



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2604

DATE FILMED 11-9-96 CAMERA NO. 4

CAMERAMAN J.M.H.

96043763896

96043763898

CAL-375 (Rev. 8-82) Ack. Individual

Staple

STATE OF CALIFORNIA

COUNTY OF Los Angeles

SS.

On this the 31st day of MARCH 19 88, before me the undersigned, a

Notary Public in and for said County and State, personally appeared

Bill Press

_____ personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name IS subscribed to the within instrument and acknowledged that HE executed the same.

Patricia Stark Rowe
Signature of Notary

Staple



FOR NOTARY SEAL OR STAMP





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1988

Mr. Bill Press
2001 Wilshire Blvd.
Suite 310
Santa Monica, CA 90403

Dear Mr. Press:

This is to acknowledge receipt of your letter, which we received on April 4, 1988. Your letter was not properly sworn to.

You must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. A statement by the notary that the complaint was sworn to and subscribed before her will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

If you have any questions concerning this matter, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

96043763899

AMERICA'S P.A.C.

1/1-

A POLITICAL ACTION COMMITTEE DEDICATED TO PROVIDING TECHNICAL AND FINANCIAL ASSISTANCE TO CANDIDATES WHO WORK FOR A SAFE ENVIRONMENT, HUMAN RIGHTS AND PEACE.

NEIL B. RINCOVER
Executive Director
NEIL B. RINCOVER
President
MELBA K. SCOTT
Drafting Coordinator

February 29, 1988

S. M. El Farra, M.D., Treasurer
Physicians Interindemnity/PAC
310 East Colorado Street, Suite 308
Glendale, California 91205

HAND DELIVERED

Dear Dr. El Farra:

Your past support of Bill Press, and other progressive candidates for political office, clearly demonstrates your commitment to those ideals of fairness and balance that America's PAC was founded upon. We are about to embark on our most ambitious project: a massive direct mail fundraising drive that will mean that we will be fully funded, and very potent, for the approaching California elections. Our present intention is to assist the following:

Bill Press
Rev. Jesse Jackson
Tom Bradley

Although the race for Mayor is next year, we believe that it is crucial to begin our assistance to Mayor Bradley immediately so that he enters the campaign from a position of strength.

Our direct mail effort will cost approximately \$16,000.; we already have raised more than \$12,000. We need your help now in making up the difference --- we estimate that this statewide direct mail campaign will net \$80,000 to \$110,000., which will enable us to purchase massive amounts of radio time and print ads just prior to the June primary.

Please help us by matching your earlier contribution, or sending whatever you can afford. I have also enclosed a few remittance envelopes you can give to other organizations or individuals who you feel may be willing to help. We need to get the mail out now; we need your help today.

We all deeply appreciate your support, and look forward to working with you on many future campaigns. Please don't hesitate to call me if you have any questions or suggestions.

Sincerely,

NEIL B. RINCOVER
Executive Director

4100 Whittell Avenue • Suite 106 • Studio City, California 91604 • (818) 760-4116
431 J Street • Fourth Floor • Sacramento, California 95814 • (916) 870-1654

96043763902

BILL PRESS FOR U.S. SENATE
EXPLORATORY COMMITTEE

(A)

October 16, 1987

Dr. Sabri El Farrar
2411 Inverness Avenue
Los Angeles, CA
90027

Dear Sabri:

It was nice meeting you at Mahmoud & Hanan El Farrar's on October 11, 1987. Thank you for taking time out of your Sunday to join us.

I'm very excited about this campaign. The initial response is very encouraging and I'm convinced we can win the primary and go on to retire Pete Wilson!

Your early support is crucial in getting us off to a strong start. Thanks again for your help.

Best regards,

BP
BILL PRESS

BP:dt

Enclosure:

I deeply appreciate your speaking up for me - and your commitment of \$2000.

96043763903

(B)

PHYSICIANS INTERINDEMNITY/PAC

310 E. COLORADO ST., NO. 308
GLENDALE, CA 91205

1010

90-1396/1222

October 12, 1987

PAY
TO THE
ORDER OF

AMERICA'S PAC

\$ 2,000.00

Two Thousand Dollars & no/100 ----- DOLLARS



ENCINO OFFICE
INDEPENDENCE
BANK
15910 VENTURA BLVD.
ENCINO, CA 91436

FOR Bill Press for U.S. Senate

S. M. El Farra, M.D.,
Treasurer

2000

America's Pac
4100 Whitsett Ave
\$ 106

Studio City
91604 - (Bill
Press
Senate)

BILL PRESS FOR U.S. SENATE

EXPLORATORY COMMITTEE

NEIL B. RINCOVER

3580 WILSHIRE BLVD. SUITE 1745
LOS ANGELES, CALIFORNIA 90010 (213) 389-8266

96043763904

PHYSICIANS INTERINDEMNITY/PAC

310 E. COLORADO ST., NO. 308
GLENDALE, CA 91205

1010

90-1396/1222

October 12, 1987

PAY
TO THE
ORDER OF

AMERICA'S PAC

\$ 2,000.00

Two Thousand Dollars & no/100

DOLLARS



INCORPORATED OFFICE
INDEPENDENCE
BANK
1810 VENTURA BLVD
EMERYVILLE, CA 94608

FOR Political contribution

S. M. El Farra, M.D.

Treasurer

96043763905

OT '87 21
P.E.O.
F.R.B. LOS ANGELES
1220-0010-8

PAY TO THE ORDER OF
CAPITOL EMPLOYEES UNION
SAC, LOS ANGELES
For Deposit Only
AMERICAN SAVINGS
0165674001

PAY TO THE ORDER OF
CAPITOL EMPLOYEES UNION
SAC, CA
121126329



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1988

Mr. Bill Press
2001 Wilshire Blvd.
Suite 310
Santa Monica, CA 90403

Dear Mr. Press:

This is to acknowledge receipt on April 15, 1988, of your letter constituting a follow-up to your correspondence dated March 30, 1988. We informed you by letter dated April 12, 1988, that your correspondence dated March 30, 1988, was not properly sworn to. The letter you submitted on April 15, 1988, also was not properly sworn to.

You must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. A statement by the notary that the complaint was sworn to and subscribed before her will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. 437g.

If you have any questions concerning this matter, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "L. G. Lerner", with a long horizontal flourish extending to the right.

By: Lois G. Lerner
Associate General Counsel

96043763906



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 9, 1988

Mr. Bill Press
c/o Bill Press For US Senate
2001 Wilshire Blvd.
Suite 310
Santa Monica, CA 90403

RE: MUR 2604

Dear Mr. Press:

This letter acknowledges receipt of your complaint, received on May 2, 1988, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by America's PAC. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2604. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

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plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 9, 1988

Neil B. Rincover, Executive Director
America's PAC
4100 Whitsett Avenue
Suite 106
Studio City, CA 91604

RE: MUR 2604
America's PAC

Dear Mr. Rincover:

The Federal Election Commission received a complaint which alleges that America's PAC may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2604. 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 America's PAC in this matter. 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. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(12)(A) of Title 2 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 completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Janice Lacy, the staff person assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

96043763911



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1988

Mr. Bill Press
c/o Bill Press for U.S. Senate
2001 Wilshire Blvd.
Suite 310
Santa Monica, CA 90403

RE: MUR 2604

Dear Mr. Press:

This letter acknowledges receipt on June 21, 1988, of the amendment to the complaint you filed on May 2, 1988, against America's PAC and Neil Rincover, acting as treasurer. The respondents will be sent copies of the amendment. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

96043763914



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 27, 1988

Neil B. Rincover, Executive Director
America's PAC
4100 Whitsett Avenue
Suite 106
Studio City, CA 91604

RE: MUR 2604
America's PAC and
Neil Rincover, acting
as treasurer

Dear Mr. Rincover:

On May 9, 1988, you were notified that the Federal Election Commission received a complaint from Bill Press on behalf of Bill Press for U.S. Senate alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On June 21, 1988, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure

96043763915

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

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 JUN 27 PM 3:53

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR # 2604
DATE COMPLAINT RECEIVED
BY OGC May 2, 1988
DATE OF NOTIFICATION
TO RESPONDENT May 9, 1988
STAFF MEMBER: Janice Lacy

COMPLAINANT: Bill Press, on behalf of
Bill Press for U.S. Senate

RESPONDENTS: America's PAC and Neil Rincover, acting
as treasurer

RELEVANT STATUTES: 2 U.S.C. § 432(b) (1)
2 U.S.C. § 433(a)
2 U.S.C. § 434(a) (1)
2 U.S.C. § 441a(a) (1) (A)
2 U.S.C. § 441a(a) (8)
2 U.S.C. § 441b(a)
2 U.S.C. § 441d(a) (3)
11 C.F.R. § 102.8
11 C.F.R. § 110.6(a) & (b)

INTERNAL REPORTS
CHECKED: B Index
Mur 1603

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Office of General Counsel received a complaint on May 2, 1988, from Bill Press, a former candidate for the United States Senate in California, on behalf of Bill Press for U.S. Senate, his principal campaign committee. The complaint named America's PAC, a political action committee headquartered in California, and Neil Rincover, Executive Director, as respondents. The complaint alleges that America's PAC solicited and received contributions for the Senate campaign of Bill Press without his

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knowledge or authorization. The complaint also alleges that America's PAC altered the memo notation on one contributor's check from "Bill Press for U.S. Senate" to "Political contribution."

This Office notified Neil Rincover and America's PAC of the complaint by regular mail on May 9, 1988. To date, we have not received any response or request for an extension of time from these parties; nor has the mailing been returned to us as undeliverable. On June 6, 1988, we contacted general information for Studio City and Sacramento, California, the two cities listed on the letterhead of America's PAC, but there was no listing for either America's PAC or Neil Rincover in either city. Finally, on June 16, 1988, we wrote the Postmasters of both cities in attempt to locate these parties. We have not yet received a response to these letters.

On June 21, 1988, this Office received additional information from the Complainant pertaining to the allegations in the complaint. In a letter from Bill Press to this Office, Bill Press claims that America's PAC solicited funds for Bill Press and another candidate in a federal election and failed to register with the Federal Election Commission. As this new information is considered an amendment to the original complaint, Neil Rincover and America's PAC have been given additional time in which to respond to the allegations.

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After receiving any responses or after the expiration of the time for receiving responses, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble
General Counsel

6/24/88
Date


By: Lois G. Lerner
Associate General Counsel

96043763918



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Neil B. Rincover, Executive Director
America's PAC
13119 Moorpark #17
Sherman Oaks, CA 91423

RE: MUR 2604
America's PAC and
Neil Rincover, acting
as treasurer

Dear Mr. Rincover,

On May 9, 1988, you were notified that the Federal Election Commission received a complaint from Bill Press on behalf of Bill Press for U.S. Senate alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time you were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On June 27, 1988, you were further notified that the Commission received additional information from the complainant pertaining to the allegations in the complaint. As this new information was considered an amendment to the original complaint, you were afforded an additional 15 days in which to respond to the allegations.

Both notifications were sent to you at the address in Studio City, California shown on the letterhead of America's PAC. However, having received no response from you to the allegations, we further researched your address and were informed that the address noted above is another present address at which you may be reached.

We have enclosed the complaint and the amendment. You are hereby afforded an additional 15 days in which to respond to the

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Letter to Neil B. Rincover
America's PAC
Page 2

allegations. Please be advised that if you fail to submit a response within 15 days of your receipt of this notification, we will proceed to the next phase of the enforcement procedure. If you have any questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

88 SEP 27 PM 1:34

In the Matter of)
)
America's PAC and Neil) MUR 2604
Rincover, acting as)
treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Office of General Counsel received a complaint on May 2, 1988, from Bill Press, a former candidate for the United States Senate in California, on behalf of Bill Press for U.S. Senate, his principal campaign committee. The complaint named America's PAC, a political action committee headquartered in California, and Neil Rincover, Executive Director, as respondents. The complaint alleges that America's PAC solicited and received contributions for the Senate campaign of Bill Press without his knowledge or authorization. The complaint also alleges that America's PAC altered the memo notation on one contributor's check from "Bill Press for U.S. Senate" to "Political contribution."

II. DIFFICULTY IN LOCATING RESPONDENTS

This Office notified Neil Rincover and America's PAC of the complaint by regular mail on May 9, 1988. We did not receive any response or request for extensions of time from these parties. On June 6, 1988, we contacted general information for Studio City and Sacramento, California, the two cities listed on the letterhead of America's PAC, but there was no listing for either America's PAC or Neil Rincover in either city. On June 16, 1988,

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we wrote the Postmasters of both cities in attempt to locate these parties.

On June 24, 1988, we received a response from the Postmaster of Sacramento, California, indicating that the address we had used was correct. On June 29, 1988, we received a response from the Postmaster of Studio City, California, indicating a new address for the respondents. In the meantime, on June 21, 1988, this Office received additional information from the Complainant pertaining to the allegations in the complaint. In a letter from Bill Press to this Office, Bill Press claimed that America's PAC solicited funds for Bill Press and another candidate in a federal election and failed to register with the Commission. As this new information was considered an amendment to the original complaint, this Office gave Neil Rincover and America's PAC additional time in which to respond to the allegations.

This Office sent the amendment to Neil Rincover and America's PAC on June 27, 1988. After receiving the new address from the Postmaster of Studio City, this Office re-sent both the complaint and the amendment by both certified and first class mail to the respondents at the new address on July 11, 1988. We allowed an additional 15 days in which the respondents could submit a response to the allegations.

The certified letter was returned on August 4, 1988 as unclaimed. The second letter was returned on August 10, 1988. We reinterpreted the handwritten address that the Postmaster provided us and sent a second notification to the respondents at

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this address by both certified and regular mail on August 23, 1988.

After receiving any responses to the notifications or after the expiration of the time for receiving responses, this Office will report to the Commission with appropriate recommendations.

Lawrence M. Noble
General Counsel

9/26/88
Date


By: Lois G. Lerner
Associate General Counsel

Staff Person: Janice Lacy

96043163923

BEFORE THE FEDERAL ELECTION COMMISSION
09 JAN 18 PM 12:11

In the Matter of)
)
America's PAC and Neil Rincover,)
 as Executive Director and)
 acting as treasurer;)
Physicians Interindemnity/PAC)
 and Sabri El Farra, as treasurer)

MUR 2604

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Office of the General Counsel received a complaint on May 2, 1988, from Bill Press, a former candidate for the United States Senate in California, on behalf of Bill Press for U.S. Senate, his principal campaign committee. The complaint names America's PAC, an unregistered political action committee headquartered in California, and Neil Rincover, Executive Director, as respondents. The Complainant alleges that America's PAC solicited and received funds for the Senate campaign of Bill Press without his knowledge or authorization. The Complainant also alleges that America's PAC altered the memo notation on one contributor's check from "Bill Press for U.S. Senate" to "Political contribution."^{1/} During the course of analyzing these allegations, this Office added Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, treasurer, as respondents.

^{1/} Despite repeated attempts to notify Mr. Rincover and America's PAC of the complaint, this Office has received no written response. This Office's first letter notifying Mr. Rincover and America's PAC of the complaint was mailed on May 9, 1988. Several follow-up attempts were also made. Finally, on October 25, 1988, Mr. Rincover contacted this Office by telephone. Subsequent to his call, this Office again made repeated attempts to contact Mr. Rincover concerning submission of a written response, but has received no response from him or from America's PAC. See General Counsel's Report dated September 26, 1988.

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The Complainant claims that Mr. Rincover is a former campaign employee of the Complainant, having been "separated" from the campaign as of September 25, 1987. Shortly thereafter, on October 11, 1987, the Complainant claims to have met with Dr. El Farra, treasurer of PI/PAC, in an apparent attempt to solicit campaign contributions. It appears that at this meeting Dr. El Farra made a \$2,000 commitment to the Complainant's campaign.^{2/}

Attached to the complaint is a check for \$2,000^{3/} drawn on the account of PI/PAC and signed by Dr. El Farra. The check, however, was made payable to America's PAC, showing only a memo notation to "Bill Press for U.S. Senate," the Complainant's campaign committee. See Attachment I(1). The check was dated October 12, 1987, the day after the meeting between Dr. El Farra and Mr. Press at which Dr. El Farra allegedly made the \$2,000 commitment to Mr. Press.

Mr. Press alleges that Dr. El Farra sent this check for the Complainant's campaign to America's PAC at the suggestion of Mr. Rincover. The original check from PI/PAC is attached to the complaint.^{4/} Also attached is a business card for Mr. Rincover,

^{2/} On a note from Mr. Press to Dr. El Farra dated October 16, 1987, Mr. Press referenced the October 11 meeting and wrote, "I deeply appreciate your speaking up for me - and your commitment of \$2,000."

^{3/} Note that elsewhere in his complaint, Mr. Press claims that Dr. El Farra informed Mr. Press that he sent America's PAC a contribution for \$1,000 for Mr. Press' campaign.

^{4/} How Mr. Press obtained possession of this check, which had not yet been cancelled through a bank, is unclear.

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whose name appears on the card under the heading "Bill Press for U.S. Senate/Exploratory Committee." Additionally, the complaint attaches a handwritten note of the address for America's PAC, and notations of "\$2,000," "Bill Press," and "Senate."

By October 21, 1987, the check had cleared. The exhibit of the cancelled check shows that it was deposited in an account of America's PAC. See Attachment I(2). However, the notation on the cancelled check is different from that shown on the original check: the notation apparently had been altered from "Bill Press for U.S. Senate" to "Political contribution." Mr. Press claims that he never received any funds from America's PAC.

Finally, attached to the complaint is an exhibit of a letter on America's PAC stationary, dated February 29, 1988, which solicits contributions in order "to assist" three candidates, one of whom was Mr. Press. See Attachment I(3). Typed on the letter are the words "Hand Delivered." The letter solicits funds to finance an impending "massive direct mail fundraising drive," which will "assist" Bill Press. The letter provides no statement of who paid for the communication, nor any statement that the communication was or was not authorized by Mr. Press. In fact, Mr. Press states that he was unaware of any fundraising activities conducted by America's PAC on his behalf, and never received any funds America's PAC may have obtained as a result of using his name in solicitations.

As alleged in an amendment to the complaint, America's PAC also has not filed a Statement of Organization with the

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Commission. Another political action committee, America's Political Action Committee located in Herndon, Virginia, is already registered with the Commission under the same name. America's PAC also has not filed any reports of receipts and disbursements with the Commission. Likewise, PI/PAC has not filed a Statement of Organization with the Commission; however, a committee by the name of "Physicians Interindemnity/FED-PAC" filed a Statement of Organization with the Commission on June 16, 1988.

II. FACTUAL AND LEGAL ANALYSIS

1. Failure to Report Earmarked Contribution

The threshold issue raised by this complaint is whether the check for \$2,000 from PI/PAC to America's PAC was, in fact, an earmarked contribution from PI/PAC to Bill Press for U.S. Senate. Pursuant to 2 U.S.C. § 441a(a)(8), all contributions made by a person on behalf of a particular candidate, including contributions which are earmarked or otherwise directed through an intermediary to such candidate, shall be treated as contributions from such person to such candidate and reported as such by the intermediary. See also 11 C.F.R. § 110.6(a). The Regulations further provide that "earmarked" means a designation which results in the contribution being made to a candidate's authorized committee. 11 C.F.R. § 110.6(b).

America's PAC received a check from PI/PAC payable to America's PAC, but on the face of which was a memo notation to "Bill Press for U.S. Senate." In order for a contribution to be

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considered "earmarked," the Regulations require the designation of a candidate's authorized committee. The memo notation on the check, "Bill Press for U.S. Senate," names the principal campaign committee of Bill Press, a candidate for U.S. Senate. Therefore, this Office concludes that the memo notation on the check from PI/PAC to America's PAC constituted an earmark of the funds to Bill Press for U.S. Senate.

Once funds are considered earmarked, the Act mandates that the funds shall be treated as a contribution from the person making the contribution to the designated candidate. 2 U.S.C. § 441a(a)(8). Accordingly, the funds from PI/PAC which earmarked the authorized committee of Mr. Press constituted a contribution from PI/PAC to Bill Press. Furthermore, for purposes of this rule, America's PAC would be considered the conduit or intermediary for the contribution. The Act imposes a legal requirement on the conduit or intermediary to report the original source and intended recipient of such contributions to the Commission and to the intended recipient. Id.; see also 11 C.F.R. § 110.6(c).^{5/} Here, the intermediary, America's PAC, failed to report the original source and the intended recipient of this contribution to the Commission and to Bill Press for U.S. Senate. Therefore, this Office recommends that the

^{5/} The Regulations also require that "the report to the intended recipient shall be made when the contribution is passed on to the intended recipient." 11 C.F.R. § 110.6(c)(2). It should be noted, however, that this contribution was never passed on to Bill Press for U.S. Senate, the intended recipient. See discussion at Pages 7-8 infra.

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Commission find reason to believe that America's PAC violated 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6(c).^{6/}

2. America's PAC Failure to Register and Report

Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission within 10 days after becoming a political committee. 2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee...which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." Although arguably the contribution from PI/PAC was not intended for America's PAC, it appears that America's PAC deposited the check in its own account, and did not forward the funds to Bill Press for U.S. Senate. By so converting the funds to its own use, America's PAC effectively received a contribution for \$2,000. Furthermore, as will be discussed below, America's PAC apparently undertook the mailing of solicitation letters to raise funds to assist Mr. Press. In its solicitation letter to PI/PAC, America's PAC states that "[o]ur direct mail effort will cost approximately \$16,000; we already have raised more than \$12,000." See Attachment I(3). Thus, it appears that America's PAC made

^{6/} It is also important to note the apparent donative intent of the contributor, PI/PAC. The check is dated October 12, 1987, the day after an alleged meeting between Mr. Press and a PI/PAC officer at which PI/PAC apparently made a commitment to Mr. Press for \$2,000. It is possible that PI/PAC wrote the check in response to a solicitation from America's PAC; however, the only solicitation letter to PI/PAC this Office is aware of is dated February 29, 1988, over four months after the date of the check.

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expenditures in excess of \$1,000^{7/} and received contributions in excess of \$1,000, for the purpose of influencing a federal election. America's PAC thus appears to be a "political committee" which must register with the Commission. America's PAC, however, has failed to register with the Commission. Additionally, 2 U.S.C. § 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission. America's PAC has failed to file such reports. Therefore, this Office recommends that the Commission find reason to believe that America's PAC violated 2 U.S.C. §§ 433 and 434(a) by failing to file a Statement of Organization and the requisite reports with the Commission.

3. Failure to Forward Contribution

The Act provides that every person who receives a contribution for an authorized political committee shall forward the contribution to the treasurer no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(1); 11 C.F.R. § 102.8(a). Additional information is required to be forwarded for contributions in excess of \$200. 11 C.F.R. § 102.8(a).

7/ In addition to Mr. Press, the letter also solicited funds for Jesse Jackson, a candidate for President, and for Tom Bradley, a candidate for Mayor of Los Angeles. Regarding the allocation of such expenditures among candidates, see 11 C.F.R. § 106.1(a), which requires attribution of expenditures in proportion to the benefit reasonably expected to be derived from such expenditures. In the present matter, the America's PAC letter solicits contributions for at least two federal candidates. Thus, it is reasonable to conclude that at least \$1,000 of the \$16,000 in estimated expenditures can be attributed to candidates for a Federal election.

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For purposes of these rules, the Act defines "person" to include a committee. 2 U.S.C. § 431(11). Therefore, America's PAC, as a political action committee, qualifies as a "person" which is subject to these rules. Additionally, the Regulations provide that the requirements of 11 C.F.R. § 102.8 apply to earmarked contributions transmitted by an intermediary or conduit. 11 C.F.R. § 102.8(c). As discussed at Section 1 above, the check from PI/PAC to America's PAC earmarked the contribution to an authorized political committee, Bill Press for U.S. Senate. Accordingly, the requirement to forward contributions applies to America's PAC's receipt of the earmarked contribution. However, Mr. Press claims that his campaign committee never received any contributions from America's PAC. Instead, it appears that America's PAC altered the memo entry on the check to read "Political contribution," and apparently converted the funds to its own use by depositing the check in an America's PAC account and failing to forward the funds to the Complainant's committee. Therefore, this Office recommends that the Commission find reason to believe that America's PAC violated 2 U.S.C. § 432(b) and 11 C.F.R. § 102.8(a) by failing to forward the contribution and the requisite information to the treasurer of Bill Press for U.S. Senate and, instead, converting the funds to its own use.^{8/}

^{8/} If the investigation indicates a concerted scheme by Mr. Rincover to convert these funds, this Office may make recommendations regarding a knowing and willful violation.

4. Impermissible Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution in connection with any federal election, and for any political committee to knowingly accept or receive any contribution containing corporate funds. Although the contribution from PI/PAC apparently was intended for Bill Press for U.S. Senate, America's PAC accepted the check and deposited the funds in its own account. Furthermore, it appears that America's PAC changed the earmark on the check from "Bill Press for U.S. Senate" to "Political contribution." By so misappropriating these funds, America's PAC accepted the funds as a contribution to itself. PI/PAC is located in Glendale, California. Because California permits corporate contributions, it is possible that some physicians who are members of PI/PAC may be corporate contributors. Thus, the contribution from PI/PAC could contain corporate funds. Therefore, this Office recommends that the Commission find reason to believe that America's PAC violated 2 U.S.C. § 441b(a) by accepting a contribution which may have contained corporate funds, and that PI/PAC violated 2 U.S.C. § 441b(a) by making a contribution which may have contained corporate funds.^{9/}

^{9/} It appears that the \$2,000 contribution from PI/PAC may also have resulted in an excessive contribution, inasmuch as PI/PAC appears to be a "person" for purposes of the Act, and thus is subject to a \$1,000 contribution limit to any candidate and his authorized political committee. See 2 U.S.C. § 441a(a)(1)(A). This Office, however, is limiting its recommendation to Section 441b(a) at this time.

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5. Failure to Report Independent Expenditures

Section 434(b)(6)(B)(iii) of the Act requires a political committee to disclose on its reports filed with the Commission information related to independent expenditures. It appears that America's PAC may have made independent expenditures on behalf of Mr. Press by producing and distributing the solicitation letter, as well as by conducting the \$16,000 direct mail campaign which it referenced in the solicitation letter.

An expenditure made by a former employee of a candidate's committee is generally presumed to be not independent. See 11 C.F.R. § 109.1(b)(4)(i)(B). Because Mr. Press claims that Mr. Rincover is a former employee of Mr. Press' committee, it could be presumed that America's PAC's expenditures were not independent. However, because Mr. Press also claims that he was unaware of any fundraising activities by America's PAC and Mr. Rincover, it appears that America's PAC made independent expenditures which were not disclosed in reports filed with the Commission. Therefore, this Office recommends that the Commission find reason to believe that America's PAC violated 2 U.S.C. § 434(b) by not disclosing to the Commission information related to its independent expenditures.

6. Unauthorized Solicitations

It appears that on February 29, 1988, America's PAC sent a letter which solicited contributions to finance a direct mail fundraising effort which would "assist" three clearly identified candidates, including Bill Press. Mr. Press claims that

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America's PAC failed to obtain his authorization, or the authorization of Bill Press for U.S. Senate, for the solicitation.

2 U.S.C. § 441d(a)(3) requires that if the communication is not authorized, it must clearly state the name of the person who paid for the communication and that the communication is not authorized by any candidate or candidate's committee. This provision, however, applies only to statements and solicitations made through any direct mailing or any other type of general public political advertising. "Direct mail" is not defined by the statute; however, definitions of "direct mail" found in Commission Regulations in other contexts provide that the term means "any mailing(s) by a commercial vendor or any mailing(s) made from commercial lists." 11 C.F.R. §§ 100.7(b)(15)(i) and 100.7(b)(17)(i). See also 11 C.F.R. § 110.14(f)(4).

The September 29 letter has "Hand Delivered" typed on its face, and specifically identifies PI/PAC as a past supporter of Bill Press. These facts indicate that that mailing to PI/PAC was too specialized to be a direct mailing involving a commercial vendor or commercial lists. Because the letter apparently cannot be considered a direct mailing, this Office concludes that Section 441d does not apply to the September 29 letter.

That same letter does, however, refer to an impending "massive direct mail fundraising drive" and estimates that this effort will cost approximately \$16,000. As discussed at Section 5 above, the Commission has received no reports from

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America's PAC concerning such expenditures. This Office is proposing interrogatories which address whether any direct mailings actually took place, and is recommending that the Commission subpoena documents used in connection with such mailings. A review of these documents may reveal Section 441d violations. Therefore, this Office makes no recommendation at this time regarding whether there is reason to believe America's PAC violated 2 U.S.C. § 441d.

7. PI/PAC Failure to Register

2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee...which makes expenditures aggregating in excess of \$1,000 during a calendar year." "Expenditure" is defined in the Act as "any...deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(9)(A)(i).

PI/PAC is a committee which issued a check for \$2,000 to America's PAC, and earmarked the funds to an authorized campaign committee of a federal candidate. Therefore, PI/PAC made an expenditure for purposes of the Act in excess of \$1,000, and thereby qualifies as a political committee. Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission within ten days after becoming a political committee. Additionally, 2 U.S.C. § 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission.

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A committee by the name of "Physicians Interindemnity/FED-PAC" registered with the Commission on June 10, 1988 as a separate segregated fund. Its Statement of Organization lists "Physicians Interindemnity/State-PAC" as a connected organization. Also in its Statement of Organization, Physicians Interindemnity/FED-PAC names Dr. El Farra, the treasurer for PI/PAC, as the treasurer of Physicians Interindemnity/FED-PAC. It thus appears that at least two committees, one on a federal level and one on a state level, are using the Physicians Interindemnity name.

The check in question was drawn on the account of "Physicians Interindemnity/PAC," not "Physicians Interindemnity/FED-PAC" or "Physicians Interindemnity/State-PAC." Thus, it is unclear which committee made the contribution. The check in question is dated October 12, 1987, which is over eight months prior to the registration of Physicians Interindemnity/FED-PAC with the Commission. Therefore, it appears that Physicians Interindemnity/FED-PAC did not make the contribution, and that it is likely that the check was drawn on the account of the state committee or another unregistered committee. In any event, PI/PAC has not registered or filed reports with the Commission. Therefore, this Office recommends that the Commission find reason to believe that PI/PAC violated 2 U.S.C. §§ 433 and 434 by failing to file a Statement of Organization and the requisite reports with the Commission.

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III. RECOMMENDATIONS

1. Find reason to believe America's PAC violated 2 U.S.C. §§ 441a(a)(8), 433, 432(b), 441b(a), 434(a) and 434(b), and 11 C.F.R. §§ 110.6(c) and 102.8(a).
2. Find reason to believe that Physicians Interindemnity/PAC violated 2 U.S.C. §§ 433, 434 and 441b(a).
3. Authorize the attached Subpoena and Order to America's PAC.
4. Approve the attached Interrogatories to Physicians Interindemnity/PAC.
5. Approve the attached letters (2) and Factual and Legal Analyses (2).

Lawrence M. Noble
General Counsel

Date

1-18-89

BY:



Lois G. Lerner
Associate General Counsel

Attachments

1. Exhibits of Check and Solicitation Letter
2. Subpoena/Order (1)
3. Interrogatories (1)
4. Letters (2)
5. Factual and Legal Analyses (2)

Staff Person: Janice Lacy

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
America's PAC and Neil Rincover,)
as Executive Director and) MUR 2604
acting as treasurer;)
Physicians Interindemnity/PAC)
and Sabri El Farra, as treasurer)

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of January 31, 1989, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 2604:

1. Find reason to believe America's PAC and Neil Rincover, as Executive Director and acting as treasurer, violated 2 U.S.C. §§ 441a(a)(8), 433, 432(b), 441b(a), 434(a) and 434(b), and 11 C.F.R. §§ 110.6(c) and 102.8(a).
2. Find reason to believe that Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. §§ 433, 434 and 441b(a).
3. Authorize Subpoena and Order to America's PAC as recommended in the General Counsel's Report dated January 18, 1989.
4. Approve the Interrogatories to Physicians Interindemnity/PAC as recommended in the General Counsel's Report dated January 18, 1989.

(continued)

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5. Approve the letters (2) and Factual and Legal Analyses (2) as recommended in the General Counsel's Report dated January 18, 1989.

Commissioners Aikens, McDonald, McGarry and Thomas voted affirmatively for this decision. Commissioner Josefiak dissented. Commissioner Elliott was not present.

Attest:

February 1, 1989
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Neil B. Rincover, Executive Director
America's PAC
13119 Moorpark #17
Sherman Oaks, CA 91423

RE: MUR 2604
America's PAC and Neil
Rincover as Executive Director
and acting as treasurer

Dear Mr. Rincover:

On July 11, 1988, the Federal Election Commission last notified America's PAC ("the Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was enclosed with that notification.

Upon further review of the allegations contained in the complaint, the Commission, on January 31, 1989, found that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 441a(a)(8), 433, 434(a), 432(b), 441b(a), and 434(b), provisions of the Act, and 11 C.F.R. §§ 110.6(c) and 102.8(a) of Commission Regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Order to Answer Questions/Subpoena for Documents must be submitted to the General Counsel's Office within 15 days of your receipt of this letter. Any additional materials or statements you wish to submit should accompany the response to the order and subpoena.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address, and

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Neil Rincover
Page 2

telephone number of such counsel, and authorizing such counsel to receive any notifications or other communications from the Commission.

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

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

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

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 investigation to be made public.

If you have any questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Danny L. McDonald
Chairman

Enclosures
Order and Subpoena
Designation of Counsel Form
Factual and Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2604

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Neil Rincover, Executive Director
America's PAC
13119 Moorpark #17
Sherman Oaks, CA 91423

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of your receipt of this Order and Subpoena.

