term "candidate" as an individual who seeks nomination or election to federal office and that an individual shall be deemed to seek nomination or election if such individual has received contributions aggregating in excess of $5,000 or has made expenditures aggregating in excess of $5,000 or if such individual has given consent to another

person to receive contributions or make expenditures and those receipts or expenditures have exceeded $5,000.

11 C.F.R. § 110.11(a)(2) states that the disclaimer requirements do not apply to bumper stickers, pins, buttons, pens and similar small items upon which the disclaimer cannot be conveniently printed.

Copies of two Norris for Congress ads did not include a disclaimer when they appeared in newspapers on or before the June 3, 1986 California primary election. However, according to the Committee's reports subsequently filed with Commission, and based on the RAD analyst's initial review, it appears that Wayne Norris had not raised or spent $5,000 by the primary date in pursuit of his successful bid for the Democratic nomination. Because the disclaimer provisions of the satute and regulations specifically apply to communications "expressly advocating the election or defeat of a clearly identified candidate ..." (emphasis added), and because at the time of the ads in question Mr. Norris did not qualify as a candidate under the Act, the Office of General Counsel is recommending that the Commission find that no violation of 2 U.S.C. § 441d occurred. As to the "wooden nickels," this Office notes that they may be characterized as "small items upon which the disclaimer cannot be conveniently printed" and are, therefore, exempted from the disclaimer requirement. See 11 C.F.R. § 110.11(a)(2).

The candidate requested pre-probable cause conciliation should the Commission decide to pursue the matter. Because the General Counsel's Office recommends that the Commission find no reason to believe a violation occurred, this Office makes no recommendation regarding that request.

III. RECOMMENDATION

1. Find no reason to believe that the Norris for Congress Committee and Maryann Norris, as treasurer, violated 2 U.S.C. § 441d.

2. Find no reason to believe that Wayne Norris violated 2 U.S.C. § 441d.

3. Close the file.

4. Send the attached letters.

Charles N. Steele
General Counsel

12/15/86
Date

BY: Lawrence M. Noble
Lawrence M. Noble
Deputy General Counsel

Attachments
Letter from Respondents
Letter to Respondents and Complainant

2704043

SENSITIVE

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

EXPEDITED FIRST GENERAL COUNSEL'S REPORT

RESPONDENTS: Wayne B. Norris
Norris for Congress Committee
Elliot Scholz, as treasurer

MUR NO.: 2261
DATE TRANSMITTED TO COMMISSION: 10-9-86
STAFF: Frances B. Hagan

COMPLAINANT: Gwen Tillemans

SUMMARY OF ALLEGATIONS

Complainant alleges that Respondents violated 2 U.S.C. § 441d by failing to identify in campaign advertisements the persons who paid for the communication.

PRELIMINARY LEGAL ANALYSIS

The Office of the General Counsel's initial review of the complaint indicates that a violation of 2 U.S.C. § 441d may have occurred in that the disclaimer statement does not appear on the Respondents' ads provided by the complainant. Therefore, the Respondents must be given the opportunity to respond to the allegation before the Office of the General Counsel can make recommendations regarding this matter.

Charles N. Steele
General Counsel

Date 10/9/86

BY: Lawrence M. Noble
Deputy General Counsel

OCT 9 P12:56

NORRIS FOR CONGRESS

215 Palisades Drive, Santa Barbara, CA 93109-1943
805-962-7703

GCC 1884

86 OCT 30 P12:00

86 OCT 30 P12:24

26 OCTOBER 1986

Ms. Frances B. Hagen
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2261

Dear Ms. Hagen,

This letter is in response to the matter discussed in the letter received by us on 14 October, 1986, bearing a date of 10 October 1986, pertaining to the MUR case number cited above. The following are point-by-point discussions of the issues of the case:

IDENTITY OF TREASURER

Our office received two identical letters. One was addressed to Elliott Scholz, who was the campaign treasurer from the date of registration of the Norris for Congress committee, August 14, 1986, until October 15, 1986, when Maryann Norris took over the treasurer's job. Since all three of the allegations refer to actions which occurred before Mr. Scholz was associated with the Committee, his name should be dropped from the case.

