



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF ROR # 2306

Date Filmed 1/29/87 Camera No. --- 2

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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):

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <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 S. Garr

date 1/16

FEC 9-21-77

TGW 1/16

87040524601



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1987

Cynthia Maduro Ryan
McDonald, Halsted, and Laybourne
Citicorp Plaza
725 S. Figueroa Street
Los Angeles, CA 90017

CLOSED

RE: MUR 2306
Greater Los Angeles Zoo
Association
Marcia Lou Hobbs, President

Dear Ms. Ryan:

On December 16, 1986, the Commission found reason to believe that your clients, the Greater Los Angeles Zoo Association violated 2 U.S.C. §§ 441b and 441f and Marcia Lou Hobbs violated 2 U.S.C. § 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and closed its file as it pertains to your clients. The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The Commission reminds your clients that contributions by a corporation, contributions in the name of another, and the permitting of the use of one's name to effect such a contribution nevertheless appear to be violations of 2 U.S.C. §§ 441b and 441f. Immediate steps should be undertaken to insure that this activity does not occur in the future.

87040524602

If you have any questions, please direct them to Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Attachment
Factual and Legal Analysis

870440524603



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Cynthia Maduro Ryan
McDonald, Halsted, and Laybourne
Citicorp Plaza
725 S. Figueroa Street
Los Angeles, CA 90017

RE: MUR 2306
Greater Los Angeles Zoo
Association
Marcia Lou Hobbs, President

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The Commission reminds your clients that contributions by a corporation, contributions in the name of another, and the permitting of the use of one's name to effect such a contribution nevertheless appear to be violations of 2 U.S.C. §§ 441b and 441f. Immediate steps should be undertaken to insure that this activity does not occur in the future.

peg 1/7/86

TAD
1/8/86

87040524604

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Greater Los Angeles Zoo Association
Marcia Lou Hobbs, President

)
)
)
)

Pre-MUR 168 (MUR 2306)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 16, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a Matter Under Review.
2. Find reason to believe that the Greater Los Angeles Zoo Association violated 2 U.S.C. § 441b.
3. Find reason to believe that the Greater Los Angeles Zoo Association violated 2 U.S.C. § 441f.
4. Find reason to believe that Marcia Lou Hobbs violated 2 U.S.C. § 441f.
5. Send an appropriate letter and legal and factual analysis.
6. Close the file.

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

Attest:

12-17-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

87040524605

SENSITIVE

FEDERAL ELECTION COMMISSION OFFICE OF THE FEC
999 E Street, N.W. COMMISSION SECRETARY
Washington, D.C. 20463

RECEIVED

FIRST GENERAL COUNSEL'S REPORT DEC 5 11:14

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

MUR # *Pre-MUR 168*
STAFF MEMBER: Shelley Garr

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: Greater Los Angeles Zoo Association
Marcia Lou Hobbs, President

RELEVANT STATUTE: 2 U.S.C. § 441b
2 U.S.C. § 441f

INTERNAL REPORTS
CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES
CHECKED: N/A

GENERATION OF MATTER

On September 11, 1986, the Commission received a letter from counsel for the Greater Los Angeles Zoo Association ("GLAZA") regarding a possible 441b violation of the FECA by GLAZA.

SUMMARY OF ALLEGATIONS

Counsel advised that Marcia Lou Hobbs, President of GLAZA, made \$250 contributions each to the Californians for Senator Pete Wilson committee on June 28, 1986, and to the Drier for Congress committee on May 4, 1986, apparently in the name of GLAZA.

"Because of GLAZA's internal practice of generally issuing checks only twice a month, Mrs. Hobbs wrote a check on her personal account, attached a GLAZA business card or some other documentation referencing GLAZA, and thereafter sought reimbursement through the organization."

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Immediately upon becoming apprised of the error, in apparent violation of 2 U.S.C. § 441b, counsel continued, the Commission was contacted to determine appropriate corrective measures. Because of the amount of funds involved, it was suggested that Mrs. Hobbs reimburse GLAZA and that the appropriate campaign statements be amended to reflect contributions by Mrs. Hobbs.

By check dated August 15, 1986, Mrs. Hobbs reimbursed the organization for the full amount of \$500. Further, a review of the campaign statements for the Californians for Pete Wilson committee and the Drier for Congress committee revealed that both contributions were originally reported in Mrs. Hobbs' name, as an individual donor, and not in the name of GLAZA. Thus, no amendments to the committees' respective reports are required.

LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 441b, corporations are prohibited from making contributions or expenditures in connection with any election for Federal office.^{1/} Furthermore, 2 U.S.C. § 441f prohibits any person from making a contribution in the name of

^{1/} Pursuant to 2 U.S.C. § 441b(b)(2), the term "contribution or expenditure" includes any direct or indirect payment, distribution, loan, advance, deposit or gift of money, or any services or anything of value to any candidate, campaign committee, or political party or organization in connection with any election for federal office.

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another person or knowingly permitting his name to be used to effect such a contribution.^{2/}

Based on the information provided, it appears that GLAZA may have violated 2 U.S.C. § 441b when it reimbursed Mrs. Hobbs for her contributions to the Wilson and Drier committees.

Further, it appears that Mrs. Hobbs may have violated 2 U.S.C. § 441f by permitting her name to be used to make contributions on behalf of GLAZA, and that GLAZA may have violated 2 U.S.C. § 441f by making contributions in the name of Mrs. Hobbs.

Although GLAZA did notify the Commission of these violations and has attempted to correct the violations by obtaining reimbursement from Mrs. Hobbs, these actions are mitigating considerations, and do not obviate the violations. The Office of General Counsel, therefore, recommends that the Commission find reason to believe that GLAZA violated 2 U.S.C. §§ 441b and 441f and that Marcia Lou Hobbs violated 2 U.S.C. § 441f.

RECOMMENDATIONS

1. Open a MUR;
2. Find reason to believe that the Greater Los Angeles Zoo Association violated 2 U.S.C. § 441b;
3. Find reason to believe that the Greater Los Angeles Zoo Association violated 2 U.S.C. § 441f;

^{2/} Pursuant to 2 U.S.C. § 431(11) the term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons.

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4. Find reason to believe that Marcia Lou Hobbs violated 2 U.S.C. § 441f;
5. Approve the attached letter and legal and factual analysis.

Charles N. Steele
General Counsel

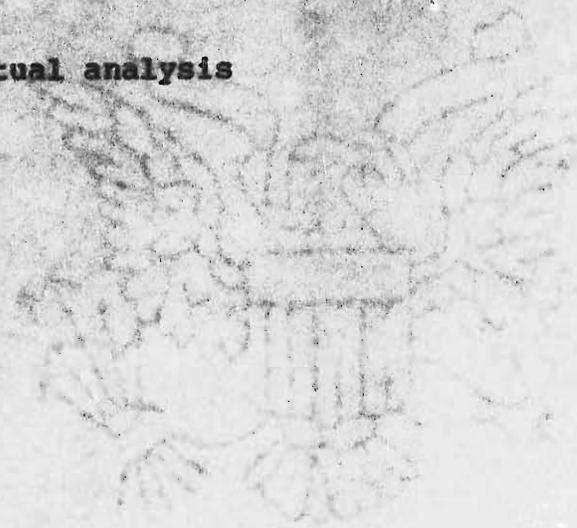
12/4/86
Date

BY: Lawrence M. Noble (L/N)
Lawrence M. Noble
Deputy General Counsel

Attachments

1. Counsel's notification
2. Proposed letter and legal factual analysis

87040524609



Charles Steele, General Counsel
September 5, 1986
Page 2

Immediately upon learning of the error, Mr. Ian Stirton of your offices was contacted by our law firm on behalf of GLAZA to obtain information concerning appropriate corrective measures. He suggested that given the small dollar amounts at issue, that the Campaign Statements be amended if necessary, and that the staff member reimburse the organization.

Please be advised that we have taken all the recommended, appropriate steps to correct this matter. Mrs. Hobbs has promptly reimbursed the organization for the full amount of \$500, upon being advised of the error. (See attached copy of reimbursement check.) Finally, a review of the Campaign Statements (see attached) indicates that an amendment is not necessary in this case, because the contribution was listed in the individual donor's name, Mrs. Hobbs, and not in the name of the organization.

The organization has done everything suggested by your office to correct the error and if there is anything further required, please immediately advise us.

Thank you and the FEC staff for your guidance and consideration.