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Neil Rincover
America's PAC
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has
hereunto set his hand in Washington, D.C. on this *3rd* day of
Feb., 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments

Questions (3 pages)
Document Request (1 Page)

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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Neil Rincover
America's PAC

QUESTIONS

1. State whether Neil Rincover has ever been associated with a political committee of Bill Press. If so, provide a description of the association (i.e., employee, volunteer, etc.), the dates of such association, and the name of the committee with which Mr. Rincover was associated.
2. Exhibit A (attached) is a check drawn on an account of Physicians Interindemnity/PAC payable to America's PAC which shows a memo notation to "Bill Press for U.S. Senate." Exhibit B appears to be the same check cancelled through an America's PAC account. This check shows a different memo notation, "Political contribution," than that shown originally on the check.
 - a. Did anyone associated with America's PAC change the memo notation? If yes, explain why.
 - b. If the answer to (a) above is no, explain how the memo notation could have been changed.
3. Did Mr. Rincover or anyone associated with America's PAC solicit Physicians Interindemnity/PAC for contributions to assist Bill Press? If yes, provide the following:
 - a. state the date(s) of such solicitations;
 - b. identify the persons solicited;
 - c. state whether any representations were made concerning the forwarding to or use of funds by Bill Press;
 - d. describe the form of the solicitations;
 - e. state the amount of funds raised by the solicitation.
4. Did Mr. Rincover or anyone associated with America's PAC solicit persons other than Physicians Interindemnity/PAC for contributions to assist Bill Press? If yes, provide the information requested in (a)-(e) from Question (3) above for these solicitations.
5. Regarding the attached solicitation letter (Exhibit C), provide the following:
 - a. the amount of funds raised by the solicitation;
 - b. the number of letters sent;

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Questions to Neil Rincover
Page 2

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- c. the source of the mailing list used;
 - d. whether America's PAC cooperated or consulted with Bill Press or his campaign committee in making the solicitation;
 - e. the amount expended in producing and distributing the letter;
 - f. the date(s) of such expenditure(s); and
 - g. the name and address of the persons to whom such expenditures were made and the services such persons provided.
6. Regarding the "massive direct mail fundraising drive" referenced in the attached solicitation letter (Exhibit C), provide the following:
- a. the amount of funds raised by the solicitation;
 - b. the number of letters sent;
 - c. the source of the mailing list used;
 - d. whether America's PAC cooperated or consulted with Bill Press or his campaign committee in making the solicitation;
 - e. the amount expended in producing and distributing the mailings;
 - f. the date(s) of such expenditure(s); and
 - g. the name and address of the persons to whom such expenditures were made and the services such persons provided.
7. During 1987-88, did Mr. Rincover or anyone at America's PAC receive funds intended for Bill Press which were forwarded to Bill Press?
8. During 1987-88, did America's PAC contribute any funds to the campaign committee of Bill Press? If yes, state the date of such contribution, and the amount given.

Questions to Neil Rincover
Page 3

9. Did America's PAC make contributions to any other candidates for Federal election during 1987 or 1988? If yes, state:
 - a. the name of the recipient;
 - b. the date of such contribution; and
 - c. the amount given.
10. Has America's PAC made any other expenditures for the purpose of influencing a Federal election during 1987 or 1988? If yes:
 - a. describe the expenditure(s);
 - b. state the amount(s) expended;
 - c. state the date(s) of such expenditure(s); and
 - d. identify the person receiving the disbursement(s).
11. State whether America's PAC used commercial lists or engaged a commercial vendor to undertake any direct mail project to raise funds to assist Bill Press.

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REQUEST FOR DOCUMENTS

Provide originals or true copies of all solicitation materials used by America's PAC to raise funds for Bill Press.

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made a \$2,000 commitment to the Complainant's campaign.^{1/}

Attached to the complaint is a check for \$2,000^{2/} drawn on the account of PI/PAC and signed by Dr. El Farra. The check, however, was made payable to America's PAC, showing only a memo notation to "Bill Press for U.S. Senate," the Complainant's campaign committee. See Exhibit A. The check was dated October 12, 1987, the day after the meeting between Dr. El Farra and Mr. Press at which Dr. El Farra allegedly made the \$2,000 commitment to Mr. Press.

Mr. Press alleges that Dr. El Farra sent this check for the Complainant's campaign to America's PAC at the suggestion of Mr. Rincover. The original check from PI/PAC is attached to the complaint. Also attached is a business card for Mr. Rincover, whose name appears on the card under the heading "Bill Press for U.S. Senate/Exploratory Committee." Additionally, the complaint attaches a handwritten note of the address for America's PAC, and notations of "\$2,000," "Bill Press," and "Senate."

By October 21, 1987, the check had cleared. The exhibit of the cancelled check shows that it was deposited in an account at America's PAC. See Exhibit B. However, the notation on the cancelled check is different from that shown on the original

^{1/} On a note from Mr. Press to Dr. El Farra dated October 16, 1987, Mr. Press referenced the October 11 meeting and wrote, "I deeply appreciate your speaking up for me - and your commitment of \$2,000."

^{2/} Note that elsewhere in his complaint, Mr. Press claims that Dr. El Farra informed Mr. Press that he sent America's PAC a contribution for \$1,000 for Mr. Press' campaign.

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check: the notation apparently had been altered from "Bill Press for U.S. Senate" to "Political contribution." Mr. Press claims that he never received any funds from America's PAC.

Finally, attached to the complaint is an exhibit of a letter on America's PAC stationary, dated February 29, 1988, which solicits contributions in order "to assist" three candidates, one of whom was Mr. Press. See Exhibit C. Typed on the letter are the words "Hand Delivered." The letter solicits funds to finance an impending "massive direct mail fundraising drive," which will "assist" Bill Press. The letter provides no statement of who paid for the communication, nor any statement that the communication was or was not authorized by Mr. Press. In fact, Mr. Press states that he was unaware of any fundraising activities conducted by America's PAC on his behalf, and never received any funds America's PAC may have obtained as a result of using his name in solicitations.

As alleged in an amendment to the complaint, America's PAC also has not filed a Statement of Organization with the Commission. Another political action committee, America's Political Action Committee located in Herndon, Virginia, is already registered with the Commission under the same name. America's PAC also has not filed any reports of receipts and disbursements with the Commission.

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1. Failure to Report Earmarked Contribution

The threshold issue raised by this complaint is whether the check for \$2,000 from PI/PAC to America's PAC was, in fact, an earmarked contribution from PI/PAC to Bill Press for U.S.

Senate. Pursuant to 2 U.S.C. § 441a(a)(8), all contributions made by a person on behalf of a particular candidate, including contributions which are earmarked or otherwise directed through an intermediary to such candidate, shall be treated as contributions from such person to such candidate and reported as such by the intermediary. See also 11 C.F.R. § 110.6(a). The Regulations further provide that "earmarked" means a designation which results in the contribution being made to a candidate's authorized committee. 11 C.F.R. § 110.6(b).

America's PAC received a check from PI/PAC payable to America's PAC, but on the face of which was a memo notation to "Bill Press for U.S. Senate." In order for a contribution to be considered "earmarked," the Regulations require the designation of a candidate's authorized committee. The memo notation on the check, "Bill Press for U.S. Senate," names the principal campaign committee of Bill Press, a candidate for U.S. Senate. Therefore, it appears that the memo notation on the check from PI/PAC to America's PAC constituted an earmark of the funds to Bill Press for U.S. Senate.

Once funds are considered earmarked, the Act mandates that the funds shall be treated as a contribution from the person making the contribution to the designated candidate. 2 U.S.C.

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§ 441a(a)(8). Accordingly, the funds from PI/PAC which earmarked the authorized committee of Mr. Press constituted a contribution from PI/PAC to Bill Press. Furthermore, for purposes of this rule, America's PAC would be considered the conduit or intermediary for the contribution. The Act imposes a legal requirement on the conduit or intermediary to report the original source and intended recipient of such contributions to the Commission and to the intended recipient. Id.; see also 11 C.F.R. § 110.6(c).^{3/} Here, the intermediary, America's PAC, failed to report the original source and the intended recipient of this contribution to the Commission and to Bill Press for U.S. Senate. Therefore, there is reason to believe that America's PAC violated 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6(c).^{4/}

2. America's PAC Failure to Register and Report

Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission within 10 days after becoming a political committee. 2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee...which

^{3/} The Regulations also require that "the report to the intended recipient shall be made when the contribution is passed on to the intended recipient." 11 C.F.R. § 110.6(c)(2). It should be noted, however, that this contribution was never passed on to Bill Press for U.S. Senate, the intended recipient. See discussion at Pages 7-8 infra.

^{4/} It is also important to note the apparent donative intent of the contributor, PI/PAC. The check is dated October 12, 1987, the day after an alleged meeting between Mr. Press and a PI/PAC officer at which PI/PAC apparently made a commitment to Mr. Press for \$2,000. It is possible that PI/PAC wrote the check in response to a solicitation from America's PAC; however, the only solicitation letter to PI/PAC this Office is aware of is dated February 29, 1988, over four months after the date of the check.

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receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." Although arguably the contribution from PI/PAC was not intended for America's PAC, it appears that America's PAC deposited the check in its own account, and did not forward the funds to Bill Press for U.S. Senate. By so converting the funds to its own use, America's PAC effectively received a contribution for \$2,000. Furthermore, as will be discussed below, America's PAC apparently undertook the mailing of solicitation letters to raise funds to assist Mr. Press. In its solicitation letter to PI/PAC, America's PAC states that "[o]ur direct mail effort will cost approximately \$16,000; we already have raised more than \$12,000." See Exhibit C. Thus, it appears that America's PAC made expenditures in excess of \$1,000^{5/} and received contributions in excess of \$1,000, for the purpose of influencing a federal election. America's PAC thus appears to be a "political committee" which must register with the Commission. America's PAC, however, has failed to register with the Commission. Additionally, 2 U.S.C.

^{5/} In addition to Mr. Press, the letter also solicited funds for Jesse Jackson, a candidate for President, and for Tom Bradley, a candidate for Mayor of Los Angeles. Regarding the allocation of such expenditures among candidates, see 11 C.F.R. § 106.1(a), which requires attribution of expenditures in proportion to the benefit reasonably expected to be derived from such expenditures. In the present matter, the America's PAC letter solicits contributions for at least two federal candidates. Thus, it is reasonable to conclude that at least \$1,000 of the \$16,000 in estimated expenditures can be attributed to candidates for a Federal election.

§ 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission. America's PAC has failed to file such reports. Therefore, there is reason to believe that America's PAC violated 2 U.S.C. §§ 433 and 434(a) by failing to file a Statement of Organization and the requisite reports with the Commission.

3. Failure to Forward Contribution

The Act provides that every person who receives a contribution for an authorized political committee shall forward the contribution to the treasurer no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(1); 11 C.F.R. § 102.8(a). Additional information is required to be forwarded for contributions in excess of \$200. 11 C.F.R. § 102.8(a).

For purposes of these rules, the Act defines "person" to include a committee. 2 U.S.C. § 431(11). Therefore, America's PAC, as a political action committee, qualifies as a "person" which is subject to these rules. Additionally, the Regulations provide that the requirements of 11 C.F.R. § 102.8 apply to earmarked contributions transmitted by an intermediary or conduit. 11 C.F.R. § 102.8(c). As discussed at Section 1 above, the check from PI/PAC to America's PAC earmarked the contribution to an authorized political committee, Bill Press for U.S. Senate. Accordingly, the requirement to forward contributions applies to America's PAC's receipt of the earmarked contribution. However, Mr. Press claims that his campaign committee never received any contributions from America's PAC. Instead, it appears that

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America's PAC altered the memo entry on the check to read "Political contribution," and apparently converted the funds to its own use by depositing the check in an America's PAC account and failing to forward the funds to the Complainant's committee. Therefore, there is reason to believe that America's PAC violated 2 U.S.C. § 432(b) and 11 C.F.R. § 102.8(a) by failing to forward the contribution and the requisite information to the treasurer of Bill Press for U.S. Senate and, instead, converting the funds to its own use.

4. Impermissible Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution in connection with any federal election, and for any political committee to knowingly accept or receive any contribution containing corporate funds. Although the contribution from PI/PAC apparently was intended for Bill Press for U.S. Senate, America's PAC accepted the check and deposited the funds in its own account. Furthermore, it appears that America's PAC changed the earmark on the check from "Bill Press for U.S. Senate" to "Political contribution." By so misappropriating these funds, America's PAC accepted the funds as a contribution to itself. PI/PAC is located in Glendale, California. Because California permits corporate contributions, it is possible that some physicians who are members of PI/PAC may be corporate contributors. Thus, the contribution from PI/PAC could contain corporate funds. Therefore, there is reason to believe that America's PAC violated 2 U.S.C. § 441b(a) by

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accepting a contribution which may have contained corporate funds.

5. Failure to Report Independent Expenditures

Section 434(b)(6)(B)(iii) of the Act requires a political committee to disclose on its reports filed with the Commission information related to independent expenditures. It appears that America's PAC may have made independent expenditures on behalf of Mr. Press by producing and distributing the solicitation letter, as well as by conducting the \$16,000 direct mail campaign which it referenced in the solicitation letter.

An expenditure made by a former employee of a candidate's committee is generally presumed not to be independent. See 11 C.F.R. § 109.1(b)(4)(i)(B). Because Mr. Press claims that Mr. Rincover is a former employee of Mr. Press' committee, it could be presumed that America's PAC's expenditures were not independent. However, because Mr. Press also claims that he was unaware of any fundraising activities by America's PAC and Mr. Rincover, it appears that America's PAC made independent expenditures which were not disclosed in reports filed with the Commission. Therefore, there is reason to believe that America's PAC violated 2 U.S.C. § 434(b) by not disclosing to the Commission information related to its independent expenditures.

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

February 6, 1989

Sabri El Farra, M.D.
Treasurer
Physicians Interindemnity/PAC
310 E. Colorado St., No. 308
Glendale, CA 91205

RE: MUR 2604
Physicians Interindemnity/PAC
and Sabri El Farra, as
treasurer

Dear Dr. El Farra:

On January 31, 1989, the Federal Election Commission found that there is reason to believe Physicians Interindemnity/PAC (the "Committee") and you, as treasurer, violated 2 U.S.C. §§ 433, 434, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

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

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Sabri El Farra
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

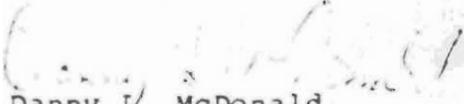
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Janice Lacy, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2604
)
)
)

INTERROGATORIES

TO: Sabri El Farra, Treasurer
Physicians Interindemnity/PAC
310 East Colorado St., #308
Glendale, CA 91205

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request to the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INSTRUCTIONS

In answering these interrogatories, furnish all information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The following interrogatories are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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Questions to:

Sabri El Farris
Physicians Interindemnity/PAC

1. The following questions concern the committee described as "Physicians Interindemnity/PAC" ("PI/PAC").
 - a. State the purpose for which this committee was organized.
 - b. Provide the name and address of the treasurer of this committee.
 - c. Is this committee affiliated with "Physicians Interindemnity/FED-PAC"? If so, how?
 - d. Is this committee affiliated with "Physicians Interindemnity/State-PAC"? If so, how?
2. Exhibit A (attached) is a check drawn on an account of PI/PAC which is payable to America's PAC. State whether this check was intended to be a contribution to Bill Press or his campaign committee, or a contribution to America's PAC. If it was intended to be a contribution to America's PAC, state the purpose of the memo notation, "Bill Press for U.S. Senate," on the check.
3. Exhibit B shows the same check cancelled through an account of America's PAC. The cancelled check shows the memo notation "Political contribution," which is different from that shown originally on the check, "Bill Press for U.S. Senate."
 - a. Did anyone associated with PI/PAC change this notation? If yes, explain why.
 - b. If the answer to (a) above is no, explain how the notation could have been changed.
4. In his complaint, Mr. Press attached Exhibit A, an uncancelled check drawn on an account of PI/PAC payable to America's PAC. Explain how Mr. Press obtained this check or a copy of this check before it was cancelled through a bank.
5. State whether there are any corporate contributors to PI/PAC.

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Questions to Sabri El Farra
Page 2

- 9 6 0 4 3 7 6 3 9 4 5
6. There appears to have been a meeting between Dr. El Farra and Mr. Press on October 11, 1987, at which Dr. El Farra apparently made a commitment of \$2,000 to Mr. Press' campaign.
 - a. State whether Dr. El Farra did, in fact, make this commitment. If yes, identify the person(s) to whom he expressed his commitment to make a contribution (i.e., Mr. Press, Neil Rincover, etc.).
 - b. Explain why, if the intent of PI/PAC was to contribute to Mr. Press' campaign, the check from PI/PAC was made payable not to Mr. Press or his campaign committee, but to America's PAC.
 7. Besides the attached solicitation letter (Exhibit C), did Mr. Rincover ever solicit PI/PAC for contributions to be used on behalf of Mr. Press? If yes, answer the following questions:
 - a. Did Mr. Rincover represent that the contributions would be forwarded to Mr. Press or his campaign committee?
 - b. Did Mr. Rincover represent that the contributions would be used by America's PAC to advocate Mr. Press' candidacy?
 - c. Did Mr. Rincover make any other representations regarding the use of the funds?
 - d. Provide the date(s) Mr. Rincover made such solicitation(s) to PI/PAC.
 8. State whether PI/PAC made any other contributions to Mr. Press' campaign. If yes, state the following:
 - a. the amount of such contributions;
 - b. the dates such contributions were made; and
 - c. if such contributions were made payable to an entity other than a committee of Mr. Press, the name of the entity which received the contribution.
 9. State whether PI/PAC made any contributions to any other candidates for federal election. If yes, provide the following:
 - a. state the amount of the contribution;

Questions to Sabri El Farra
Page 3

- b. state the date such contribution was made; and
- c. identify the recipient of the contribution.

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Physicians Interindemnity/PAC **MUR:** 2604
and Sabri El Farra, as
treasurer

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The Commission received a complaint on May 2, 1988, from Bill Press, a former candidate for the United States Senate in California, on behalf of Bill Press for U.S. Senate, his principal campaign committee. The complaint names America's PAC, an unregistered political action committee headquartered in California, and Neil Rincover, Executive Director, as respondents. The Commission has added Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, treasurer, as respondents.

The Complainant claims that Mr. Rincover is a former campaign employee of the Complainant, having been "separated" from the campaign as of September 25, 1987. Shortly thereafter, on October 11, 1987, the Complainant claims to have met with Dr. El Farra, treasurer of PI/PAC, in an apparent attempt to solicit campaign contributions. It appears that at this meeting Dr. El Farra made a \$2,000 commitment to the Complainant's campaign.^{1/}

Attached to the complaint is a check for \$2,000^{2/} drawn on

^{1/} On a note from Mr. Press to Dr. El Farra dated October 16, 1987, Mr. Press referenced the October 11 meeting and wrote, "I deeply appreciate your speaking up for me - and your commitment of \$2,000."

^{2/} Note that elsewhere in his complaint, Mr. Press claims that Dr. El Farra informed Mr. Press that he sent America's PAC a contribution for \$1,000 for Mr. Press' campaign.

the account of PI/PAC and signed by Dr. El Farra. The check, however, was made payable to America's PAC, showing only a memo notation to "Bill Press for U.S. Senate," the Complainant's campaign committee. See Exhibit A. The check was dated October 12, 1987, the day after the meeting between Dr. El Farra and Mr. Press at which Dr. El Farra allegedly made the \$2,000 commitment to Mr. Press.

Mr. Press alleges that Dr. El Farra sent this check for the Complainant's campaign to America's PAC at the suggestion of Mr. Rincover. The original check from PI/PAC is attached to the complaint.

By October 21, 1987, the check had cleared. The exhibit of the cancelled check shows that it was deposited in an account of America's PAC. See Exhibit B. However, the notation on the cancelled check is different from that shown on the original check: the notation apparently had been altered from "Bill Press for U.S. Senate" to "Political contribution." Mr. Press claims that he never received any funds from America's PAC.

Finally, attached to the complaint is an exhibit of a letter on America's PAC stationary to PI/PAC, dated February 29, 1988, which solicits contributions in order "to assist" three candidates, one of whom was Mr. Press. See Exhibit C.

PI/PAC has not filed a Statement of Organization with the Commission. However, a committee by the name of "Physicians Interindemnity/FED-PAC" filed a Statement of Organization with the Commission on June 16, 1988.

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The threshold issue raised by this complaint is whether the check for \$2,000 from PI/PAC to America's PAC was, in fact, an earmarked contribution from PI/PAC to Bill Press for U.S. Senate. Pursuant to 2 U.S.C. § 441a(a)(8), all contributions made by a person on behalf of a particular candidate, including contributions which are earmarked or otherwise directed through an intermediary to such candidate, shall be treated as contributions from such person to such candidate and reported as such by the intermediary. See also 11 C.F.R. § 110.6(a). The Regulations further provide that "earmarked" means a designation which results in the contribution being made to a candidate's authorized committee. 11 C.F.R. § 110.6(b).

America's PAC received a check from PI/PAC payable to America's PAC, but on the face of which was a memo notation to "Bill Press for U.S. Senate." In order for a contribution to be considered "earmarked," the Regulations require the designation of a candidate's authorized committee. The memo notation on the check, "Bill Press for U.S. Senate," names the principal campaign committee of Bill Press, a candidate for U.S. Senate. Therefore, it appears that the memo notation on the check from PI/PAC to America's PAC constituted an earmark of the funds to Bill Press for U.S. Senate.

Once funds are considered earmarked, the Act mandates that the funds shall be treated as a contribution from the person making the contribution to the designated candidate. 2 U.S.C. § 441a(a)(8). Accordingly, the funds from PI/PAC which earmarked

the authorized committee of Mr. Press constituted a contribution from PI/PAC to Bill Press. Furthermore, for purposes of this rule, America's PAC would be considered the conduit or intermediary for the contribution.^{3/}

1. Impermissible Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution in connection with any federal election. PI/PAC is located in Glendale, California. Because California permits corporate contributions, it is possible that some physicians who are members of PI/PAC may be corporate contributors. Thus, the contribution from PI/PAC could contain corporate funds. Therefore, there is reason to believe that PI/PAC violated 2 U.S.C. § 441b(a) by making a contribution which may have contained corporate funds.

2. PI/PAC Failure to Register

2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee...which makes expenditures aggregating in excess of \$1,000 during a calendar year." "Expenditure" is defined in the Act as "any...deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(9)(A)(i).

^{3/} It is also important to note the apparent donative intent of the contributor, PI/PAC. The check is dated October 12, 1987, the day after an alleged meeting between Mr. Press and a PI/PAC officer at which PI/PAC apparently made a commitment to Mr. Press for \$2,000. It is possible that PI/PAC wrote the check in response to a solicitation from America's PAC; however, the only solicitation letter to PI/PAC this Office is aware of is dated February 29, 1988, over four months after the date of the check.

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PI/PAC is a committee which issued a check for \$2,000 to America's PAC, and earmarked the funds to an authorized campaign committee of a federal candidate. Therefore, PI/PAC made an expenditure for purposes of the act in excess of \$1,000, and thereby qualifies as a political committee. Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission within ten days after becoming a political committee. Additionally, 2 U.S.C. § 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission.

A committee by the name of "Physicians Interindemnity/FED-PAC" registered with the Commission on June 10, 1988, as a separate segregated fund. Its Statement of Organization lists "Physicians Interindemnity/State-PAC" as a connected organization. Also in its Statement of Organization, Physicians Interindemnity/FED-PAC names Dr. El Farra, the treasurer for PI/PAC, as the treasurer of Physicians Interindemnity/FED-PAC. It thus appears that at least two committees, one on a federal level and one on a state level, are using the Physicians Interindemnity name.

The check in question was drawn on the account of "Physicians Interindemnity/PAC," not "Physicians Interindemnity/FED-PAC" or "Physicians Interindemnity/State-PAC." Thus, it is unclear which committee made the contribution. The check in question is dated October 12, 1987, which is over eight months prior to the registration of Physicians

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Interindemnity/FED-PAC with the Commission. Therefore, it appears that Physicians Interindemnity/FED-PAC did not make the contribution, and that it is likely that the check was drawn on the account of the state committee or another unregistered committee. In any event, PI/PAC has not registered or filed reports with the Commission. Therefore, there is reason to believe that PI/PAC violated 2 U.S.C. §§ 433 and 434 by failing to file a Statement of Organization and the requisite reports with the Commission.

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LAW OFFICES OF
ADAMS, DUQUE & HAZELTINE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO OFFICE
500 WASHINGTON STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-1240

SAN DIEGO OFFICE
401 WEST A STREET
TWENTY-THIRD FLOOR
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 232-1240

523 WEST SIXTH STREET
LOS ANGELES, CALIFORNIA 90014
TELEPHONE (213) 620-1240
TELECOPIER (213) 614-1250
TELEX 68-6135

NEW YORK OFFICE
551 MADISON AVENUE
EIGHTH FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 750-1240

HENRY DUQUE (1904-1971)
EARL C. ADAMS (1892-1986)

February 21, 1989

VIA FEDERAL EXPRESS

Office of the General Counsel
Federal Election Commission
Room 659
999 E Street
N.W., Washington, D.C. 20463

Re: Physicians Interindemnity/PAC and Sabri El Farra, as treasurer; MUR: 2604

Dear Sir or Madam:

We are counsel to "Physician Interindemnity/PAC and Sabri El Farra, as treasurer" and have been contacted with respect to the above-referenced matter. We are currently reviewing your Factual and Legal Analysis and the Interrogatories and will assist our clients in preparing their response.

Please feel free to call the undersigned if you have any questions or need additional information.

Sincerely,

WJK

WILLIAM J. KOPESKY

cc: Dale A. Welke, Esq.
Sabri El Farra, M.D.

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89 FEB 22 AM 11:14

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RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

April 10, 1989

89 APR 17 AM 11:01

Janice Lacy, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2604/America's PAC

Dear Ms. Lacy:

Enclosed find the materials we spoke of during our conversation of April 5. Thank you for your courtesy, and please don't hesitate to call if you need any further information or materials.

I would like to give you some background regarding this matter. Bill Press came to me early in 1987, when he was contemplating a run for the U.S Senate. He had never run for public office before, and I had just completed a widely publicized retention campaign for a California Supreme Court Justice, and was serving as Finance Director for the California Secretary of State.

It turned out that Bill hired myself and others in search of "credibility" for his long-shot campaign, evidenced by his quickly leaking to reporters around the state that I was aboard (enclosed are a few of the resulting articles). After learning that Bill did not intend to honor our consulting agreement to me, I retained an attorney to sue him for unpaid salary and other compensation; that dispute, in my opinion, prompted this retaliatory complaint.

America's PAC was an independent political committee registered with the Secretary of State of California and the Fair Political Practices Commission (ID# 870484). This committee was formed prior to my association with Bill Press. I openly supported various political causes and candidates during the time I was also working for Bill.

I have never knowingly misrepresented my affiliation to a potential contributor. With regard to Dr. El Farra, since I was accompanied by Bill when I met him, I made it very clear that the two (America's PAC and Bill Press' potential candidacy) were separate.

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89 APR 19 AM 11:54

RECEIVED
FEDERAL ELECTION COMMISSION

Janice Lacy
April 10, 1989
Page two

America's PAC could not properly involve itself in a federal campaign or a California initiative campaign. The letter of February 19, which indicates possible future support for Bill Press and/or Jesse Jackson, was an error that was never duplicated and should not have occurred. America's PAC never solicited funds for Bill's aborted campaign, or any other federal race.

You should know that America's PAC hosted a fundraising dinner on November 21, 1987 at the Century Plaza Hotel where we honored a former Supreme Court Justice, and where the featured speaker was California's Lt. Governor Leo McCarthy. McCarthy was, at that time, an opponent of Bill's for the Democratic Senate nomination. Dr. El Farra was invited to support this dinner, and was offered the opportunity to sit at the Lt. Governor's table; obviously, Bill Press was not invited and did not attend. Is it plausible that four months later, Dr. El Farra would believe that a contribution to America's PAC was the functional equivalent of a contribution to Bill Press?

The February 29 letter to Dr. El Farra makes reference to "a few remittance envelopes" that I asked him to circulate. I have enclosed one for your review.

I hope that this matter can be resolved to your satisfaction with the answers and other materials I have provided. Again, I appreciate the additional time to assemble these materials, and please don't hesitate to contact me should you have additional questions.

I look forward to hearing from you soon.

Sincerely,



Neil Rincover
13119 Moorpark Street, #17
Sherman Oaks, CA 91423
818/784-5305

enclosures

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Neil Rincover
America's PAC

ANSWERS

1. I went to work for Bill Press on June 15, 1987. At that time, he was contemplating becoming a candidate for the U.S. Senate in California and asked me to assemble a campaign staff and strategy for him. I was a paid consultant.

I believe that during the entire period of my employment Mr. Press was "exploring" the candidacy (which he ultimately decided not to undertake), and we never established a formal committee. However, at some point we began calling ourselves the "Bill Press for Senate Exploratory Committee," and later opened a bank account under that name.

Your Factual Analysis states that I was "'separated' from the campaign as of September 25, 1987." That is incorrect. I left the campaign approximately November 1, 1987. I attended campaign events with Bill Press, and was paid by him, well after September 25, 1987.

2 (a). Absolutely not.

(b). This October 12, 1987 check was the first of two contributions from this group. I have enclosed the other contribution (in the amount of \$1000.) dated March 2, 1988. Note that the later check contains the notation "contribution," and in no way indicates that it is intended for Bill Press or anyone else other than America's PAC. I am troubled that when this complaint was filed, you were not notified as to this second contribution, nor furnished with a copy of this check.

It should also be pointed out that America's PAC was discussed with (and financial support was sought from) Dr. El Farra on other occasions, when it was made absolutely clear that America's PAC was not affiliated with Bill Press. Further, Bill Press and I met Dr. El Farra, his family, and others on the same day at a party hosted by the El Farra family at their home. Bill and I attended together; Bill discussed a possible run for the Senate, and I discussed America's PAC and other things political.

9504363976

The first check was received with the "Bill Press for U.S. Senate" notation, and was promptly returned to Dr. El Farra's secretary/assistant. I called her and told her that a new check would have to be prepared before we could accept the contribution. (I had on numerous occasions explained to Dr. El Farra that America's PAC was not associated with or controlled by Bill Press.) Apparently, rather than generate a new check, someone in that office altered the original one and returned it to America's PAC.

3. No.

4. No.

5 (a). \$1,000.

(b). One.

(c). S.M. El Farra, M.D., was a previous contributor to the Committee.

(d). No.

(e). None.

(f). None.

(g). None.

6. Due to the lack of adequate funds, the direct mail project referred to did not take place.

7. No.

8. No.

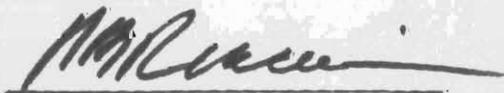
9. No. This California committee was not organized to participate in Federal elections.

10. No.

11. No.

DATED: April 10, 1989

Respectfully submitted,

By: 

NEIL B. RINCOVER

96043763977

PHYSICIANS INTERINDEMNITY/PAC

1019

310 E. COLORADO ST., NO. 308
GLENDALE, CA 91205

90-1306/1222

March 2, 1988

PAY TO THE ORDER OF America's P.A.C. -- ID #870484

\$ 1,000.00

Exactly One Thousand & no/100----- DOLLARS



ENCINO OFFICE
INDEPENDENCE BANK
18710 VENTURA BLVD.
ENCINO, CA 91436

Contribution

FOR

S. M. El-Barra
S. M. El-Barra, Treasurer

96043763978

McCarthy's delightful summer ^{Bob} ^{8/16/87}

EARLY MANEUVERING in the contest for the 1988 Democratic U.S. Senate nomination is beginning to look a little like a cut-down version of the old Agatha Christie novel, "Ten Little Indians." Or maybe it's more like a race for a Democratic presidential nomination right after New Hampshire.

The point is that the candidates are dropping like flies. That's just dandy for Lt. Gov. Leo McCarthy. Only a short while ago, the race for the nomination appeared to be a four-way affair. Now it's down to two, or if you listen to McCarthy, maybe just himself.

If he's correct, the longest-running general-election campaign for a Senate seat in the state's history has just started. Californians won't vote for nearly another 15 months on whether to re-elect Republican Pete Wilson or replace him with a Democrat. McCarthy hopes to use all that time attacking Wilson's record without having to spend much time or money fighting off other Democrats.

He's had remarkable cooperation from his potential opponents. Rep. Robert Matsui, D-Sacramento, one of the long shots, collected enough early campaign contributions to be taken seriously, despite his lack of name recognition in Southern California. But then he suddenly pulled out of the race.

March Fong Eu's case is even more curious. Along with McCarthy, she was regarded as one of the early front-runners. But she displayed an amazing ability to shoot herself in the foot, one toe at a time, by making impolitic public statements that had her campaign advisers cringing whenever she opened her mouth. Her troubles compounded when her husband, Hong Kong-based businessman Henry Eu, refused to disclose his personal assets so she could file the financial statements required of all candidates for federal offices.

THEN, AFTER her early campaign contributions proved disappointing, Eu announced that she was suspending her efforts to win the Senate nomination to devote her energy to qualifying an anti-crime initiative on the 1988 ballot. Whether she ever will resume her Senate campaign seems an open question. Even if she does, her early campaign misfortunes have made her seem a much less formidable contender.

All this has turned the summer of '87 into a particularly delightful time for McCarthy. The only

POLITICS IN REVIEW

By Martin Smith
Political Editor

cloud on his horizon, as far as the Democratic primary is concerned, is William Press, a Southern California television news commentator and a one-time environmentalist leader who served former Gov. Jerry Brown, both in his state administration and in his political campaigns.

Press was — and remains — a dark horse. He is still not an officially announced candidate, but his indecision seems more apparent than real. In the language of political fiction, he is only "exploring" a possible candidacy. One of



Bee graphic/Hugo

Bill Press

his campaign staffers concedes, however, that the chances that Press will enter the race rank very high, perhaps 99.9 on a scale of 100.

That one-tenth of 1 percent uncertainty is vital. It's all that permits Press to keep his job as a broadcaster until he finally declares his candidacy sometime around the end of this year. If he already had said he is certain to run, he would be retired from the airwaves. As long as he leaves the door open, even a tiny crack, to the possibility that he might not run, he can continue to broadcast his commentaries, draw his salary and, not so incidentally, be seen on television screens in the most populous media market in the state.

McCarthy responds to Press with his own bit of political fic-

tion: He pretends the Press candidacy doesn't exist. And wishing may make it so. If being ignored makes it harder for Press to gain enough financial support to run a credible primary race.

Whether Press can raise enough money to pose a potential threat to McCarthy is, as one Press aide, Nell Rincover, acknowledged, "the obvious question." First, however, he must present himself as a clear alternative to McCarthy, who is a moderate and conventional liberal. Press' strategy appears to be to run to the left of McCarthy on environmental and anti-war issues in hopes that this will strike sparks among both veteran party activists and a younger generation of Democrats.

In this endeavor, he's already enlisted some interesting names as supporters. Some have a demonstrated talent for fund-raising, others reflect Press' previous ties with Jerry Brown.

One supporter listed by the Press campaign is Tom Houston, a Brown-appointed chairman of the state Fair Political Practices Commission and, more recently, the right-hand man to Los Angeles Mayor Tom Bradley. Another is Joann Ruden, who has served state Controller Gray Davis as a campaign fund-raiser. She is in charge of fund-raising for Press.