UNIDENTIFIED ITEM

Both of the letters we received contained a copy of an amendment to my Candidate's Financial Disclosure Statement. However, the amendment was not referenced anywhere in the remainder of the document, and we do not know how to respond to its presence.

ORGANIZATION AT THE TIME OF THE INCIDENTS

All three of the allegations refer to actions which occurred during the primary election campaign. At that time, the total amount of money raised ($3846.34) and spent ($3773.72) was under $5000.00, and thus, I did not qualify as a "Candidate", under the meaning of the Act. The Norris for Congress Committee, as such, was not in existence at that time, and the only people working on the campaign at the time were myself and a friend, Jim Price, who is an unemployed oilfield diver from Louisiana. (My wife was not working on it at the time, either.) Although Jim was nominally my "campaign manager", I effectively controlled all monies, and made all major decisions. Thus, any improper actions were all mine, as there was no committee at the time, and, as far as I know, no legal reason for there to be one.

LEGAL KNOWLEDGE OF THE PARTICIPANTS

Since I was not a "Candidate" under the meaning of the Act, I did not read the booklet on the Act before the primary election; I simply did not think that it applied to me until I was a "Candidate". I knew that there were State laws governing both printed and broadcast material, but I had been assured by either a radio or newspaper salesperson (I don't remember which!) that the State laws applied only to State and local candidates, and that there were no similar laws

governing Federal elections. In any case, I did not know that the Act regulated advertising as well as monetary reporting. (In all fairness, I assumed there were laws on advertising somewhere, but I also assumed they were mostly codifications of truth-in-advertising principles, which I was obviously observing anyway!) In the final analysis, there WAS no "Norris for Congress" committee at the time -- there was just myself and a friend! The vast majority of the money spent was my own ($1860.38) or a contribution from my parents ($800)!

Unfortunately, we have never had any professional legal help from anyone, especially Democratic Party Committees. Our local Central Committee is totally ineffective; I recently read that they only had $250.00 in their treasury. My own committee has had no money for legal help -- or for any other type of paid professional help, for that matter, either. Although our elected State officials are both Democrats, there has been no Democratic federal officeholder from this district in 40 years or more, so there is no real local expertise.

I am a physicist by profession, unfortunately not a lawyer. My pregnant wife has been partially disabled by exposure to chemicals during her career as a research chemist, and she cannot work. So I am not financially able to quit my job or take a leave of absence during the campaign. As a result, the smallest number of hours I have worked at my job during a week of campaigning has been about 32, with the rest being made up from vacation time. As you can imagine, reading the legal requirements has been a challenging task, although I managed to do it after I became a candidate.

SPECIFICS OF THE ACTIONS

As the time of the primary election approached, and we began running ads, we were told by print advertisers that "Paid for..." lines were required for their papers, so we dreamed up the name "Norris for Congress", with the intention of keeping the name when we formed the committee. Up to the time we received the letter, I was under the impression that all our ads had the "Paid for..." line. After I spoke to you, Jim and I tried to remember the facts of how we placed the ads, but we were not confident of our recollections.

The one thing of which we are certain is that the ad in the Santa Barbara Weekly, which cost $104.16, was placed over the phone; we did not have the capability to do typesetting in the ornate typeface of the ad. In addition, the photo is an older one that they evidently had lying around from stock. Since it was placed over the phone, we are not sure whether or not we discussed the "Paid for..." line with the copy person.

The ad in the Oxnard Press Courier, which cost $42.35, was typeset by us, and so I am personally responsible for that. We tried to remember whether or not we discussed having the Press Courier add a "Paid for..." line, and we cannot; the likelihood, however, is that we did not.

The wooden nickels were ordered over the phone from a novelty company, who said we didn't need a "Paid for..." line. We do not think we need one, either, because the FEC booklet specifically excludes "Bumper stickers, pins, buttons or similar small items". We have included samples of the wooden nickels.

RECENT ACTIONS

When I was elected in the primary, and then exceeded the $5000 limit, I read the materials accompanying the FEC package, and have, of course, complied with the advertisement requirements. Enclosed is a copy of the only ad we have run since that time.