Very truly yours,

Cynthia Maduro Ryan

Cynthia Maduro Ryan

MHM:pb

87040524611

97040524612

MARCIA LOU HOBSB
1053 STONE CANYON ROAD 884-1100
LOS ANGELES, CA 90077

3675

August 15 1986

18-N/1220

Pay to the
order of

Director Los Angeles Zoo Account \$ 500.00

Five Hundred

00
100
00 Dollars

SECURITY PACIFIC NATIONAL BANK

Glendale Office #0273
201 N. Brand Blvd.
Glendale, CA 91203

Marcia Lou Hobsb

Memo

⑆ 1 2 2 0 0 0 0 4 3 ⑆ 3 6 7 5 ⑆ 2 7 3 ⑆ 2 0 0 7 9 7 ⑆

2(3)

ALIGNED AREA

ALIGNED AREA

1 Name of Committee or Party
Californians for Senator Pete Wilson

2 FEC Identification Number
C00165720

**RECEIVED
AND FILED**

Address (Number and Street)
1200 Third Avenue, Suite 700
City, State and Zip Code
San Diego, CA 92101

3. Is this Report an Amendment? YES NO
Office of the Secretary of State
Sacramento, California

FEB 25 1986

TYPE OF REPORT

APRIL 25 1986
MUNSON FONG ES, Secretary of State

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Twelfth day report preceding election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

This report contains activity for - Primary Election General Election Special Election Runoff Election

SUMMARY

3. Covering Period 1/1/84 through 6/30/84

6. Net Contributions (other than loans)

(a) Total Contributions (other than loans) (From Line 11 (a))

(b) Total Contribution Refunds (from Line 20 (d))

(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))

7. Net Operating Expenditures

(a) Total Operating Expenditures (from Line 17)

(b) Total Offsets to Operating Expenditures (from Line 14)

(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))

8. Cash on Hand at Close of Reporting Period (from Line 27)

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

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)	209,496.93	209,496.93
6 (b)	100.00	100.00
6 (c)	209,396.93	209,396.93
7 (a)	91,725.05	91,725.05
7 (b)	2,267.98	2,267.98
7 (c)	89,457.07	89,457.07
8	153,768.66	
9	-0-	
10	4,184.74	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4088

Robert E. Miller, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

2/21/86

Date

NOTE: Submission of late erroneous 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.

FEC FORM 3 (3/80)

I (4)

SCHEDULE A

ITEMIZED RECEIPTS

Line Number 119

Statement Covers Period From 01/01/84 through 06/30/84

Name of committee: Californians for Senator Pete Wilson

	Employer	Date	Amount
Marcia Lou Hobbs 1053 Stone Canyon Road Los Angeles CA 90077 Receipt For: Primary	Greater Los Angeles Soc Assn.	05/04/84 \$	250.00
	Occupation: President Aggregate YTD: \$		250.00
Charles Hodges 42-470 Maypen Road Bermuda Dunes CA 92201 Receipt For: Primary	Best Effort	04/25/84 \$	500.00
	Occupation: Best Effort Aggregate YTD: \$		500.00
John R. Holt 112 N. Oakhurst Drive Beverly Hills CA 92010 Receipt For: Primary	N/A	06/21/84 \$	250.00
	Occupation: Retired Aggregate YTD: \$		250.00
Philip A. Homme 5545 E. Telegraph Road Los Angeles CA 90040 Receipt For: Primary	Philip Homme Company	03/12/84 \$	250.00
	Occupation: President Aggregate YTD: \$		250.00
Charles B. Hope P.O. Box 2488 San Diego CA 92112 Receipt For: Primary	Hope Consulting Group	06/25/84 \$	250.00
	Occupation: President Aggregate YTD: \$		250.00
Nelson A. Howard P. O. Box 5334 Santa Barbara CA 93108 Receipt For: Primary	N/A	06/22/84 \$	250.00
	Occupation: Retired Aggregate YTD: \$		250.00
William Hudson 1117 Avenida Sevilla, #1-B Walnut Creek CA 94595 Receipt For: Primary	N/A	05/31/84 \$	500.00
	Occupation: Retired Aggregate YTD: \$		500.00
Jacquelin H. Hume 3355 Pacific Avenue San Francisco CA 94118 Receipt For: Primary	Found. for Teaching Economics	04/11/84 \$	500.00
	Occupation: Chairman Aggregate YTD: \$		500.00

SUBTOTAL of Receipts This Page..... I(5) \$ 2,750

19
3.27.85

STATEMENT OF CANDIDACY
RECEIVED AND DEPOSITED
side for instructions)

1. (a) Name of Candidate (in Full) DAVID T. DREIER	to the office of the Secretary of State of the State of California MAR 22 1985 GORDON FUNG SR, Secretary of State	2. Identification No. I.D.# 075337	MAR 29 11 04 AM '85
(b) Address (Number and Street) 112 No. 2nd. Ave.		3. Party Affiliation REPUBLICAN	REGISTRATION
(c) City, State and ZIP Code COVINA, CA 91723		4. Office Sought U.S. CONGRESSMAN	
		5. District & State of Candidate 33rd. DISTRICT, CALIFORNIA	

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1986 election(s).
(Year of Election)

NOTE: This designation must be filed with the appropriate office listed below.

(a) Name of Committee (in Full)
DREIER FOR CONGRESS COMMITTEE

(b) Address (Number and Street)
P.O. BOX 1110

(c) City, State and ZIP Code
COVINA, CA 91722

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

7. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in Full)

(b) Address (Number and Street)

(c) City, State and ZIP Code

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

David Dreier
(Signature of Candidate)

2/25/85
(Date)

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

CANDIDATES FOR --

President mail to:	U.S. Senate mail to:	U.S. House of Representatives mail to:	For further information contact:	Federal Election Commission
Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463	Secretary of the Senate 119 D Street, N.E. Washington, D.C. 20510	Clerk of the House 1035 Longworth Office Bldg. Washington, D.C. 20515		Toll Free 800-424-9530 Local 202-623-4088

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FEC FORM 2 (3/80)

97040524615

I(6)

REPORTS OF RECEIPTS AND DISBURSES
For Authorized Committees

19 2/20/85

(Summary Page)

ALIGN AREA	ALIGN AREA
C00088658 JACK H COUCH DREIER FOR CONGRESS COMMITTEE PO BOX 1110 COVINA	850617 CA 91722
2. FEC Identification Number I.D. # 075337	2 11 85
3. Is the Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	REGISTERED

4. TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Twelfth day report preceding _____ (Type of Election)
- election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____
- Termination Report

RECEIVED AND FILED
 In the office of the Secretary of State
 of the State of California
AUG 05 1985
 MARCH FORD ES, Secretary of State

This report contains activity for '85 Primary Election General Election Special Election Recall Election

R 7 0 4 0 5 2 4 6 1 6

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	1/1/85 through 6/30/85		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (a))		121,162.50	121,162.50
(b) Total Contribution Refunds (from Line 20 (d))		-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		121,162.50	121,162.50
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		21,890.89	21,890.89
(b) Total Offsets to Operating Expenditures (from Line 14)		403.88	403.88
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))		21,487.01	21,487.01
8. Cash on Hand at Close of Reporting Period (from Line 27)		738,086.63	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		-0-	

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

For further information, contact:
 Federal Election Commission
 Toll Free 800-424-9630
 Local 202-523-4068

JACK H. COUCH
 Type or Print Name of Treasurer

 SIGNATURE OF TREASURER

7/31/85
 Date

NOTE: Submission of false erroneous 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.