SHE WILL have important help from Jodie Evans. If that name's unfamiliar, it's because she worked under her former married name of Jodie Krajewski while serving as one of Jerry Brown's key aides and campaign fund-raisers. Her new husband is multimillionaire industrialist Max Palevsky, a long-time liberal political activist.

Also listed as a Press supporter is Los Angeles attorney Ken Ziffren. He seems intent on following the example of his father, Paul Ziffren, and becoming a state party powerhouse. Rincover, now working actively in the Press campaign, is another significant acquisition, having served as Eu's state finance chairman until he quit her campaign on June 1.

Yet none of this is spoiling McCarthy's summer. At this point, some of his advisers even see an advantage if Press remains in the race and campaigns on McCarthy's left. Press could strengthen McCarthy in the long run by making him appear more of a moderate when he faces Wilson.

Just as long as Press' candidacy doesn't strike too many sparks in the primary.

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SACRAMENTO BEE
August 18, 1987

PAGE 2

People in politics

By Joe Scott

Bush has bumps, bucks

Vice President George Bush, slipping in opinion polls amid increasing signs of internal staff problems, nevertheless raised more than \$700,000 at two Southern California presidential campaign fund-raisers last week.

At his L.A. dinner on Wednesday, Bush lavished praise on an officially neutral Gov. George Deukmejian, star GOP fundraiser Joyce Valdez and Lee Atwater, his national campaign manager.

Bush ignored his press secretary, Larry Thomas, who was present and had worked until March for Deukmejian before becoming the vice president's chief spokesman.

Two days later, Thomas' resignation, for "complex personal reasons," was cryptically announced, along with his continued fidelity to Bush.

The night before, Thomas gave no hint of a rift as he emceed a huge Sacramento retirement party for Steven Merksamer, Deukmejian's ex-chief of staff, with the governor present.

Thomas, who managed Deukmejian's 1984 re-election landslide and was expected to become a senior campaign adviser to Bush, was not available for comment yesterday.

Informed sources downplay personal family considerations in Thomas' departure. They suggest that he was a victim of the same savage infighting that has just led to the departure of veteran ex-Reagan political organizer Andy Carter from Bush's campaign staff.

State Sen. Bill Campbell, R-Hacienda Heights, will be a state Bush co-chairman.

Rep. Jack Kemp, R-N.Y., the only native Californian running for president, raised money for the Senate and Assembly GOP caucuses last week in Sacramento, with the two top Senate Republicans, minority leader Ken Maddy, and caucus chairman John Doolittle, together with Assembly minority leader Pat Nolan, believed privately tilting toward Kemp.

The major Democratic focus this week is on Friday's audition by five presidential



George Bush
Piling up the dough



Albert Gore Jr.
Picking up the pace



Zev Yaroslavsky
Putting out the word

hopefuls at a San Francisco party fund-raising dinner.

The Rev. Jesse Jackson, Rep. Richard Gephardt, D-Mo., Sens. Albert Gore Jr., D-Tenn., and Paul Simon, D-Ill. and former Arizona Gov. Bruce Babbitt will attend.

Joining them at The Fairmont event will be Kitty Dukakis, standing in for her candidate husband, Massachusetts Gov. Michael Dukakis.

Gore has an ambitious five-day statewide funding and get-acquainted swing starting Thursday.

Besides dinner with producer Norman Lear's group of West Side L.A. liberals, Gore will attend a cocktail party hosted by state party chairman Peter Kelly and be interviewed by the potent, and uncommitted, fund-raising group, The Hollywood Women's Political Caucus.

Gore will be feted a week from today at an L.A. luncheon hosted by Dr. Armand Hammer, the Occidental Petroleum chairman. One Oxy board member just happens to be the candidate's father, retired Sen. Albert Gore, D-Tenn.

UC Regent Jerry Hallissey is Babbitt's state finance chairman.

Grass-roots activists, shut out of the delegation-selection process in the 1984 presidential primary, won a major victory over the weekend.

Under a revised plan adopted narrowly by the state Democratic party's executive committee, the names of party presidential candidates will appear alone on the ballot. And delegates will be awarded on the candidates' order of finishing in each congressional district.

The plan is a setback for 1984 winner-take-all delegate forces, led by backers of Gephardt, and Sen. Joseph Biden, D-Del., who will formally declare his candidacy tomorrow. ■

City politic

Were last week's City Council victories by ex-state Sen. Nate Holden and urban planner Ruth Galanter clues that L.A. is

entering a City Hall era — the kind of reaction to development that began transforming San Francisco politics in 1975 when Democratic state Sen. George Moscone became mayor?

While insiders mull over the question, the initial financial test of support in the 1989 L.A. mayoral contest is quietly underway.

Mayor Tom Bradley, a "reasonable growth" advocate running for an unprecedented fifth term, has adopted a "bunker mentality" after his two council candidates were badly defeated. The mayor has scheduled several \$1,000-per-person, "max out" events in June as proof of his political clout.

Wednesday, lawyer Richard Riordan, Republican and past mayor Bradley contributor who is closely aligned with downtown development interests, hosts breakfast.

Councilman Zev Yaroslavsky, a convert to the "slow growth" movement and possible Bradley challenger, has formed a 1989 mayoral committee. He's set 20 citywide fund-raisers this month alone, with tabs of \$50 to one-grand each.

L.A. whispers

The formation of a new statewide political action committee, America's PAC, to assist liberal candidates and initiatives — an outgrowth of the defeat three liberal Supreme Court justices last fall — will be announced this month. APAC's executive director will be ex-Justice Cruz Reynoso's campaign manager, Neil B. Rincover, who has resigned as state finance director of Democratic Secretary of State March Fong Eu's U.S. Senate campaign.

Democratic State Controller Gray Davis, who has a 5-grand-per-tablecloth deficit-reduction feed June 15 in L.A., introduced John Molinari, a former Republican, at the San Francisco supervisor's mayoral kickoff dinner Friday. ■

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AMERICA'S P.A.C.

4100 Whitsett Ave., Suite 106
Studio City, California 91604

I support candidates who work for a safe environment, human rights, and PEACE

You may use my name!

SIGNATURE

You can also count on me to:

- | | |
|---|---|
| <input type="checkbox"/> Volunteer | <input type="checkbox"/> Host a fundraiser
(coffee, cocktails, luncheon) |
| <input type="checkbox"/> Make telephone calls | <input type="checkbox"/> Mail/Distribute literature |

Here's my contribution of \$ _____

Name _____ Phone _____

Home Address _____

City _____ Zip _____

Employer or Firm _____ Occupation _____

Business Address _____ Phone _____

City _____ Zip _____

Please make checks payable to: America's PAC, Treasurer: Lance H. Olson
Corporate contributions are acceptable. Paid for by America's PAC.

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OGC 3179

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

LAW OFFICES OF

ADAMS, DUQUE & HAZELTINE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

09 JUN 23 PM 12:03

NEW YORK OFFICE

551 MADISON AVENUE
EIGHTH FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 750-1240

HENRY DUQUE (1904-1971)
EARL C. ADAMS (1892-1986)

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TELEPHONE (619) 232-1240

523 WEST SIXTH STREET
LOS ANGELES, CALIFORNIA 90014
TELEPHONE (213) 620-1240
TELECOPIER (213) 614-1250
TELEX 68-6135

June 22, 1989

FEDERAL EXPRESS

Office of the General Counsel
Federal Election Commission
Room 659
999 E Street, N.W.
Washington, D.C. 20463

Re: Physicians Interindemnity/PAC and Sabri El Farra, as treasurer; MUR: 2604

Dear Sir or Madam:

Pursuant to our February 21, 1989 letter and in connection with your Factual and Legal Analysis (the "Analysis"), we have examined Physicians Interindemnity Trust's ("PI Trust") records with respect to its separate segregated funds. Based on such review, we believe that neither PI Trust, Dr. Sabri El Farra nor Physicians Interindemnity PAC ("PI/PAC") have committed any intentional violations of the Federal Election Campaign Act of 1971.

Introduction

The first issue raised in the Analysis is that of corporate contributions. In order to respond properly to that issue, it is necessary to first respond to the second issue raised in the Analysis, i.e., the requirement that PI/PAC file a Statement of Organization.

Physicians Interindemnity Pac-Statement of Organization

PI/PAC is a California state PAC (ID # 0000870337) and was organized on April 8, 1987. A copy of the Statement of Organization as filed with the State of California is enclosed. PI/PAC continues to file its disclosure statements with the California Secretary of State's Political Reform Division. As you note in the Analysis, on June 10, 1988, PI Trust filed a Statement of Organization with the Federal Election Commission for a separate segregated fund by the name of Physicians Interindemnity/FED-PAC ("PI/FED-PAC").

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ADMINISTRATIVE DIVISION

HAND DELIVERED

The Statement of Organization listed "Physicians Interindemnity/State-PAC" as a connected organization. However, there is not now, nor has there ever been, any organization with that name affiliated with PI Trust. The committee referred to in the June 10, 1988 Statement of Organization is PI/PAC and the incorrect name was a clerical error that unfortunately was not detected. As of this date PI Trust has only formed two committees, i.e., PI/FED-PAC and PI/PAC. In this connection, we note that contributions to the PAC's are solicited jointly from the members of PI Trust, so there is no difference between those contributing to PI/PAC as opposed to PI/FED-PAC.

Thus, the contribution to America's PAC was made by PI/PAC, i.e., a registered state PAC. We acknowledge that such contribution should have been made by a federal PAC. The committee misunderstood the distinction between a federal and a state election. It understood that federal elections were limited to general or primary elections for the office of President and Vice President and from this premise incorrectly concluded that a campaign to be elected as a Senator from California was a state election campaign. Consequently, the contribution to America's PAC was made by the registered state committee (PI/PAC) not a federal PAC (PI/FED-PAC did not exist at that time). However, there was no attempt to hide such contribution and it was fully disclosed on Form 420 filed with the State of California for the period 7/1/87 through 12/31/87. A copy of that form is enclosed.

We note, based on our review, that it appears PI/PAC made several other contributions in 1987 and early 1988 which should have been made by a federal committee. These contributions were also mistakenly made by PI/PAC and fully disclosed on its periodic filings in California. Copies of such filings are also enclosed. As correctly stated in the Analysis, PI/FED-PAC was not formed until June 1988. This was done in anticipation of the 1988 Presidential Elections. All contributions for federal candidates made subsequent to that date were made by PI/FED-PAC.

Corporate Contributions

The Analysis raises the issue of federal law respecting contributions by corporations. By way of background, PI Trust is an interindemnity arrangement for physicians and surgeons in California authorized by Insurance Code Section 1280.7 to provide alternative medical malprac-

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tice coverage to its members. Membership in the trust is limited to individual physicians and surgeons or their sole shareholder professional medical corporations. In that context, we are requesting your advice and assistance, if appropriate, with respect to contributions to PI/FED-PAC by such professional corporations. We have examined the instructions with respect to forming a federal PAC and reviewed some case law concerning contributions by corporations. Based on this review, we believe that 2 USC § 441b was not really intended to apply to a corporation such as a professional medical corporation.

9 6 0 4 3 6 3 9 3 5

First, in FEC v. Massachusetts Citizens For Life, 479 U.S. 238 (1986), the Supreme Court held that § 441b applied to a nonprofit-non stock corporation which had many members. However, the Court also held that the law was unconstitutionally applied to the corporation in that particular case. More importantly for the purposes of this letter, in the course of its opinion the Court discussed the purposes behind prohibitions on corporate contributions. These included, "the need to restrict 'the influence of political war chests funneled through the corporate form', citations omitted; to 'eliminate the effect of aggregated wealth on federal elections', citations omitted; to curb the political influence of 'those who exercise control over large aggregations of capital', citations omitted; and to regulate the 'substantial aggregations of wealth amassed by the special advantages which go with the corporate form of organization', citations omitted", 479 U.S. at 257. The Court went on to discuss the fact that the resources of a corporation are not an indication of popular support for such corporation's political ideas. Consequently, the law, as the Court notes, permits a corporation to make expenditures through a political committee expressly established to engage in campaign activity and spending. Presumably, only those who actually support the political positions of the committee would contribute to the PAC.

Such a distinction makes no sense in the context of a single shareholder professional corporation, and many of PI Trust's members are physicians who are just such corporations. For example, an individual doctor's professional corporation could form a separate segregated fund to which the doctor would contribute the same amount of money that he contributed to PI/FED-PAC. Such amount could then be legally contributed to PI/FED-PAC. The amount of the net contribution would remain unchanged, the only difference would be an additional layer of paperwork. Such a procedure would be the

triumph of form over substance.

Because we believe that the law is, or at least should be, inapplicable to single shareholder professional corporations, we seek your advice in this regard.

Conclusion

We believe that the foregoing indicates that neither PI/PAC nor Dr. El Farra intentionally violated federal law. Consequently, on behalf of PI/PAC and Dr. El Farra, we hereby respectfully request that this matter be made a subject of conciliation as discussed in the Description of Preliminary Procedures For Processing Possible Violations Discovered by the Federal Election Commission which was attached to the Analysis. We have already counselled our clients on the proper application of federal law.

Please advise us if this alternative is available and feel free to call us if you have any questions or need any additional information.

Sincerely,



WILLIAM J. KOPESKY

cc: Sabri El Farra, M.D.
Dale A. Welke, Esq.

96043763986

0604287

LAW OFFICES OF

ADAMS, DUQUE & HAZELTINE

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SAN FRANCISCO OFFICE
500 WASHINGTON STREET
SAN FRANCISCO, CALIFORNIA 94111
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SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 232-1240

523 WEST SIXTH STREET

TENTH FLOOR

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EIGHTH FLOOR
NEW YORK, NEW YORK 10022
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TELECOPIER (212) 644-9727

HENRY DUQUE (1904-1971)
EARL C. ADAMS (1892-1986)

October 16, 1989

FEDERAL EXPRESS

Mary Ann Bumgarner, Esq.
Office of the General Counsel
Federal Election Commission
Room 659
999 E Street, N.W.
Washington, D.C. 20463

Re: Physicians Interindemnity/PAC and Sabri El Farra, as treasurer; MUR: 2604

Dear Ms. Bumgarner:

As you requested, enclosed please find copies of the Recipient Committee Campaign Statements of Physicians Interindemnity Political Action Committee ("PI/PAC") referred to in Mr. Kopesky's letter dated June 22, 1989.

I will be working with Mr. Kopesky on MUR Number 2604, and will do my best to assist you in resolving the matter.

Thank you very much for your time and consideration.

Very truly yours,

John Yamada
JOHN YAMADA

cc: Sabri El Farra, M.D.
Dale A. Welke, Esq.
William J. Kopesky, Esq.

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89OCT 17 AM11:04

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DRM 420
1987

**RECIPIENT COMMITTEE
CAMPAIGN STATEMENT**
(Government Code Sections 84200-84217)
Type or Print in Ink

Statement covers period 7/1/87 through 12/31/87

CHECK ONE OF THE FOLLOWING BOXES TO INDICATE THE TYPE OF STATEMENT BEING FILED.

<input type="checkbox"/> PRE-ELECTION STATEMENT	<input type="checkbox"/> BALLOT MEASURE QUALIFICATION STATEMENT
<input checked="" type="checkbox"/> SEMI-ANNUAL STATEMENT	<input type="checkbox"/> SPECIAL ODD-YEAR CAMPAIGN REPORT
<input type="checkbox"/> SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 405 and attach it to this statement.)	

A OFFICIAL USE ONLY

NAME OF COMMITTEE: Physicians Interindemnity Political Action Committee (PI/PAC) I.D. NUMBER: #870337

ADDRESS OF COMMITTEE: NO. AND STREET: 10 E. Colorado Street, #308 CITY: Glendale STATE: CA ZIP CODE: 91205 AREA CODE/PHONE NUMBER: (818) 241-5119

NAME OF TREASURER: Abri M. El Farra, M.D.

PERMANENT ADDRESS OF TREASURER: NO. AND STREET: 10 E. Colorado Street, #308 CITY: Glendale STATE: CA ZIP CODE: 91205 AREA CODE/BUSINESS PHONE NUMBER: (818) 241-5119

IS THIS A SPONSORED COMMITTEE? (See definition on reverse)
 YES NO

IS THIS A CONTROLLED COMMITTEE? (See definition on reverse)
 YES (If yes, candidate or officeholder must verify the campaign statement) NO

DATE OF ELECTION (Mo., Day, Yr.) (If applicable):
TOTAL PAGES: 7

CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE, CANDIDATES, STATE MEASURE PROPONENTS OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY. NOTE: If this committee is controlled by more than one candidate, the name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR AFFILIATED COMMITTEE, IF ANY. ALSO PROVIDE THE NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD, AND DISTRICT NUMBER, IF ANY. IF ACTING JOINTLY WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS.

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE	OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION

CANDIDATE(S) OR MEASURE(S) FOR WHICH THIS COMMITTEE IS PRIMARILY FORMED

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE	OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

I have used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 2/15/88 at Glendale, CA by S. M. El Farra (SIGNATURE OF TREASURER)

A candidate, officeholder or state measure proponent who controls a committee must also verify the campaign statement. I have used all reasonable diligence and to the best of my knowledge the treasurer has used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____ by _____ (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

Executed on _____ at _____ by _____ (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

Executed on _____ at _____ by _____ (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

For information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act."



Form 405
1988

This form must be used to amend statements filed pursuant to Government Code Sections 84200-84217, and must be filed with all filing officers who received the statement being amended. NOTE: This form is not used to amend a Statement of Organization (Form 410). To amend a Statement of Organization, use the Form 410.

(Type or Print in Ink)

The information required in Section I must correspond to the information provided on the campaign statement.

A OFFICIAL USE ONLY

NAME OF FILER:

Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NO. (IF APPLICABLE)
#870337

ADDRESS OF FILER:

10 E. Colorado Street, #308, Glendale

STATE ZIP CODE
CA 91205

AREA CODE PHONE NUMBER
(818) 241-5119

NAME OF TREASURER (IF APPLICABLE):

Sabri M. El Farra, M.D.

PERMANENT ADDRESS OF TREASURER (IF APPLICABLE):
10 E. Colorado Street, #308,

CITY STATE ZIP CODE
Glendale, CA 91205

AREA CODE PHONE NUMBER
(818) 241-5119

The following information amends campaign disclosure statement, Form No. 420. Executed on 2/15/88 for the period 7/1/87 through 12/31/87

The amended information affects items on the:

[] Front Page [] Allocation Page [x] Summary x Schedule E
[x] Schedules(s) G

Describe the changes below. Include in detail all information you wish to become a part of your official campaign statement. Also attach a new front page, Summary or appropriate schedule if needed for clarification.

Schedule E - Enclosed

Schedule G - Line 15 in Statement of Changes in Financial Condition should have been zero. Activity on Schedule G shown in error.

Summary - Line 15 changed to zero and line 17 amended accordingly.

See additional information on reverse side or on appropriately labeled continuation sheets. (Number of pages attached)

VERIFICATION

I have used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 5/19/88 at Glendale, CA by _____

Sabri M. El Farra, Treasurer

A candidate, officeholder or state measure proponent who controls a committee must also verify the campaign statement.

I have used all reasonable diligence, and to the best of my knowledge, the treasurer has used all reasonable diligence in preparing this Statement. I have reviewed the Statement and to the best of my knowledge the information contained herein is true and complete.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____ by _____

Executed on _____ at _____ by _____

Executed on _____ at _____ by _____

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(Amounts May be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD

FROM 7/1/87 THROUGH 12/31/87

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Committee (PI/PAC)

I.D. NUMBER (IF COMMITTEE) 870337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule and the back of page 12 for detailed explanations of each category.

- *C* - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
O - OUTSIDE ADVERTISING
I - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES
S - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
L - LITERATURE
F - FUNDRAISING EVENTS
B - BROADCAST ADVERTISING
G - GENERAL OPERATIONS AND OVERHEAD
N - NEWSPAPER AND PERIODICAL ADVERTISING
T - TRAVEL, ACCOMMODATIONS AND MEALS
P - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

IMPORTANT: Do not itemize the payment of accrued expenses on Schedule E. Report only the lump sum of these payments on Line 4 of the Summary section, below.

Table with 3 columns: NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION; CODE OR DESCRIPTION OF PAYMENT; AMOUNT PAID. Includes entries for RCF-PAC, Speaker's Dinner, America's Pac, and Roth for Supervisor Committee, ending with a SUBTOTAL of \$4,900.

IMPORTANT: Contributions and expenditures made out of campaign funds to or on behalf of other candidates or committees must also be entered on the Allocation Page, Page 2.

SUMMARY

- 1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD (include all Schedule E subtotals) \$ 9,900
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized)
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS (Schedule B, Part 2, Column (d))
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4)
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of Summary Page \$ 9,900

CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD

FROM THROUGH

7/1/87 12/31/87

DATE, OFFICER/CLERK OR COMMITTEE:

ans Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER OF COMMITTEE

#870337

9
6
0
4
3
7
6
3
9
9
2

	COLUMN A Cumulative total from previous period	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
CONTRIBUTIONS RECEIVED			
Monetary contributions	\$ 41,900	\$ 2,900 SCHEDULE A, LINE 3	\$ 44,800
Loans received		SCHEDULE B, LINE 7	
SUBTOTAL CASH RECEIPTS	\$ 41,900 LINES 1 + 2	\$ 2,900 LINES 1 + 2	\$ 44,800 LINES 1 + 2
Non-monetary contributions		SCHEDULE C, LINE 3	
TOTAL CONTRIBUTIONS WITHOUT PLEDGES	LINES 3 + 4	LINES 3 + 4	LINES 3 + 4
Pledges		SCHEDULE D, LINE 7	
TOTAL CONTRIBUTIONS	41,900 LINES 5 + 8	2,900 LINES 5 + 8	44,800 LINES 5 + 8 (SHOULD EQUAL LINE 7, COLUMNS A + B)
EXPENDITURES MADE			
Payments	\$ 7,000	\$ 9,900 SCHEDULE E, LINE 5	\$ 16,900
Loans made		SCHEDULE EE, LINE 7	
SUBTOTAL	7,000 LINES 8 + 9	9,900 LINES 8 + 9	16,900 LINES 8 + 9
Accrued expenses (unpaid bills)		SCHEDULE F, LINE 5	
TOTAL EXPENDITURES	\$ 7,000 LINES 10 + 11	\$ 9,900 LINES 10 + 11	\$ 16,900 LINES 10 + 11 (SHOULD EQUAL LINE 12, COLUMNS A + B)

* IF THIS IS THE FIRST REPORT FILED FOR THE CALENDAR YEAR, COLUMN A SHOULD BE BLANK EXCEPT FOR UNPAID LOANS RECEIVED, PLEDGES, OUTSTANDING LOANS MADE AND UNPAID BILLS (LINES 2, 6, 9 AND 11).

STATEMENT OF CHANGES IN FINANCIAL CONDITION

1. Cash on hand at the beginning of this period. (Enter "Cash on Hand at Closing Date" from previous statement filed.)	\$ 34,857.68
4. Cash receipts this period (Line 3, Column B above)	2,900.00
5. Miscellaneous adjustments to cash (Schedule G, Line 8)	-0-
6. Cash payments this period (Line 10, Column B above)	9,900.00
7. Cash on hand at closing date (Lines 13 + 14 + 15 - 16 above)	\$ 27,857.68
8. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse	\$
9. Outstanding debts (Line 2 + Line 11 of Column C above)	\$

AMENDED

\$ 27,857.68
ENDING CASH ON HAND SHOULD NOT BE A NEGATIVE AMOUNT

STATEMENT OF CONTRIBUTIONS FOR CANDIDATES IN BOTH A JUNE AND NOVEMBER ELECTION (See Instructions on Reverse)

	1/1 thru 6/30	7/1 to date
10. CONTRIBUTIONS RECEIVED:		
11. EXPENDITURES MADE:		

SCHEDULE A

**MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM 7/1/87	THROUGH 12/31/87

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

#870337

LINE NO.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
1/87	Hagen, Mowbray P. 1820 Fullerton #310 Corona, CA 91719	Medical Doctor		\$100	\$100
	Lee, Moon Y. 1820 Fullerton #320 Corona, CA 91719	"		100	100
1/87	Newman, Lee D. 435 N. Bedford #310 Beverly Hills, CA 90210	"		100	100
1/87	Sharf, Andrew G. 633 N. Central Avenue Glendale, CA 91203	"		100	100
1/87	Sroujeh, Khaldoun S. 1300 N. Vermont #409 Los Angeles, CA 90027	"		100	100
	Tsai, Isaac K.Y. 770 Magnolia, 1-E Corona, CA 91719	"		100	100
13/87	Jaqua, Terry L. 15248 11th Street Victorville, CA 92392	"		100	100
If more space is needed, check box at left and attach additional Schedules A.				SUBTOTAL	700

SUMMARY

AMOUNT RECEIVED — CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals)	\$ 2,900	
AMOUNT RECEIVED — CONTRIBUTIONS OF LESS THAN \$100 (Not itemized)		
TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1 Column B of Summary Page		\$ 2,900

SCHEDULE A
MONEY CONTRIBUTIONS RECEIVED
 (CONTINUATION SHEET)
FORM 420 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7/1/87	12/31/87

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
#870337

96043763994

DATE RECEIVED	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE ALSO ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION	EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
1/87	Baratta, Michael V. 7230 Medical Center Dr., #300 Canoga Park, CA 91307	Medical Doctor		\$100	\$100
1/87	Houlihan, Robert E. 2701 W. Alameda Ave, #507 Burbank, CA 91505	"		100	100
"	Halloran, William X. 275 Victoria Street, L Costa Mesa, CA 92627	"		100	100
6/87	Liu, Rit 13521 Telegraph Road, Whittier, CA 90605	"		100	100
"	Rosenwein, Marilyn 50 S. San Mateo DR. #420 San Mateo, CA 94401	"		100	100
7/87	Maloon, Stephen A. 2807 Loma Vista Road, #103 Ventura CA 93003	"		100	100
7/87	Mehrkhah, Hassan 850 E. Lathan, Suite A Hemet, CA 92343	"		100	100
10/87	Vyas, Jayshree M. 1820 W. Lincoln Avenue Anaheim, CA 92801	"		100	100
20/87	Agcaoili, Feliz C. 450 Sutter St., #935 San Francisco, CA 94108	"		100	100
"	Bauer, F. Henning 4141 Geary Blvd., #309 San Francisco, CA 94118	"		100	100
"	Heng, Allen K. 2198 Calle Riscoso Thousand Oaks, CA 91362	"		100	100

] If more space is needed, check box at left and attach additional Schedules A.

SUBTOTAL \$1,100

SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7/1/87	12/31/87

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
 Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
 #870337

DATE RECEIVED	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE ALSO ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
7/87	Iskander, Ray N. 1560 E. Chevy Chase Dr. Glendale, CA 91206	Medical Doctor		\$100	\$100
"	Mesrobian, Raffi-Jean 2625 W. Alameda Avenue Burbank, CA 91505	"		100	100
7/87	Park, John B. 250 W. Putnam Ave. Porterville, CA 93257	"		100	100
9 9 5 "	Richmond, Harvey S. 436 N. Roxbury Dr. #205 Beverly Hills, CA 90210	"		100	100
9 20/87	Wu, Ronald S.P. 435 Arden Avenue, #330 Glendale, CA 91203	"		100	100
9 3 7 6	Figueroa, Luis J. 2705 E. Whittier Blvd. Los Angeles, CA 90023	"		100	100
9 4 3 7	Figueroa, Manuel I. 2705 E. Whittier Blvd. Los Angeles, CA 90023	"		100	100
9 6 0 4	Jamaluddin, Umaima S. 3941 San Dimas Street Bakersfield, CA 93301	"		100	100
9 6 0 4	Sanchez, Alfonso R. 2705 Whittier Blvd. Los Angeles, CA 90023	"		100	100
9 3	Romero, Elliott 2617 E. Chapman Ave. #105 Orange, CA 92669	"		100	100
9 3	Sokoloff, Norman F. 500 E. Remington Dr. #20 Sunnyvale, CA 94087	"		100	100

If more space is needed, check box at left and attach additional Schedules A.

SUBTOTAL \$1,100



**RECIPIENT COMMITTEE
CAMPAIGN STATEMENT**
(Government Code Sections 84200-84217)
Type or Print in Ink

*Mailed
7/27/88*

**FORM 420
1988**

Statement covers period 1/1/88 through 6/30/88

CHECK ONE OF THE FOLLOWING BOXES TO INDICATE THE TYPE OF STATEMENT BEING FILED

<input type="checkbox"/> PRE ELECTION STATEMENT	<input type="checkbox"/> BALLOT MEASURE QUALIFICATION STATEMENT
<input checked="" type="checkbox"/> SEMI-ANNUAL STATEMENT	<input type="checkbox"/> SPECIAL ODD-YEAR CAMPAIGN REPORT
<input type="checkbox"/> SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 405 and attach it to this statement.)	<input type="checkbox"/> TERMINATION STATEMENT (Attach a Form 415 to this Form 420.)

A OFFICIAL USE ONLY

NAME OF COMMITTEE: Physicians Interindemnity Political Action Committee (PI/PAC) I.D. NUMBER 870337

ADDRESS OF COMMITTEE: NO. AND STREET 310 E. Colorado Street, #308 CITY Glendale STATE CA ZIP CODE 91205 AREA CODE/PHONE NUMBER (818) 241-5119

NAME OF TREASURER: Sabri M. El Farra, M.D.

PERMANENT ADDRESS OF TREASURER: NO. AND STREET 310 E. Colorado Street, #308 CITY Glendale STATE CA ZIP CODE 91205 AREA CODE/BUSINESS PHONE NUMBER (818) 241-5119

II IS THIS A SPONSORED COMMITTEE? (See definition on reverse)
 YES NO

III IS THIS A CONTROLLED COMMITTEE? (See definition on reverse)
 YES (If yes, candidate or officeholder must verify the campaign statement) NO

DATE OF ELECTION (Mo. Day, Yr.) (if applicable):

IV CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE, CANDIDATES, STATE MEASURE PROPONENTS OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY. NOTE: If this committee is controlled by more than one candidate, the name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR AFFILIATED COMMITTEE. IF CANDIDATE, ALSO PROVIDE THE NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD, AND DISTRICT NUMBER, IF ANY.	IF ACTING JOINTLY WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS

V CANDIDATE(S) OR MEASURE(S) FOR WHICH THIS COMMITTEE IS PRIMARILY FORMED

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

I HAVE USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.
EXECUTED ON 7/19/88 AT Glendale, CA BY Sabri M. El Farra (SIGNATURE OF TREASURER) Treasurer

A CANDIDATE, OFFICEHOLDER OR STATE MEASURE PROPONENT WHO CONTROLS A COMMITTEE MUST ALSO VERIFY THE CAMPAIGN STATEMENT.

I HAVE USED ALL REASONABLE DILIGENCE AND TO THE BEST OF MY KNOWLEDGE THE TREASURER HAS USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

C	I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.
D	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
E	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
F	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

FOR INFORMATION ONLY TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE INFORMATION REGARDING OUR CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT.

96043763997

ALLOCATION PAGE
FORM 420

PAGE 2 OF 69

STATEMENT COVERS PERIOD	
FROM	THROUGH
1/1/88	6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **Physicians Interindemnity Political Action Committee (PI/PAC)** I.D. NUMBER **870337**

DATE	IND. EXP.*	NAME OF CANDIDATE OR OFFICEHOLDER AND OFFICE OR MEASURE AND BALLOT NUMBER OR LETTER	CHECK ONE		AMOUNT	CUMULATIVE TO DATE
			SUPPORT	OPPOSE		
1/12/88		Friends of Tom Bane 5430 Van Nuys Blvd., #203 Van Nuys, CA 91401 I.D. #744811	x		\$6000	6,000
1/26		Dymally Campaign Committee Beverly Wilshire Beverly Hills, CA. ID#088919	x		2000	2,000
1/26		Friends of Tom Bane 5430 Van Nuys Blvd., #203 Van Nuys, CA 91401, ID#744811	x		6000	12,000
3/2		America's PAC 4100 Whitsett Avenue, Studio City, CA 91604 I.D. #870484	x		1000	1,000
3/3		The Richard Katz Committee 310 No. San Vicente Bl., #206 West Hollywood, CA 90048 I.D. #800101	x		700	700
3/15		RFC-PAC Room 380, City Hall Los Angeles, CA 90012 I.D. 860350	x		1000	1,000
4/25		L.A. World Affairs Council 900 Wilshire Blvd., #230 Los Angeles, CA 90017	x		330	330
4/26		MDAC I.D. #870755	x		3000	3,000
5/6		HPMC Foundation Heart of Hollywood Awards Dinner 1300 No. Vermont Avenue Los Angeles, CA 90027	x		400	400
5/6		Louise Gelber for State Senate 1225 Rancho Road Arcadia, CA 91006, I.D. 880-432	x		200	200
5/24		Foundation for Middle East Communication	x		2000	2,000
5/31		Assemblyman G. Felando P.O. Box 4198 Torrance, CA 90510 I.D. #781098	x		5000	5,000
6/20		Bill Leonard - 25th Senatorial District - c/o Ed Dombrowski, MD #700-547	x		500	500

*An "independent expenditure" is an expenditure which is not made at the behest, under the control or at the direction of, in cooperation, consultation, coordination, or concert with, or with the approval of, the candidate or committee on whose behalf it is made.