SUMMARY

There is no question that the two newspaper ads are in violation of the Act. We do not feel that the wooden nickels were in violation, however.

Obviously, no one, including myself, violated the Act intentionally. As a former computer programmer, aircraft flight instructor, and owner of an FAA-approved charter airline, I'm actually a bit of a stickler for fine details in the law; this is a highly embarassing situation for me personally -- the kind I strove to avoid in the past, and continue striving to avoid. It's a little like discovering -- after you land -- that the gas cap on your airplane was left off!

Also, of course, I have re-run the last 6 months thru my mind many times to try to figure out if I were grossly negligent in not looking in the right place to FIND the law. Being as fair as I can, I don't see that I was grossly negligent; obviously, I should have read every single page that crossed my desk, but that simply wasn't possible. So I read the things that looked like they had the highest priority or carried the greatest risk of "gotcha's"; when I got to the part in the FEC manual about the $5000.00, I stopped reading, putting it off until I crossed the threshhold.

I take some comfort in the fact that, at least, there was nothing done which could possibly influence the present election. The newspapers were both small-circulation, local publications, the ads themselves were small, and each ad ran only once. Then, too, I was not running against my current opponent -- I was one of three candidates in a Democratic primary, which I won handily, largely due to name recognition from a prior race and from civic work. My opponent, a six-term incumbent, has over $300,000 to spend in the race. I will probably spend under $15,000, of which nearly $6000 will be my own money (thank you, MasterCard!)

Your office, and the Commission, must now do what you have to do. The above information is as complete, pertinent, and helpful as I can make it. If you need any clarification, please let me know.

Under the circumstances, I would like to request a conciliation in this matter. It would seem that there is no reason to belabor the point.

ENCL:

WAYNE B. NORRIS

g from clothes hangers to ballpoint pens.
ved success with a series of emergency
ures that froze prices and the exchange rate
ries for the lowest-paid workers. Protec-
favor national industry boosted the produc-
er goods. As a result, inflation was slashed
percent it reached at the end of Belaúnde's
ent.

has stabilized the economy, but critics say
hese measures were needed, they can't last in-
there is no coherent medium- or long-term
The prices of Peru's traditional exports—
ar, copper, gold and silver—have fallen
ere is no thought given to converting to
A Westerner working in the area of interna-
nent said, "They say it's the fault of the
imperialists, but they have no idea of how to
omy, no strategy of a new position for Peru
national economy."

e foreign investment here; the government
ned by debt payments and by more than 175
s, most of which lose money as a result of
l corruption. The business class prefers to
ick profits to send abroad. Companies' lines
oreign banks are drying up. At the moment,
a does have the support of most of the busi-
, which appreciates the success of his initial
ees no alternative leadership.

r policy has been mixed. He doubled the
to $42 a month and expanded social security
-labor law was enacted with APRA's sup-
for job security after three months' work,
wing firing for cause. At the same time, a
hortened the negotiation period. By making
tly to management, the law encourages
tration, thus reducing unions' clout. An-
allows large firms to hire nonunion part-
added shifts, also weakening the unions.
claim to fame, his declaration that he will
an 10 percent of export earnings in foreign
s been disputed here, though recent pay-
ot to have been much above the limit. The
ther he has broken his campaign promise is
ve because the figures depend on what kind
system is used and what is included in
. Last year's exports of approximately
expected to drop because of the loss in oil

has made a $250 million payment to the
Inter-American Development Bank—a ne-
to get more loans—and two $35 million
e International Monetary Fund; he had
M.F. $157 million more, which would have
ayments substantially and which Peru says
paid. Peru must also pay bilateral debts;
Soviet Union has been in kind. In July,
that foreign companies must keep their
r two years to promote the national
economy. In August, he ordered private companies to stop payments to foreign banks on medium- and long-term loans totaling $1.5 billion for at least two years. They are current on short-term payments.