ITEMIZED RECEIPTS

(Use separate accounts for each category and attach Summary Page)

Information copied from such Reports or 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)
DREIER FOR CONGRESS COMMITTEE I.D.# 075337

97040524617

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
YOSEIKE YAMAMOTO 253 S. Gerhart Ave. Los Angeles, CA 90022 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	None Occupation Housewife Aggregate Year-to-Date—\$ 500.00	5/3/85	500.00
MELVIN J. YOUNG 1320 Golden Vista West Covina, CA 91790 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestview Cadillac 2700 E. Garvey Ave. West Covina, CA 91791 Occupation Auto Dealer Aggregate Year-to-Date—\$ 250.00	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
PHILIP W. WALSH 8681 Hillcrest Buena Park, CA Receipt For: '88 <input checked="" type="checkbox"/> Primary '86 <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Emblem Development Co. P.O.Box 548 Fullerton, CA 92632 Occupation Builder Aggregate Year-to-Date—\$ 2,000.00	Date (month, day, year) 5/31/85	Amount of Each Receipt This Period 2,000.00
CARL A. WILLIAMS 2040 White Bluff Dr. San Dimas, CA 91773 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer National Medical Enter. 11620 Wilshire Blvd. Los Angeles, CA Occupation Exec. Aggregate Year-to-Date—\$ 250.00	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
MARCIA LOU HOBBS 1053 Stone Canyon Rd. Los Angeles, CA 90077 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Los Angeles Zoo Assoc. 5333 Zoo Dr. Los Angeles, CA 90027 Occupation Pres. Aggregate Year-to-Date—\$ 250.00	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
WARREN H. PERSON 249 W. 14th. St. Upland, CA 91786 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Person Ford 2855 Foothill Blvd. La Verne, CA 91750 Occupation Auto Dealer Aggregate Year-to-Date—\$ 250.00	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—\$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			3,500.00
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Cynthia Maduro Ryan
McDonald, Halsted, and Laybourne
Citicorp Plaza
725 S. Figueroa Street
Los Angeles, CA 90017

RE: MUR
Greater Los Angeles Zoo
Association
Marcia Lou Hobbs, President

Dear Ms. Ryan:

The Federal Election Commission notified you on September 22, 1986, that it had received your correspondence regarding a possible violation of the Federal Election Campaign Act by your clients, the Greater Los Angeles Zoo Association and its President, Marcia Lou Hobbs.

Upon further review of the information supplied by you, the Commission, on _____, 1986, determined that there is reason to believe that the Greater Los Angeles Zoo Association violated 2 U.S.C. §§ 441b and 441f and that Marcia Lou Hobbs violated 2 U.S.C. § 441f. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. You should be advised, however, that if pre-probable cause conciliation is requested, the Commission is under no obligation to propose a conciliation agreement until it has completed its investigation in this matter. Also, under 11 C.F.R. § 111.18(d), the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. In the absence of any information which demonstrates that no further action should be taken against your clients, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

87040524618

Cynthia Maduro Ryan
Page 2

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 your clients wish the matter to be made public. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures
Procedures
General Counsel's Factual and Legal Analysis

87040524619

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
STAFF MEMBER & TEL. NO.
Shelley Garr 376-8200

RESPONDENT: **Greater Los Angeles
Zoo Association
Marcia Lou Hobbs, President**

SUMMARY OF ALLEGATIONS

On September 11, 1986, the Commission received a letter from counsel for the Greater Los Angeles Zoo Association ("GLAZA") regarding a possible 441b violation of the FECA by GLAZA.

FACTUAL BASIS AND LEGAL ANALYSIS

Counsel advised that Marcia Lou Hobbs, President of GLAZA, made \$250 contributions each to the Californians for Senator Pete Wilson committee on June 28, 1986, and to the Drier for Congress committee on May 4, 1986, apparently in the name of GLAZA.

"Because of GLAZA's internal practice of generally issuing checks only twice a month, Mrs. Hobbs wrote a check on her personal account, attached a GLAZA business card or some other documentation referencing GLAZA, and thereafter sought reimbursement through the organization."

Immediately upon becoming apprised of the error, in apparent violation of 2 U.S.C. § 441b, counsel continued, the Commission was contacted to determine appropriate corrective measures. Because of the amount of funds involved, it was suggested that Mrs. Hobbs reimburse GLAZA and that the appropriate campaign statements be amended to reflect contributions by Mrs. Hobbs.

87040524620

By check dated August 15, 1986, Mrs. Hobbs reimbursed the organization for the full amount of \$500. Further, a review of the campaign statements for the Californians for Pete Wilson committee and the Drier for Congress committee revealed that both contributions were originally reported in Mrs. Hobbs' name, as an individual donor, and not in the name of GLAZA. Thus, no amendments to the committees' respective reports are required.

Pursuant to 2 U.S.C. § 441b, corporations are prohibited from making contributions or expenditures in connection with any election for Federal office.^{1/} Furthermore, 2 U.S.C. § 441f prohibits any person from making a contribution in the name of another person or knowingly permitting his name to be used to effect such a contribution.^{2/}

Based on the information provided, it appears that GLAZA may have violated 2 U.S.C. § 441b when it reimbursed Ms. Hobbs for her contributions to the Wilson and Drier committees.

Further, it appears that Marcia Lou Hobbs may have violated 2 U.S.C. § 441f by permitting her name to be used to make contributions on behalf of GLAZA, and that GLAZA may have

1/ Pursuant to 2 U.S.C. § 441b(b)(2), the term "contribution or expenditure" includes any direct or indirect payment, distribution, loan, advance, deposit or gift of money, or any services or anything of value to any candidate, campaign committee, or political party or organization in connection with any election for federal office.

2/ Pursuant to 2 U.S.C. § 431(11) the term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons.

87040524621

violated 2 U.S.C. § 441f by making contributions in the name of Mrs. Hobbs.

Although GLAZA did notify the Commission of these violations and has attempted to correct the violations by obtaining reimbursement from Mrs. Hobbs, these actions are mitigating considerations, and do not obviate the violations. The Office of General Counsel, therefore, recommends that the Commission find reason to believe that GLAZA violated 2 U.S.C. §§ 441b and 441f and that Marcia Lou Hobbs violated 2 U.S.C. § 441f.

87040624622



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 1986

JMM
JMM 8/68

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Macdonald, Halstead & Laybourne
Attn: Cynthia Maduro Ryan, Esquire
Citicorp Plaza- 36th Floor
Los Angeles, CA 90017

Dear Mrs. Ryan:

87040524623

This is to acknowledge receipt of a letter on September 11, 1986, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended, (the "Act") by your client, the Greater Los Angeles Zoo Association. You will be notified as soon as the Commission takes action on your submission.

If you have any questions, please call Laurence Tobey, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling matters such as these.

Pursuant to 2 U.S.C. § 437g(a)(4)(B) and 437(g)(a)(12)(A) the Commission's review of this matter shall remain confidential.

Sincerely,

Charles N. Steele
General Counsel

Laurence M. Noble (LJZ)
By: Lawrence M. Noble
Deputy General Counsel

Enclosure

MACDONALD, HALSTED & LAYBOURNE

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

CITICORP PLAZA

THIRTY-SIXTH FLOOR

725 SOUTH FIGUEROA STREET

LOS ANGELES, CALIFORNIA 90017

(213) 629-3000

RECEIVED AT THE FEC

600# 1480

86 SEPT 11 AM: 13

ALEXANDER MACDONALD
629-3000

A. STEVENS HALSTED, JR.
629-3000

SAN DIEGO

WELLS FARGO BUILDING
101 WEST BROADWAY
SAN DIEGO, CALIFORNIA 92101
(619) 233-1441

CABLES: MACHALAY LSA
TELECOPIER: 619-629-7808
TELE: 785713

DIRECT DIAL NUMBER:

ORVILLE A. ANDERSON
GORDON C. BOSSERMAN
THOMAS CURTIS, JR.
CHARLES H. DICK, JR.
DAVID C. DOYLE
RONALD J. EPSTEIN
KEVIN R. FIORE
JOHN G. GULON
GILBERT K. HANCOCK
MORTON S. JACOBSON
DENNIS KEELY
THOMAS S. HODGE
SHERRETT S. LAYBOURNE
DEWALD MCDONALD
MICHAEL K. MAHER
JOHN HARRIS
ROBERT H. HILLMAN
HOWARD S. KATH, JR.
WILLIAM F. KIRKPATRICK
CYNTHIA MADURO PEARL
CATHLEEN J. SIVANA
JOHN R. SMITH
JAMES J. SLACK, JR.
MURPHY J. SPAN
THOMAS D. WOOD

TERRY S. BATES
DAVID DALES BELINGER
THOMAS M. FERRELL
DOUGLAS F. GALANTER
CYNTHIA S. GARNETT
STEVEN H. HANLEY
DONALD R. JOSEPH
TERRENCE H. KING
JANEY A. KOPPEL
ANDREW S. MURPHY
SALVINA WITTMANN ROBERTS
LOUIE A. WILKER
DAVID S. PETERLIN
BARLENE E. PACE
MARY L. RUSSELL
RANDOLPH H. SHARON
THOMAS H. SHREVE
JOSEPH B. SHREVE
CAROL S. SHREVE
JOHN H. SHREVE
STEPHEN T. TERRY
CYNTHIA L. UNDER
GARY L. UNDER
WESLEY A. WOLFE
DECLAN R. WOLFE