96043763998

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE) **870337**

96043763999

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/04/88	H. Jack Abdulian, M.D. 1300 N. Vermont Ave., #805 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Ricardo S. Alvarez, M.D. 1940 Spyglass Tr. W. Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	John S. Barnsdale, M.D. 116 Pacific Ave. Auburn, CA 95603	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	F. Henning Bauer, M.D. 4141 Geary Blvd., #309 San Francisco, CA 94118	Occupation: Medical Doctor	Employer:	\$100	\$100
1/01/88	Jorge F. Carreon, M.D. 4390 Tweedy Blvd. South Gate, CA 90280	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Gordon Burr Miller, M.D. 490 Post Street, #508 San Francisco, CA 94102	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Warren Moe, M.D. 1321 N. Vermont Avenue Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Amir H. Monfared, M.D. 8631 W. Third Street, #230-E Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Virgilio V. Naco, M.D. Hesperia Medical Group 15203 11th Street Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

**CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD FROM 1/1/88 THROUGH 6/30

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Committee (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

CONTRIBUTIONS RECEIVED

	COLUMN A Cumulative total from previous period	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions	\$ _____	\$55,600 <small>SCHEDULE A, LINE 3</small>	\$55,600
2. Loans received	_____	_____	_____
3. SUBTOTAL CASH RECEIPTS	\$ _____ <small>LINES 1 + 2</small>	\$55,600 <small>SCHEDULE B, LINE 7 LINES 1 + 2</small>	\$55,600 <small>LINES 1 + 2</small>
4. Non-monetary contributions	_____	_____	_____
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES	_____	55,600 <small>SCHEDULE C, LINE 3 LINES 3 + 4</small>	55,600 <small>LINES 3 + 4</small>
6. Enforceable Promises (Except loan guarantees, see Line 18 below)	_____	_____	_____
7. TOTAL CONTRIBUTIONS	\$ _____ <small>LINES 5 + 6</small>	\$55,600 <small>SCHEDULE D, LINE 7 LINES 5 + 6</small>	\$55,600 <small>LINES 5 + 6 (SHOULD EQUAL LINE 7, COLUMNS A + B)</small>

EXPENDITURES MADE

8. Payments	\$ _____	\$30,140 <small>SCHEDULE E, LINE 5</small>	\$30,140
9. Loans Made	_____	_____	_____
10. SUBTOTAL	_____	30,140 <small>SCHEDULE EE, LINE 7 LINES 8 + 9</small>	30,140 <small>LINES 8 + 9</small>
11. Accrued expenses (unpaid bills)	_____	_____	_____
12. TOTAL EXPENDITURES	\$ _____ <small>LINES 10 + 11</small>	\$30,140 <small>SCHEDULE F, LINE 5 LINES 10 + 11</small>	\$30,140 <small>LINES 10 + 11 (SHOULD EQUAL LINE 12, COLUMNS A + B)</small>

***IF THIS IS THE FIRST REPORT FILED FOR THE CALENDAR YEAR, COLUMN A SHOULD BE BLANK EXCEPT FOR LINES 2, 6, 9 AND 11.**

STATEMENT OF CHANGES IN FINANCIAL CONDITION

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.)	\$27,857.68
14. Cash receipts this period (Line 3, Column B above)	55,600.00
15. Miscellaneous increases to cash (Schedule G, Line 4)	83,457.00
16. Cash payments this period (Line 10, Column B above)	30,140.68
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.)	\$53,317.68
18. Amount of loan guarantees received (Schedule B, Part I, Column (b))	\$ _____
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse	\$ _____
20. Outstanding debts (Line 2 + Line 11 of Column C above)	\$ _____

SUMMARY FOR CANDIDATES IN BOTH A JUNE AND NOVEMBER ELECTION (See Instructions on Reverse)

	1/1 THRU 6/30	7/1 TO DATE
21. CONTRIBUTIONS RECEIVED:		
22. EXPENDITURES MADE:		

96043764001

**SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)**

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870237

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
1/4/88	Robert A. Goldstein, M.D. Southland OB/GYN Medical Group 2621 S. Bristol, #300-302 Santa Ana, CA 92704	Occupation: Medical Doctor	Employer:	\$100	\$100
1/4/88	Sergio H. Levenzon, M.D. 2621 S. Bristol, #300 Santa Ana, CA 92704	Occupation: Medical Doctor	Employer:	\$100	\$100
1/4/88	Talal R. Muhtaseb, M.D. 1734 N. Riverside Avenue Rialto, CA 92376	Occupation: Medical Doctor	Employer:	\$100	\$100
1/4/88	Naresh K. Sharma, M.D. 1020 Santiago Drive Newport Beach, CA 92660	Occupation: Medical Doctor	Employer:	\$200	\$200
1/4/88	Urvashi V. Sura, M.D. 7365 Carnelian Street, #125 Rancho Cucamonga, CA 91730	Occupation: Medical Doctor	Employer:	\$100	\$100
1/4/88	Simon I. Zemel, M.D. Southland OB/GYN Medical Group 2621 S. Bristol, #300-302 Santa Ana, CA 92704	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Diana Barrows, M.D. 4045 Third Avenue, #201 San Diego, CA 92103	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$800	

SUMMARY

- | | |
|---|-----------|
| 1. AMOUNT RECEIVED - CONTRIBUTIONS OF \$100 OR MORE
(Include all Schedule A subtotals) | \$ 55,600 |
| 2. AMOUNT RECEIVED - CONTRIBUTIONS OF LESS THAN \$100 (Not itemized) | |
| 3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD
(Line 1 + Line 2) Enter here and on Line 1, Column 8 of Summary Page | \$ 55,600 |

96043764002

NEIARY CONTRIBUTIONS RECEIV
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

PAGE 1 OF 04

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/24/88	Marshall L. Berman, M.D. 336 1/2 S. Glendora Avenue West Covina, CA 91790	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Paula K. Bernstein, M.D. 8635 W. 3rd Street, #765-W Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Reid G.H. Binder, M.D. 3998 Vista Way, Suite C Oceanside, CA 92056	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Chavalit Chaya, M.D. 1786 N. Riverside Ave., #11 Rialto, CA 92376	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Nillawan Chaya, M.D. 1786 N. Riverside Ave., #11 Rialto, CA 92376	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Byung C. Chung, M.D. 4731 Placidia Ave. Toluca Lake, CA 91602	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Martin A. Cooper, M.D. 14935 Rinaldi St., #403 Mission Hills, CA 91345	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Gerald J. McCann, M.D. 11817 E. Telegraph Road Santa Fe Springs, CA 90670	Occupation: Medical Doctor	Employer:	\$100	\$100
3/24/88	Thomas W. McIndoe, M.D. 15247 Eleventh Street, #600 Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764003

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE) **870337**

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/24/88	August R. Bianco, M.D. Chapman Medical Group 2617 E. Chapman Avenue, #105 Orange, CA 92669	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Hector A. Gancedo, M.D. 2031 Pasadena Avenue Los Angeles, CA 90031	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Richard L. Godt, M.D. 600 N. Mountain Ave., #C-102 Upland, CA 91786	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	John J. Ryan, M.D. 1771-C West Romneya Anaheim, CA 92801	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Steven A. Schlosser, M.D. Valley OB-GYN Medical Group 23861 W. McBean Pkwy., #E-21 Valencia, CA 91355	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Allen E. Shepherd, M.D. 15225 Vanowen St., #210 Van Nuys, CA 91405	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Vibul Tangpraphaphorn, M.D. 109 Adkisson Way Taft, CA 93268	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	J. Thomas Williams, M.D. 6200 Wilshire Blvd. #1000 Los Angeles, CA 90048	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Abasali K. Amir-Jahed, M.D. 1640 Barry Avenue #2 Los Angeles, CA 90025	Occupation: Medical Doctor		\$100	\$100
		Employer:			
		SUBTOTAL		\$900	

96043764004

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>OF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS. ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>OF SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>	RECEIVED THIS PERIOD	CUMULATIVE TO DATE	
3/24/88	Ovi Moas, M.D. 9815 Las Tunas Drive Temple City, CA 91780	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Fernando Montelongo, M.D. 932 E. Chapman Avenue Orange, CA 92666	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Benjamin M. Nepomuceno, M.D. 15247 Eleventh Street, #500 Victorville, CA 92392	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Leslie I. Novikoff, M.D. Valley OB-GYN Medical Group 23861 West McBean Parkway, #E-21 Valencia, CA 91355	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Inchul Park, M.D. 360 E. 7th St., Ste. D Upland, CA 91786	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Parviz Pirnazar, M.D. 10921 Wilshire Blvd., #1110 Los Angeles, CA 90024	Occupation: Medical Doctor Employer:	\$100	\$100	
3/24/88	Paul J. Pitlyk, M.D. 1750 El Camino Real, #407 Burlingame, CA 94010	Occupation: Medical Doctor Employer:	\$100	\$100	
3/25/88	John B. Dorsey, M.D. 653 Camino de Los Mares #110 San Clemente, CA 92672	Occupation: Medical Doctor Employer:	\$100	\$100	
3/25/88	Babatunde A. Eboreime, M.D. 185 S. Euclid Ave., #21 Pasadena, CA 91101	Occupation: Medical Doctor Employer:	\$100	\$100	
SUBTOTAL			\$900		

96043764005

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/24/88	Elie N. Shuhaibar, M.D. 150 East Meda Avenue, #102 Glendora, CA 91740	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Maria Lourdes R. Sisante, M.D. 1127 Wilshire Blvd., #508 Los Angeles, CA 90017	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Parviz Taleghany, M.D. 10921 Wilshire Boulevard, #514 Los Angeles, CA 90024	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Forest S. Tennant, M.D. Tennant Group 336 1/2 S. Glendora Avenue West Covina, CA 91790	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Jeffrey L. Millman, M.D. 7301 Medical Center Drive, #503 Canoga Park, CA 91307	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	William I. Han, M.D. Beach Medical Villa, #207 17522 Beach Boulevard Huntington Beach, CA 92647	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Alex P. Jardini, M.D. 874 W. Martin Luther King Blvd. Los Angeles, CA 90037	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Alber K. Karamanoukian, M.D. 5126 Hollywood Blvd., Ste. 1 & 2 Hollywood, CA 90027	Occupation: Medical Doctor		\$100	\$100
		Employer:			
3/24/88	Jeffrey D.S. Lee, M.D. 130 W. Alosta Avenue, #320 Glendora, CA 91740	Occupation: Medical Doctor		\$100	\$100
		Employer:			
SUBTOTAL				\$900	

96043764006

FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE.

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY-POLITICAL ACTION COMMITTEE (PI/PAC) 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/25/88	Theodore C. Baiz, M.D. 1750 El Camino Real, #407 Burlingame, CA 94010	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Jagan N. Bansal, M.D. 5425 N. Figueroa Avenue Los Angeles, CA 90042	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Robert M. Carlton, M.D. 7301 Medical Center Dr., #406 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Samuel L. Cotton, M.D. 231 West Vernon Avenue, #203 Los Angeles, CA 90037	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	James L. Creighton, M.D. Valley OB-GYN Medical Group 23861 W. McBean Pkwy., #E-21 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Robert D. Johnson, M.D. 27800 Medical Center Rd., #102 Mission Viejo, CA 92691	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Michael J. Jordan, M.D. 50 Alessandro Place, #420 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Joon Y. Koh, M.D. 4220 West Third Street, #105 Los Angeles, CA 90020	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	William D. Kuntz, M.D. 28910 Rancho California Road, #103 Temecula, CA 92390	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043/64007

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

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		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/25/88	Gary D. London, M.D. Valley OB-GYN Medical Group 23861 W. McBean Pkwy., #E-21 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Hassan Mehrkhan, M.D. 850 E. Latham, Suite A Hemet, CA 92343	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Alex Abbassi, M.D. Valley Women's Institute, Inc. 6325 Topanga Canyon Blvd., #508 Woodland Hills, CA 91367	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Oswaldo C. Arenas-Diaz, M.D. 218 W. Badillo St. Covina, CA 91723	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Terrell B. Bounds, M.D. 2486 Ponderosa Drive North, #D-114 Camarillo, CA 93010	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Donald G. Byrnes, M.D. 3330 Third Ave., #303 San Diego, CA 92103	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	Bruce M. Schiffman, M.D. 18411 Clark Dr., #107 Tarzana, CA 91356	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	Khosrow Tabaddor, M.D. 4520 Gable Drive Encino, CA 91316	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	Antero Velez, M.D. 13320 Riverside Drive, #226 Sherman Oaks, CA 91423	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764008

UNLAWFUL CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE) **870337**

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		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/25/88	Arthur G. Michels, M.D. 1300 N. Vermont Avenue, #304 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	Paul C. Milling, M.D. 925 E. Pennsylvania Avenue, Ste. G Escondido, CA 92025	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Faramarz Mohtadi, M.D. 3957 Tilden Ave., Suite A Culver City, CA 90232	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	Jong Sook Park, M.D. 12555 Garden Grove Blvd., #307 Garden Grove, CA 92643	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Dennis J. Ainbinder, M.D. 18981 Ventura Blvd., #201 Tarzana, CA 91356	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Patrick P. Chaipat, M.D. 23561 Paseo de Valencia #7 Laguna Hills, CA 92653	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Julian Lee-Wen Chiang, M.D. 915 W. 7th Street Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Larry N. Francis, M.D. 425 E. Alvarado Street Fallbrook, CA 92028	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Jackson C. Fu, M.D. 44241 N. 15th Street West, #302 Lancaster, CA 93534	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764009

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER OF COMMITTEE:

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/25/88	Mehdi Fakhrai, M.D. 3808 Riverside Drive, #505 Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100 --	\$100
3/25/88	Charles B. Gassner, M.D. Valley OB-GYN Medical Group 23861 W. McBean Pkwy., #E-21 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Joseph L. Izzo, M.D. 1750 El Camino Real #407 Burlingame, CA 94010	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Dennis L. Crunk, M.D. P.O. Box 567 Mammoth Lakes, CA 93546	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Ronald A. Fragen, M.D. 2145 Tahquitz McCallum Way, Ste. 5 Palm Springs, CA 92262	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Parviz Galdjie, M.D. 25880 Tournament Road, #110 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
3/28/88	Francis X. Hardiman, M.D. 1441 Avocado Avenue, #501 Newport Beach, CA 92660	Occupation: Medical Doctor	Employer:	\$100	\$100
3/28/88	Thanit Hasadsri, M.D. 101 Adkisson Way Taft, CA 93268	Occupation: Medical Doctor	Employer:	\$100	\$100
3/28/88	Ahmad M. Javaheri, M.D. 7700 Magnolia #1-C Corona, CA 91719	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

9604376401C

UNLAWFUL CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/28/88	Sang D. Chung, M.D. 279-B S. Atlantic Boulevard Los Angeles, CA 90022	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Kenneth K. Koch, M.D. 1100 N. Ventura Road Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Thomas S. C. Leong, M.D. 2111 W. March Lane #3B Stockton, CA 95207	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Paul K. Lim, M.D. 6403 Coyle Avenue, #170 Carmichael, CA 95608	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Long-Dei Liu, M.D. 12852 Palm St., #103 Garden Grove, CA 92640	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Lyman G. Mason, M.D. 1100 N. Ventura Road Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Mohammad Mehdizadeh, M.D. 14624 Sherman Way, #307 Van Nuys, CA 91405	Occupation: Medical Doctor	Employer:	\$100	\$100
3/28/88	Dora Mendoza, M.D. 22 N. Garfield Avenue P.O. Box 7164 Alhambra, CA 91802	Occupation: Medical Doctor	Employer:	\$100	\$100
3/25/88	Alexander Carli, M.D. 3900 Sherman Drive, Ste. 2-E Riverside, CA 92503	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

9604376401

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC) I.D. NUMBER (IF COMMITTEE) 870337

96043764012

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/25/88	Ronald S.P. Wu, M.D. 435 Arden Avenue, #330 Glendale, CA 91203	Occupation: Medical Doctor	Employer:	\$100	\$100
03/25/88	James J. Yang, M.D. 3144 Santa Anita Avenue El Monte, CA 91733	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Edward W. Gallagher, M.D. 3023 Bunker Hill St. #204 San Diego, CA 92109	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	John L. Gerich, M.D. 10628 Riverside Drive, Suite 1 North Hollywood, CA 91602	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Habib S. Girgis, M.D. 4835 Van Nuys Boulevard Sherman Oaks, CA 91403	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Thor C. Gjerdrum, M.D. 915 E. Stowell Road, Ste. A Santa Maria, CA 93454	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Bruce Houman, M.D. 1820 Fullerton Ave., #260 Corona, CA 91719	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Thomas Tzong-Lin Huang, M.D. Oxnard Hueneme OB/GYN Medical Group 915 W. 7th Street Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
3/29/88	Daniel B. Hunting, M.D. 450 4th Ave. #303 Chula Vista, CA 92010	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

UNITARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

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		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
3/24/88	Dapo A. Popoola, M.D. 12954 S. Hawthorne Boulevard, #101 Hawthorne, CA 90250	Occupation: Medical Doctor Employer:		\$100	\$100
3/28/88	Ju Chul Rhee, M.D. 1770 N. Orange Grove, #100 Pomona, CA 91767	Occupation: Medical Doctor Employer:		\$100	\$100
3/28/88	Shaik M. Saheb, M.D. 18250 Roscoe Blvd., #140 Northridge, CA 91325	Occupation: Medical Doctor Employer:		\$100	\$100
3/28/88	Fulvio G. Serafini, M.D. 500 E. Olive Ave., #520 Burbank, CA 91505	Occupation: Medical Doctor Employer:		\$100	\$100
3/28/88	Henry M. Suckle, M.D. 25 North 14th Street, #700 San Jose, CA 95112	Occupation: Medical Doctor Employer:		\$100	\$100
3/28/88	Megan S. Thurmond, M.D. 1372 N. McDowell Boulevard, Suite B Petaluma, CA 94952	Occupation: Medical Doctor Employer:		\$100	\$100
3/29/88	Lewis S. Coleman, M.D. 3917 Riverside Dr. #9430 Burbank, CA 91505	Occupation: Medical Doctor Employer:		\$100	\$100
3/29/88	Lucien O. Cox, M.D. 2200 Santa Monica Blvd., #212 Santa Monica, CA 90404	Occupation: Medical Doctor Employer:		\$100	\$100
3/29/88	Steven G. Coyle, M.D. 2795 Loma Vista Rd. Ventura, CA 93003	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

96043764013

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

96043764014

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/29/88	Dariush Javanshir, M.D. 6800 Lincoln Avenue, #205 Buena Park, CA 90620	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Korey S. Jorgensen, M.D. 275 Victoria, #2-K Costa Mesa, CA 92627	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Venus N. Julian, M.D. 6900 Van Nuys Blvd., #9 Van Nuys, CA 91405	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Ted S. Lin, M.D. 915 West 7th Street Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Feliciano S. Navalta, Jr., M.D. 16660 Paramount Blvd., #306 Paramount, CA 90723	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Ronald B. Perelman, M.D. 18981 Ventura Blvd., #201 Tarzana, CA 91356	Occupation: Medical Doctor	Employer:	\$100	\$100
03/28/88	Visith Priromprintr, M.D. 11441 Heacock Street, B-1 Moreno Valley, CA 92387	Occupation: Medical Doctor	Employer:	\$100	\$100
3/28/88	David M. Wall, M.D. 11782 Norgrove Los Alamitos, CA 90720	Occupation: Medical Doctor	Employer:	\$100	\$100
3/30/88	Khalid B. Ahmed, M.D. 101 E. Beverly Blvd., #103 Montebello, CA 90640	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (OF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Vernon L. Stafford, M.D. 14935 Rinaldi, #407 Mission Hills, CA 91345	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Rajendra K. Tiwari, M.D. 1300 N Vermont Avenue, #910 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Craig R. Whatcott, M.D. 310 W. Foothill Boulevard Glendora, CA 91740	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Michael E. Yannone, M.D. P. O. Box 1990 Lake Arrowhead, CA 92352	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	J. Dewitt Fox, M.D. 7080 Hollywood Boulevard, #616 Los Angeles, CA 90028	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Steven Freedman, M.D. 7301 Medical Center Drive, #500 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
4/31/88	Saeed Hakim, M.D. 12806 South Bristol Circle Los Angeles, CA 90049	Occupation: Medical Doctor	Employer:	\$100	\$100
4/31/88	John E. Hanna, M.D. 275 Victoria Street, #2B Costa Mesa, CA 92627	Occupation: Medical Doctor	Employer:	\$100	\$100
4/31/88	Lawrence H. Hansen, M.D. 3801 Katella #110 Los Alamitos, CA 90720	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764015

MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Gideon G. Pilar, M.D. 13070 Highland Springs Avenue Beaumont, CA 92223	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Robert P. Proulx, M.D. St. Joseph Medical Center Buena Vista & Alameda Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Uziel Reiss, M.D. 433 N. Camden Drive, #1190 Beverly Hills, CA 90210	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Michael V. Baratta, M.D. 7230 Medical Center Dr., #300 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Thomas M. Barrett, M.D. 6725 Carnelian Street Alta Loma, CA 91701	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	James W. Brann, M.D. 425 E. Alvarado, Suite D Fallbrook, CA 92028	Occupation: Medical Doctor	Employer:	\$100	\$100
13/31/88	William H. Yao, M.D. 2111 Whitehall Place, Suite D Alameda, CA 94501	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Bonnie A. Beaver 7301 Medical Center Drive, #50 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Edmund T. Dombrowski, Jr., M.D. 245 Terracina Boulevard, #106-C Redlands, CA 92373	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764016

UNITARY CONTRIBUTIONS RECEIPT
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Edward B. Merchant 50 Alessandro Place, #430 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Jehan Zeb Mir, M.D. 24065 Neece Street, #17 Torrance, CA 90505	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Daniel J. Murphy, M.D. 100 N. Brent Street, #202 Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Amir A. Najmabadi, M.D. P. O. Box 3791 Beverly Hills, CA 90212	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Samir A. K. Nazo, M.D. 2307 Empire Avenue Burbank, CA 91504	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	John J. Rubino, M.D. 7301 Medical Ctr. Dr., #303 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Philip S. Schwarzman, M.D. St. Joseph Medical Center Buena Vista & Alameda Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Jean H. Sharp, M.D. 2111 Whitehall Place, Suite D Alameda, CA 94501	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Marvin W. Simmons, M.D. P.O. Box 5173 Fresno, CA 93755	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764017

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>OF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS. ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>OF SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Ok Suk Kim, M.D. 3875 Jackson #19 Riverside, CA 92503	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/30/88	Barry N. Laven, M.D. 512 Westline Drive Alameda, CA 94501	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/30/88	Jai H. Lee, M.D. 3053 W. Olympic Blvd., #305 Los Angeles, CA 90006	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/31/88	Stanford C. Lee, M.D. St. Joseph Medical Center Buena Vista At Alameda Burbank, CA 91505	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/31/88	John Leung, M.D. Buena Vista & Alameda Burbank, CA 91505	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/30/88	Georgina L. Makabali, M.D. 1300 N. Vermont Blvd. #403 Los Angeles, CA 90027	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/30/88	Joseph S. Mansour, M.D. 3733 San Dimas Blvd., #106 Bakersfield, CA 93301	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/31/88	Peter R. Obligato, M.D. St. Joseph Medical Center Buena Vista & Alameda Burbank, CA 91505	Occupation: Medical Doctor		\$100	\$100
		Employer:			
03/30/88	Howard L. Pennington, M.D. 1294 W. Sixth Street, #101 San Pedro, CA 90732	Occupation: Medical Doctor		\$100	\$100
		Employer:			
SUBTOTAL				\$900	

96043764018

FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 5/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (OF COMMITTEE) **870337**

96043764019

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/31/88	Tong Chung, M.D. 3805 San Dimas, Suite A Bakersfield, CA 93301	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Karapet Dermendjian, M.D. 5256 Los Encantos Way Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Tushar K. Desai, M.D. St. Joseph Medical Center Buena Vista at Alameda Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Richard M. Goldberg, M.D. St Joseph Medical Center Buena Vista at Alameda Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	William G. Karow, M.D. 12301 Wilshire Blvd., #415 Los Angeles, CA 90025	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Chin G. Kim, M.D. P. O. Box 5970 Buena Park, CA 90622	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Joong Tae Kim, M.D. 3545 Wilshire Boulevard, #221 Los Angeles, CA 90010	Occupation: Medical Doctor	Employer:	\$100	\$100
3/29/88	Jung I. Yang, M.D. 1526 August Lane Santa Ana, CA 92707	Occupation: Medical Doctor	Employer:	\$100	\$100
3/29/88	Sang B. Yoo, M.D. 6800 W. Lincoln Avenue, #200 Buena Park, CA 90620	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY-POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE) **870337**

9604376402C

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Richard A. Reisman, M.D. Ventura Co. OB & GYN Medical Group In 2795 Loma Vista Road Ventura, CA 93003	Medical Doctor		\$100	\$100
03/29/88	Mark A. Rosenfeld, M.D. 8635 W. Third Street, #1190 Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Malverse Martin, M.D. 23101 Sherman Place, #404 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
3/29/88	James A. Mitchell, M.D. 1300 N. Vermont Ave., #801 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Ata O. Montazeri, M.D. 7218 S. Garfield Avenue Bell Gardens, CA 90201	Occupation: Medical Doctor	Employer:	\$100	\$100
03 29/88	Valerie P. Myers, M.D. 185 S. Euclid Avenue, #3 Pasadena, CA 91101	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Julius A. Paskan, M.D. 9814 Washington Blvd. Culver City, CA 90230	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Leonard Perez, M.D. 3733 San Dimas, #102 Bakersfield, CA 93301	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	John W. Perry, M.D. 1300 N. Vermont Avenue, #610 Los Angeles, Ca 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
		SUBTOTAL		\$900	

MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER OF COMMITTEE) **870337**

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Robert W. Cranston, M.D. 5565 Grossmont Ctr. Dr., #126 La Mesa, CA 92041	Occupation: Medical Doctor Employer:		\$100	\$100
03/30/88	Roy Egari, M.D. P.O. Box 2043 Artesia, CA 90702	Occupation: Medical Doctor Employer:		\$100	\$100
03/30/88	In Haing Hur, M.D. 1801 W. Romneya Dr., #607 Anaheim, CA 92801	Occupation: Medical Doctor Employer:		\$100	\$100
03/30/88	Ronna Jurow, M.D. 100 North Brent, #103 Ventura, CA 93003	Occupation: Medical Doctor Employer:		\$100	\$100
03/30/88	Sooren Karayan, M.D. 435 Arden Ave., #510 Glendale, CA 91203	Occupation: Medical Doctor Employer:		\$100	\$100
03/29/88	Steven A. Kotner, M.D. 5555 Reservoir Drive, #208 San Diego, CA 92120	Occupation: Medical Doctor Employer:		\$100	\$100
03/29/88	Walter Kwock, M.D. 1321 N. Vermont Ave. #4 Los Angeles, CA 90027	Occupation: Medical Doctor Employer:		\$100	\$100
03/29/88	James A. Macer, M.D. 185 S. Euclid Avenue, #3 Pasadena, CA 91101	Occupation: Medical Doctor Employer:		\$100	\$100
03/29/88	Stephen A. Maloon 2807 Loma Vista Road, #103 Ventura, CA 93003	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

96043/64021

MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/30/88	Ebenezer O. Ajilore, M.D. Pasadena Women's Medical Group Inc. 50 Alessandro Pl., #310 Pasadena, CA 91105	Occupation: Medical Doctor		\$100	\$100
03/30/88	Douglas E. Bertleson, M.D. 50 Alessandro Pl., #310 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Terrell M. Bond, M.D. 801 N. Tustin Ave., #407 Santa Ana, CA 92705	Occupation: Medical Doctor	Employer:	\$100	\$100
03/29/88	Henry H. Chung, M.D. 1801 W. Romneya Dr., #501 Anaheim, CA 92801	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Ataolah Eghrari, M.D. 8635 W. Third Street, #855-W Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	Jorge N. Flores, M.D. 1520 South 9th Avenue Hacienda Heights, CA 91745	Occupation: Medical Doctor	Employer:	\$100	\$100
03/30/88	John C. Gustafson, M.D. Ventura Co. OB & GYN Medical Group Inc. 2795 Loma Vista Road Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
3/30/88	Robert W. Hammatt, M.D. 290 Hospital Circle, Suite A Westminster, CA 92683	Occupation: Medical Doctor	Employer:	\$100	\$100
3/30/88	John F. Hildebrand, M.D. 9410 Elk Grove-Florin Road P. O. Box 1177 Elk Grove, CA 95624	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764022

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>IF SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
03/31/88	Teodor Polak, M.D. 11860 Wilshire Blvd., #302 Los Angeles, CA 90025	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	David M. Priver, M.D. 663 Silvergate San Diego, CA 92106	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Richard S. Reiner, M.D. 433 N. Camden Drive, #1190 Beverly Hills, CA 90210	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Seyed M. Rezaian, M.D. 9001 Wilshire Blvd., #201 Beverly Hills, CA 90211	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Hugo D. Riffel, M.D. P.O. Box 11268 Glendale, CA 91206	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Josephine B. Saad, M.D. 3650 E. South St., #212 Lakewood, CA 90712	Occupation: Medical Doctor	Employer:	\$100	\$100
3/31/88	Mazin Q. Sabri, M.D. 4950 San Bernardino Street, #105 Montclair, CA 91763	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Wun-Yi Tsai, M.D. 2066 Clarmar Way, #A San Jose, CA 95128	Occupation: Medical Doctor	Employer:	\$100	\$100
03/31/88	Stephen C. Walker, M.D. 1771 W. Romneya Street, #D Anaheim, CA 92801	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764023

MEMORANDUM CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	RECEIVED THIS PERIOD	CUMULATIVE TO DATE	
03/31/88	Bharati Hiten Shah, M.D. 16083 Canyon Ridge Drive Riverside, CA 92503	Occupation: Medical Doctor Employer:	\$100	\$100	
03/31/88	Abrar H. Shirazi, M.D. 1687 Erringer Road, #107 Simi Valley, CA 93065	Occupation: Medical Doctor Employer:	\$100	\$100	
03/31/88	Dale Stoops, M.D. 1206 East North Street Manteca, CA 95336	Occupation: Medical Doctor Employer:	\$100	\$100	
03/31/88	John B. Thompson, M.D. 39000 Bob Hope Drive, #W-309 Rancho Mirage, CA 92270	Occupation: Medical Doctor Employer:	\$100	\$100	
03/31/88	Barry M. Thall, M.D. 223 E. Thousand Oaks Blvd. #320 Thousand Oaks, CA 91360	Occupation: Medical Doctor Employer:	\$100	\$100	
4/01/88	Faye L. Bomer, M.D. 602 Via Zapata Riverside, CA 92507	Occupation: Medical Doctor Employer:	\$100	\$100	
4/01/88	Gerald H. Bradley, M.D. 1334 W. Covina Blvd., #203 San Dimas, CA 91773	Occupation: Medical Doctor Employer:	\$100	\$100	
4/01/88	Junn Yann Chang, M.D. 1919 N. Fairview Street, #202 Santa Ana, CA 92706	Occupation: Medical Doctor Employer:	\$100	\$100	
4/01/88	Tsang H. Chang, M.D. 500 N. Garfield Avenue #201 Monterey Park, CA 91754	Occupation: Medical Doctor Employer:	\$100	\$100	
SUBTOTAL			\$900		

96043764024

NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 496
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>OF SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/01/88	Mohammad Abuzaineh, M.D. 4025 Falling Leaf Encino, CA 91316	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Taki N. Anagnoston, M.D. 700-R West Sixth St. Gilroy, CA 95020	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Frank R. Barta, M.D. 1500 S. Central Ave. #300 Glendale, CA 91204	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Fayez J. Garro, M.D. 720 N. Tustin Avenue, #200 Santa Ana, CA 92705	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Alex D. Gazau, M.D. 2125 Thousand Oaks Blvd. Thousand Oaks, CA 91362	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Leonard Glaser, M.D. 23861 W. McBean Pkwy., #A-2 Valencia, CA 91355	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Mehdi Habibi, M.D. 1300 N. Vermont Ave., #504 Los Angeles, CA 90027	Occupation: Medical Doctor Employer:		\$100	\$100
4/01/88	Young I. Hahn, M.D. 627 Haverkamp Drive Glendale, CA 91206	Occupation: Medical Doctor Employer:		\$100	\$100
01/01/88	Stephen Kantor, M.D. 3340 W. Ball Rd. Ste. F Anaheim, CA 92804	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

96043764025

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (OF COMMITTEE)
870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, (ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>IF SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/01/88	Farrell A. Cole, M.D. 1008 Fowler Way Placerville, CA 95667	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	Carlos A. Flores, M.D. 10339 Balboa Blvd., #308 Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
14/01/88	John D. Kaufman, M.D. 23861 W. McBean Parkway, #A-2 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Shigeo Kuwahara, M.D. 2128 Canyon Road Arcadia, CA 91006	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Margin M. Lew, M.D. 3055 W. Orange Avenue, #101 Anaheim, CA 92804	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Joseph Y. Li, M.D. 10 Congress Street, #403 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
1/01/88	Harold N. Lynge, M.D. Two South Thirteenth Street San Jose, CA 95112	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Ambrose S. Masto, M.D. 2625 W. Alameda #506 Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Edmund B. Weis, Jr., M.D. 30555 Seventh Street Redlands, CA 92374	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764026

NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR OF COMMITTEE. IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/01/88	Sultan A. Hakeem, M.D. 2740 S. Bristol Street, #214 Santa Ana, CA 92704	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	William X. Halloran, M.D. 275 Victoria St., Suite L Costa Mesa, CA 92627	Occupation: Medical Doctor Employer:		\$100	\$100
04/01/88	Ray N. Iskander, M.D. 1560 E. Chevy Chase Dr. Glendale, CA 91206	Occupation: Medical Doctor Employer:		\$100	\$100
4/01/88	Hubert W. Jeng, M.D. 3620 S. Bristol St., #104 Santa Ana, CA 92704	Occupation: Medical Doctor Employer:		\$100	\$100
4/01/88	Carlos F. Jimenez, M.D. 480 Fourth Avenue, #507 Chula Vista, CA 92010	Occupation: Medical Doctor Employer:		\$100	\$100
4/01/88	Leland H. Johnson, M.D. 813 Court Street, #1. Jackson, CA 95642	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Marvin I. Beams, M.D. 36 Doctors Park Drive Santa Rosa, CA 95405	Occupation: Medical Doctor Employer:		\$100	\$100
1/04/88	Narender N. Bhatia, M.D. 4310 Olive Avenue Long Beach, CA 90807	Occupation: Medical Doctor Employer:		\$100	\$100
/04/88	Robert I. Branick, M.D. 2100 Webster St., #109 San Francisco, CA 94115	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

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CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE): **870337**

96043764008

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/01/88	Arthur Bunzel, M.D. 1741-F West Romneya Drive Anaheim, CA 92801	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Dennis M. Carden, D.O., M.D. 370 Summit Boulevard P.O. Box 2906 Big Bear Lake, CA 92315	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Charles C. Oh, M.D. 3144 Santa Anita Avenue El Monte, CA 91733	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Joseph E. O'Donnell, M.D. 585 East Elder Fallbrook, CA 92028	Occupation: Medical Doctor	Employer:	\$100	\$100
4/01/88	Edward L. Racek, M.D. 750 Medical Center Court, #5 Chula Vista, CA 92010	Occupation: Medical Doctor	Employer:	\$100	\$100
1/01/88	Wilma J. Rajcher, M.D. 11160 Warner Avenue, #109 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
1/01/88	John R. Schroeder, M.D. 1334 W. Covina Blvd., #204 San Dimas, CA 91773	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Maurice P. Sherman, M.D. 2023 W. Vista Way, Suite J Vista, CA 92083	Occupation: Medical Doctor	Employer:	\$100	\$100
/01/88	Vernon L. Smythe, M.D. 1500 S. Central Avenue, #300 Glendale, CA 91204	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$.900	