The view in Washington is that the economy is not going to collapse; it's a subsistence economy, and people are subsisting. Yet the Reagan Administration has overreacted to García's anti-imperialist rhetoric. "A lot of people in Washington would like to see García fail," said an American observer. He said that "foot-dragging in Washington with respect to disbursements of foreign aid" almost caused Peru to run afoul of the Brooke-Alexander amendment, which bans dispensing new funds to countries in arrears for more than a year on loan payments to the United States. However, Peru

Sep 6(?) 1986

PROGRESSIVE DEMOCRATIC CANDIDATE...

WAYNE B. NORRIS

SEEKS YOUR HELP TO UNSEAT

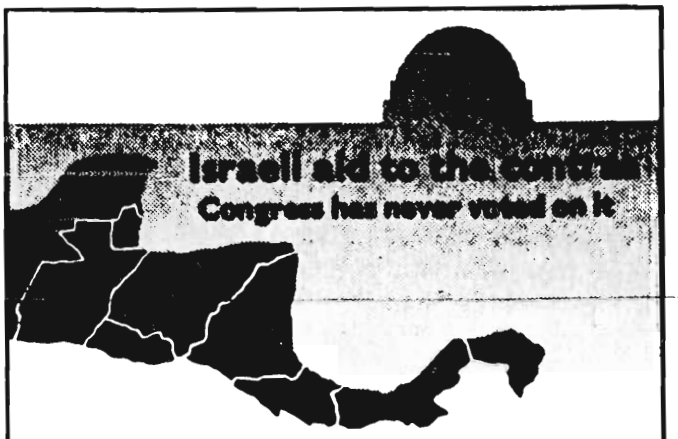
ROBERT LAGOMARSINO, right-wing congressperson from Ronald Reagan's home district, the 19th of California. Santa Barbara/Ventura Counties.

COMPARE	NORRIS	LAGOMARSINO
Occupation	Physicist, Author, Educator	Incumbent, Attorney
ERA	Supports	Opposed
Military Contra Aid	Opposes	Supported
S. Africa Sanctions	Supports	Opposed
Nuclear Test Ban	Supports	Opposed

Please Send Campaign Contributions to
Norris for Congress
Elliott Scholz, Treasurer
215 Palisades Drive
Santa Barbara, CA 93109-1943
805.962-7203

Position Papers Sent on Request
Endorsed by Labor, Environmental, Seniors, and Women's Groups

Paid for by the Norris for Congress Committee



yet every time Congress has voted down contra aid, Israel has increased its involvement with the contras. Since the late '70s Israel's presence in Central America has followed the same seesaw pattern, supplying Guatemala, El Salvador, Somoza and his heirs, the contras, whatever the US denies.

Israeli Foreign Affairs, an independent monthly report, provides fully documented coverage of Israel's diplomatic and military activities beyond the Middle East for a growing number of readers determined to keep US policy from getting away from us.

$20 brings you a year of Israeli Foreign Affairs. Or send $2 for a sample issue to Israeli Foreign Affairs, 5825 Telegraph Avenue, #34F, Oakland, CA 94609.

Institutions $35. Overseas add $6. $10 air mail. Back issues available.

NORRIS FOR CONGRESS

215 Palisades Drive, Santa Barbara, CA 93109-1943
805-962-7703

87140741204

Plum

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gwen Tillemans, Chairman
Committee To Re-elect Lagomarsino To Congress
PO Box 23
Santa Barbara, CA 93102

RE: MUR 2261

Dear Ms. Tillemans:

This letter is to acknowledge receipt of your complaint of October 7, 1986, against Mr. Wayne B. Norris, and Norris For Congress and Mr. Elliot Scholz, as treasurer, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless the respondent notifies the Commission in writing that they wish the matter to be made public.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure

Alm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1986

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Mr. Wayne B. Norris
215 Palisades Drive
Santa Barbara, CA 93109

RE: MUR 2261

Dear Mr. Norris:

This letter is to notify you that on October 7, 1986, the Federal Election Commission received a complaint which alleges that you have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2261. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in connection with this matter. You may respond to the allegations made against you within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid, special delivery envelope.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission.