PROFESSIONAL CORPORATION

ROBERT H. EDWARDS
COUNSEL

September 5, 1986

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

86 SEPT 11
PM 2:41

GENERAL COUNSEL

87040524624

Charles Steele, General Counsel
Federal Elections Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Please be advised that this law firm represents the Greater Los Angeles Zoo Association (hereinafter "GLAZA"). We are bringing to your attention that we have discovered in the course of our involvement with the client that an error pertaining to campaign contributions was made in good faith and without knowledge of the legal implications by Mrs. Hobbs, the President of the organization. Basically, the error consisted of Mrs. Hobbs purchasing one (1) dinner ticket per event and obtaining reimbursement, resulting in a \$250 contribution to "Californians for Senator Pete Wilson" on May 4, 1984 and a \$250 contribution to "Dreier for Congress" on June 28, 1985. Because of GLAZA's internal practice of generally issuing checks only twice a month, Mrs. Hobbs wrote a check on her personal account, attached a GLAZA business card or some other documentation referencing GLAZA, and thereafter sought reimbursement through the organization. She viewed these above-referenced political dinner parties as community events, similar to fundraising dinners for the Urban League, Audubon Society, Natural History Museum, etc., and, thereby, believed reimbursement for such involvements on behalf of the organization was appropriate.

Charles Steele, General Counsel
September 5, 1986
Page 2

Immediately upon learning of the error, Mr. Ian Stirton of your offices was contacted by our law firm on behalf of GLAZA to obtain information concerning appropriate corrective measures. He suggested that given the small dollar amounts at issue, that the Campaign Statements be amended if necessary, and that the staff member reimburse the organization.

Please be advised that we have taken all the recommended, appropriate steps to correct this matter. Mrs. Hobbs has promptly reimbursed the organization for the full amount of \$500, upon being advised of the error. (See attached copy of reimbursement check.) Finally, a review of the Campaign Statements (see attached) indicates that an amendment is not necessary in this case, because the contribution was listed in the individual donor's name, Mrs. Hobbs, and not in the name of the organization.

The organization has done everything suggested by your office to correct the error and if there is anything further required, please immediately advise us.

Thank you and the FEC staff for your guidance and consideration.

Very truly yours,

Cynthia Maduro Ryan

Cynthia Maduro Ryan

MHM:pb

87040524625

87040524626

MARCIA LOU HOBBS
1053 STONE CANYON ROAD 884-1100
LOS ANGELES, CA 90077

3675

August 15 1986

18-V1220

Pay to the
order of

Director Los Angeles Zoo Account \$ 500⁰⁰₁₀₀

Five Hundred

Dollars
₁₀₀

SECURITY PACIFIC NATIONAL BANK

Glendale Office #0273
601 N. Brand Blvd.
Glendale, CA 91203

Marcia Lou Hobbs

Memo

⑆ 122000043⑆3675⑆273⑆200797⑆

ALION AREA

ALION AREA

1. Name of Committee (in Full)

Californians for Senator Pete Wilson

2. FEC Identification Number

C00165720

RECEIVED

Address (Number and Street)

1200 Third Avenue, Suite 700

3. Is this Report an Amendment? YES NO
in the Office of the Secretary of State of the State of California

City, State and Zip Code

San Diego, CA 92101

FEB 25 1986

4. TYPE OF REPORT

April 15 Quarterly Report

Twelfth day report preceding election on _____ in the State of _____ (Type of Election)

July 15 Quarterly Report

election on _____ in the State of _____

October 15 Quarterly Report

Thirtieth day report following the General Election on _____ in the State of _____

January 31 Year End Report

_____ in the State of _____

July 31 Mid Year Report (Non-election Year Only)

Termination Report

This report contains activity for - Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period 1/1/84 through 6/30/84

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (a))	209,496.93	209,496.93
(b) Total Contribution Refunds From Line 20 (d))	100.00	100.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	209,396.93	209,396.93
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	91,725.05	91,725.05
(b) Total Offsets to Operating Expenditures (from Line 14)	2,267.98	2,267.98
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	89,457.07	89,457.07
8. Cash on Hand at Close of Reporting Period (from Line 27)	153,768.66	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	4,184.74	

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

For further information, contact:
Federal Election Commission
Toll Free 888-424-6530
Local 202-527-4068

Robert E. Miller, Jr.

Type or Print Name of Treasurer

Robert E. Miller, Jr.
SIGNATURE OF TREASURER

2/21/86

Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §417g.

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

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SCHEDULE A

ITEMIZED RECEIPTS

Line Number 11A

Statement Covers Period From 01/01/84 through 06/30/84

Name of committee: Californians for Senator Pete Wilson

	Employer	Date	Amount
* Marcia Lou Hobbs 1053 Stone Canyon Road Los Angeles CA 90077 Receipt For: Primary	Greater Los Angeles Zoo Assn. Occupation: President Aggregate YTD: \$ 250.00	05/04/84 \$	250.0
Charles Hodges 42-470 Maypen Road Bermuda Dunes CA 92201 Receipt For: Primary	Best Effort Occupation: Best Effort Aggregate YTD: \$ 500.00	04/25/84 \$	500.0
00 John R. Holt 912 N. Oakhurst Drive Beverly Hills CA 92010 Receipt For: Primary	N/A Occupation: Retired Aggregate YTD: \$ 250.00	06/21/84 \$	250.0
Philip A. Homme 5545 E. Telegraph Road Los Angeles CA 90040 Receipt For: Primary	Philip Homme Company Occupation: President Aggregate YTD: \$ 250.00	03/12/84 \$	250.0
4 Charles B. Hope P. O. Box 2488 San Diego CA 92112 Receipt For: Primary	Hope Consulting Group Occupation: President Aggregate YTD: \$ 250.00	06/25/84 \$	250.0
Nelson A. Howard P. O. Box 5334 Santa Barbara CA 93108 Receipt For: Primary	N/A Occupation: Retired Aggregate YTD: \$ 250.00	06/22/84 \$	250.0
William Hudson 1117 Avenida Sevilla, #1-B Walnut Creek CA 94595 Receipt For: Primary	N/A Occupation: Retired Aggregate YTD: \$ 500.00	05/31/84 \$	500.0
Jacquelin H. Hume 3355 Pacific Avenue San Francisco CA 94118 Receipt For: Primary	Found. for Teaching Economics Occupation: Chairman Aggregate YTD: \$ 500.00	04/11/84 \$	500.0

SUBTOTAL of Receipts This Page..... \$ 2,750.

19
3.27.85

STATEMENT OF CANDIDACY
RECEIVED
AND (see reverse side for instructions)

1. (a) Name of Candidate (in Full) DAVID T. DREIER	for the office of the Secretary of State of the State of California MAR 22 1985	2. Identification No. I.D.# 075537	MAR 23 11 04 AM '85
(b) Address (Number and Street) 112 No. 2nd. Ave.	MARCH FORN SU, Secretary of State	3. Party Affiliation REPUBLICAN	COUNTY CLERK'S OFFICE REGISTERED ELECTIONS
(c) City, State and ZIP Code COVINA, CA 91723		4. Office Sought U.S. CONGRESSMAN	
		5. District & State of Candidate 33rd. DISTRICT, CALIFORNIA	

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1986 election(s).
(Year of Election)

NOTE: This designation must be filed with the appropriate office listed below.