**SCHEDULE A
NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)**

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER OF COMMITTEE: **870337**

96043764029

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/01/88	Nelida M. Soffici, M.D. 8305 Seranata Drive Whittier, CA 90603	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	Ronald W. Strahan, M.D. 11645 Wilshire Blvd., #1150 Los Angeles, CA 90025	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	William D. Tanner, M.D. Tennant Group 324 N. Laurel Avenue Ontario, CA 91762	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	Gabriel Tenenbaum, M.D. 637 S. Lucas Avenue Los Angeles, CA 90017	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	Wei-Che Tsai, M.D. 1035 West Ramsey Street, Suite C P.O. Box 1087 Banning, CA 92220	Occupation: Medical Doctor	Employer:	\$100	\$100
04/01/88	Thomas M. Wormuth, M.D. 10651 Riverside Drive North Hollywood, CA 91602	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Charles H. Chen, M.D. 11160 Warner Ave., #111 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	John Din, M.D. 2720 Capitol Ave. #302 Sacramento, CA 95816	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Gregory J. Ewertz, M.D. 8631 W. Third Street, #240E Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (OF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/04/88	James L. Fuller, M.D. 3280 Professional Drive, Ste. A Auburn, CA 95603	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	Usha Gupta, M.D. 2554 Buenos Aires Drive Covina, CA 91724	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	Cyril G. Hartman, M.D. 1937 Sequoia Street Ceres, CA 95307	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	Herbert D. Huddleston, M.D. 1300 N. Vermont Ave. #605 Los Angeles, CA 90027	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	James L. Hull, M.D. 8475 S. Van Ness Ave., #101 Inglewood, CA 90305	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	McKinely M. Exum, M.D. 555 W. Compton Boulevard, #202 Compton, CA 90220	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Robert S. Firpo, M.D. 2720 N. Harbor Blvd., #220 Fullerton, CA 92635	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Walter E. Fox, M.D. 435 N. Bedford Drive, #303 Beverly Hills, CA 90210	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Isaac B. Freeman, M.D. 620 West Acre Road West Sacramento, CA 95691	Occupation: Medical Doctor Employer:		\$100	\$100
			SUBTOTAL	\$900	

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NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TRADEMARK'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	EXCESSIVE TO DATE
04/04/88	Ruey-Chyr Kao, M.D. 500 N. Garfield Avenue, #306 Monterey Park, CA 91754	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	KiHong Kwon, M.D. 2720 N. Harbor Boulevard, #220 Fullerton, CA 92635	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Ralph E. Lassa, II, M.D. 216 Howard Street Petaluma, CA 94952	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Thomas T. Lee, M.D. 4950 San Bernardino St., #104 Montclair, CA 91763	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Marc S. Leventhal, M.D. 150 Nemaha Street Pomona, CA 91767	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	William E. Lubke, M.D. 188 E. Artesia St. Pomona, CA 91767	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Carl R. Luem, M.D. 777 S. Main Street, #200 Orange, CA 92668	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Carolle Jean-Murat, M.D. 6475 Alvarado Road, #220 San Diego, CA 92120	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Keith R. Johnson, M.D. 494 Broadway El Cajon, CA 92021	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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PHYSICIAN CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC) I.D. NUMBER (IF COMMITTEE) 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>OF COMMITTEE. IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/04/88	Nelly K. Mac, M.D. 273 Teloma Drive Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	M. Masoud Malek-Zadeh, M.D. 9001 Wilshire Blvd. #305 Beverly Hills, CA 90211	Occupation: Medical Doctor	Employer:	\$100	\$100
04/04/88	Harvey S. Richmond, M.D. 436 N. Roxbury Drive, #205 Beverly Hills, CA 90210	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Eduardo A. Tovar-Galvez, M.D. 2720 N. Harbor Blvd. #220 Fullerton, CA 92635	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Thomas Show-Tzer Tzeng, M.D. 2720 N. Harbor Boulevard, #220 Fullerton, CA 92635	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	M. H. Safavian, M.D. 11160 Warner, #309 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Alexander Shadid, Jr., M.D. Attn: Ann 720 N. Tustin Avenue, #200 Santa Ana, CA 92705	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Terry L. Cole, M.D. 2629 Loma Vista Rd. Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
4/06/88	Boyd Cooper, M.D. 1300 N. Vermont Ave. #1006 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/05/88	Lydia C. Aguilera, M.D. 433 N. 4th Street, #201 Montebello, CA 90640	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Merrill P. Bacon, M.D. Bacon & Peterson Anesthesia Medical Center 80 Encino Ave. Camarillo, CA 93010	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Wen T. Chiang, M.D. 1048 S. Garfield Avenue, #301 Alhambra, CA 91801	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Robert S. Chung, M.D. 3000 W. Olympic Blvd. #302 Los Angeles, CA 90006	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Arthur I. Garfinkel, M.D. 25050 Peachland Avenue, #206 Newhall, CA 91321	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Kesho N. Hurria, M.D. 3347 W. Ball Rd. Anaheim, CA 92804	Occupation: Medical Doctor	Employer:	\$100	\$100
04/05/88	Daniel B. Martinez, M.D. 652 E. Santa Clara Street San Jose, CA 95112	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Edgardo Gracia, M.D. 480 Fourth Avenue, #206 Chula Vista, CA 92010	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Federico S. Cruz, M.D. 500 N. Garfield, #304 Monterey Park, CA 91754	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE.

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/11/88	Nashat N. Ateia, M.D. 14135 Francisquito Ave., #106 Baldwin Park, CA 91706	Occupation: Medical Doctor	Employer:	\$100	\$100
4/05/88	Gary H. Nishida, M.D. 903 West 7th Street Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
4/05/88	Carol L. Peterson, M.D. Bacon & Peterson Anesthesia Medical G 80 Encino Avenue Camarillo, CA 93010	Occupation: Medical Doctor	Employer:	\$100	\$100
4/05/88	Carl R. Reller, M.D. 555 Tachevah Drive, #105-3W Palm Springs, CA 92262	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	James A. Sadoyama, M.D. 229 Cajon St. Redlands, CA 92373	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Shahnaz Q. Shaikh, M.D. 11160 Warner Avenue, #109 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
4/06/88	Nathan Barrett, M.D. 1050 Las Tablas Road, #9 Templeton, CA 93465	Occupation: Medical Doctor	Employer:	\$100	\$100
4/06/88	Donald K. Boehm, Jr., M.D. 5321 N. Fresno, #106-C Fresno, CA 93710	Occupation: Medical Doctor	Employer:	\$100	\$100
4/06/88	C. Phillip Weaver, M.D. 4811 Chippendale Dr., #606 Sacramento, CA 95841	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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**SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)**

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STATEMENT COVERS PERIOD	
FROM	THROUGH
1/1/88	6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>OR SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/04/88	Elizabeth Suits, M.D. 1003 Via La Paz San Pedro, CA 90732	Occupation: Medical Doctor Employer:		\$100	\$100
04/05/88	Mark N. Sussman, M.D. 2807 Loma Vista Road, #103 Ventura, CA 93003	Occupation: Medical Doctor Employer:		\$100	\$100
04/04/88	Wen-Hsiung Tsai, M.D. 180 Broadway, Suite F Richmond, CA 94804	Occupation: Medical Doctor Employer:		\$100	\$100
14/04/88	Katukota C. Vijay, M.D. 1818 N. Orange Grove, #303 Pomona, CA 91767	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Jayshree M. Vyas, M.D. 1820 W. Lincoln Avenue Anaheim, CA 92801	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Norman E. Warnke, III, M.D. 729 Sunrise Avenue, #900 Roseville, CA 95661	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Jack T. Watson, M.D. 2631 Oakshore Drive Westlake Village, CA 91361	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Christopher L. Smale, M.D. 4000 Physicians Blvd., #211 Bakersfield, CA 93301	Occupation: Medical Doctor Employer:		\$100	\$100
4/04/88	Cort G. Stoskopf, M.D. 27403 Ynez Road, #103 Rancho California, CA 92390	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

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NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC) I.D. NUMBER (IF COMMITTEE) **870337**

96043764036

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	RECEIVED THIS PERIOD	CUMULATIVE TO DATE	
04/04/88	David Wren Jr., M.D. 2600 MacDonald Avenue Richmond, CA 94804	Occupation: Medical Doctor Employer:	\$100	\$100	
04/04/88	Rochelle L. Yonezawa, M.D. 50 S. San Mateo Drive, #420 San Mateo, CA 94401	Occupation: Medical Doctor Employer:	\$100	\$100	
04/05/88	Jeung Choo Yoo, M.D. 13070 Highland Springs Avenue, #9 Beaumont, CA 92223	Occupation: Medical Doctor Employer:	\$100	\$100	
04/05/88	Mohsen Zabetian, M.D. 850 E. Latham Avenue Hemet, CA 92343	Occupation: Medical Doctor Employer:	\$100	\$100	
04/04/88	Alan G. Zacharia, M.D. 1500 Southgate, #114 Daly City, CA 94015	Occupation: Medical Doctor Employer:	\$100	\$100	
4/06/88	Ulhas Balasubramaniam, M.D. 1275 North Rose Drive, #124 Placentia, CA 92670	Occupation: Medical Doctor Employer:	\$100	\$100	
4/06/88	Louis Barbara, M.D. 451 W. Gonzales #130 Oxnard, CA 93030	Occupation: Medical Doctor Employer:	\$100	\$100	
4/11/88	Eugene A. Baciocco, M.D. 1800 Sullivan Ave., #410 Daly City, CA 94015	Occupation: Medical Doctor Employer:	\$100	\$100	
4/11/88	Jean E. Carrey, M.D. 3400 W. Lomita Blvd., #602 Torrance, CA 90505	Occupation: Medical Doctor Employer:	\$100	\$100	
SUBTOTAL			\$900		

SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/06/88	Morris Fier, M.D. 307 Placentia Avenue, #105 Newport Beach, CA 92663	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Mark P. Harmeling, M.D. 14624 Sherman Way, #502 Van Nuys, CA 91405	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Robert L. Johnson, M.D. 595 Buckingham Way San Francisco, CA 94132	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Carole Jordan-Harris, M.D. 3733 Floresta Way Los Angeles, CA 90043	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Norman S. L. Merchant, M.D. 1101 N. Euclid Avenue Upland, CA 91786	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Lee D. Newman, M.D. 435 N. Bedford Drive, #310 Beverly Hills, CA 90210	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Howard A. Olgin, M.D. 14860 Roscoe Boulevard, #207 Panorama City, CA 91402	Occupation: Medical Doctor	Employer:	\$100	\$100
1/27/88	Terry L. Jaqua, M.D. Victor Valley Hospital 15248 - 11th Street Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
1/26/88	Rit Liu, M.D. 13521 Telegraph Road, Suite B Whittier, CA 90605	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764037

NETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE) **870337**

96043764038

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/06/88	Ernest L. Washington, M.D. 3742 Whittier Boulevard Los Angeles, CA 90023	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	John A. Olsen, M.D. 1125 S. Beverly Drive #720 Los Angeles, CA 90035	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Alfred G. Peters, M.D. 5321 North Fresno, #106-C Fresno, CA 93710	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Jon H. Rich, M.D. 10630 Sepulveda Blvd., #201 Mission Hills, CA 91345	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	M. Ray Rogers, M.D. 246 W. College, #302 Covina, CA 91723	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Josepha I. Seletz, M.D. 8631 W. Third St., #225-E Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Shahpour Sadri-Tabrizi, M.D. 27800 Medical Center Road, #220 Mission Viejo, CA 92691	Occupation: Medical Doctor	Employer:	\$100	\$100
04/06/88	Eldene A. Smith, M.D. 57475 Twenty-nine Palms Hwy. Ste. A Yucca Valley, CA 92284	Occupation: Medical Doctor	Employer:	\$100	\$100
1/28/88	Edward A. Moore, M.D. Attn: Mrs. Nepomuceno 15247 Eleventh St., #500 Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$.900	

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR OF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS. (ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
14/08/88	Daniel J. Cohn, M.D. 500 Esplanade Drive, #700 Oxnard, CA 93030.	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Pratibha R. Desai, M.D. 11100 Warner Avenue, #114 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Sabri M. El Farra, M.D. 1601 North Gower Street, #101 Hollywood, CA 90028	Occupation: Medical Doctor	Employer:	\$100	\$100
14/07/88	Alejandro F. Aguilar, M.D. 7501 Seville Avenue Huntington Park, CA 90255	Occupation: Medical Doctor	Employer:	\$100	\$100
14/08/88	Robert G. Aptekar, M.D. 14651 S. Bascom Ave. #150 San Jose, CA 95030	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Gerry J. Blacker, M.D. 3418 Loma Vista Road Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Lawrence M. Bruksch, M.D. 8631 W. Third St., #240-E Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	James B. Butterfield, M.D. 18130 Harbor, SVL 8931 Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Soon Myung Cha, M.D. 3544 W. Olympic Blvd., #210 Los Angeles, CA 90019	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043164079

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE.

I.D. NUMBER OF COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/07/88	Narendra K. Gupta, M.D. 130 W. Alosta Avenue Glendora, CA 91740	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Joseph I. Kang, M.D. 3030 W. 8th St., #407 Los Angeles, CA 90005	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Kong S. Koh, M.D. 2727 W. Olympic Blvd., #304 Los Angeles, CA 90006	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Rafik Latif, M.D. 6325 Topango Canyon Blvd., #409 Woodland Hills, CA 91367	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Paul D. Levin, M.D. 1595 Soquel Dr., #300 Santa Cruz, CA 95065	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Abbas Etebari, M.D. 1300 N. Vermont Avenue, #1006 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Shaban Azar Farr, M.D. 23861 W. McBean Pkwy, Suite E-17 Valencia, CA 91355	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Stephen W. Gehrs, M.D. 5353 Balboa Blvd. #208 Encino, CA 91316	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Lloyd B. Greig, M.D. 9201 Sunset Blvd., #906 Los Angeles, CA 90069	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043164040

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/07/88	Roy E. Paulsen, M.D. 70 North 15th Street San Jose, CA 95112	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Paul J. Rosen, M.D. 1150 Scott Blvd. Santa Clara, CA 95050	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Winston C. San Agustin, M.D. 850 S. Atlantic Boulevard Monterey Park, CA 91754	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Khaled A. Sanadiki, M.D. 5702 S. Magnolia Ave. Whittier, CA 90601	Occupation: Medical Doctor	Employer:	\$100	\$100
4/08/88	Robert S. Sankus, M.D. 420 W. Acacia St. #11 Stockton, CA 95203	Occupation: Medical Doctor	Employer:	\$100	\$100
4/07/88	Barry S. Solof, M.D. 2463 Solar Drive Los Angeles, CA 90046	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Oscar M. Andres, M.D. 7275 E. Southgate Drive Sacramento, CA 95823	Occupation: Medical Doctor	Employer:	\$100	\$100
1/08/88	David L. Levine, M.D. 3344 S. LaCienega Blvd. Los Angeles, CA 90016	Occupation: Medical Doctor	Employer:	\$100	\$100
7/08/88	Bruce B. McLucas, M.D. 2428 Santa Monica Boulevard, #402 Santa Monica, CA 90404	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043 / 64041

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/12/88	Scott E. Davis, M.D. 1320 Maricopa Highway Ojai, CA 93023	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Robert K. Evans, M.D. 2505 Samaritan Drive, #407 San Jose, CA 95124	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Alfredo F. Fernandez, M.D. 1800 Sullivan Avenue, #410 Daly City, CA 94015	Occupation: Medical Doctor	Employer:	\$100	\$100
04/12/88	Luis J. Figueroa, M.D. Guadalajara Medical Clinic, Inc. 2705 E. Whittier Blvd. Los Angeles, CA 90023	Occupation: Medical Doctor	Employer:	\$100	\$100
04/12/88	Manuel I. Figueroa, M.D. Guadalajara Medical Clinic Inc. 2705 E. Whittier Blvd. Los Angeles, CA 90023	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Polieno A. Cespon, M.D. 330 N. Vermont Ave Los Angeles, CA 90004	Occupation: Medical Doctor	Employer:	\$100	\$100
1/11/88	Stephen E. Conrad, M.D. 1800 Sullivan Ave. #410 Daly City, CA 94015	Occupation: Medical Doctor	Employer:	\$100	\$100
/11/88	Edgar Z. Cosme, M.D. 1626 Peacock Lane Fullerton, CA 92633	Occupation: Medical Doctor	Employer:	\$100	\$100
/12/88	Robert V. Dabao, M.D. 500 N. Garfield Avenue #304 Monterey Park, CA 91754	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764012

MEMORIAL CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE.

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/11/88	Hung G. Hoang, M.D. 7315 Stockton Blvd., #3 Sacramento, CA 95823	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	David Wei-Ping Huang, M.D. 500 N. Garfield Avenue, #204 Monterey Park, CA 91754	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	John B. James, M.D. 1679 E. Main Street, #101 El Cajon, CA 92021	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Mansoor Karamooz, M.D. 421 E. Angeleno Ave., #202 Burbank, CA 91501	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Ronald Hiromi Kato, M.D. 266 Green Valley Road Freedom, CA 95019	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Chan Quang Kieu, M.D. 3372 Venture Drive Huntington Beach, CA 92649	Occupation: Medical Doctor	Employer:	\$100	\$100
4/12/88	Cornelius Wm. Lane, M.D. 3257 Professional Drive, Suite F Auburn, CA 95603	Occupation: Medical Doctor	Employer:	\$100	\$100
04/12/88	Lynous W. Hall, M.D. 8363 Reseda Boulevard, #9 Northridge, CA 91324	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Hubert L. Hemsley, M.D. 508 N. Long Beach Blvd. Compton, CA 90221	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

9604364013

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICE-HOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/11/88	Alfonso R. Sanchez, M.D. Guadalajara Medical Clinic Inc. 2705 Whittier Blvd. Los Angeles, CA 90023	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Saul M. Luchs, M.D. 14120 Hawthorne Blvd. Hawthorne, CA 90250	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Harry A. Lusk, M.D. 15216 Vanowen Street, Suite 2-C Van Nuys, CA 91405	Occupation: Medical Doctor	Employer:	\$100	\$100
04/11/88	Morris E. Mosely, M.D. 14017 S. Van Ness Avenue, #10 Gardena, CA 90249	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Hyun Kyo Park, M.D. 175 N. Jackson Ave., #203 San Jose, CA 95116	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Anita K. Rama, M.D. 2485 High School Avenue, #222 Concord, CA 94520	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Elliott Romero, M.D. Chapman Medical Group 2617 E. Chapman Avenue, #105 Orange, CA 92669	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Joseph C. Rudison, M.D. P. O. Box 73507 Los Angeles, CA 90003	Occupation: Medical Doctor	Employer:	\$100	\$100
1/22/88	Adalid Acha, M.D. 7213 Martwood Way San Jose, CA 95120	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764044

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/12/88	Philip M. Adamson, M.D. 3257 Professional Dr., Ste. F Auburn, CA 95603	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Ghassem Bahrambeygui, M.D. 1007 Blair Calexico, CA 92231	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Stephen J. Bernocco, M.D. 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Robert B. Sloves, M.D. Torned Women's Medical Group Inc. 3400 W. Lomita Blvd., #602 Torrance, CA 90505	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Khaldoun S. Sroujieh, M.D. 1300 N. Vermont Ave. #409 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Rogit R. Trivedi, M.D. 11180 Warner Avenue, #161 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Pean-Yuan Wang, M.D. 12225 South Street, #105 Artesia, CA 90701	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	Gerald I. Wasserwald, M.D. Torned Women's Medical Group Inc. 3400 W. Lomita Boulevard, #602 Torrance, CA 90505	Occupation: Medical Doctor	Employer:	\$100	\$100
4/11/88	George S. Watkin, M.D. 1083 North D Street San Bernardino, CA 92410	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764045

VOLUNTARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/14/88	Christopher B. Cutter, M.D. 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Shoa O. Foroughi, M.D. 1141 W. Redondo Beach Blvd., #307 Gardena, CA 90247	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Michael W. Frey, M.D. 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Robert N. Helton, M.D. 725 W. La Veta Ave., #210 Orange, CA 92668	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Ali Hoda, M.D. 7880 Wren Ave., #D-143 Gilroy, CA 95020	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Paul Buzad, Jr., M.D. 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Christopher C. Chidi, M.D. 1141 W. Redondo Beach Blvd., #407 Gardena, CA 90247	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Patrick J. Clark, M.D. 6108 Regents Road San Diego, CA 92122	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Robert B. Crum, M.D. 323 N. Prairie Avenue Inglewood, CA 90301	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICER/CLERK OR COMMITTEE: **PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)** I.D. NUMBER (IF COMMITTEE): **870337**

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
04/14/88	Jirair B. Konialian, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
04/14/88	Garth G. Lee, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
04/14/88	Elliott C. Leonhardt, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
04/14/88	William O. Livingston, M.D. 612 W. Duarte Road, #202 Arcadia, CA 91006	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Futaba Matsumoto, M.D. 14418 E. Pacific Avenue Baldwin Park, CA 91706	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Nabil M. Mattar, M.D. 960 E. Green Street, #207 Pasadena, CA 91106	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Emmanuel N. Mba, M.D. 325 East Hillcrest Blvd. Inglewood, CA 90301	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Lloyd K. Ito, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Mervyn Katz, M.D. Granada Hills Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764047

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE.

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/12/88	Gary K. Michelson, M.D. 8610 S. Sepulveda Blvd., #101 Los Angeles, CA 90045	Occupation: Medical Doctor	Employer:	\$100	\$100
4/12/88	Bahjat Kurd Misto, M.D. 12482 E. Washington Blvd. Whittier, CA 90602	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Elliot L. Munjack, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Jaganath A. Naidu, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/13/88	Harold T. Peart, M.D. 6091 W. Pico Blvd. Los Angeles, CA 90035	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Arthur S. Petoyan, M.D. Granada Medical Group 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
4/14/88	Stephen D. Proffitt, M.D. P. O. Box 9828 Fountain Valley, CA 92728	Occupation: Medical Doctor	Employer:	\$100	\$100
4/18/88	Rudi A. Unterthiner, M.D. 71-246 Sahara Road Rancho Mirage, CA 92270	Occupation: Medical Doctor	Employer:	\$100	\$100
4/18/88	Gary F. Willen, M.D. P.O. Box 8439 South Lake Tahoe, CA 95731	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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FORM 420 UK 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/18/88	Subramaniam Balasubramaniam, M.D. 761 Fairway Lane Anaheim Hills, CA 92807	Occupation: Medical Doctor	Employer:	\$100	\$100
4/20/88	Milton N. Estes, M.D. 333 Miller Avenue Mill Valley, CA 94941	Occupation: Medical Doctor	Employer:	\$100	\$100
4/21/88	Pamela R. Fenton, M.D. 8635 West 3rd St., #765 W Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Marilyn F. Rosenwein, M.D. 50 S. San Mateo Dr., #420 San Mateo, CA 94401	Occupation: Medical Doctor	Employer:	\$100	\$100
4/12/88	Rifaat D. Salem, M.D. 510 N. Prospect St., #320 Redondo Beach, CA 90277	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Herga K. Samanth, M.D. 3356 W. Ball Rd., #219 Anaheim, CA 92804	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Peter P. Saroff, M.D. 995 E. St. John Place, Suite B Hemet, CA 92343	Occupation: Medical Doctor	Employer:	\$100	\$100
4/12/88	Barbara Lee Schulz, M.D. 510 N. Prospect St., #310 Redondo Beach, CA 90277	Occupation: Medical Doctor	Employer:	\$100	\$100
4/15/88	Stephen L. Smith, M.D. 1662 E. Main Street, #422 El Cajon, CA 92021	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
4/19/88	Henry C. Jackson, M.D. 43847 N. Heaton #1-E Lancaster, CA 93534	Occupation: Medical Doctor	Employer:	\$100	\$100
4/20/88	Mehmet Kasim, M.D. 1510 W. Verdugo Avenue Burbank, CA 91506	Occupation: Medical Doctor	Employer:	\$100	\$100
4/18/88	Melvin B. Kornblatt, M.D. 360 E. 7th Street, Suite L Upland, CA 91786	Occupation: Medical Doctor	Employer:	\$100	\$100
4/19/88	Clifton V. Lee, M.D. Western Women's Medical Clinic 4361 S. Western Avenue Los Angeles, CA 90062	Occupation: Medical Doctor	Employer:	\$100	\$100
4/19/88	John B. Park, M.D. 250 W. Putnam Avenue Porterville, CA 93257	Occupation: Medical Doctor	Employer:	\$100	\$100
4/21/88	Wayne C. Furr, M.D. 1560 E. Chevy Chase, #255 Glendale, CA 91206	Occupation: Medical Doctor	Employer:	\$100	\$100
4/20/88	A. Stephen Genest, M.D. 15899 Los Gatos-Almaden Rd. #5 Los Gatos, CA 95030	Occupation: Medical Doctor	Employer:	\$100	\$100
4/18/88	Thomas A. Goldenberg, M.D. 2209 South Street P.O. Box 8439 South Lake Tahoe, CA 95731	Occupation: Medical Doctor	Employer:	\$100	\$100
4/20/88	George N. Haddad, M.D. 275 Victoria St., Suite H Costa Mesa, CA 92627	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM: 1/1/88 THROUGH: 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

LD. NUMBER (IF COMMITTEE):

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER LD. NUMBER OR, IF NO LD. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	RECEIVED THIS PERIOD	CUMULATIVE TO DATE	
4/25/88	Hendrik J. DeJager, M.D. 25455 Barton Road, #104A Loma Linda, CA 92354	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/27/88	Mowbray P. Hagan, M.D. 1820 Fullerton Avenue, #310 Corona, Ca 91719	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/25/88	Allen K. Heng, M.D. 2198 Calle Riscoso Thousand Oaks, CA 91362	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/25/88	Steven S. Ho, M.D. 412 W. Carroll Ave. #104 Glendora, CA 91740	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/29/88	Jorge V. Rayde, M.D. 14935 Rinaldi Street, #207 Mission Hills, CA 91345	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/27/88	Raymond A. Schrecongost, M.D. 2415 W. Vine St. Lodi, CA 95240	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
4/27/88	Thomas A. Stiffler, M.D. 451 W. Gonzales Road, #260 Oxnard, CA 93030	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
05/88	Ahmad Aurang, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
05/88	Nasser Aziz-Zadeh, M.D. 1959 Kingsdale Avenue Redondo Beach, CA 90276	Occupation: Medical Doctor	\$100	\$100	
		Employer:			
SUBTOTAL			-\$900		

96043764051

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
/27/88	Daryl E. Murdoch, M.D. 2523 El Portal Drive, #103 San Pablo, CA 94806	Occupation: Medical Doctor	Employer:	\$100	\$100
/28/88	William L. Pugh, M.D. 1320 Maricopa Road Ojai, CA 93023	Occupation: Medical Doctor	Employer:	\$100	\$100
/18/88	Stanley W. Yang, M.D. 360 East 7th Street, Suite L Upland, CA 91786	Occupation: Medical Doctor	Employer:	\$100	\$100
/29/88	Philip M. Abatecola, M.D. 1074 Beaumont Avenue Beaumont, CA 92223	Occupation: Medical Doctor	Employer:	\$100	\$100
/25/88	Liz Ashley, M.D. 1525 Superior Ave., #200 Newport Beach, CA 92663	Occupation: Medical Doctor	Employer:	\$100	\$100
/25/88	Brian D. Brantner, M.D. 3555 Loma Vista Rd., #200 Ventura, CA 93003	Occupation: Medical Doctor	Employer:	\$100	\$100
'25/88	Ines S. Cilliani, M.D. 3620 S. Bristol Street, #103 Santa Ana, CA 92704	Occupation: Medical Doctor	Employer:	\$100	\$100
28/88	Joseph Costello, M.D. 15381 Seventh Street Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
28/88	Julius A. Cruz, M.D. 15247 - 11th Street, #100 Victorville, CA 92392	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE

I.D. NUMBER OF COMMITTEE
870337

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
/10/88	Bobby J. Harris, M.D. 5901 W. Olympic Boulevard, #200 Los Angeles, CA 90036	Occupation: Medical Doctor	Employer:	\$100	\$100
/05/88	Aliasghar Hasheminejad, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	Employer:	\$100	\$100
5/03/88	Emmanuel Brandeis, M.D. 450 N. Bedford Dr., #209 Beverly Hills, CA 90210	Occupation: Medical Doctor	Employer:	\$100	\$100
5/05/88	Kamran Broukhim, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	Employer:	\$100	\$100
5/06/88	Byung W. Chun, M.D. 13433 Telegraph Road Whittier, CA 90605	Occupation: Medical Doctor	Employer:	\$100	\$100
/10/88	Tirso Del Junco, M.D. 4924 Sunset Blvd., 2nd Fl. Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
/09/88	M. Faid Dia, M.D. 23560 Madison Street, #207 Torrance, CA 90505	Occupation: Medical Doctor	Employer:	\$100	\$100
/05/88	Abdollah Gilani, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	Employer:	\$100	\$100
/09/88	Anthony V. Grisanti, M.D. 2625 W. Alameda Ave., #518 Burbank, CA 91505	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764053

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER (IF COMMITTEE)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	RECEIVED THIS PERIOD	CUMULATIVE TO DATE	
5/06/88	Dan Matz, M.D. 18350 Roscoe Blvd., #718 Northridge, CA 91325	Occupation: Medical Doctor Employer:	\$100	\$100	
5/05/88	Bahram Mohit, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor Employer:	\$100	\$100	
5/09/88	Antonio C. Ong, M.D. 2105 W. Beverly Blvd., #209 Los Angeles, CA 90057	Occupation: Medical Doctor Employer:	\$100	\$100	
5/05/88	Bahram Parsa, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor Employer:	\$100	\$100	
5/05/88	Cheng K. Hsieh, M.D. 15366 Eleventh Street, Suite N Victorville, CA 92392	Occupation: Medical Doctor Employer:	\$100	\$100	
5/09/88	Kirtikumar B. Junnarkar, M.D. 21180 Walnut St. Lake Elsinore, CA 92330	Occupation: Medical Doctor Employer:	\$100	\$100	
5/06/88	Ziad L. Kharuf, M.D. 725 W. La Veta Ave., #210 Orange, CA 92668	Occupation: Medical Doctor Employer:	\$100	\$100	
5/06/88	Dan Tzuoh Lee, M.D. 931 Buena Vista Street, #203 Duarte, CA 91010	Occupation: Medical Doctor Employer:	\$100	\$100	
5/05/88	Philip F. Macon, M.D. 1669 West Avenue "J" Lancaster, CA 93536	Occupation: Medical Doctor Employer:	\$100	\$100	
SUBTOTAL			\$900		

96043764054

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVER PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER OF COMMITTEE:
870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
05/05/88	Abdel M. Ahmed, M.D. 201 S. Alvarado Street, #722 Los Angeles, CA 90057	Occupation: Medical Doctor Employer:		\$100	\$100
5/02/88	Gary E. Brazina, M.D. 10921 Wilshire Blvd., #LL-7 Los Angeles, CA 90024	Occupation: Medical Doctor Employer:		\$100	\$100
5/02/88	David A. Brys, M.D. Westwood Medical Plaza 10921 Wilshire Boulevard, #LL-7 Los Angeles, CA 90024	Occupation: Medical Doctor Employer:		\$100	\$100
5/17/88	Ming-Kong Chen, M.D. c/o of Miin-Hsiung Tzeng 23861 West McBean Parkway, #D-16 Valencia, CA 91355	Occupation: Medical Doctor Employer:		\$100	\$100
5/23/88	James Chinn, M.D. 65 N. First Avenue, #101 Arcadia, CA 91006	Occupation: Medical Doctor Employer:		\$100	\$100
5/23/88	Cadrin E. Gill, M.D. 231 W. Vernon Avenue, #201 Los Angeles, CA 90037	Occupation: Medical Doctor Employer:		\$100	\$100
5/05/88	Kazem Paya, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor Employer:		\$100	\$100
5/05/88	Bijan F. Radpour, M.D. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor Employer:		\$100	\$100
5/03/88	Jeffrey R. Richardson, M.D. 3003 Loma Vista, Suite F Ventura, CA 93003	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

96043764055

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

I.D. NUMBER OF COMMITTEE
 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(OF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(OF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
/12/88	Stephen W. Hargett, M.D. 1300 N. Vermont Ave., #601 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
/17/88	Leonard H. Lazarus, M.D. 6515 La Jolla Boulevard La Jolla, CA 92037	Occupation: Medical Doctor	Employer:	\$100	\$100
5/09/88	Nayan M. Shah, M.D. 1770 N. Orange Grove Ave., #203 Pomona, CA 91767	Occupation: Medical Doctor	Employer:	\$100	\$100
/09/88	Karim A. Shaikley, M.D. 1844 N. Garey Avenue Pomona, CA 91767	Occupation: Medical Doctor	Employer:	\$100	\$100
/06/88	Malek I. Sheibani, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	Employer:	\$100	\$100
/03/88	David G. Smith, M.D. 530 Lomas Santa Fe Drive, #5 Solana Beach, CA 92075	Occupation: Medical Doctor	Employer:	\$100	\$100
/03/88	Nhiep Tang, M.D. 2720 S. Bristol, #108 Santa Ana, CA 92704	Occupation: Medical Doctor	Employer:	\$100	\$100
03/88	Isaac Kung-Yu Tsai, M.D. 770 Magnolia, 1-E Corona, CA 91719	Occupation: Medical Doctor	Employer:	\$100	\$100
05/88	Nnaemeka Udoh, M.D. 1315 N. Bullis Road, #14 Compton, CA 90221	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

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FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER OF COMMITTEE