If you have any questions, please contact Frances B. Hagan, the staff person assigned to this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Complaint
Procedures
Envelope

Plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1986

SPECIAL DELIVERY
RETURN RECEIPT REQUESTED

Elliot Scholz, Treasurer
Norris For Congress
215 Palisades Drive
Santa Barbara, CA 93109-1943

RE: MUR 2261

Dear Mr. Scholz:

This letter is to notify you that on October 7, 1986, the Federal Election Commission received a complaint which alleges that Norris For Congress and you, as treasurer, have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2261. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and Norris For Congress in connection with this matter. You may respond to the allegations made against you and Norris For Congress within 15 days of receipt of this letter. The complaint may be dismissed by the Commission prior to receipt of the response if the alleged violations are not under the jurisdiction of the Commission or if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by mailgram. If no response is filed within the 15 day statutory requirement, the Commission may take further action based on available information.

You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response to this notification, we have enclosed a pre-addressed, postage paid special delivery envelope.

Please submit any factual or legal materials w
believe are relevant to the Commission's analysis of
Where appropriate, statements should be submitted

This matter will remain 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 matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission.

If you have any questions, please contact Frances B. Hagan, the staff person assigned to this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Complaint
Procedures
Envelope

GCC#1700

RECEIVED AT THE FEC
86 OCT 7 P12:02

RE-ELECT Lagomarsino TO CONGRESS

RECEIVED
86 OCT 7 P4:29

September 29, 1986

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Elections Comission
Washington D.C. 20463

Dear Mr. Noble:

My name is Gwen Tillemans and I reside at 648 E. Hemlock in Oxnard California 93030. My phone number is (805) 483-1907. I serve as the chair of the Committee to Re-Elect Congressman Bob Lagomarsino.

This letter is being sent to serve as a formal complaint under Federal Elections laws that the democratic nominee in this race, Mr. Wayne B. Norris of 215 Palisades Drive in Santa Barbara, California 93109, is in violation of USC 4441 d 11CFR 110.11(a) by not identifying the person or persons responsible for advertisements and publications. Copies of the publications are included to support this complaint. They are as follows:

paid advertisement in the Oxnard Press Courier, June 3, 1986.
paid advertisement in the Santa Barbara Weekly, May 29, 1986
paid political matter obtained during the Santa Barbara County Fair at the Democratic Headquarters Booth July 25, 1986. (wooden nickel)

These materials were obtained in public and available to the general public without charge.

I do hereby swere that the information contained is true to the best of my knowledge and I sworn before the listed notary public. I may be contacted through the address listed below should you have any additional questions.

Gwen Tillemans
Chairman

P. O. BOX 23, SANTA BARBARA, CA 93102
Paid for by Committee to Re-Elect Congressman Lagomarsino, Katherine H. Haley, Treasurer

STATE OF CALIFORNIA)
) ss.
County of Ventura)

On ~~October~~ Sept 29, 1986, personally appeared before me and known to me, GWEN TILLEMANS, who being duly sworn swore to and subscribed her signature in my presence that the contents of the Complaint alleging violation of FEC Election laws was true to the best of her knowledge.

R. Blinn Maxwell
R. BLINN MAXWELL
Notary Public for said State

OFFICIAL SEAL
R. BLINN MAXWELL
NOTARY PUBLIC - CALIFORNIA
VENTURA COUNTY
My Comm. Expires Oct 3 1989

8607C171040

NORRIS FOR CONGRESS

215 Palisades Drive, Santa Barbara, CA 93109-1943
805-962-7703

RECEIVED
OFFICE OF RECORDS & REGISTRATION
1986 MAY 23 AM 8:37
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

MAY 15 1986

5-15-86

THE CLERK, U.S. HOUSE OF REPRESENTATIVES
OFFICE OF RECORDS AND REGISTRATION
1036 LONGWORTH HOUSE OFFICE BLDG.
WASHINGTON, D.C. 20515

CC

Dear Sir or Madam,

This is a correction to the FINANCIAL DISCLOSURE STATEMENT filed by:

WAYNE B. NORRIS, CANDIDATE, U.S.H.R. 17th CA. DIST.