(a) Name of Committee (in Full)
DREIER FOR CONGRESS COMMITTEE

(b) Address (Number and Street)
P.O. BOX 1110

(c) City, State and ZIP Code
COVINA, CA 91722

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

7. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in Full)

(b) Address (Number and Street)

(c) City, State and ZIP Code

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

David Dreier
(Signature of Candidate)

2/25/85
(Date)

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

CANDIDATES FOR --

President mail to:	U.S. Senate mail to:	U.S. House of Representatives mail to:	For further information contact:	Federal Election Commission
Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463	Secretary of the Senate 119 D Street, N.E. Washington, D.C. 20510	Clerk of the House 1036 Longworth Office Bldg. Washington, D.C. 20515		Toll Free 800-424-9530 Local 202-523-4068

87040524629

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ITEMIZED RECEIPTS

LINE NUMBER 17A
(Use separate schedule for each category (unclassified Summary Page))

Information copied from such Reports or 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)
DRETER FOR CONGRESS COMMITTEE I.D.# 075337

87040524631

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
TOSHIKO YAMAMOTO 253 S. Gachart Ave. Los Angeles, CA 90022	None	5/3/85	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife Aggregate Year-to-Date-\$ 500.00		
B. Full Name, Mailing Address and ZIP Code MELVIN J. YOUNG 1320 Golden Vista West Covina, CA 91790	Name of Employer Crestview Cadillac 2700 E. Garvey Ave. West Covina, CA 91791	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Auto Dealer Aggregate Year-to-Date-\$ 250.00		
C. Full Name, Mailing Address and ZIP Code PHILIP W. WALSH 8681 Hillcrest Buena Park, CA	Name of Employer Emblem Development Co. P.O. Box 548 Fullerton, CA 92632	Date (month, day, year) 5/31/85	Amount of Each Receipt This Period 2,000.00
Receipt For: <input checked="" type="checkbox"/> Primary '88 <input checked="" type="checkbox"/> General '86 <input type="checkbox"/> Other (specify):	Occupation Builder Aggregate Year-to-Date-\$ 2,000.00		
D. Full Name, Mailing Address and ZIP Code CARL A. WILLIAMS 2040 White Bluff Dr. San Dimas, CA 91773	Name of Employer National Medical Enter. 11620 Wilshire Blvd. Los Angeles, CA	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Exec. Aggregate Year-to-Date-\$ 250.00		
E. Full Name, Mailing Address and ZIP Code MARCIA LOU HOERS 1053 Stone Canyon Rd. Los Angeles, CA 90077	Name of Employer Los Angeles Zoo Assoc. 5333 Zoo Dr. Los Angeles, CA 90027	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Pres. Aggregate Year-to-Date-\$ 250.00		
F. Full Name, Mailing Address and ZIP Code WARREN H. PERSON 249 W. 14th. St. Upland, CA 91786	Name of Employer Person Ford 2855 Foothill Blvd. La Verne, CA 91750	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Auto Dealer Aggregate Year-to-Date-\$ 250.00		
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 of Receipts This Page (optional)			3,500.00
TOTAL This Period (last page this line number only)			



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 2306

Date Filmed 1/29/87 Camera No. --- 2

Cameraman AS

87040524632



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

M03-14-88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2306

88040675307

6CC # 4575

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

MACDONALD, HALSTED & LAYBOURNE
ATTORNEYS AT LAW
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
CITICORP PLAZA
THIRTY-SIXTH FLOOR
725 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017
(213) 629-3000

87 OCT 16 PM 10:56

A. STEVENS HALSTED, JR.
1907-1986

SAN DIEGO
WELLS FARGO BUILDING
101 WEST BROADWAY
SAN DIEGO, CALIFORNIA 92101
(619) 238-1441

CABLES: MACHALAY LSA
TELECOPIER: 213-629-7208
TELEX: 782718

DIRECT DIAL NUMBER:

October 2, 1987

- ORVILLE A. ARMSTRONG*
- GORDON E. BOSSERMAN
- THOMAS CURTIS, JR.*
- JAY H. DAVIS
- CHARLES H. DICK, JR.
- DAVID C. DOYLE
- RONALD J. EPFMAN*
- KEVIN P. FIDORE*
- BRIAN S. GOLUSH
- GILBERT E. HAAH*
- MORTON B. JACKSON*
- DONALD R. JOSEPH
- DEWMS HEDLEY
- THOMAS S. HODGE
- JOAN RUPERSMITH LARKIN
- EVERETT B. LAYBOURNE
- DONALD MCBRATH II*
- MICHAEL H. MAHER*
- JOEL MARK
- ROBERT H. PHILIBOSIAN
- WILLIAM F. RINEHART
- CYNTHIA MADURO RYAN
- KATHLEEN J. SHIMA*
- JOHN R. SHNER
- ABBY S. SILVERMAN
- JAMES J. SLASY, JR.*
- THOMAS H. SMALL
- MALCOLM GEORGE SMITH
- MARTIN J. SPEAR*
- ANTHONY H. VIENNA
- TRAVERS D. WOOD*
- CYNTHIA A. BASHANT
- TERRY A. BATES
- DIANE GILES BERLINER
- STEPHANNE D. BERRINGTON
- WALTER M. CAMPFIELD
- CHRY JO CASTELL
- THOMAS W. FERRELL
- DOUGLAS F. GALANTER
- CYNTHIA R. GARNETT
- ANDREW S. GELB
- J. PAUL GEMAC
- WILLIAM A. GODDARD
- STEVEN H. HARVEY
- JOHN D. HERBERBERGER
- TERRANCE H. HOWE
- JANET A. ROBBIN
- ANNA S. MASTERS
- MALISSA MATHIASY MCREITH
- LOUI A. MILLER
- ALI H. M. MOJDEH
- LORANNE L. PEDOWITZ
- DAVID K. PETELER
- MARION A. PHILLIPS
- DAVID E. RADE
- MARY L. RUSSELL
- SAVIT SEBHMAT
- RANDOLPH H. SHARON
- THOMAS H. SHODSMITH
- CAROL SHYDER
- JOHN R. SOMMER
- STEPHEN T. TERRY
- DAVID TRENG
- GARY L. URRIN
- KENNETH L. WILTON
- WENDY A. WOLDT
- CECILIA R. WOLFE

*PROFESSIONAL CORPORATION
ROBERT H. EDWARDS
COUNSEL

Certified Mail #P294 860 223
Return Receipt Requested

Charles Steele, General Counsel
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Attention: Ms. Shelly Garr

Re: Informational Letter
Closed File MUR 2306
Greater Los Angeles Zoo Association ("GLAZA")
Marcia Lou Hobbs, President

Dear Ms. Garr:

Although the file is closed, I am providing you with some additional information, which has just come to my attention, in order to complete your files. As you recall, on September 5, 1986, I wrote to the Commission regarding the above-captioned matter (See Attachment 1). On December 16, 1986, the Commission ruled on this case matter (See Attachment 2). Specifically, in that ruling, the Commission "after considering the circumstances of this matter", determined to take "no further action" and closed its file.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 16 PM 12:00

8 9 0 4 0 5 7 5 3 0 8

Charles Steele, Esq.
October 2, 1987
Page 2

Enclosed please find Attachment 3 which is a campaign report for Californians for Senator Pete Wilson for the period 1/1/85 through 6/30/85, which was inadvertently overlooked in the files due to a clerical error. If the 1985 Wilson contribution had been discovered in the September 1986 search, it would have been disclosed, as were the 1984 Wilson and 1985 Dreier contributions. What is meaningful in this case is that since September 1986 corrective measures at GLAZA have been installed to prevent the making of any political contributions and such measures were in place and operative prior to the Commission's decision in December 1986. Therefore, since September 1986 no further political contributions have been made.

Further, upon learning of the clerical error, all appropriate steps recommended by the Commission have been taken to correct this particular matter. Mrs. Hobbs has promptly reimbursed the organization for the full amount of \$250.00, upon being advised of the error relative to the Wilson 1985 contribution (See Attachment 4). Finally, a review of the Wilson 1985 Campaign Statement (See Attachment 3) indicates that an amendment is not necessary in this case, because the contribution was listed in the individual donor's name, Mrs. Hobbs, and not in the name of the organization.

GLAZA has done everything suggested by the Commission to correct this matter and no contributions have been made since September 1986, when full disclosure was made to the Commission.

Thank you and the FEC staff for your courtesy and consideration.

Sincerely,

Cindy

Cynthia Maduro Ryan
Counsel for GLAZA

CMR:pcr
Enclosures

89040675309

MACDONALD, HALSTED & LAYBOURNE

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

CITICORP PLAZA

THIRTY-SIXTH FLOOR

725 SOUTH FIGUEROA STREET

LOS ANGELES, CALIFORNIA 90017

(213) 629-3000

ALEXANDER MACDONALD

1989-979

A STEVENS HALSTED, JR.

607-988

SAN DIEGO

WELLS FARGO BUILDING

101 WEST BROADWAY

SAN DIEGO, CALIFORNIA 92101

(619) 238-1441

CABLES MACHALAY LSA

TELECOPIER 613-820-7208

TELEX 782718

DIRECT DIAL NUMBER

ORVILLE A. ...
GORDON E. ...
THOMAS CURTIS, JR.
CHARLES H. ...
DAVID C. ...
DONALD J. ...
ALVIN P. ...
ERNEST S. ...
GILBERT C. ...
MORTON S. ...
DORIS WELBY
THOMAS S. ...
EVERETT S. ...
DONALD ...
MICHAEL A. ...
JOEL ...
ROBERT H. ...
ROBERT S. ...
WILLIAM F. ...
CYNTHIA ...
KATHLEEN J. ...
JOHN S. ...
JAMES J. ...
MARTIN J. ...
THOMAS S. ...