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>OF COMMITTEE. IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>OR SELF-EMPLOYED, ENTER NAME OF BUSINESS</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
5/17/88	Warren T. Nagata, M.D. 50 Bellefontaine, #202 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
5/17/88	Raymond C. Ng, M.D. 39 Congress Street, #303 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
5/20/88	Eldridge H. Pearsall, M.D. 18250 Roscoe Blvd. #240 Northridge, CA 91325	Occupation: Medical Doctor	Employer:	\$100	\$100
/17/88	Marc R. Lebed, M.D. 50 Bellefontaine, #202 Pasadena, CA 91105	Occupation: Medical Doctor	Employer:	\$100	\$100
/16/88	Moon Y. Lee, M.D. 1820 Fullerton Avenue, #320 Corona, CA 91719	Occupation: Medical Doctor	Employer:	\$100	\$100
'16/88	Rose M. Lewis, M.D. 390 Laurel St., #300 San Francisco, CA 94118	Occupation: Medical Doctor	Employer:	\$100	\$100
'11/88	Donald C. McEwen, M.D. Suite 203 Probst 39000 Bob Hope Drive Rancho Mirage, CA 92270	Occupation: Medical Doctor	Employer:	\$100	\$100
10/88	Ray V. Morales, M.D. 1125 S. Beverly Drive, #730 Los Angeles, CA 90035	Occupation: Medical Doctor	Employer:	\$100	\$100
11/88	Sheldon Haas, M.D. 7301 Medical Center Drive, #401 Canoga Park, CA 91307	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$.900	

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FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
5/27	Vahan Ananian, M.D. 1300 N. Vermont, #504 Los Angeles, CA 90027	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Glenn E. LeTourneau, M.D. 2925 Sycamore Drive, #304 Simi Valley, CA 93065	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Robert S.Y. Cheng, M.D. 206 E. Las Tunas Drive, #9 San Gabriel, CA 91776	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Robert E. Marcolesco, M.D. 12852 Palm Street, #306 Garden Grove, CA 92640	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Ali Reza Berenji, M.D. 500 E. Esplanade Drive, #1460 Oxnard, CA 93030	Occupation: Medical Doctor	Employer:	\$100	\$100
5/11/88	Pasquale V. Picchione, M.D. 555 E. Tachevah Dr., #3W-102 Palm Springs, CA 92262	Occupation: Medical Doctor	Employer:	\$100	\$100
/18/88	Marie D. Schafle, M.D. 900 Hyde Street San Francisco, CA 94109	Occupation: Medical Doctor	Employer:	\$100	\$100
/18/88	Stephen A. Schmones, M.D. 8631 W. Third St., #225E Los Angeles, CA 90048	Occupation: Medical Doctor	Employer:	\$100	\$100
/23/88	Manorama Sharma, M.D. 17150 Euclid Street, #218 Fountain Valley, CA 92708	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$900	

96043764053

FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870537

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
6/2	Anna Galfaian, M.D. 610 N. Central Avenue, #104 Glendale, CA 91203	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	Renato D. Gallina, M.D. 250 Avila Street San Francisco, CA 94123	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	Yung-Tae Kim, M.D. 8833 Reseda Boulevard, Suite D Northridge, CA 91324	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	Leland L. Sprague, M.D. 1810 Marisol Dr. Ventura, CA 93001	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	George S. Weinberger, M.D. 2080 Century Park East, #1702 Los Angeles, CA 90067	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	Aram P. Kezirian, M.D. 7080 Hollywood Boulevard, #1109 Los Angeles, CA 90028	Occupation: Medical Doctor	Employer:	\$100	\$100
6/2	Bonifacio B. Regis, M.D. Hesperia Medical Group 15888 Main Street, Suite 112B Hesperia, CA 92345	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Dong H. Hwang, M.D. 3905 Sacramento Street, #203 San Francisco, CA 94118	Occupation: Medical Doctor	Employer:	\$100	\$100
5/27	Yogesh K. Paliwal, M.D. 1770 N. Orange Grove, #203 Pomona, CA 91767	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				-\$900	

96043164059

FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	OCCUPATION		AMOUNT	
		EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
5/23/88	Daniel M. Silver, M.D. 10921 Wilshire Blvd., #LL7 Los Angeles, CA 90024	Occupation: Medical Doctor Employer:		\$100	\$100
6/11/88	Miin-Hsiung Tzeng, M.D. 23861 McBean Parkway, #D-16 Valencia, CA 91355	Occupation: Medical Doctor Employer:		\$100	\$100
6/10/88	James W. Weber, M.D. 130 W. Alostia Glendora, CA 91740	Occupation: Medical Doctor Employer:		\$100	\$100
6/17/88	William T. Williams, M.D. 10 Congress Street, #408 Pasadena, CA 91105	Occupation: Medical Doctor Employer:		\$100	\$100
6/13/88	Robin Wulffson, M.D. 400 Newport Center Drive, #608 Newport Beach, CA 92660	Occupation: Medical Doctor Employer:		\$100	\$100
6/2	Leroy R. Weekes, M.D. 1828 Western Avenue, #1 Los Angeles, CA 90006	Occupation: Medical Doctor Employer:		\$100	\$100
5/2	Hussein Vahab-Zadeh, M.D. Supercare Medical Group, Inc. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor Employer:		\$100	\$100
4/7	Geronimo G. Rodriguez, M.D. 960 E. Green Street, #206 Pasadena, CA 91106	Occupation: Medical Doctor Employer:		\$100	\$100
5/31	Joseph A. Ndiyob, M.D. 3635 S. La Brea Avenue Los Angeles, CA 90016	Occupation: Medical Doctor Employer:		\$100	\$100
SUBTOTAL				\$900	

96043764060

CONTRIBUTIONS RECEIVED
FORM 420 OR 490
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC)

870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
5/31	Ebrahim Duel, M.D. 801 North Tustin Avenue, #704 Santa Ana, CA 92705	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	Michael M. Sela, M.D. 960 E. Green Street, #168 Pasadena, CA 91106	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	James E. Carter, M.D. 27800 Medical Center Road, #122 Mission Viejo, CA 92691	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	Marcel M. Horowitz, M.D. 4910 Van Nuys Blvd. #300 Sherman Oaks, CA 91403	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	James R. Schaefer, M.D. 6475 Alvarado Rd., #134 San Diego, CA 92120	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	Michael Huang, M.D. 100 O'Connor Drive, #28 San Jose, CA 95128	Occupation: Medical Doctor	Employer:	\$100	\$100
5/31	Ata O. Mehrtash, M.D. 1141 West Redondo Beach Gardena, CA 90247	Occupation: Medical Doctor	Employer:	\$100	\$100
4/04/88	Edward N. DeMayo, M.D. 900 S. Eliseo, #103 Greenbrae, CA 94904	Occupation: Medical Doctor	Employer:	\$100	\$100
		Occupation:	Employer:		
SUBTOTAL				.\$800	

96043764061

STATEMENT COVERS PERIOD
 FROM 1/1/88 THROUGH 6/30/88

(Amounts May Be Rounded To Whole Dollars)

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Committee (PI/PAC)

I.D. NUMBER (IF COMMITTEE) 870337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule and the back of page 12 for detailed explanations of each category.

"C" - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES

"I" - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES

"L" - LITERATURE

"B" - BROADCAST ADVERTISING

"N" - NEWSPAPER AND PERIODICAL ADVERTISING

"O" - OUTSIDE ADVERTISING

"S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS

"F" - FUNDRAISING EVENTS

"G" - GENERAL OPERATIONS AND OVERHEAD

"T" - TRAVEL ACCOMMODATIONS AND MEALS

"P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

IMPORTANT: Do not itemize the payment of accrued expenses on Schedule E. Report only the lump sum of these payments on Line 4 of the Summary section, below.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Friends of Tom Bane 5430 Van Nuys Blvd., #203 Van Nuys, CA 91401 I.D. #744811	C		\$ 6,000
Dymally Campaign Committee Beverly Wilshire Beverly Hills, CA. I.D.#088919	F		2,000
Friends of Tom Bane 5430 Van Nuys Blvd., #203 Van Nuys, CA 91401 I.D. #744811	C		6,000
America's PAC 4100 Whitsett Avenue, #106 Studio City, CA 91604 I.D. #870484	C		1,000
SUBTOTAL			\$15,000

IMPORTANT: Contributions and expenditures made out of campaign funds to or on behalf of other candidates or committees must also be entered on the Allocation Page, Page 2.

SUMMARY

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD
(Include all Schedule E subtotals) \$ 30,140
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized)
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS
(Schedule B, Part 2, Column (d))
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4)
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of Summary Page \$ 30,140

96043764062

**SCHEDULE E
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE
(CONTINUATION SHEET)
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1/1/88	6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Physicians Interindemnity Political Action Committee (PI/PAC) I.D. NUMBER OF COMMITTEE: 870337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. Refer to the back of this schedule for detailed explanations of each category.

- "C" - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
- "I" - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES
- "L" - LITERATURE
- "B" - BROADCAST ADVERTISING
- "N" - NEWSPAPER AND PERIODICAL ADVERTISING
- "O" - OUTSIDE ADVERTISING
- "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
- "F" - FUNDRAISING EVENTS
- "G" - GENERAL OPERATIONS AND OVERHEAD
- "T" - TRAVEL ACCOMMODATIONS AND MEALS
- "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

96043764063

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
The Richard Katz Committee 310 No. San Vicente Bl., #206 West Hollywood, CA 90048 I.D. #800101	C		\$ 700
RFC-PAC Room 380, City Hall Los Angeles, CA 90012 I.D. #860350	C		1,000
L.A. World Affairs Council 900 Wilshire Blvd., #230 Los Angeles, CA 90017	F	Jesse Jackson Luncheon	330
MDAC I.D. #870755	E		3,000
HPMC Foundation Heart of Hollywood Awards dinner 1300 No. Vermont Ave. Los Angeles, CA 90027	F		400
Louise Gelber for State Senate 1225 Rancho Road Arcadia, CA 91006 I.D. #880-432	C		200
Foundation For Middle East Communication		Donation - Charity	2,000
		SUBTOTAL	\$7,630

SCHEDULE E
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE
(CONTINUATION SHEET)
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

PAGE 69 OF 69

STATEMENT COVERS PERIOD	
FROM	THROUGH
1/1/88	6/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Physicians Interindemnity Political Action Committee (PI/PAC) I.D. NUMBER (IF COMMITTEE) B70337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. Refer to the back of this schedule for detailed explanations of each category.

- *C* - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
- *I* - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES
- *L* - LITERATURE
- *B* - BROADCAST ADVERTISING
- *N* - NEWSPAPER AND PERIODICAL ADVERTISING
- *O* - OUTSIDE ADVERTISING
- *S* - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
- *F* - FUNDRAISING EVENTS
- *G* - GENERAL OPERATIONS AND OVERHEAD
- *T* - TRAVEL, ACCOMMODATIONS AND MEALS
- *P* - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

96043764064

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Assemblyman G. Felando P.O. Box 4198 Torrance, CA 90510 I.D. #781098	C		\$5,000
Bill Leonard - 25th Senatorial District - c/o Ed Dombrowski MD #700-547	C		500
Paul Woodruff - 61st Assembly District - c/o Ed Dombrowski MD #871-576	C		500
World Affairs Council		Donation	260
California Special Olympics		Donation	250
University of Calif. Northridge Scholarship Fund		Donation	1,000
		SUBTOTAL	\$7,510



FORM 420
1988

CAMPAIGN STATEMENT
(Government Code Sections 84200-84217)

Type or Print in Ink

Statement covers period 7/1/88 through 9/30/88

*mailed
10/2/88*

CHECK ONE OF THE FOLLOWING BOXES TO INDICATE THE TYPE OF STATEMENT BEING FILED

- PRE-ELECTION STATEMENT
- SEMI-ANNUAL STATEMENT
- SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 406 and attach it to this statement.)
- BALLOT MEASURE QUALIFICATION STATEMENT
- SPECIAL 000-YEAR CAMPAIGN REPORT
- TERMINATION STATEMENT (Attach a Form 415 to this Form 420.)

A OFFICIAL USE ONLY

NAME OF COMMITTEE

Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER

#870337

ADDRESS OF COMMITTEE, NO. AND STREET

310 E. Colorado Street, #308, Glendale CA 91205

CITY STATE ZIP CODE

AREA CODE/PHONE NUMBER

(818) 241-5119

NAME OF TREASURER

Sabri M. El Farra, M.D.

PERMANENT ADDRESS OF TREASURER, NO. AND STREET

310 E. Colorado Street, #308, Glendale CA 91205

CITY STATE

ZIP CODE

AREA CODE/ BUSINESS PHONE NUMBER

(818) 241-5119

II IS THIS A SPONSORED COMMITTEE? (See definition on reverse)

YES NO

III IS THIS A CONTROLLED COMMITTEE? (See definition on reverse)

YES (If yes, candidate or officeholder must verify the campaign statement)

NO

DATE OF ELECTION (Mo. Day, Yr.) (If applicable)

IV CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE, CANDIDATES, STATE MEASURE PROPONENT OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY. NOTE: If this committee is controlled by more than one candidate, name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR AFFILIATED COMMITTEE, IF CANDIDATE, ALSO PROVIDE THE NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD, AND DISTRICT NUMBER, IF ANY

IF ACTING JOINTLY WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS

V CANDIDATE(S) OR MEASURE(S) FOR WHICH THIS COMMITTEE IS PRIMARILY FORMED

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE	OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

I HAVE USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON 10/2/88 AT Glendale, CA

(DATE)

(CITY AND STATE)

BY

Sabri M. El Farra

(SIGNATURE OF TREASURER) Sabri El Farra, Treasurer

A CANDIDATE, OFFICEHOLDER OR STATE MEASURE PROPONENT WHO CONTROLS A COMMITTEE MUST ALSO VERIFY THE CAMPAIGN STATEMENT.

I HAVE USED ALL REASONABLE DILIGENCE AND TO THE BEST OF MY KNOWLEDGE THE TREASURER HAS USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

C	I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.
D	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
E	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
F	EXECUTED ON _____ AT _____ BY _____ (DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

FOR INFORMATION FROM THE QUALITY TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977 SEE THE ORGANIZATION MANUAL ON CAMPAIGN USE ONLY PROVISIONS OF THE PUBLIC ACCESS TO ORGANIZATION ACT.

96043764055

ALLOCATION PAGE
FORM 420

STATEMENT COVERS PERIOD
FROM 7/1/88 THROUGH 9/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Physicians Interindemnity Political Action Comm. (PI/PAC) I.D. NUMBER #870337

96043764066

DATE	IND. EXP.*	NAME OF CANDIDATE OR OFFICEHOLDER AND OFFICE OR MEASURE AND BALLOT NUMBER OR LETTER	CHECK ONE		AMOUNT	CUMULATIVE TO DATE
			SUPPORT	OPPOSE		
8/23/88		Speakers Dinner (Willie Brown 5430 Van Nuys Blvd., #230 Van Nuys, CA 91401	x		\$5,000	5,000
8/26/88		Antonovich/88 ID#861505 116 N. Maryland Avenue, #205 Glendale, CA 91206	x		1,000	1,000
8/26/88		Antonovich/88 ID#861505 116 N. Maryland Avenue, #205 Glendale, CA 91206	x		200	1,200
9/13/88		Friends of David Roberti 11783 Laurelcrest Drive Studio City, CA 91604 ID#74479	x		250	250
9/13/88		Project "90 for Target '88 10 Civic Center Plaza Santa Ana, CA 92701 ID881457	x		250	250
9/13/88		George Hanna for Mayor ID881544 1810 E. 17th Street Santa Ana, CA 92701	x		500	500
9/13/88		N A A A P.O. Box 27880 Los Angeles, CA 90027	x		500	500
9/28/88		Foundation for Middle East Comm. 9500 Wilshire Blvd., P-11E Beverly Hills, CA 90212	x		360	2,360
9/28/88		Don Knabe - State Senate P.O. Box 4566 Cerritos, CA 90703 ID 800040	x		500	500

*An "independent expenditure" is an expenditure which is not made at the behest, under the control or at the direction of, in cooperation, consultation, coordination, or concert with, or with the approval of, the candidate or committee on whose behalf it is made.

**CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS:
FROM: 7/1/88 THRU: 9/30

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
Physicians Interindemnity Political Action Comm. (PI/PAC)

ID. NUMBER (IF COMMITTEE):
#870337

CONTRIBUTIONS RECEIVED

	COLUMN A Cumulative total from previous periods	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions.....	\$ 55,600	\$ 700	\$ 56,300
2. Loans received.....			
3. SUBTOTAL CASH RECEIPTS.....	\$ 55,600	\$ 700	\$ 56,300
4. Non-monetary contributions.....			
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES.....	55,600	700	56,300
6. Enforceable Promises (Except loan guarantees, see Line 18 below).....			
7. TOTAL CONTRIBUTIONS.....	\$ 55,600	\$ 700	\$ 56,300

EXPENDITURES MADE

8. Payments.....	\$ 30,140	\$ 8,560	\$ 38,700
9. Loans Made.....			
10. SUBTOTAL.....	30,140	8,560	38,700
11. Accrued expenses (unpaid bills).....			
12. TOTAL EXPENDITURES.....	\$ 30,140	\$ 8,560	\$ 38,700

*IF THIS IS THE FIRST REPORT FILED FOR THE CALENDAR YEAR, COLUMN A SHOULD BE BLANK EXCEPT FOR LINES 2, 6, 9 AND 11.

STATEMENT OF CHANGES IN FINANCIAL CONDITION

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.).....	\$ 53,317.68	
14. Cash receipts this period (Line 3, Column B above).....	700.00	
15. Miscellaneous increases to cash (Schedule G, Line 4).....		
16. Cash payments this period (Line 10, Column B above).....	8,560.00	
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.).....		\$ 45,457.68
18. Amount of loan guarantees received (Schedule B, Part I, Column (b)).....		\$
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse.....		\$
20. Outstanding debts (Line 2 + Line 11 of Column C above).....		\$

SUMMARY FOR CANDIDATES IN BOTH A JUNE AND NOVEMBER ELECTION (See Instructions on Reverse)

	1/1 THRU 6/30	7/1 TO DATE
21. CONTRIBUTIONS RECEIVED:		
22. EXPENDITURES MADE:		

96043764067

**SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)**

STATEMENT COVERS PERIOD
FROM 7/1/88 THROUGH 9/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: PHYSICIANS INTERINDEMNITY POLITICAL ACTION COMMITTEE (PI/PAC) I.D. NUMBER (IF COMMITTEE) 870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>OF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS. ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
7/01/88	Joong G. Kim, M.D. 13707 E. Carleton Drive Cerritos, CA 90701	Occupation: Medical Doctor	Employer:	\$100	\$100
7/05/88	Nader Nwaiser, M.D. 13016 Woodbridge Street Studio City, CA 91604	Occupation: Medical Doctor	Employer:	\$100	\$100
7/7/88	Irving Duke 10660 White Oak Avenue Granada Hills, CA 91344	Occupation: Medical Doctor	Employer:	\$100	\$100
7/11/88	Robert Becker, M.D. 14935 Rinaldi St., #505 Mission Hills, CA 91345	Occupation: Medical Doctor	Employer:	\$100	\$100
7/11/88	Umaima S. Jamaluddin, M.D. 3941 San Dimas St., Bldg. 101 Bakersfield, CA 93301	Occupation: Medical Doctor	Employer:	\$100	\$100
7/21/88	William E. Mathews, M.D. 2600 Park Avenue, #206 Concord, CA 94520	Occupation: Medical Doctor	Employer:	\$100	\$100
7/29/88	Heshmat allah Foroohar, M.D. 1959 Kingsdale Avenue Redondo Beach, CA 90278	Occupation: Medical Doctor	Employer:	\$100	\$100
SUBTOTAL				\$700	

SUMMARY

1. AMOUNT RECEIVED - CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals)	\$ 700.00
2. AMOUNT RECEIVED - CONTRIBUTIONS OF LESS THAN \$100 (Not itemized).....	
3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1, Column 8 of Summary Page.....	\$ 700.00

96043764038

**SCHEDULE E
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE** PAGE 5 OF 6
FORM 420 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM 7/1/88	THROUGH 9/30/88
I.D. NUMBER (IF COMMITTEE) #870337	

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
Physicians Interindemnity Political Action Comm. (PI/PAC)

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule and the back of page 12 for detailed explanations of each category.

- | | |
|--|--|
| "C" - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES | "O" - OUTSIDE ADVERTISING |
| "I" - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES | "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS |
| "L" - LITERATURE | "F2" - FUNDRAISING EVENTS |
| "B" - BROADCAST ADVERTISING | "G" - GENERAL OPERATIONS AND OVERHEAD |
| "N" - NEWSPAPER AND PERIODICAL ADVERTISING | "T" - TRAVEL, ACCOMMODATIONS AND MEALS |
| | "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES |

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

IMPORTANT: Do not itemize the payment of accrued expenses on Schedule E. Report only the lump sum of these payments on Line 4 of the Summary section, below.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Speakers Dinner (Willie Brown) 5430 Van Nuys Blvd., #230 Van Nuys, CA 91401	F		\$5,000
Antonovich/88 #861505 116 N. Maryland Avenue, #205 Glendale, CA 91206	C		1,000
Antonovich/88 ID#861505 116 N. Maryland Avenue, #205 Glendale, CA 91206	C		200
Friends of David Roberti 11783 Laurelcrest Drive Studio City 91604 ID 74479	C		250
SUBTOTAL			\$6,450

IMPORTANT: Contributions and expenditures made out of campaign funds to or on behalf of other candidates or committees must also be entered on the Allocation Page, Page 2.

SUMMARY

- | | |
|--|----------|
| 1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD
(Include all Schedule E subtotals) | \$ 8,560 |
| 2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized) | |
| 3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS
(Schedule B, Part 2, Column (d)) | |
| 4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4) | |
| 5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of
Summary Page | \$ 8,560 |

96043764059



(Government Code Sections 84200-84217)
Type or Print in Ink

Statement covers period 10/1/88 through 12/31/88

FORM 420
1988

CHECK ONE OF THE FOLLOWING BOXES TO INDICATE THE TYPE OF STATEMENT BEING FILED.

- PRE-ELECTION STATEMENT
- SEMI-ANNUAL STATEMENT
- SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 406 and attach it to this statement.)

- BALLOT MEASURE QUALIFICATION STATEMENT
- SPECIAL GOV-YEAR CAMPAIGN REPORT

TERMINATION STATEMENT
Attach a Form 418 to this Form 420.

A OFFICIAL USE ONLY

NAME OF COMMITTEE: Physicians Interindemnity Political Action Committee (PI/PAC) I.R. NUMBER #870337

ADDRESS OF COMMITTEE: NO. AND STREET 310 E. Colorado Street, #308, CITY Glendale, STATE CA ZIP CODE 91205 AREA CODE/PHONE NUMBER (818) 241-5119

NAME OF TREASURER: Sabri M. El Farra, M.D.
PERMANENT ADDRESS OF TREASURER: NO. AND STREET 310 E. Colorado Street, #308, CITY Glendale, STATE CA ZIP CODE 91205 AREA CODE/ BUSINESS PHONE NUMBER (818) 241-5119

II IS THIS A SPONSORED COMMITTEE? (See definition on reverse)
 YES NO

III IS THIS A CONTROLLED COMMITTEE? (See definition on reverse)
 YES (If yes, candidate or officeholder must verify the campaign statement) NO DATE OF ELECTION (Mo., Day, Yr.) (If applicable)

IV CANDIDATES OR STATE MEASURE PROPONENTS CONTROLLING THIS COMMITTEE; CANDIDATES, STATE MEASURE PROPONENT OR COMMITTEES WITH WHICH THIS COMMITTEE ACTS JOINTLY. NOTE: If this committee is controlled by more than one candidate, name of each controlling candidate must be listed below.

NAME OF CANDIDATE, STATE MEASURE PROPONENT OR AFFILIATED COMMITTEE, IF CANDIDATE, ALSO PROVIDE THE NAME OF THE ELECTIVE OFFICE SOUGHT OR HELD, AND DISTRICT NUMBER, IF ANY. IF ACTING JOINTLY WITH ANOTHER COMMITTEE, IDENTIFICATION NUMBER OF COMMITTEE OR TREASURER'S NAME AND PERMANENT STREET ADDRESS.

V CANDIDATE(S) OR MEASURE(S) FOR WHICH THIS COMMITTEE IS PRIMARILY FORMED

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

I HAVE USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON 1/30/89 AT Glendale, CA BY Sabri El Farra
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

A CANDIDATE, OFFICEHOLDER OR STATE MEASURE PROPONENT WHO CONTROLS A COMMITTEE MUST ALSO VERIFY THE TREASURER'S CAMPAIGN STATEMENT.

I HAVE USED ALL REASONABLE DILIGENCE AND TO THE BEST OF MY KNOWLEDGE THE TREASURER HAS USED ALL REASONABLE DILIGENCE IN PREPARING THIS STATEMENT. I HAVE REVIEWED THE STATEMENT AND TO THE BEST OF MY KNOWLEDGE THE INFORMATION CONTAINED HEREIN AND IN THE ATTACHED SCHEDULES IS TRUE AND COMPLETE.

- C I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.
- D EXECUTED ON _____ AT _____ BY _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
- E EXECUTED ON _____ AT _____ BY _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)
- F EXECUTED ON _____ AT _____ BY _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

FOR INFORMATION FROM AN OFFICE TO BE PROVIDED TO THE PUBLIC UNDER THE CALIFORNIA FREEDOM OF INFORMATION ACT OF 1977 SEE THE CALIFORNIA FREEDOM OF INFORMATION ACT.

96043764071

ALLOCATION PAGE
FORM 420

PAGE 2 OF 8

STATEMENT COVERS PERIOD
FROM 10/1/88 THROUGH 12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: **Physicians Interindemnity Political Action Committee (PI/PAC)** I.D. NUMBER: **#870337**

DATE	IND. EXP.*	NAME OF CANDIDATE OR OFFICEHOLDER AND OFFICE OR MEASURE AND BALLOT NUMBER OR LETTER	CHECK ONE		AMOUNT	CUMULATIVE TO DATE
			SUPPORT	OPPOSE		
10/4/88		MADD 5430 Van Nuys Blvd., #314 Van Nuys, CA 91401 #94-2707273	X		\$ 400.00	\$ 400.00
10/6/88		MADD 5430 Van Nuys Blvd., #314 Van Nuys, CA 91401 #94-2707273	X		600.00	1000.00
10/6/88		McCarthy for U.S. Senate 5601 Saluson, #226 Culver City, CA 90230 #00215004	X		500.00	500.00
10/6/88		Friends of John N. Cowles 4055 Wilshire Blvd., #315 Los Angeles, CA 90010 #Co0225789	X		500.00	500.00
10/24/88		St. Annes Melkite Church 11245 Rye Street North Hollywood, CA 91602 #95-1642382	X		500.00	500.00
10/24/88		St. Annes Melkite Church 11245 Rye Street North Hollywood, CA 91602 #95-1642382	X		500.00	1000.00
10/24/88		Foundation for Middle East Communication 9500 Wilshire Boulevard, P-11E Beverly Hills, CA 90212	X		300.00	2660.00
10/24/88		Foundation for Middle East Communication 9500 Wilshire Boulevard, P-11E Beverly Hills, CA 90212	X		500.00	3160.00
10/11/88		Press Age 5320 Derry Avenue, Suite C Acoura Hills, CA 91301	X		1614.60	1614.60
11/1/88		Richard David Boyle for Assembly Committee 395 Sycamore Place Sierra Madre, CA 91024 #881667	X		500.00	500.00
11/1/88		Larkin for Senate Committee 1038 N. La Jolla Avenue Los Angeles, CA 90046 #88133	X		500.00	500.00
11/3/88		Voter Education & Registration Action, Inc. 322 W. Compton Blvd., #103 Compton, CA 90020 #95-3850938	X		500.00	500.00
11/3/88		The News Circle P.O. Box 3634 Glendale, CA 91201-0684 #573-86-2953	X		400.00	400.00

*An "independent expenditure" is an expenditure which is not made at the behest, under the control or at the direction of, in cooperation, consultation, coordination, or concert with, or with the approval of, the candidate or committee on whose behalf it is made.

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**CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD FROM 1 THRU

10/1/88 12/31

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Committee (PI/PAC)

ID. NUMBER (IF COMMITTEE):

#870337

CONTRIBUTIONS RECEIVED

	COLUMN A Cumulative total from previous periods	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions	\$ 56,300	\$ 800 <small>SCHEDULE A, LINE 3</small>	\$ 57,100
2. Loans received			
3. SUBTOTAL CASH RECEIPTS	\$ 56,300 <small>LINES 1 + 2</small>	\$ 800 <small>SCHEDULE B, LINE 7 LINES 1 + 2</small>	\$ 57,100 <small>LINES 1 + 2</small>
4. Non-monetary contributions			
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES	56,300 <small>LINES 3 + 4</small>		
6. Enforceable Promises (Except loan guarantees, see Line 18 below)			
7. TOTAL CONTRIBUTIONS	\$ 56,300 <small>LINES 5 + 6</small>	\$ 800 <small>SCHEDULE D, LINE 7 LINES 5 + 6</small>	\$ 57,100 <small>LINES 5 + 6 (SHOULD EQUAL LINE 7 COLUMNS A + B)</small>

EXPENDITURES MADE

8. Payments	\$ 38,700	\$ 12,364.60 <small>SCHEDULE E, LINE 5</small>	\$ 41,064.60
9. Loans Made			
10. SUBTOTAL	38,700 <small>LINES 8 + 9</small>	12,364.60 <small>SCHEDULE EE, LINE 7 LINES 8 + 9</small>	41,064.60 <small>LINES 8 + 9</small>
11. Accrued expenses (unpaid bills)			
12. TOTAL EXPENDITURES	\$ 38,700 <small>LINES 10 + 11</small>	\$ 12,364.60 <small>SCHEDULE F, LINE 5 LINES 10 + 11</small>	\$ 41,064.60 <small>LINES 10 + 11 (SHOULD EQUAL LINE 7 COLUMNS A + B)</small>

*IF THIS IS THE FIRST REPORT FILED FOR THE CALENDAR YEAR, COLUMN A SHOULD BE BLANK EXCEPT FOR LINES 2, 6, 9 AND 11.

STATEMENT OF CHANGES IN FINANCIAL CONDITION

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.)	\$ 45,457.68	
14. Cash receipts this period (Line 3, Column B above)	800.00	
15. Miscellaneous increases to cash (Schedule G, Line 4)		
16. Cash payments this period (Line 10, Column B above)	12,364.60	
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.)		\$ 33,893.08
18. Amount of loan guarantees received (Schedule B, Part I, Column (b))		\$
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse		\$
20. Outstanding debts (Line 2 + Line 11 of Column C above)		\$

SUMMARY FOR CANDIDATES IN BOTH A JUNE AND NOVEMBER ELECTION (See Instructions on Reverse)

	1/1 THRU 6/30	7/1 TO DATE
21. CONTRIBUTIONS RECEIVED:		
22. EXPENDITURES MADE:		

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**SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)**

STATEMENT COVERS PERIOD
FROM 10/1/88 THROUGH 12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
Physicians Interindemnity Political Action Comm. (PI/PAC)

I.D. NUMBER (IF COMMITTEE)
#870337

DATE RECD.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
10/4/88	Benjamin H. Westphal, M.D. P.O. Box 667 Anderson, CA 96007	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
10/4/88	Norman K. Arai, M.D. P.O. Box 667 Anderson, CA 96007	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
10/4/88	Joy Lee Hinkle, M.D. P.O. Box 667 Anderson, CA 96007	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
10/4/88	Albert M. Randolph, M.D. P.O. Box 667 Anderson, CA 96007	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
10/20/88	Anunciacion L. Ando, M.D. 15888 Main St., #112-B Hesperia, CA 92345	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
10/27/88	Joel M. Mintalar, M.D. 15888 Main St., #112-B Hesperia, CA 92345	Occupation:	Medical Doctor	\$100	\$100
		Employer:			
12/13/88	Mark W. Brown, M.D. 15248 - 11th Street Victorville, CA 92392	Occupation:	Medical Doctor	\$200	\$200
		Employer:			
SUBTOTAL				\$800	

96043164075

SUMMARY

- | | |
|---|--------|
| 1. AMOUNT RECEIVED -- CONTRIBUTIONS OF \$100 OR MORE
(Include all Schedule A subtotals) | \$ 800 |
| 2. AMOUNT RECEIVED -- CONTRIBUTIONS OF LESS THAN \$100 (Not itemized) | |
| 3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD
(Line 1 + Line 2) Enter here and on Line 1, Column B of Summary Page. | \$ 800 |

STATEMENT COVERS PERIOD
FROM 10/1/88 THROUGH 12/31/88

(Amounts May Be Rounded To Whole Dollars)

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:
Physicians Interindemnity Political Action Committee (PI/PAC) I.D. NUMBER OF COMMITTEE: #870337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule and the back of page 12 for detailed explanations of each category.

- "C" - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
- "I" - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES
- "L" - LITERATURE
- "B" - BROADCAST ADVERTISING
- "N" - NEWSPAPER AND PERIODICAL ADVERTISING
- "O" - OUTSIDE ADVERTISING
- "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
- "F" - FUNDRAISING EVENTS
- "G" - GENERAL OPERATIONS AND OVERHEAD
- "T" - TRAVEL, ACCOMMODATIONS AND MEALS
- "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

IMPORTANT: Do not itemize the payment of accrued expenses on Schedule E. Report only the lump sum of these payments on Line 4 of the Summary section, below.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
MADD 5430 Van Nuys Blvd., #314 Van Nuys, CA 91401 #94-2707273	C		\$ 400.00
MADD 5430 Van Nuys Blvd., #314 Van Nuys, CA 91401 #94-2707273	C		\$ 600.00
McCarthy for U.S. Senate 5601 Saluson, #226 Culver City, CA 90230 #00215004	C		\$ 500.00
Friends of John N. Cowles 4055 Wilshire Blvd., #315 Los Angeles, CA 90010 #CO0225789	C		\$ 500.00
SUBTOTAL			\$ 2000.00

IMPORTANT: Contributions and expenditures made out of campaign funds to or on behalf of other candidates or committees must also be entered on the Allocation Page, Page 2.

SUMMARY

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD
(Include all Schedule E subtotals) \$ 12,364.60
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized)
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS
(Schedule B, Part 2, Column (d))
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4)
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of
Summary Page \$ 12,364.60

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SCHEDULE E
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE
(CONTINUATION SHEET)
FORM 420 OR 490
(Amounts May Be Rounded To Whole Dollars)

PAGE 7 OF 8

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Physicians Interindemnity Political Action Committee (PI/PAC)

I.D. NUMBER (OF COMMITTEE)
 #870337

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. Refer to the back of this schedule for detailed explanations of each category.