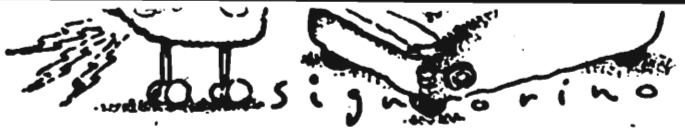
—ADD TO: II B

DEAN WITTER REYNOLDS IRA - 1986 - DIVIDENDS - CATEGORY A
(HUSBAND + WIFE)
" " " " 1985 - " " A

—ADD TO: III

DEAN WITTER REYNOLDS IRA, INCLUDES STOCK IN TANDY CORP., DIAMOND SHAMROCK LTD. PARTNERS (over $1000) AND INTERCAPITAL LIQUID ASSET SHARES VALUE CATEGORY [B]

WAYNE B. NORRIS
CANDIDATE



Of course, a superior system exists. It's called the Dvorak Simplified Keyboard, or DSK, after inventor August Dvorak, who developed it while a professor at the University of Washington in Seattle. Among other improvements, the DSK puts all vowels in the "home row" of keys—the second row from the bottom—and favors the right hand slightly. Numerous studies have proved that it can be learned quite easily even by experienced typists, and that it makes for faster, less fatiguing, and more accurate typing than the conventional system. But habit, apparently, dies hard in the typing biz—the DSK was patented in 1932.

Cecil, old buddy, even though I am receiving a doctorate this spring, the old adage that the more you learn the less you know still holds true. So tell me this: how does a gas station pump know when to turn off before spilling gallons of gas onto the pavement? —Ethel Pumper

Pal, you're going to *need* a doctorate to understand the following, so cleanse your mind of distracting thoughts. In a gas pump handle you [illegible] two valves; the main valve, which is actuated by the oversize trigger you squeeze to make the gas flow, and the check valve, which lets gas flow out but won't let anything back in again, thus reducing fire hazard. In the seat of the check valve you have a little hole. To the backside of this hole is connected a Y-shaped tube. One branch of this tube runs down the nozzle and exits at the tip while the other runs back to a diaphragm connected to a re[illegible] mechanism on the main valve. When you squeeze the gas pump trigger, gas running past the hole in the check valve sucks air out of the Y-shaped tube. (This is because of the Bernoulli principle: a moving stream of fluid tend to pull things in from the sides. Take my word for it.) As long as the end of the Y-shaped tube exiting at the spout is unobstruc[illegible] air is simply pulled into the tube and nothing much else happens. However, as soon as the gas in your car's fill-up pipe gets high enough to cover the end of the tube, a partial vacuum is created therein, which yanks on the diaphragm, releases the main valve, and shuts off the gas. If the gas happens to be especially foamy one day, it may actuate the release mechanism prematurely, with the result that you end up with less than a full tank of gas. Simple, huh? Sure, just like nuclear fission. Stick with English Lit.

—CECIL ADAMS

[illegible]ere something you need to get straight? Cecil Adams can deliver the Straight Dope on any topic. Write Cecil Adams, c/o The Weekly, 820 State St. 214, Santa Barbara, CA 93101.

Top quality French cleated leather shoe.
Reg. 61.95. **NOW JUST 35.95!**

20% OFF ALL OTHER SHOES IN STOCK
Touring and cleated styles, including
BATA, SIDI, DETTO, CANNONDALE & AVOCET.

MANY MORE ITEMS ON SALE — PICK UP COMPLETE LIST AT THE SALE!

10% OFF ALL parts and accessories not already sale priced.

OPEN AIR BICYCLES — SANTA BARBARA BIG WAREHOUSE STORE!
224 Chapala Street (by the Amtrak Station)
963-3717 Open 7 Days A Week, 9am-6pm!

Sale ends 8 pm Tuesday, June 5th. Limited To Items In Stock.

WAYNE NORRIS
FOR
U.S. CONGRESS
DEMOCRAT–
FOR A CHANGE

- PHYSICIST
- AUTHOR
- PAST PRESIDENT, M.A.D.D.

ENDORSED BY:
- California League of Conservation Voters (CLCV)
- National Council of Senior Citizens
- Democratic Digest

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2261

DATE FILMED 2/13/87 CAMERA NO. 4

CAMERAMAN AS

8704041215