TERRY S. ...
DAVID ...
THOMAS ...
DONALD ...
STEWART ...
DONALD ...
TERENCE ...
JAMES ...
ALVIN ...
WILLIAM ...
LEO ...
DAVID ...
DAVID ...
JOHN ...
THOMAS ...
ALVIN ...
JOHN ...
CYNTHIA ...
JOHN ...
JOHN ...
JOHN ...
JOHN ...
JOHN ...

*PROFESSIONAL CORPORATION

ROBERT H. ...
COUNSEL

September 5, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Steele, General Counsel
Federal Elections Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:

Please be advised that this law firm represents the Greater Los Angeles Zoo Association (hereinafter "GLAZA"). We are bringing to your attention that we have discovered in the course of our involvement with the client that an error pertaining to campaign contributions was made in good faith and without knowledge of the legal implications by Mrs. Hobbs, the President of the organization. Basically, the error consisted of Mrs. Hobbs purchasing one (1) dinner ticket per event and obtaining reimbursement, resulting in a \$250 contribution to "Californians for Senator Pete Wilson" on May 4, 1984 and a \$250 contribution to "Dreier for Congress" on June 28, 1985. Because of GLAZA's internal practice of generally issuing checks only twice a month, Mrs. Hobbs wrote a check on her personal account, attached a GLAZA business card or some other documentation referencing GLAZA, and thereafter sought reimbursement through the organization. She viewed these above-referenced political dinner parties as community events, similar to fundraising dinners for the Urban League, Audubon Society, Natural History Museum, etc.; and, thereby, believed reimbursement for such involvements on behalf of the organization was appropriate.

88040675310

Charles Steele, General Counsel
September 5, 1986
Page 2

Immediately upon learning of the error, Mr. Ian Stirton of your offices was contacted by our law firm on behalf of GLAZA to obtain information concerning appropriate corrective measures. He suggested that given the small dollar amounts at issue, that the Campaign Statements be amended if necessary, and that the staff member reimburse the organization.

Please be advised that we have taken all the recommended, appropriate steps to correct this matter. Mrs. Hobbs has promptly reimbursed the organization for the full amount of \$500, upon being advised of the error. (See attached copy of reimbursement check.) Finally, a review of the Campaign Statements (see attached) indicates that an amendment is not necessary in this case, because the contribution was listed in the individual donor's name, Mrs. Hobbs, and not in the name of the organization.

The organization has done everything suggested by your office to correct the error and if there is anything further required, please immediately advise us.

Thank you and the FEC staff for your guidance and consideration.

Very truly yours,

Cynthia Maduro Ryan
Cynthia Maduro Ryan

MHM:pb

bcc: Chip Nielsen, Esq.
Task Force Members

Sent on September 8, 1986 by
Certified Mail

8 3 0 4 0 5 7 5 3 1 1

89040675312

MARCIA LOU HOBBS
1053 STONE CANYON ROAD 684-1100
LOS ANGELES, CA 90077

3675

August 15 1986

18-41220

Pay to the
order of

Director Los Angeles Zoo Association 500

Five Hundred

00
100
Dollars

SECURITY PACIFIC NATIONAL BANK
Gendale Office #0273
6371 Brand Blvd.
Gendale, CA 91203

Marcia Lou Hobbs

Memo

⑆ 622000043⑆ 3675⑆ 273⑆ 200797⑆

ALICN AREA

ALICN AREA

1 Name of Committee in Full: Californians for Senator Pete Wilson

2 FEC Identification Number: C00165720

RECEIVED

Address Number and Street:

3 Is this Report an Amendment? AND FILED

1200 Third Avenue, Suite 700

Office of the Secretary of State

City, State and Zip Code

Check if address is different than previously reported.

San Diego, CA 92101

FEB 25 1986

4 TYPE OF REPORT

April 15 Quarterly Report

Twelfth day report preceding

(Type of Election)

July 15 Quarterly Report

election on _____ in the State of _____

October 15 Quarterly Report

Thirtieth day report following the General Election on

January 31 Year End Report

_____ in the State of _____

July 31 Mid Year Report (Non-election Year Only)

Termination Report

This report contains activity for -

Primary Election

General Election

Special Election

Runoff Election

SUMMARY

5. Covering Period 1/1/84 through 6/30/84

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

6. Net Contributions (other than loans)

(a) Total Contributions (other than loans) (From Line 11 (a))

209,496.93

209,496.93

(b) Total Contribution Refunds (from Line 20 (d))

100.00

100.00

(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))

209,396.93

209,396.93

7. Net Operating Expenditures

(a) Total Operating Expenditures (from Line 17)

91,725.05

91,725.05

(b) Total Offsets to Operating Expenditures (from Line 14)

2,267.98

2,267.98

(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))

89,457.07

89,457.07

8. Cash on Hand at Close of Reporting Period (from Line 27)

153,768.66

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

-0-

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

4,184.74

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Robert E. Miller, Jr.

Type or Print Name of Treasurer

Robert E. Miller, Jr.
SIGNATURE OF TREASURER

2/21/86

Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 417g.

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

89040675313

SCHEDULE A

ITEMIZED RECEIPTS

Line Number

Statement Covers Period From 01/01/84 through 06/30/84

Name of committee: Californians for Senator Pete Wilson

2 3 0 4 0 5 7 5 3 1 4

Name	Address	City	CA	Employer	Date	Amount
Marcia Lou Hobbs	1053 Stone Canyon Road	Los Angeles	CA 90077	Greater Los Angeles Zoo Assn.	05/04/84	\$ 25
Receipt For: Primary				Occupation: President		
				Aggregate YTD: \$	250.00	
Charles Hodges	42-470 Maypen Road	Bermuda Dunes	CA 92201	Best Effort	04/25/84	\$ 50
Receipt For: Primary				Occupation: Best Effort		
				Aggregate YTD: \$	500.00	
John B. Holt	112 N. Oakhurst Drive	Beverly Hills	CA 92010	N/A	06/21/84	\$ 25
Receipt For: Primary				Occupation: Retired		
				Aggregate YTD: \$	250.00	
Philip A. Homme	5545 E. Telegraph Road	Los Angeles	CA 90040	Philip Homme Company	03/12/84	\$ 25
Receipt For: Primary				Occupation: President		
				Aggregate YTD: \$	250.00	
Charles B. Hope	P. O. Box 2488	San Diego	CA 92112	Hope Consulting Group	06/25/84	\$ 25
Receipt For: Primary				Occupation: President		
				Aggregate YTD: \$	250.00	
Nelson A. Howard	P. O. Box 5334	Santa Barbara	CA 93108	N/A	06/22/84	\$ 25
Receipt For: Primary				Occupation: Retired		
				Aggregate YTD: \$	250.00	
William Hudson	1117 Avenida Sevilla, #1-B	Walnut Creek	CA 94595	N/A	05/31/84	\$ 50
Receipt For: Primary				Occupation: Retired		
				Aggregate YTD: \$	500.00	
Jacquelin H. Hume	3355 Pacific Avenue	San Francisco	CA 94118	Found. for Teaching Economics	04/11/84	\$ 50
Receipt For: Primary				Occupation: Chairman		
				Aggregate YTD: \$	500.00	

SUBTOTAL of Receipts This Page..... \$ 2,7

19
3.27

STATEMENT OF CANDIDACY
RECEIVED
AND FILED

In the office of the Secretary of State
of the State of California

MAR 22 1985

1. (a) Name of Candidate (in Full) DAVID T. DREIER	2. Identification No. I.D.# 075557
(b) Address (Number and Street) 112 No. 2nd. Ave.	3. Party Affiliation REPUBLICAN
(c) City, State and ZIP Code COVINA, CA 91723	4. Office Sought U.S. CONGRESSMAN
	5. District & State of Candidate 33rd. DISTRICT, CALIFORNIA

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1986 election(s).
(Year of Election)

NOTE: This designation must be filed with the appropriate office listed below.