- *C* - MONETARY & IN-KIND CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
- *I* - INDEPENDENT EXPENDITURES TO SUPPORT OR OPPOSE OTHER CANDIDATES OR MEASURES
- *L* - LITERATURE
- *B* - BROADCAST ADVERTISING
- *N* - NEWSPAPER AND PERIODICAL ADVERTISING
- *O* - OUTSIDE ADVERTISING
- *S* - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
- *F* - FUNDRAISING EVENTS
- *G* - GENERAL OPERATIONS AND OVERHEAD
- *T* - TRAVEL, ACCOMMODATIONS AND MEALS
- *P* - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

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NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
St. Annes Melkite Church 11245 Rye Street North Hollywood, CA 91602 #95-1642382	F		\$ 500.00
St. Annes Melkite Church 11245 Rye Street North Hollywood, CA 91602 #95-1642382	F		\$ 500.00
Foundation for Middle East Communication 9500 Wilshire Boulevard, P-11E Beverly Hills, CA 90212	C		\$ 300.00
Foundation for Middle East Communication 9500 Wilshire Boulevard, P-11E Beverly Hills, CA 90212	C		\$ 500.00
Press Age 5320 Derry Avenue, Suite C Agoura Hills, CA 91301	O		\$ 1614.60
Richard David Boyle for Assembly Committee 395 Sycamore Place Sierra Madre, CA 91024 #881667	C		\$ 500.00
Larkin for Senate Committee 1038 N. La Jolla Avenue Los Angeles, CA 90046 #88133	C		\$ 500.00
		SUBTOTAL	\$ 4414.60

89 DEC 12 PM 12:49

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Physicians Interindemnity/PAC) MUR 2604
and Sabri El Farra, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission received a complaint on May 2, 1988, from Bill Press, a former candidate for the United States Senate in California, on behalf of Bill Press for U.S. Senate, his principal campaign committee. The complaint named America's PAC, an unregistered political action committee headquartered in California, and Neil Rincover, Executive Director, as respondents. The Commission added Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, treasurer, as respondents based on their failure to file a Statement of Organization and the requisite reports with the Commission and because they apparently had made contributions to federal political committees which contained corporate funds.¹

II. ANALYSIS

On January 31, 1989, the Commission found reason to believe that Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. §§ 433, 434 and 441b(a). By

1. This report addresses only PI/PAC's apparent violations of the Act and its request for pre-probable cause conciliation. The investigation of violations by America's PAC is ongoing and will be addressed in a later report.

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letter dated June 22, 1989, counsel on behalf of respondents requested pre-probable cause conciliation (Attachment I).

Information provided by PI/PAC in its response to the Commission's reason to believe findings has raised an additional issue of excessive contributions pursuant to 2 U.S.C. § 441a(a)(1)(A).

1. Failure to Register and Report

Counsel for PI/PAC has identified PI/PAC as a California state political action committee which was organized on April 8, 1987, by Physicians Interindemnity Trust ("PI Trust").

Pursuant to 2 U.S.C. § 431(4)(A), "political committee" is defined as "any committee...which makes expenditures aggregating in excess of \$1,000 during a calendar year." "Expenditure" is defined in the Act as "any...deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office."

On October 12, 1987, Respondents issued a check for \$2,000 to America's PAC, and, as evidenced by PI/PAC's original check, by the report filed by PI/PAC with the state and by PI/PAC's response to the Commission's findings, (Attachment I, page 2) earmarked these funds to an authorized campaign committee of a federal candidate, Bill Press for Congress (Attachment II).² Therefore, Respondents had made expenditures for purposes of

2. America's PAC argues that the contribution was intended for its own use as witness a replacement check with America's PAC named as the designated payee.

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influencing federal elections in excess of \$1,000 as of October 12, 1987, bringing PI/PAC within the definition of "political committee" pursuant to 2 U.S.C. § 431(4).

Further, in their response to the Commission's reason to believe findings, counsel for Respondents states that they made several other contributions in 1987 and early 1988 which should have been made by a federal committee, rather than by a state committee such as PI/PAC. According to copies of periodic filings made by Respondents with the state of California, at least four other contributions were made to committees of candidates running for federal office. Respondents contributed \$1,000 during the latter half of 1987, and \$2,000 in 1988, to the Dymally Campaign Committee. In 1988, Respondents contributed \$500 to McCarthy for U.S. Senate, and \$500 to the Larkin for Senate Committee.

Pursuant to 2 U.S.C. § 434(a)(1), a political committee is required to file reports of receipts and disbursements with the Commission. Respondents did not file a Statement of Organization with the Commission within 10 days after becoming a political committee in violation of § 433, nor file reports of receipts and disbursements with the Commission.³

2. Impermissible Corporate Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a

3. On June 10, 1988, PI Trust filed a statement of organization with the Commission for Physicians Interindemnity/FED PAC ("PI/FED-PAC"), a separate committee from PI/PAC.

9 6 0 4 3 7 6 4 0 3 1

corporation to make a contribution in connection with any federal election. According to the response submitted by Respondents, PI Trust is an interindemnity arrangement for physicians and surgeons in California authorized by Insurance Code Section 1280.7 to provide alternative medical malpractice coverage to its members. Certain of PI/Trust's members are sole shareholder professional medical corporations. Contributions to PI/PAC are solicited from members of PI Trust. As stated above, in 1987 and 1988 PI/PAC made contributions totaling at least \$9,000 to at least four federal committees. Therefore, there is evidence that Respondents made contributions to federal candidates using monies obtained from corporate entities.⁴

4. In their response to the Commission's reason to believe findings, counsel for Respondents cite to the case, FEC v. Massachusetts Citizens For Life, Inc., ("MCFL"), 479 U.S. 238 (1986). In MCFL, the Court carved out a limited exception to the application of 2 U.S.C. § 441b for independent expenditures by certain non-profit ideological corporations. The Court qualified its exemption for entities such as MCFL by setting out "three features essential to" its holding. One feature was MCFL's policy not to accept contributions from business corporations or labor unions. Further, the focus of the Court was upon independent expenditures by corporations, not upon contributions.

Counsel argues that PI/Trust's members fit within the exemptions set out by the Court in MCFL. He argues that Section 441b should not be applicable to single shareholder professional corporations such as PI/PAC's contributors. However, the present matter involves contributions by PI/PAC's members and then by PI/PAC, not independent expenditures by those members or by the committee. As noted above, the Court in MCFL also specifically premised its decision upon that organization's political purpose and its non-involvement in business activities. PI Trust and its members are business organizations. Thus the MCFL exception is not applicable.

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3. Impermissible Excessive Contributions

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his authorized political committees with respect to any election which in the aggregate, exceed \$1,000.

As stated above, according to copies of periodic filings made by Respondents with the state of California and received by this Office on October 17, 1989, at least four contributions were made to committees of candidates running for federal office. One of these committees, the Dymally Campaign Committee, was given \$1,000 during the second half of 1987 for the primary election, and \$2,000 on January 26, 1988. The \$2,000 contributed in 1988 were two contributions of \$1,000 each. One contribution was designated for the primary election and the other for the general election. Therefore, the aggregation of the two contributions for the primary election result in a \$1,000 excessive contribution by Respondents.⁵ Also, the \$2,000 check issued to America's PAC, but earmarked for federal candidate, Bill Press, is an excessive contribution pursuant to 2 U.S.C. § 441a(a)(1)(A).

5. PI/PAC reported the 1988 contribution to the Dymally Campaign Committee as a \$2,000 contribution made on January 26, 1988. The Dymally Campaign Committee reported the \$2,000 contribution as being from Sabri El Farra, who is the treasurer of PI/PAC, and as having been received on February 2, 1988. The Dymally Campaign Committee further reported that \$1,000 of the contribution was designated for the primary election and the other \$1,000 for the general election.

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This Office recommends that the Commission find reason to believe that Physicians Interindemnity PAC/PAC violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to both the Dymally Campaign Committee and Bill Press for U.S. Senate. During a telephone conversation between this Office and counsel for Respondents on November 16 with regard to this additional reason to believe recommendation, counsel agreed to the inclusion of any new finding in his clients' request for pre-probable cause conciliation.

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

Attached for the Commission's approval is a proposed conciliation agreement with Physicians Interindemnity/PAC and Sabri El Farra, as treasurer

III. RECOMMENDATIONS

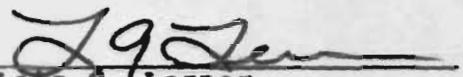
1. Find reason to believe Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
2. Enter into conciliation with Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, prior to a finding of probable cause to believe.

9 6 0 4 3 / 6 4 0 3 4

3. Approve the attached proposed conciliation agreement and letter.

Lawrence M. Noble
General Counsel

12-11-89
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Request for conciliation dated June 22, 1989.
2. Copies of checks issued to America's PAC and a copy of a state disclosure form pertaining to Bill Press.
3. Copies of state disclosure forms.
4. Proposed conciliation agreement and letter.

Staff Person: Mary Ann Bumgarner

96043764035



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS
COMMISSION SECRETARY *MAH*

DATE: DECEMBER 15, 1989

SUBJECT: MUR 2604 - GENERAL COUNSEL'S REPORT
DATED DECEMBER 11, 1989

The above-captioned document was circulated to the Commission on Wednesday, December 13, 1989 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	XXXX

This matter will be placed on the meeting agenda for Tuesday, January 9, 1989 at 10:00 a.m.

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

96043764086

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Physicians Interindemnity/PAC) MUR 2604
and Sabri E. Farra, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 9, 1990, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2604:

1. Find reason to believe Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
2. Enter into conciliation with Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, prior to a finding of probable cause to believe.

(continued)

96043764087

Federal Election Commission
Certification for MUR 2604
January 9, 1990

Page 2

3. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated December 11, 1989.

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

Attest:

1-10-90
Date

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

96043764088



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 18, 1990

William J. Kopesky, Esquire
Adams, Duque & Hazeltine
523 West Sixth Street
Los Angeles, California 90014

RE: MUR 2604
Physicians Interindemnity/PAC
and Sabri El Farra, as treasurer

Dear Mr. Kopesky:

On January 31, 1989, the Federal Election Commission found reason to believe that your clients, Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. §§ 433, 434 and 441b(a). On January 9, 1990, the Commission found reason to believe that your clients violated 2 U.S.C. § 441a(a)(1)(A). At your request, on January 9, 1990, the Commission also determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement addressing all of the above violations that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

A handwritten signature in cursive script that reads "Lee Ann Elliott".

Lee Ann Elliott
Chairman

Enclosure
Conciliation Agreement

96043764089

OGC 5411

LAW OFFICES OF
ADAMS, DUQUE & HAZELTINE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO OFFICE
500 WASHINGTON STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-1240

SAN DIEGO OFFICE
401 WEST A STREET
TWENTY THIRD FLOOR
SAN DIEGO, CALIFORNIA 92101
TELEPHONE (619) 232-1240

523 WEST SIXTH STREET
TENTH FLOOR
LOS ANGELES, CALIFORNIA 90014
TELEPHONE (213) 620-1240
TELECOPIER (213) 614-1250
TELEX 66-6135

NEW YORK OFFICE
551 MADISON AVENUE
EIGHTH FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 750-1240
TELECOPIER (212) 644-9727

HENRY DUQUE (1904-1971)
EARL C. ADAMS (1892-1986)

February 13, 1990

Mary Ann Bumgarner, Esq.
Federal Election Commission
Office of the General Counsel
Room 659
999 E Street N.W.
Washington, D.C. 20463

Re: MUR 2604

Dear Ms. Bumgarner:

Thank you for your consent to an extension of time to complete the conciliation negotiations for the above referenced matter. I understand that the deadline is now Friday March 9, 1990. Please acknowledge your consent to this extension by signing the enclosed copy of this letter and returning it to us in the self addressed stamped envelope provided. Thanks again for your courtesy and I will be in touch shortly to discuss the proposed agreement.

Sincerely,

Bill
WILLIAM J. KOPESKY

Received and acknowledged _____

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HAND DELIVERED

90FEB 14 AH10:22

90FEB 14 AH11:59

RECEIVED
FEDERAL ELECTION COMMISSION
90FEB 14 11:59 AM '90
RECEIVED
FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 21, 1990

William J. Kopesky, Esquire
Adams, Duque & Hazeltine
523 West Sixth Street
Los Angeles, California 90014

RE: MUR 2604
Physicians Interindemnity/PAC
and Sabri El Farra, as
treasurer

Dear Mr. Kopesky:

This is in response to your letter dated February 13, 1990, which we received on February 14, 1990, requesting an extension of 14 days to respond to the Commission's letter dated January 18, 1990. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 9, 1990.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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90 FEB 20 PM 4:21

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Physicians Interindemnity/PAC) MUR 2604
and Sabri El Farra, as treasurer)

GENERAL COUNSEL'S REPORT

On January 31, 1989, the Commission found reason to believe that Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, as treasurer, violated 2 U.S.C. §§ 433, 434 and 441b(a). On January 9, 1990, the Commission found reason to believe that PI/PAC violated 2 U.S.C. § 441a(a)(1)(A). At the request of PI/PAC, on January 9, 1990, the Commission also determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause. Based on contacts with the Committee's counsel, it appears that the matter can be resolved through conciliation. Accordingly, this Office will continue conciliation for another 30 days.

Lawrence M. Noble
General Counsel

2/16/90
Date

BY: 
Lois G. Lerner
Associate General Counsel

Staff Assigned: Mary Ann Bumgarner

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000 6858

LAW OFFICES OF
ADAMS, DUQUE & HAZELTINE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SAN FRANCISCO OFFICE
500 WASHINGTON STREET
SAN FRANCISCO, CALIFORNIA 94111
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551 MADISON AVENUE
EIGHTH FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 750-1240
TELECOPIER (212) 644-9727

HENRY DUQUE (1904-1971)
EARL C. ADAMS (1892-1986)

July 3, 1990

VIA FEDERAL EXPRESS

Mary Ann Bumgarner, Esq.
Office of the General Counsel
Federal Election Commission
Room 659
999 E Street, N.W.
Washington D.C. 20463

HAND DELIVERED

90 JUL -5 AM 10:11

FEDERAL ELECTION COMMISSION
MAIL ROOM

Re: Physicians Interindemnity /PAC and Sabri El Farra,
as treasurer; MUR 2604

Dear Mary Ann:

As we discussed this morning, enclosed are responses to Interrogatory Nos. 2, 3, 4, 6, 7, and 8 contained the Factual and Legal Analysis. If you have any questions, please don't hesitate to call.

Sincerely,

Bill

WILLIAM J. KOPESKY

Enclosure

cc: Sabri El Farra, M.D.
Dale A. Welke, Esq.

90 JUL -5 11:12:38

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

96043764093

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Physicians) MUR 2604
Interindemnity/PAC and Sabri El)
Farra, M.D., Treasurer)
_____)

RESPONSE TO INTERROGATORIES

Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, M.D., Treasurer, object to providing any information that is privileged or immune from discovery. The inadvertent production of any information that is privileged, which constitutes attorney work product, or which is otherwise immune from discovery, shall not constitute a waiver of any privilege or of any other ground for objecting to discovery with respect to such information, or the subject matter thereof, or of PI/PAC or Dr. El Farra, to object to the use of any such information. Subject to this objection, PI/PAC and Dr. El Farra respond as follows:

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///

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RESPONSE TO INTERROGATORY 2:

Check number 1010 as shown in Exhibit A of the Federal Election Commission ("FEC") Interrogatories (attached hereto) was intended to be a contribution from PI/PAC to Bill Press (or his campaign committee) in his U.S. Senate campaign. The memo notation on the check reflects this intent.

Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

RESPONSE TO INTERROGATORY 3:

a. No individual associated with PI/PAC was authorized to change the original and specific memo notation "Bill Press for U.S. Senate" to the more general notation "Political contribution" before, during, or after the check was made payable to America's PAC. To the best of Dr. El Farra's knowledge, no individual associated with PI/PAC changed this notation.

b. After Dr. El Farra drafted the check shown on Exhibit A, he handed it to Mr. Neil Rincover on or about October 12, 1987. He did not learn of the notation change until after PI/PAC was notified by the FEC of Mr. Press' complaint. Consequently, the notation on the check must have been changed sometime after the check was handed to Mr. Rincover, and Dr. El Farra is unable to explain how the notation was changed.

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Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

RESPONSE TO INTERROGATORY 4:

After Dr. El Farra drafted the check shown in Exhibit A, he handed it to Mr. Rincover on or about October 12, 1987. At some time after that date, Mr. Press asked Dr. El Farra for a copy of the check Dr. El Farra had handed to Mr. Rincover, and Dr. El Farra forwarded the copy to Mr. Press.

Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

RESPONSE TO INTERROGATORY 6:

a. Dr. El Farra made a commitment to Mr. Press on or about October 11, 1987 to contribute \$2,000 to Mr. Press' U.S. Senate campaign on behalf of PI/PAC.

b. The check was made payable to America's PAC in the belief that America's PAC was a political committee which could accept political contributions from organizations such as PI/PAC, and then pass those contributions to the candidates designated by such

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organizations. Because PI/PAC's check was specifically earmarked for Mr. Press' U.S. Senate campaign in the form of the notation "Bill Press for U.S. Senate" typed on the lower left corner of the check, Dr. El Farra believed that the check would go to Mr. Press (or his campaign committee).

Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

RESPONSE TO INTERROGATORY NO. 7:

With the exception of the solicitation letter as shown in Exhibit C of the FEC Interrogatories (attached hereto), Mr. Rincover did not solicit PI/PAC or, to the best of Dr. El Farra's knowledge, any individual connected with PI/PAC, for contributions to be used on behalf of Mr. Press.

Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

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RESPONSE TO INTERROGATORY 8:

PI/PAC made no other contributions to Mr. Press' campaign.

Dr. El Farra provided informational, documentary or other input regarding this response and is the person capable of furnishing testimony concerning the response given. Margaret L. Epstein, Esq. and William J. Kopesky, Esq. assisted in drafting this response.

ADAMS, DUQUE & HAZELTINE
WILLIAM J. KOPESKY
MARGARET L. EPSTEIN

By Margaret L. Epstein
Margaret L. Epstein
Attorneys for responding parties

96043 / 64078

VERIFICATION

I, Sabri El Farra, M.D., declare:

1. I am the treasurer of Physicians Interindemnity/PAC, which is a respondent in the above-entitled action. I am authorized to make this Verification on its and on my own behalf.

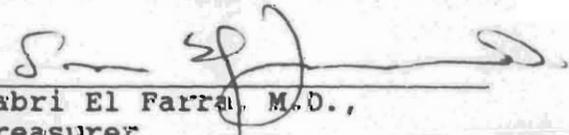
2. I have read the foregoing Response to Interrogatories and know the contents thereof.

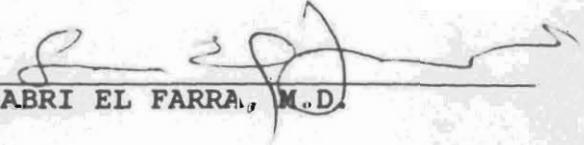
3. Except as to those matters which I state to the best of my knowledge, I know the matters stated therein are true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 3, 1990, at Glendale, California.

PHYSICIANS INTERINDEMNITY/PAC

By 
Sabri El Farra, M.D.,
Treasurer


SABRI EL FARRA, M.D.

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1010

00 1300/1222

PHYSICIANS INTERINDEMNITY/PAC

310 E. COLORADO ST., NO. 308
GLENDALE, CA 91205

October 12, 1987

PAY
TO THE
ORDER OF

AMERICA'S PAC

\$ 2,000.00

Two Thousand Dollars & no/100 -----DOLLARS



FOR Bill Press for U.S. Senate

[Signature]
S. M. Farra, M.D.,
Treasurer

EXHIBIT A

PHYSICIANS INTERINDEMNITY/PAC

310 E. COLORADO ST., NO. 308
GLENDALE, CA 91205

1010

90-1396/1222

October 12, 1987

PAY TO THE ORDER OF AMERICA'S PAC

\$ 2,000.00

Two Thousand Dollars & no/100 DOLLARS



INDEPENDENCE BANK
1910 VENTURA BLVD.
ENCINO, CA 91436

FOR Political contribution =

S. M. [Signature] [Signature]
FEDERAL RESERVE NOTE

9604376410

OT '87 21
P.O.
F.R.B. LOS ANGELES
1220-0018-0

AMERICA'S PAC
016567/10/87

PAY TO THE ORDER OF
CAPITOL...
SAC, CA
121106329

EXHIBIT B

AMERICA'S P.A.C.

1.1.

A POLITICAL ACTION COMMITTEE LEGALLY ORGANIZED TO SUPPORT THE ELECTION OF CANDIDATES WHO WORK FOR A BETTER ENVIRONMENT AND A BETTER WORLD

Bill Press
Executive Director
Neil B. Rincover
President
Mick Scott
Secretary/Cas Director

February 29, 1988

S. M. El Farra, M.D., Treasurer
Physicians Interindemnity/PAC
310 East Colorado Street, Suite 308
Glendale, California 91205

HAND DELIVERED

Dear Dr. El Farra:

Your past support of Bill Press, and other progressive candidates for political office, clearly demonstrates your commitment to those ideals of fairness and balance that America's PAC was founded upon. We are about to embark on our most ambitious project: a massive direct mail fundraising drive that will mean that we will be fully funded, and very potent, for the approaching California elections. Our present intention is to assist the following:

Bill Press
Rev. Jesse Jackson
Tom Bradley

Although the race for Mayor is next year, we believe that it is crucial to begin our assistance to Mayor Bradley immediately so that he enters the campaign from a position of strength.

Our direct mail effort will cost approximately \$16,000.; we already have raised more than \$12,000. We need your help now in making up the difference --- we estimate that this statewide direct mail campaign will net \$80,000 to \$110,000., which will enable us to purchase massive amounts of radio time and print ads just prior to the June primary.

Please help us by matching your earlier contribution, or sending whatever you can afford. I have also enclosed a few remittance envelopes you can give to other organizations or individuals who you feel may be willing to help. We need to get the mail out now; we need your help today.

We all deeply appreciate your support, and look forward to working with you on many future campaigns. Please don't hesitate to call me if you have any questions or suggestions.

Sincerely,

NEIL B. RINCOVER
Executive Director

EXHIBIT C

96043764102

90 AUG -9 AM 10:13

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Physicians Interindemnity/PAC)	MUR 2604
and Sabri El Farra, as treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a revised signed conciliation agreement which has been submitted by William J. Ropesky, counsel for Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, as treasurer (Attachment 1). A check for the civil penalty has not been received.

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For the foregoing reasons, this Office recommends that the

Commission accept the revised conciliation agreement submitted by PI/PAC.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Physicians Interindemnity/PAC and Sabri El Farra, as treasurer.
2. Close the file as these respondents.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 8/7/90

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Proposed conciliation agreement.
2. Response dated June 7, 1990.

Staff Member: Mary Ann Bungarner

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2604
Physicians Interindemnity/PAC)
and Sabri El Farra, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 10, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2604:

1. Accept the conciliation agreement with Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, as recommended in the General Counsel's Report dated August 7, 1990.
2. Close the file as to these respondents.
3. Approve the letter, as recommended in the General Counsel's Report dated August 7, 1990.

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

Attest:

8-13-90

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Wed., August 8, 1990	10:13 a.m.
Circulated to the Commission:	Wed., August 8, 1990	4:00 p.m.
Deadline for vote:	Fri., August 10, 1990	4:00 p.m.

dh

96043764106



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1990

William J. Kopesky, Esquire
Adams, Duque & Hazeltine
523 West Sixth Street
Los Angeles, California 90014

RE: MUR 2604
Physicians Interindemnity/PAC
and Sabri El Farra, as
treasurer

Dear Mr. Kopesky:

On August 10, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 433, 434, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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

96043764107

William J. Kopesky
Page 2

questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

96043764108

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Physicians Interindemnity/PAC) MUR 2604
and Sabri El Farra, as treasurer)

CONCILIATION AGREEMENT

The matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Physicians Interindemnity/PAC and Sabri El Farra, as treasurer, ("Respondents"), violated 2 U.S.C. §§ 433, 434, and 441b(a).

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

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

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

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

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

1. PI/PAC is a California state political action committee which was organized on April 8, 1987, by Physicians Interindemnity Trust ("PI Trust").

2. Sabri El Farra is the treasurer of PI/PAC.

3. Pursuant to 2 U.S.C. § 431(4)(A), "political committee" is defined as "any committee...which makes expenditures aggregating in excess of \$1,000 during a calendar year."

4. Pursuant to 2 U.S.C. § 431(9)(A)(i), "expenditure" is defined as "any...deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office."

5. On October 12, 1987, Respondents issued a check for \$2,000 to America's PAC, and earmarked the funds for Bill Press for U.S. Senate, the authorized campaign committee of a federal candidate.

6. Respondents contributed \$1,000 in 1987 and \$2,000 in 1988 to the Dymally Campaign Committee, the authorized campaign committee of a federal candidate.

7. Respondents contributed \$500 in 1988 to McCarthy for U.S. Senate, the authorized campaign committee of a federal candidate.

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8. Respondents contributed \$500 in 1988 to the Larkin for Senate Committee, the authorized campaign committee of a federal candidate.

9. As of October 12, 1987, Respondents made expenditures in excess of \$1,000, bringing PI/PAC within the definition of "political committee" pursuant to 2 U.S.C. § 431(4).

10. Pursuant to 2 U.S.C. § 433(a), a political committee must file a Statement of Organization with the Commission within 10 days after becoming a political committee.

11. Pursuant to 2 U.S.C. § 434(a)(1), a political committee is required to file reports of receipts and disbursements with the Commission.

12. Although Respondents did not file a timely Statement of Organization with the Commission within 10 days after becoming a political committee nor file reports of receipts and disbursements with the Commission, Respondents contend that the failure to make such filings stemmed from Respondents' misunderstanding of the applicable law and that the amount of the contributions was reported to the California Fair Political Practices Commission.

13. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution in connection with any federal election.

14. PI Trust is an interindemnity arrangement for

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physicians and surgeons in California authorized to provide alternative medical malpractice coverage to its members.

15. Certain of PI Trust's members are sole shareholder professional medical corporations.

16. Contributions to PI/PAC are solicited from members of PI Trust.

17. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his authorized political committees with respect to any election which in the aggregate, exceed \$1,000.

18. Respondents contributed, for the primary election, \$1,000 in 1987 and \$1,000 in 1988 to the Dymally Campaign Committee, the authorized campaign committee of a federal candidate, resulting in a \$1,000 excessive contribution.

19. On October 12, 1987, Respondents issued a check for \$2,000 to America's PAC, and earmarked the funds for Bill Press for U.S. Senate, the authorized campaign committee of a federal candidate, resulting in a \$1,000 excessive contribution

V. Respondents violated 2 U.S.C. §§ 433 and 434 by failing to file a Statement of Organization and the requisite reports with the Commission. Respondents contend that these violations were not knowing and willful.

VI. Respondents violated 2 U.S.C. § 441b(a) by making

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contributions to federal political committees which contained corporate funds. Respondents contend that this violation was not knowing and willful.

VII. Respondents violated 2 U.S.C. § 441(a)(1)(A) by making excessive contributions to two authorized campaign committees of federal candidates. Respondents contend that this violation was not knowing and willful.

VIII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Thousand Dollars (\$3,000), pursuant to 2 U.S.C. § 437g(a)(5)(a).

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

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

XI. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply and to so notify the Commission.

XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

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no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION

Lawrence M. Noble
General Counsel

BY: *Lois G. Lerner*
Lois G. Lerner
Associate General Counsel

8/14/90
Date

FOR THE RESPONDENTS:

SM [Signature]
Name:
Position: *Secretary*

7/10/90
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
America's PAC and)
Neil Rincover, as Executive)
Director and acting as)
treasurer)

MUR 2604

SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the above named respondents, based on the assessment of the information presently available.

Date

3/21/91

LM Noble (LJL)
Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
America's PAC and Neil)
Rincover, as Executive Director)
and acting as treasurer)

MUR 2604

SENSITIVE
EXECUTIVE SESSION
SEP 17 1991

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission found reason to believe that America's PAC and Neil Rincover, as Executive Director and acting treasurer ("Respondents"), violated 2 U.S.C. §§ 432(b), 433, 434(a), 434(b), 441a(a)(8), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"), and 11 C.F.R. §§ 102.8(a) and 110.6(c) of the Commission Regulations. America's PAC is an unregistered political action committee headquartered in California with Neil Rincover as Executive Director. It appears that since at least October 12, 1987, Mr. Rincover has also been acting as treasurer.

On April 24, 1991, this Office sent a General Counsel's Brief notifying Respondents that this Office was prepared to recommend that the Commission find probable cause to believe in this matter. No response was received from Respondents. On several occasions, this Office attempted unsuccessfully to contact Mr. Rincover by telephone to determine whether

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Respondents intended to respond to the Brief.¹

II. ANALYSIS (The General Counsel's Brief is incorporated by reference.)

a. Failure to Forward Contribution

Pursuant to 2 U.S.C. § 441a(a)(8), all contributions made by a person on behalf of a particular candidate, including contributions which are earmarked or otherwise directed through an intermediary to such candidate, shall be treated as contributions from such person to such candidate and reported as such by the intermediary. The Commission's regulations provide that "earmarked" means a designation, instruction, or encumbrance, whether direct or indirect, express or implied, oral or written, which results in all or any part of a contribution or expenditure being made to, or expended on behalf of, a clearly identified candidate or a candidate's authorized committee. 11 C.F.R. § 110.6(b). The Act requires that every person who receives a contribution for an authorized political committee shall forward the contribution to the treasurer no later than 10 days after receiving the

1. The violations of the Act set forth in Section II, subsections a, b, c and d of this report, were previously addressed in the General Counsel's Brief. In addition to recommendations as to these violations of the Act, at this time, this Office will be recommending that the Commission take no further action as to Respondents' violations of 11 C.F.R. §§ 102.8(a) and 110.6(c), based on their duplicate nature with 2 U.S.C. §§ 432(b) and 441a(a)(8) respectively. See Section II, subsections a and b. Furthermore, Section II, subsection e of this report, concerns Respondents' violations of 2 U.S.C. § 434(b) and 11 C.F.R. § 102.8(a). These violations were not addressed in the Brief in this matter since this Office intends to recommend that the Commission take no further action with regard to these violations.

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contribution and, if the amount of the contribution is in excess of \$50, the name and address of the contributor and the date of receipt shall also be forwarded. 2 U.S.C. § 432(b)(1); 11 C.F.R. § 102.8(a).² The Act defines "person" to include a committee. 2 U.S.C. § 431(11). Further, the Regulations provide that the requirements of 11 C.F.R. § 102.8 apply to earmarked contributions transmitted by an intermediary or conduit. 11 C.F.R. § 102.8(c).

America's PAC received a check in the amount of \$2,000 from Physicians Interindemnity PAC ("PI/PAC") and Sabri El Farra, as treasurer.³ The check was made payable to America's PAC, but on the face was a memo notation referencing "Bill Press for U.S. Senate," the principal campaign committee of Bill Press, a former candidate for the United States Senate in California. According to the Regulations, since the check designated the principal campaign committee of Bill Press, these funds would be considered earmarked for Bill Press and would be treated as a contribution from PI/PAC to the Bill Press campaign. Therefore, America's PAC would be considered the conduit or intermediary for the contribution. However, according to the complaint in this matter from Bill Press, America's PAC altered the notation on the check in question

2. Additional information is required to be forwarded for contributions in excess of \$200. 11 C.F.R. § 102.8(a).

3. On August 10, 1990, the Commission accepted a signed conciliation agreement submitted on behalf of PI/PAC in settlement of violations of certain provisions of the Act. The file has been closed in this matter as it pertains to PI/PAC.

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from "Bill Press for U.S. Senate" to "Political contribution." Further, according to the complaint, America's PAC accepted the check and deposited the funds into its own account. At no time was this contribution from PI/PAC forwarded to the Bill Press campaign.

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According to the amended complaint from Bill Press, America's PAC had been soliciting funds and received funds for his U.S. Senate campaign without his knowledge or approval. Mr. Press states that Mr. Rincover, acting treasurer of America's PAC, was a former campaign employee of his, but was "separated from the campaign" as of September 25, 1987.⁴ Attached to the amended complaint is a letter from Mr. Press to Dr. Sabri El Farra, treasurer of PI/PAC, regarding the contribution in question. In the letter, dated October 16, 1987, Mr. Press discusses meeting Dr. El Farra on October 11, 1987, and the importance of Dr. El Farra's support for Mr. Press' campaign. Mr. Press also notes on the letter his appreciation for Dr. El Farra's "speaking up for me" and his "commitment of \$2,000." In the amended complaint, Mr. Press asserts that Dr. El Farra told him that he sent a check for \$2,000 to America's PAC, at the suggestion of Mr. Rincover, for the benefit of his campaign. However, as stated above, complainant alleges that America's PAC altered the notation on the check in question from "Bill Press for U.S.

4. According to his response, Mr. Rincover states that he was associated with Mr. Press' campaign until approximately November 1, 1987.

Senate" to "Political contribution," and deposited the funds into its own account.

According to the response to the complaint from Neil B. Rincover, Executive Director and acting treasurer for America's PAC, when the check dated October 12, 1987, was received from PI/PAC with the notation "Bill Press for U.S. Senate," Mr. Rincover promptly returned the check to the secretary for Dr. El Farra, the treasurer of PI/PAC. Mr. Rincover asserts that someone associated with PI/PAC altered the memo on the check to read "Political contribution," not anyone associated with America's PAC. Mr. Rincover further asserts that when he discussed America's PAC with Dr. El Farra and sought financial support, he made it clear that America's PAC was not affiliated with Bill Press.

According to Mr. Rincover, America's PAC received a second contribution from PI/PAC dated March 2, 1988, with the notation "Contribution." According to Mr. Rincover this contribution was sent to America's PAC and intended for deposit by America's PAC. Thus, Mr. Rincover argues that the first contribution was also intended for deposit by America's PAC and was not a contribution to the Bill Press campaign, as alleged.

However, according to their response to interrogatories dated July 3, 1990, counsel for PI/PAC confirms the allegation that Dr. El Farra, acting in his capacity as treasurer, made a commitment to Mr. Press on or about October 11, 1987 to contribute \$2,000 to Mr. Press' campaign on behalf of PI/PAC. The first check in question was made payable to America's PAC

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in the belief that America's PAC would pass the contribution on to the Bill Press for U.S. Senate campaign. This belief, in part, appears to be based upon the fact Mr. Rincover, as acting treasurer of America's PAC, was also employed by the Bill Press senate campaign. Further, it appears that at the time Dr. El Farra made the commitment to Mr. Press to contribute \$2,000 to his campaign, Mr. Press was accompanied by Mr. Rincover. Thus, while the check was made payable to America's PAC, it was specifically earmarked for Mr. Press' campaign. Furthermore, according to PI/PAC, no individual associated with PI/PAC was authorized to change the original notation on the check before, during, or after the check was made payable to America's PAC. According to the response, Dr. El Farra also did not learn of the notation change until after PI/PAC was notified by the Commission of Mr. Press' complaint. Consequently, PI/PAC asserts that the check must have been changed sometime after the check was handed to Mr. Rincover on October 11, 1987, and Dr. El Farra is unable to explain how the notation was changed.