(a) Name of Committee (in Full)
DREIER FOR CONGRESS COMMITTEE

(b) Address (Number and Street)
P.O. BOX 1110

(c) City, State and ZIP Code
COVINA, CA 91723

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

7. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in Full)

(b) Address (Number and Street)

(c) City, State and ZIP Code

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

David Dreier
(Signature of Candidate)

2/25/85
(Date)

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

CANDIDATES FOR --

President mail to: Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463	U.S. Senate mail to: Secretary of the Senate 119 D Street, N.E. Washington, D.C. 20510	U.S. House of Representatives mail to: Clerk of the House 1035 Longworth Office Bldg. Washington, D.C. 20515	For further information contact:	Federal Election Commission Toll Free 800-424-9530 Local 202-623-4068
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93040675315

REPORTS OF RECEIPTS AND DISBURSES
For Authorized Committee

19 2/23/85

(Summary Page)

ALYON AREA: CO0088658 050617 ALYON AREA

JACK H COUCH
DREIER FOR CONGRESS COMMITTEE
PO BOX 1110
CUVINA CA 91722

2. FEC Identification Number: I.D.# 075337

3. Is this Report an Amendment? YES NO

address is different than previously reported.

4. TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non-election Year Only)

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

Termination Report

RECEIVED AND FILED
in the office of the Secretary of State
of the State of California
AUG 05 1985
MARCH FONG EJ, Secretary of State

This report contains activity for '88 Primary Election General Election Special Election Recall Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1/1/85</u> through <u>6/30/85</u>		
6. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (a))		121,162.50	121,162.50
(b) Total Contribution Refunds (from Line 20 (d))		-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))		121,162.50	121,162.50
7. Net Operating Expenditures			
(a) Total Operating Expenditures (from Line 17)		21,890.89	21,890.89
(b) Total Offsets to Operating Expenditures (from Line 14)		403.88	403.88
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))		21,487.01	21,487.01
8. Cash on Hand at Close of Reporting Period (from Line 27)		738,086.63	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		-0-	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9630
Local 202-523-4068

JACK H. COUCH
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

7/31/85
Date

NOTE: Submission of false erroneous 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.

FEC FORM 3 (3-80)

89040575316

ITEMIZED RECEIPTS

(Use separate receipts for each category of contributions)
 (See Instructions on Reverse Side)

Information copied from such Reports or 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 committees.

Name of Committee (In Full)
DREIER FOR CONGRESS COMMITTEE I.D.# 075337

2 3 0 4 0 6 7 5 3 1 7

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
TOSHIKI YAMAMOTO 253 S. Gerhart Ave. Los Angeles, CA 90022	None	5/3/85	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Housewife Aggregate Year-to-Date-\$ 500.00		
NEWEN J. YOUNG 1320 Golden Vista West Covina, CA 91790	Name of Employer Crestview Cadillac 2700 E. Garvey Ave. West Covina, CA 91791	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Auto Dealer Aggregate Year-to-Date-\$ 250.00		
PHILIP W. WALSH 8681 Hillcrest Buena Park, CA	Name of Employer Emblem Development Co. P.O.Box 548 Fullerton, CA 92632	Date (month, day, year) 5/31/85	Amount of Each Receipt This Period 2,000.00
Receipt For: '88 <input checked="" type="checkbox"/> Primary '86 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Builder Aggregate Year-to-Date-\$ 2,000.00		
CARL A. WILLIAMS 2040 White Bluff Dr. San Dimas, CA 91773	Name of Employer National Medical Enter. 11620 Wilshire Blvd. Los Angeles, CA	Date (month, day, year) 5/24/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Exec. Aggregate Year-to-Date-\$ 250.00		
MARCIA LOU HOBBS 1053 Stone Canyon Rd. Los Angeles, CA 90077	Name of Employer Los Angeles Zoo Assoc. 5333 Zoo Dr. Los Angeles, CA 90027	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Pres. Aggregate Year-to-Date-\$ 250.00		
WARREN H. PERSON 249 W. 14th. St. Upland, CA 91786	Name of Employer Person Ford 2855 Foothill Blvd. La Verne, CA 91750	Date (month, day, year) 6/28/85	Amount of Each Receipt This Period 250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Auto Dealer Aggregate Year-to-Date-\$ 250.00		
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 of Receipts This Page (optional)			3,500.00
TOTAL This Period (last page this line number only)			

P 324 159 828

MACDONALD, HALSTED & LAYBOURNE
RECEIPT FOR CERTIFIED MAIL

CITICORP PLAZA, THIRTY-SIXTH FLOOR
NO INSURANCE COVERAGE PROVIDED

725 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017

(See Reverse)

LOS ANGELES, CALIFORNIA 90017

Charles Steele, General Counsel

Federal Elections Commission

999 "E" Street, N.W.

Washington, D.C. 20463

POSTAGE	\$
CERTIFIED FEE	¢
SPECIAL DELIVERY	¢
RESTRICTED DELIVERY	¢
CONSULT POSTMASTER FOR FEES	¢
OPTIONAL SERVICES	¢
RETURN RECEIPT SERVICE	¢
SHOW TO WHOM DATE AND ADDRESS OF DELIVERY	¢
SHOW TO WHOM DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
SHOW TO WHOM DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢

TOTAL POSTAGE AND FEES \$

POSTMARK OR DATE

PS Form 3800, Apr. 1976

07-08-56

CERTIFIED

P 324 159 828

MAIL

FROM
MACDONALD, HALSTED & LAYBOURNE
 CITICORP PLAZA, THIRTY-SIXTH FLOOR
 725 SOUTH FIGUEROA STREET
 LOS ANGELES, CALIFORNIA 90017

Charles Steele, General Counsel
 Federal Elections Commission
 999 "E" Street, N.W.
 Washington, D.C. 20463

CERTIFIED MAIL
 RETURN RECEIPT REQUESTED

81507508190

3 2 0 4 0 5 / 3 3 1 9

PS Form 3811, July 1982

SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- Show to whom and date delivered
 - Show to whom, date, and address of delivery
2. RESTRICTED DELIVERY
- (The restricted delivery fee is charged in addition to the return receipt fee.)
- TOTAL \$

3. ARTICLE ADDRESSED TO:
Charles Steele, General Counsel
Federal Elections Commission
 999 ... Street, N.W.
 Washington, D.C. 20463

4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COB <input type="checkbox"/> EXPRESS MAIL	ARTICLE NUMBER P324 159 828
--	---------------------------------------

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

5. DATE OF DELIVERY	POSTMARK <small>(may be on reverse side)</small>
---------------------	---

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:	7b. EMPLOYER'S INITIALS
-------------------------------	-------------------------

RETURN RECEIPT

RECEIVED

JAN 14 1987

Attorney-Client
Privileged Communication



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 9, 1987

Cynthia Maduro Ryan
McDonald, Halsted, and Laybourne
Citicorp Plaza
725 S. Figueroa Street
Los Angeles, CA 90017

RE: MUR 2306
Greater Los Angeles Zoo
Association
Marcia Lou Hobbs, President

Dear Ms. Ryan:

On December 16, 1986, the Commission found reason to believe that your clients, the Greater Los Angeles Zoo Association violated 2 U.S.C. §§ 441b and 441f and Marcia Lou Hobbs violated 2 U.S.C. § 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and closed its file as it pertains to your clients. The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The Commission reminds your clients that contributions by a corporation, contributions in the name of another, and the permitting of the use of one's name to effect such a contribution nevertheless appear to be violations of 2 U.S.C. §§ 441b and 441f. Immediate steps should be undertaken to insure that this activity does not occur in the future.

88040575320

If you have any questions, please direct them to Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Attachment
Factual and Legal Analysis

8 3 0 4 0 5 7 5 3 2 1

violated 2 U.S.C. § 441f by making contributions in the name of Mrs. Hobbs.

Although GLAZA did notify the Commission of these violations and has attempted to correct the violations by obtaining reimbursement from Mrs. Hobbs, these actions are mitigating considerations, and do not obviate the violations. The Office of General Counsel, therefore, recommends that the Commission find reason to believe that GLAZA violated 2 U.S.C. §§ 441b and 441f and that Marcia Lou Hobbs violated 2 U.S.C. § 441f.

8 3 0 4 0 6 7 5 3 2 2

2000

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2306
STAFF MEMBER & TEL. NO.
Shelley Garr 376-8200

RESPONDENT: **Greater Los Angeles
Zoo Association
Marcia Lou Hobbs, President**

SUMMARY OF ALLEGATIONS

On September 11, 1986, the Commission received a letter from counsel for the Greater Los Angeles Zoo Association ("GLAZA") regarding a possible 441b violation of the FECA by GLAZA.

FACTUAL BASIS AND LEGAL ANALYSIS

Counsel advised that Marcia Lou Hobbs, President of GLAZA, made \$250 contributions each to the Californians for Senator Pete Wilson committee on June 28, 1986, and to the Drier for Congress committee on May 4, 1986, apparently in the name of GLAZA.

"Because of GLAZA's internal practice of generally issuing checks only twice a month, Mrs. Hobbs wrote a check on her personal account, attached a GLAZA business card or some other documentation referencing GLAZA, and thereafter sought reimbursement through the organization."

Immediately upon becoming apprised of the error, in apparent violation of 2 U.S.C. § 441b, counsel continued, the Commission was contacted to determine appropriate corrective measures. Because of the amount of funds involved, it was suggested that Mrs. Hobbs reimburse GLAZA and that the appropriate campaign statements be amended to reflect contributions by Mrs. Hobbs.

88040575323

By check dated August 15, 1986, Mrs. Hobbs reimbursed the organization for the full amount of \$500. Further, a review of the campaign statements for the Californians for Pete Wilson committee and the Drier for Congress committee revealed that both contributions were originally reported in Mrs. Hobbs' name, as an individual donor, and not in the name of GLAZA. Thus, no amendments to the committees' respective reports are required.

Pursuant to 2 U.S.C. § 441b, corporations are prohibited from making contributions or expenditures in connection with any election for Federal office.^{1/} Furthermore, 2 U.S.C. § 441f prohibits any person from making a contribution in the name of another person or knowingly permitting his name to be used to effect such a contribution.^{2/}

Based on the information provided, it appears that GLAZA may have violated 2 U.S.C. § 441b when it reimbursed Ms. Hobbs for her contributions to the Wilson and Drier committees.

Further, it appears that Marcia Lou Hobbs may have violated 2 U.S.C. § 441f by permitting her name to be used to make contributions on behalf of GLAZA, and that GLAZA may have

1/ Pursuant to 2 U.S.C. § 441b(b)(2), the term "contribution or expenditure" includes any direct or indirect payment, distribution, loan, advance, deposit or gift of money, or any services or anything of value to any candidate, campaign committee, or political party or organization in connection with any election for federal office.

2/ Pursuant to 2 U.S.C. § 431(11) the term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons.

38040575324

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

1985
38 Year

(Summary Page)

ALIGN AREA		ALIGN AREA
1. Name of Committee (in Full) Californians for Senator Pete Wilson		2. FEC Identification Number C00165720
Address (Number and Street) 1200 Third Avenue, Suite 700		3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and Zip Code San Diego, CA 92101		<input type="checkbox"/> Check if address is different than previously reported.

SEP 30 11 11 AM '85
COUNTY OF SAN DIEGO
REGISTRAR-RECORDER

4. **TYPE OF REPORT**

RECEIVED AND FILED
In the office of the Secretary of State of the State of California
SEP 19 1985
GAIL M FONG ES, Secretary of State

April 15 Quarterly Report Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

July 15 Quarterly Report Thirtieth day report following the General Election on _____ in the State of _____

October 15 Quarterly Report Termination Report

July 31 Mid Year Report (Non-election Year Only)

This report contains activity for - Primary Election General Election Special Election Runoff Election

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1/1/85</u> through <u>6/30/85</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (a))	1,154,014.01	1,154,014.01
(b) Total Contribution Refunds (from Line 20 (d))	500.00	500.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,153,514.01	1,153,514.01
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	270,340.48	270,340.48
(b) Total Offsets to Operating Expenditures (from Line 14)	365.15	365.15
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	269,975.33	269,975.33
8. Cash on Hand at Close of Reporting Period (from Line 27)	1,172,567.43	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	13,724.00	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4068

Robert E. Miller, Jr.
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

7/31/85
Date

NOTE: Submission of false erroneous 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.

88040675325

SCHEDULE A

ITEMIZED RECEIPTS

Line Number 11A

Statement Covers Period From 01/01/85 through 06/30/85

Name of committee: Californians for Senator Pete Wilson

		Employer	Date	Amount
Mrs. Carla A Hills 3125 Chainbridge Rd. Washington DC 20016		Latham Watkins & Hills	04/12/85	\$ 500.00
Occupation: Lawyer Receipt For: Primary		Aggregate YTD: \$	500.00	
Roderick M. Hills 3125 Chainbridge Road, N.W. Washington DC 20016		Latham Watkins & Hills	04/12/85	\$ 500.00
Occupation: Attorney Receipt For: Primary		Aggregate YTD: \$	500.00	
Fritz E. Hitchcock 912 Via Mirada Palos Verdes Estates CA 90274		Puente Hills Toyota/Mazda	03/29/85	\$ 500.00
Occupation: Pres Receipt For: Primary		Aggregate YTD: \$	500.00	
Walter E. Hoadley 999 Green Street, Apt. 2205 San Francisco CA 94133		Hoover Institution	05/07/85	\$ 250.00
Occupation: Fin. Econ. Receipt For: Primary		Aggregate YTD: \$	250.00	
Marcia Lou Hobbs † 1053 Stone Canyon Road Los Angeles CA 90077		Greater Los Angeles Zoo Assn.	04/12/85	\$ 250.00
Occupation: President Receipt For: Primary		Aggregate YTD: \$	250.00	
Charles Hodges 42-470 Maypen Road Bermuda Dunes CA 92201		Sun World International	04/05/85	\$ 250.00
Occupation: Sales Mgr. Receipt For: Primary		Aggregate YTD: \$	250.00	
Mrs. Elaine S. Hoffman 1100 Avondale Road San Marino CA 91108		N/A	04/05/85	\$ 875.00
Occupation: Housewife Receipt For: Primary		Aggregate YTD: \$	875.00	
Mrs. Elaine S. Hoffman 1100 Avondale Road San Marino CA 91108		N/A	04/05/85	\$ 125.00
Occupation: Housewife Receipt For: General		Aggregate YTD: \$	1,000.00	

SUBTOTAL of Receipts This Page..... \$ 3,250.00

8 9 0 4 0 6 7 5 3 2 7

MARCIA LOU HOBBS
1063 STONE CANYON ROAD 854-1180
LOS ANGELES, CA 90077

3980

30 Sept. 1987

16-4/1220

Pay to the
order of

GLAZA

\$ 250 ⁰⁰/₁₀₀

Two Hundred Fifty

⁰⁰/₁₀₀ Dollars

SECURITY PACIFIC NATIONAL BANK
Glendale Office #0273
801 N Brand Blvd
Glendale CA 91203

Marcia Lou Hobbs

Memo _____

⑆ 2 200004 3⑆ 3980 ⑈ 273 ⑈ 200797 ⑈

334413

MACDONALD, HALSTED & LAYBOURNE
ATTORNEYS AT LAW

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THIRTY-SIXTH FLOOR
725 SOUTH FIGUEROA STREET
LOS ANGELES, CALIFORNIA 90017
(213) 629-3000

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A. STEVENS HALSTED, JR.
1907-1988

SAN DIEGO
WELLS FARGO BUILDING
101 WEST BROADWAY
SAN DIEGO, CALIFORNIA 92101
(619) 238-1441

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ROBERT H. EDWARDS
COUNSEL

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Shelly Garr, Esq.
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Re: Informational Letter
Closed File MUR 2306
Greater Los Angeles Zoo Association (GLAZA)
Marcia Lou Hobbs, President

Dear Ms. Garr:

We received today, this unusual notice from the Postal Service (see attached copy) and the original copy of our receipt, torn in half. Because we are concerned that this document may not have reached your offices, we are sending another copy to you and would appreciate the receipt being signed and returned to us.

Thank you in advance for your cooperation.

Sincerely,

Cindy

Cynthia Maduro Ryan

CMR:pcr
Enclosures

38040675329



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WASHINGTON, D.C. 20463

03 November 1987

Plan

Cynthia Maduro Ryan, Esquire
MacDonald, Halstead, & Laybourne
Citicorp Plaza
36th Floor
725 South Figueroa Street
Los Angeles, CA 90017

RE: MUR ~~2036~~ 2306
Greater Los Angeles Zoo
Association, Marcia Lou
Hobbs, as President

Dear Ms. Ryan:

This letter is to confirm the Federal Election Commission's receipt of your letter dated October 2, 1987, in which you provided supplemental information pertaining to MUR 2306. Because the file in MUR 2306 has been closed, your correspondence will be added to that file and placed on the public record.

If you have any further questions, please direct them to Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

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