Based on the evidence available, it appears that the memo notation on the check from PI/PAC to America's PAC constituted an earmark of the funds to Bill Press for U.S. Senate. However, the check at issue was deposited into an account of America's PAC and at no time was it forwarded to the Bill Press campaign. Therefore, Respondents effectively converted the \$2,000 into a contribution to America's PAC. Based on the foregoing, this Office recommends that the Commission find

there is probable cause to believe that America's PAC violated 2 U.S.C. § 432(b) by failing to forward the contribution and the requisite information to the treasurer of Bill Press for U.S. Senate. Furthermore, this Office also recommends that the Commission take no further action as to Respondents' violation of 11 C.F.R. § 102.8(a), based on its duplicate nature with 2 U.S.C. § 432(b).

b. Failure to Report Earmarked Contribution

The Act imposes a legal requirement on the conduit or intermediary to report the original source and intended recipient of such contributions to the Commission and to the intended recipient. 2 U.S.C. § 441a(a)(8); 11 C.F.R. § 110.6(c).

As the intermediary for the earmarked contribution from PI/PAC, America's PAC failed to report the original source and the intended recipient of this contribution to the Commission and to Bill Press for U.S. Senate. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. § 441a(a)(8). Furthermore, this Office also recommends that the Commission take no further action as to Respondents' violation of 11 C.F.R. § 110.6(c), based on its duplicate nature with 2 U.S.C. § 441a(a)(8).

c. America's PAC Failure to Register and Report

Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission

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within 10 days after becoming a political committee. 2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee ... which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." Additionally, 2 U.S.C. § 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission.

Although the contribution from PI/PAC was earmarked for the Bill Press for U.S. Senate campaign, America's PAC deposited the check into its own account, failed to forward the contribution to the Bill Press campaign, and thereby effectively converted the \$2,000 as a contribution to America's PAC.⁵ Thus, America's PAC qualifies as a "political committee" which must register and report with the Commission. Further, America's PAC failed to file any reports of receipts and disbursements with the Commission. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. §§ 433 and 434(a) by failing to file a Statement of Organization and subsequent reports with the Commission.

5. Initially this Office believed, based on a solicitation letter sent to PI/PAC by America's PAC, that America's PAC had engaged in a direct mail effort to raise funds for Mr. Press. The cost for the direct mail project was to be approximately \$16,000, \$12,000 of which had already been raised. Thus, it appeared that America's PAC had made expenditures in excess of \$1,000 for the purpose of influencing a federal election. However, based on answers to interrogatories, America's PAC states that due to the lack of adequate funds, the direct mail project did not take place.

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d. Impermissible Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a any political committee to knowingly accept or receive any contribution containing corporate funds.

PI/PAC is a California state political action committee for which contributions are solicited from members of PI Trust. PI Trust is an interindemnity arrangement for physicians and surgeons in California authorized to provide alternative medical malpractice coverage to its members. Certain of PI Trust's members are sole shareholder medical corporations. Thus, the contribution from PI/PAC, which America's PAC effectively converted as a contribution to itself, contained corporate funds. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. § 441b(a) by accepting a contribution containing corporate funds.

e. Failure to Report Independent Expenditures

Section 434(b)(6)(B)(iii) of the Act requires a political committee to disclose on its reports filed with the Commission information related to independent expenditures. Further, Commission regulations provide that the itemization of disbursements on a committees' Schedule E shall include the total of all such expenditures of \$200 or less made during the reporting period. 11 C.F.R. § 104.3(b)(3)(vii)(C). Initially it appeared that based on a solicitation letter sent by America's PAC to Dr. El Farra, treasurer of PI/PAC, that America's PAC had made an independent expenditure on behalf of

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Mr. Press by producing and distributing the solicitation letter. The letter solicited contributions to finance a direct mail fundraising effort which would "assist" three clearly identified candidates, including Bill Press. The letter stated that the direct mail campaign was to be conducted at a cost of \$16,000. Mr. Press claimed that he was unaware of any fundraising activities by America's PAC and Mr. Rincover.

Based on answers to interrogatories, only one solicitation letter was sent by America's PAC. This letter was sent to Dr. El Farra because he was a previous contributor. As stated in footnote 5, the direct mail project did not take place due to a lack of adequate funds. Therefore, the only expenditure made by America's PAC on behalf of Bill Press was the solicitation letter.

According to America's PAC, no amount was expended in producing and distributing the letter. While it would appear that some amount was spent in the production of this solicitation letter, that amount would be de minimus. The letter to PI/PAC has "Hand Delivered" typed on its face and therefore, it does not appear that postage would be considered an issue in this matter. In any event, the cost of delivery of this one solicitation likely was very small. Based on the foregoing, this Office recommends that the Commission take no further action as to violations by America's PAC of 2 U.S.C. § 434(b) and 11 C.F.R. § 104.3(b)(3)(vii)(C) concerning

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America's PACs' failure to disclose to the Commission any independent expenditures on behalf of Bill Press.⁶

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

Attached for the Commission's approval is a proposed conciliation agreement with America's PAC and Neil Rincover.

IV. RECOMMENDATIONS

1. Find there is probable cause to believe that America's PAC and Neil Rincover, as acting treasurer, violated 2 U.S.C §§ 432(b), 433, 434(a), 441a(a)(8) and 441b(a).
2. Take no further action as to violations by America's PAC and Neil Rincover, as acting treasurer, of 2 U.S.C. § 434(b) and 11 C.F.R. §§ 102.8(a) and 110.6(c).

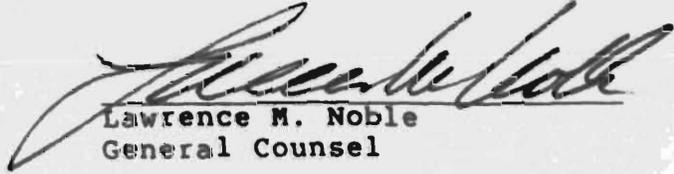
6. At the reason to believe stage in this matter, this Office made a recommendation only as to a violation of 2 U.S.C. § 434(b)(6)(B) by Respondents with regard to their failure to report information related to independent expenditures made on behalf of Bill Press. However, 11 C.F.R. § 104.3(b)(3)(vii)(C) goes beyond the requirements of 2 U.S.C. § 434(b)(6)(B) by requiring that the itemization of disbursements on a committee's Schedule E shall include the total of all such expenditures of \$200 or less made during the reporting period. Therefore, this Office recommends that the Commission find there is reason to believe that America's PAC and Neil Rincover, as acting treasurer, violated 11 C.F.R. § 104.3(b)(3)(vii)(C); however, as set out above, this Office also recommends that the Commission take no further action as to this violation.

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3. Find reason to believe that America's PAC and Neil Rincover, as acting treasurer, violated 11 C.F.R. § 104.3(b)(3)(vii)(C), but take no further action.
4. Approve the attached proposed conciliation agreement, factual and legal analysis and appropriate letter.

8/22/91

Date


Lawrence M. Noble
General Counsel

Attachment

1. Conciliation Agreement
2. Factual and legal analysis

Staff Assigned: Mary Ann Bumgarner

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 24, 1991

Mr. Neil Rincover, Executive Director and
acting as treasurer
America's PAC
6922 Hollywood Blvd.
Suite 700
Hollywood, California 90028

RE: MUR 2604
America's PAC and Neil
Rincover, as Executive
Director and acting as
treasurer

Dear Mr. Rincover:

Based on a complaint filed with the Federal Election Commission on May 2, 1988, and information supplied by you, the Commission, on January 31, 1989, found that there was reason to believe America's PAC and you, as acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), 434(b), 441a(a)(8) and 441b, provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"), and 11 C.F.R. §§ 102.8(a) and 110.6(c) of Commission Regulations and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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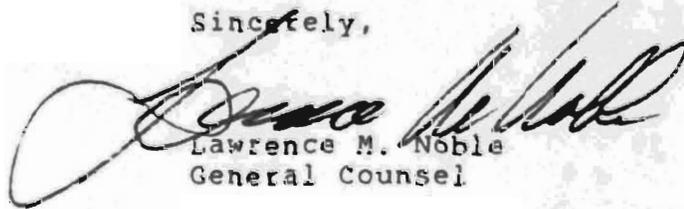
Neil Rincover
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
America's PAC and Neil) MUR 2604
Rincover, as Executive Director)
and acting as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On January 31, 1989 the Commission found reason to believe that America's PAC and Neil Rincover, as Executive Director and acting treasurer ("Respondents"), violated 2 U.S.C. §§ 432(b), 433, 434(a), 434(b), 441a(a)(8), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"), and 11 C.F.R. §§ 102.8(a) and 110.6(c) of the Commission Regulations.

America's PAC is an unregistered political action committee headquartered in California with Neil Rincover as Executive Director and acting as treasurer. As of this time, Respondents have not requested pre-probable cause conciliation.

II. LEGAL ANALYSIS

a. Failure to Forward Contribution

Pursuant to 2 U.S.C. § 441a(a)(8), all contributions made by a person on behalf of a particular candidate, including contributions which are earmarked or otherwise directed through an intermediary to such candidate, shall be treated as contributions from such person to such candidate and reported as such by the intermediary. The Regulations further provide

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that "earmarked" means a designation which results in the contribution being made to a candidate's authorized committee. 11 C.F.R. § 110.6(b). The Act requires that every person who receives a contribution for an authorized political committee shall forward the contribution to the treasurer no later than 10 days after receiving the contribution. 2 U.S.C. § 432(b)(1); 11 C.F.R. § 102.8(a).

America's PAC received a check in the amount of \$2,000 from Physicians Interindemnity PAC ("PI/PAC") and Sabri El Farra, as treasurer. The check was made payable to America's PAC, but on the face was a memo notation to "Bill Press for U.S. Senate." According to the Regulations, since the check designated the principal campaign committee of Bill Press, these funds would be considered earmarked for Bill Press and would be treated as a contribution from PI/PAC to the Bill Press campaign. Therefore, America's PAC would be considered the conduit or intermediary for the contribution. However, according to the complaint in this matter from Bill Press, a former candidate for the United States Senate in California, America's PAC altered the notation on the check in question from "Bill Press for U.S. Senate" to "Political contribution." Further, according to the complaint, America's PAC accepted the check and deposited the funds into its own account. At no time was this contribution from PI/PAC forwarded to the Bill Press campaign.

According to the amended complaint from Bill Press, America's PAC had been soliciting funds and received funds for

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his U.S. Senate campaign without his knowledge or approval. Mr. Press states that Mr. Rincover, acting treasurer of America's PAC, was a former campaign employee of his, but was "separated from the campaign" as of September 25, 1987.¹ Attached to the amended complaint is a letter from Mr. Press to Dr. Sabri El Farra, treasurer of PI/PAC, regarding the contribution in question. In the letter, dated October 16, 1987, Mr. Press discusses meeting Dr. El Farra on October 11, 1987, and the importance of Dr. El Farra's support for Mr. Press' campaign. Mr. Press also notes on the letter his appreciation for Dr. El Farra's "speaking up for me" and his "commitment of \$2,000." In the amended complaint, Mr. Press asserts that Dr. El Farra told him that he sent a check for \$2,000 to America's PAC, at the suggestion of Mr. Rincover, for the benefit of his campaign. However, as stated above, complainant alleges that America's PAC altered the notation on the check in question from "Bill Press for U.S. Senate" to "Political contribution," and deposited the funds into its own account.

According to the response to the complaint from Neil B. Rincover, Executive Director and acting treasurer for America's PAC, when the check dated October 12, 1987, was received from PI/PAC with the notation "Bill Press for U.S. Senate," Mr. Rincover promptly returned the check to the secretary for

1. According to his response, Mr. Rincover states that he was associated with Mr. Press' campaign until approximately November 1, 1987.

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Dr. El Farra, the treasurer of PI/PAC. Mr. Rincover asserts that someone associated with PI/PAC altered the memo on the check to read "Political contribution," not anyone associated with America's PAC. Mr. Rincover further asserts that when he discussed America's PAC with Dr. El Farra and sought financial support, he made it clear that America's PAC was not affiliated with Bill Press.

According to Mr. Rincover, America's PAC received a second contribution from PI/PAC dated March 2, 1988, with the notation "Contribution." According to Mr. Rincover this contribution was sent to America's PAC and intended for deposit by America's PAC. Thus, Mr. Rincover argues that the first contribution was also intended for deposit by America's PAC and was not a contribution to the Bill Press campaign, as alleged.

However, according to their response to interrogatories dated July 3, 1990, counsel for PI/PAC confirms the allegation that Dr. El Farra, acting in his capacity as treasurer, made a commitment to Mr. Press on or about October 11, 1987 to contribute \$2,000 to Mr. Press' campaign on behalf of PI/PAC. The first check in question was made payable to America's PAC in the belief that America's PAC would pass the contribution on to the Bill Press for U.S. Senate campaign. This belief, in part, appears to be based upon the fact Mr. Rincover, as acting treasurer of America's PAC, was also employed by the Bill Press senate campaign. Further, it appears that at the time Dr. El Farra made the commitment to Mr. Press to contribute \$2,000 to his campaign, Mr. Press was accompanied by

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Mr. Rincover. Thus, while the check was made payable to America's PAC, it was specifically earmarked for Mr. Press' campaign. Furthermore, according to PI/PAC, no individual associated with PI/PAC was authorized to change the original notation on the check before, during, or after the check was made payable to America's PAC. According to the response, Dr. El Farra also did not learn of the notation change until after PI/PAC was notified by the Commission of Mr. Press' complaint. Consequently, PI/PAC asserts that the check must have been changed sometime after the check was handed to Mr. Rincover on October 11, 1987, and Dr. El Farra is unable to explain how the notation was changed.

Based on the evidence available, it appears that the memo notation on the check from PI/PAC to America's PAC constituted an earmark of the funds to Bill Press for U.S. Senate. However, the check at issue was deposited into an account of America's PAC and at no time was it forwarded to the Bill Press campaign. Therefore, America's PAC effectively converted the \$2,000 as a contribution to itself. Based on the foregoing, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. § 432(b) by failing to forward the contribution and the requisite information to the treasurer of Bill Press for U.S. Senate.

b. Failure to Report Earmarked Contribution

The Act imposes a legal requirement on the conduit or

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intermediary to report the original source and intended recipient of such contributions to the Commission and to the intended recipient. 2 U.S.C. § 441a(a)(8); see also 11 C.F.R. § 110.6(c).

As the intermediary for the earmarked contribution from PI/PAC, America's PAC failed to report the original source and the intended recipient of this contribution to the Commission and to Bill Press for U.S. Senate. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. § 441a(a)(8).

c. America's PAC Failure to Register and Report

Pursuant to 2 U.S.C. § 433(a), each political committee must file a Statement of Organization with the Commission within 10 days after becoming a political committee. 2 U.S.C. § 431(4)(A) defines "political committee" to mean "any committee . . . which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." Additionally, 2 U.S.C. § 434(a)(1) requires the treasurer of a political committee to file reports of receipts and disbursements with the Commission.

Although the contribution from PI/PAC was earmarked for the Bill Press for U.S. Senate campaign, America's PAC deposited the check into its own account, failed to forward the contribution to the Bill Press campaign, and thereby

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effectively converted the \$2,000 as a contribution to itself.² Thus, America's PAC qualifies as a "political committee" which must register and report with the Commission. Further, America's PAC failed to file any reports of receipts and disbursements with the Commission. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. §§ 433 and 434(a) by failing to file a Statement of Organization and subsequent reports with the Commission.

d. Impermissible Contributions

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a any political committee to knowingly accept or receive any contribution containing corporate funds.

PI/PAC is a California state political action committee for which contributions are solicited from members of PI Trust. PI Trust is an interindemnity arrangement for physicians and surgeons in California authorized to provide alternative medical malpractice coverage to its members. Certain of PI Trust's members are sole shareholder medical corporations. Thus, the contribution from PI/PAC, which America's PAC effectively converted as a contribution to itself, contained

2. Initially this Office believed, based on a solicitation letter sent to PI/PAC by America's PAC, that America's PAC had engaged in a direct mail effort to raise funds for Mr. Press. The cost for the direct mail project was to be approximately \$16,000, \$12,000 of which had already been raised. Thus, it appeared that America's PAC had made expenditures in excess of \$1,000 for the purpose of influencing a federal election. However, based on answers to interrogatories, America's PAC states that due to the lack of adequate funds, the direct mail project did not take place.

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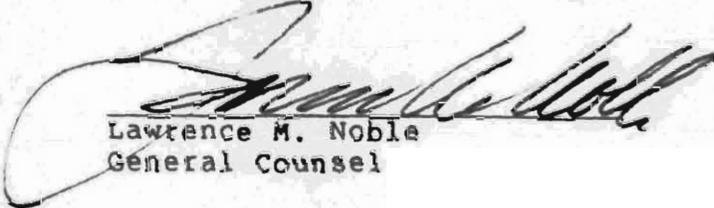
corporate funds. Therefore, this Office recommends that the Commission find there is probable cause to believe that America's PAC violated 2 U.S.C. § 441b(a) by accepting a contribution containing corporate funds.

III. RECOMMENDATION

1. Find there is probable cause to believe that America's PAC and Neil Rincover, as acting treasurer, violated 2 U.S.C §§ 432(b), 433, 434(a), 441a(a)(8) and 441b.

Date

4/23/91


Lawrence M. Noble
General Counsel

96043764137

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2604
America's PAC and Neil Rincover,)
as Executive Director and acting as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 17, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2604:

1. Find there is probable cause to believe that America's PAC and Neil Rincover, as acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), and 441a(a)(8) and 441b(a).
2. Take no further action as to violations by America's PAC and Neil Rincover, as acting treasurer, of 2 U.S.C. § 434(b) and 11 C.F.R. §§ 102.8(a) and 110.6(c).
3. Find reason to believe that America's PAC and Neil Rincover, as acting treasurer, violated 11 C.F.R. § 104.3(b)(3)(vii)(C), but take no further action.

(continued)

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4. Approve the proposed conciliation agreement, factual and legal analysis, and appropriate letter as recommended in the General Counsel's report dated August 22, 1991.

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

Attest:

9-18-91
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 27, 1991

Mr. Neil Rincover, Executive Director
America's PAC
6922 Hollywood Blvd.
Suite 700
Hollywood, California 90028

RE: MUR 2604
America's PAC and Neil
Rincover, as Executive
Director and acting as
treasurer

Dear Mr. Rincover:

On September 17, 1991, the Federal Election Commission found that there is probable cause to believe America's PAC and you, as acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), 441a(a)(8) and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). However, the Commission determined to take no further action as to violations by America's PAC and you, as acting treasurer, of 2 U.S.C. § 434(b) and 11 C.F.R. §§ 102.8(a) and 110.6(c) of the Commission regulations. In addition, the Commission found that there is reason to believe that America's PAC and you, as acting treasurer, violated 11 C.F.R. § 104.3(b)(3)(vii)(C), but determined to take no further action.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

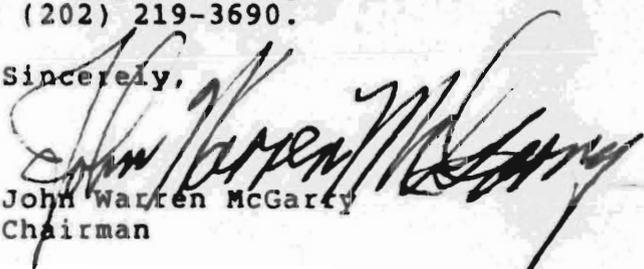
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

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Mr. Rincover
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,


John Warren McGarty
Chairman

Enclosures
Factual and Legal Analysis
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: America's PAC and
Neil Rincover, as
Executive Director and
acting as treasurer

MUR: 2604

The Commission found reason to believe that America's PAC and Neil Rincover, as Executive Director and acting treasurer ("Respondents"), violated 2 U.S.C. §§ 432(b), 433, 434(a), 434(b), 441a(a)(8), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act").

America's PAC is an unregistered political action committee headquartered in California with Neil Rincover as Executive Director. It appears that since at least October 12, 1987, Mr. Rincover has also been acting as treasurer.

At the reason to believe stage in this matter, this Office made a recommendation only as to a violation of 2 U.S.C. § 434(b)(6)(B) by Respondents with regard to their failure to report information related to independent expenditures made on behalf of Bill Press. However, 11 C.F.R. § 104.3(b)(3)(vii)(C) goes beyond the requirements of 2 U.S.C. § 434(b)(6)(B) by requiring that the itemization of disbursements on a committee's Schedule E shall include the total of all such expenditures of \$200 or less made during the reporting period. Therefore, this Office has included this section of the regulations in the analysis and recommendations in this matter.

Section 434(b)(6)(B)(iii) of the Act requires a political

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committee to disclose on its reports filed with the Commission information related to independent expenditures. Further, Commission regulations provide that the itemization of disbursements on a committees' Schedule E shall include the total of all such expenditures of \$200 or less made during the reporting period. 11 C.F.R. § 104.3(b)(3)(vii)(C). Initially it appeared that based on a solicitation letter sent by America's PAC to Dr. El Farra, treasurer of PI/PAC, that America's PAC had made an independent expenditure on behalf of Mr. Press by producing and distributing the solicitation letter. The letter solicited contributions to finance a direct mail fundraising effort which would "assist" three clearly identified candidates, including Bill Press. The letter stated that the direct mail campaign was to be conducted at a cost of \$16,000. Mr. Press claimed that he was unaware of any fundraising activities by America's PAC and Mr. Rincover.

Based on answers to interrogatories, only one solicitation letter was sent by America's PAC. This letter was sent to Dr. El Farra because he was a previous contributor. As stated in footnote 5, the direct mail project did not take place due to a lack of adequate funds. Therefore, the only expenditure made by America's PAC on behalf of Bill Press was the solicitation letter.

According to America's PAC, no amount was expended in producing and distributing the letter. While it would appear that some amount was spent in the production of this solicitation letter, that amount would be de minimus. The

letter to PI/PAC has "Hand Delivered" typed on its face and therefore, it does not appear that postage would be considered an issue in this matter. In any event, the cost of delivery of this one solicitation likely was very small. Therefore, there is reason to believe that America's PAC violated 11 C.F.R. § 104.3(b)(3)(vii)(C) by failing to disclose to the Commission any independent expenditures on behalf of Bill Press; however, based on the de minimus amount involved, no further action will be taken with regard to this violation.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 15, 1991

Neil Rincover, Executive Director
America's PAC
6922 Hollywood Blvd.
Suite 700
Hollywood, California 90028

RE: MUR 2604
America's PAC and Neil
Rincover, as Executive
Director and acting as
treasurer

Dear Mr. Rincover:

On September 27, 1991, you were notified that the Federal Election Commission found probable cause to believe that America's PAC and you, as acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), 441a(a)(8) and 441b(a). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 20 days of receipt of this letter.

Should you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
America's PAC and Neil)
Rincover, as Executive Director)
and acting as treasurer)

MUR 2604

SENSITIVE
FEB 4 1992

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

I. BACKGROUND

On September 17, 1991, the Federal Election Commission found that there is probable cause to believe America's PAC and Neil Rincover, as Executive Director and acting treasurer ("Respondents"), violated 2 U.S.C. §§ 432(b), 433, 434(a), 441a(a)(8), and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act").¹ The Commission's notification letter and proposed conciliation agreement were mailed on September 27, 1991. No response was submitted by Respondents.

On November 15, 1991, a second letter was sent to Respondents reminding them that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days. The letter further requested a response within twenty days of receipt of the letter or a recommendation concerning the filing of civil suit would be

1. America's PAC is an unregistered political action committee headquartered in California with Neil Rincover as Executive Director. It appears that since at least October 12, 1987, Mr. Rincover has also been acting as treasurer.

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made to the Commission by this Office. No response was submitted by Respondents to the second letter.

On several occasions, this Office attempted unsuccessfully to contact Mr. Rincover by telephone to determine whether Respondents intended to respond to the Commission's probable cause findings. The last time Mr. Rincover was in contact with this Office was May 8, 1991, approximately two weeks after the mailing of the General Counsel's Brief notifying Respondents that this Office was prepared to recommend that the Commission find probable cause to believe in this matter. At that time, Mr. Rincover indicated by telephone that he was very interested in conciliation and he would be sending in a written response; however, a responsive brief was not received.

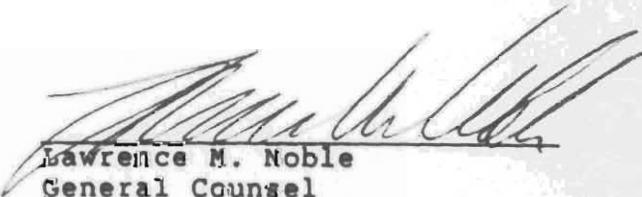
It is the view of this Office that Respondents have had ample opportunity to respond in this matter. Therefore, since Respondents have made no effort to negotiate an agreement or cooperate in this matter, it is recommended that the Commission authorize this Office to file civil suit.

II. RECOMMENDATIONS

1. Authorize the Office of General Counsel to file a civil suit for relief in United States District Court against America's PAC and Neil Rincover, as Executive Director and acting as treasurer.
2. Approve the appropriate letter.

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Date

1/27/92


Lawrence M. Noble
General Counsel

Staff Person: Mary Ann Bumgarner

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2604
America's PAC and Neil)
Rincover, as Executive)
Director and acting as)
treasurer.)

CERTIFICATION

I, Delores R. Harris, recording secretary for the Federal Election Commission executive session on February 4, 1992, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2604:

1. Authorize the Office of General Counsel to file a civil suit for relief in United States District Court against America's PAC and Neil Rincover, as Executive Director and acting as treasurer.
2. Approve the appropriate letter, as recommended in the General Counsel's report dated January 27, 1992.

Commissioners Aikens, Elliott, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

February 5, 1992
Date

Delores R. Harris
Delores R. Harris
Administrative Assistant

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1992

Neil Rincover, Executive Director
America's PAC
6922 Hollywood Blvd.
Suite 700
Hollywood, California 90028

RE: MUR 2604
America's PAC and Neil
Rincover, as Executive
Director and acting as
treasurer

Dear Mr. Rincover:

You were previously notified that on September 17, 1991, the Federal Election Commission found probable cause to believe that America's PAC and you, as acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), 441a(a)(8) and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Stephen Hershkowitz, Assistant General Counsel, at (202) 219-3400, within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

JULY 27, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill Press
2001 Wilshire Blvd.
Suite 310
Santa Monica, CA 90403

Dear Mr. Press:

This is in reference to the complaint you filed with the Federal Election Commission on May 2, 1988, concerning possible violations of the Federal Election Campaign Act of 1971, as amended, ("the Act") by America's PAC and Neil Rincover, as Executive Director and acting treasurer.

After conducting an investigation, the Commission found probable cause to believe that America's PAC and Neil Rincover, as Executive Director and acting treasurer, violated 2 U.S.C. §§ 432(b), 433, 434(a), 441a(a)(8) and 441b(a). The Commission was unable to settle the matter through conciliation and, therefore, authorized the filing of a civil suit in United States District Court. On January 14, 1993, the U.S. District Court for the Central District of California issued a Final Order and Default Judgment against America's PAC and Neil Rincover. On May 23, 1994, the court denied Neil Rincover's motion to set aside the default judgment and held America's PAC and Neil Rincover in civil contempt. Copies of both Orders are enclosed.

In addition, during the course of its investigation, this Office added Physicians Interindemnity/PAC ("PI/PAC") and Sabri El Farra, as treasurer, as respondents. On January 9, 1990, the Commission found reason to believe that PI/PAC and Sabri El Farra, as treasurer, violated 2 U.S.C. §§ 433, 434, 441a(a)(1)(A) and 441b(a) and offered to enter into conciliation prior to a finding

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Mr. Press
Page 2

of probable cause to believe. On August 10, 1990, the Commission accepted a signed conciliation agreement submitted on behalf of PI/PAC and its treasurer and closed the file as to these respondents. A copy of this agreement is enclosed for your information.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Ann Bumgarner

Mary Ann Bumgarner
Attorney

Enclosures

1. Final Order and Default Judgment
2. Contempt Order
3. Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

JULY 27, 1994

William J. Kopesky, Esquire
Adams, Duque & Hazeltine
523 West Sixth Street
Los Angeles, CA 90014

RE: MUR 2604
Physicians Interindemnity/PAC
and Sabri El Farra, as
treasurer

Dear Mr. Kopesky:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Ann Bumgarner
Mary Ann Bumgarner
Attorney

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Lawrence M. Noble
General Counsel

Richard B. Bader
Associate General Counsel

Stephen E. Hershkowitz
Assistant General Counsel

Robert W. Bonham, III
Senior Attorney

FILED
JAN 13 1993
CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ENTERED
CLERK, U.S. DISTRICT COURT
JAN 14 1993
CENTRAL DISTRICT OF CALIFORNIA
BY

LOGGED
DEC 21 1992
CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
BY

FOR THE PLAINTIFF
FEDERAL ELECTION COMMISSION
999 F Street, N.W.
Washington, D.C. 20463
(800) 424-9530
202 419-3690

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

FEDERAL ELECTION COMMISSION,)
Plaintiff,) No. CV-92-2747-LGB(Tx)
v.)
AMERICA'S PAC, et al.,) FINAL ORDER AND DEFAULT
Defendants.) JUDGMENT

FINAL ORDER AND DEFAULT JUDGMENT

Upon consideration of the plaintiff Federal Election Commission's motions for default judgment against defendants America's PAC and Neil Barry Rincover, as Executive Director and acting treasurer of America's PAC,

IT IS HEREBY ORDERED that the plaintiff's motions be and the same hereby are granted.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that:

- 1. Defendants America's PAC and Neil Barry Rincover, as

1
2 Executive Director and acting treasurer of America's PAC,
3 violated 2 U.S.C. § 432(b) by failing to forward a \$2,000
4 earmarked contribution from Physicians Interindemnity/PAC
5 ("PI/PAC") to the Bill Press for U.S. Senate committee to the
6 treasurer of the Bill Press committee in a timely manner;

7 2. Defendants America's PAC and Neil Barry Rincover, as
8 Executive Director and acting treasurer of America's PAC,
9 violated 2 U.S.C. § 432(b) by failing to forward the requisite
10 information regarding the earmarked contribution from PI/PAC to
11 the Bill Press for U.S. Senate committee to the treasurer of the
12 Bill Press committee and to the Federal Election Commission in a
13 timely manner;

14 3. Defendants America's PAC and Neil Barry Rincover, as
15 Executive Director and acting treasurer of America's PAC,
16 violated 2 U.S.C. § 433 by failing to file a statement of
17 organization for America's PAC with the Federal Election
18 Commission in a timely manner;

19 4. Defendants America's PAC and Neil Barry Rincover, as
20 Executive Director and acting treasurer of America's PAC,
21 violated 2 U.S.C. § 434 by failing to file periodic reports of
22 receipts and expenditures for America's PAC with the Federal
23 Election Commission in a timely manner;

24 5. Defendants America's PAC and Neil Barry Rincover, as
25 Executive Director and acting treasurer of America's PAC,
26 violated 2 U.S.C. § 441b(a) by knowingly accepting a \$2,000
27 contribution from PI/PAC which contained corporate funds;

28 6. Defendants America's PAC and Neil Barry Rincover, as

1
2 Executive Director and acting treasurer of America's PAC, shall
3 refund the \$2,000 contribution to PI/PAC within fifteen (15) days
4 from the date of entry of this final order and default judgment;

5 7. Defendants America's PAC and Neil Barry Rincover, as
6 Executive Director and acting treasurer of America's PAC, shall
7 file a statement of organization and periodic reports of receipts
8 and expenditures for America PAC covering the reporting periods
9 since October 12, 1987 with the Federal Election Commission
10 within fifteen (15) days from the date of entry of this final
11 order and default judgment;

12 8. Defendants America's PAC and Neil Barry Rincover, as
13 Executive Director and acting treasurer of America's PAC, shall
14 pay a civil penalty to the plaintiff Federal Election Commission
15 in the total amount of twenty-five thousand dollars (\$25,000) for
16 the foregoing violations, for which defendants shall be jointly
17 and severally liable. This amount represents civil penalties of
18 five thousand dollars (\$5,000) for each of the five foregoing
19 violations by defendants. See 2 U.S.C. § 437g(a)(6)(B).

20 Given defendants' default in this litigation and the absence
21 of any assurances that defendants will comply in all respects
22 with 2 U.S.C. §§ 432(b), 433, 434 and 441b in the future, the
23 Court finds that there is a likelihood of repetition of the
24 foregoing violations by defendants. Therefore,

25 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that defendants
26 America's PAC and Neil Barry Rincover are enjoined: (i) from
27 failing to forward earmarked contributions and/or the requisite
28 information regarding such contributions to the treasurer of the

1 designated committee and to the Federal Election Commission in a
2 timely manner in violation of 2 U.S.C. § 432(b), (ii) from
3 failing to file statements of organization and/or reports of
4 receipts and expenditures in violation of 2 U.S.C. §§ 433
5 and 434, and (iii) from knowingly accepting contributions in
6 connection with a federal election which contain corporate funds
7 in violation of 2 U.S.C. § 441b.
8

9 JAN 13 1993

LOURDES G. BAIRD

10
11 Date

LOURDES G. BAIRD
United States District Judge

12
13 Copies to:

14 Robert W. Bonham, III
15 Office of the General Counsel
16 FEDERAL ELECTION COMMISSION
17 999 E Street, N.W.
18 Washington, D.C. 20463
19 (Counsel for plaintiff),
20

21 and

22 Neil Barry Rincover
23 LAW OFFICE OF NEIL BARRY RINCOVER
24 3600 Wilshire Blvd., Suite 2124
25 Los Angeles, CA 90010
26 (Defendant),
27

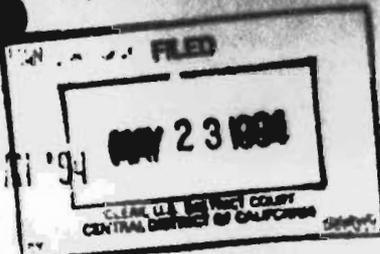
28 and

America's PAC
c/o Neil Barry Rincover
LAW OFFICE OF NEIL BARRY RINCOVER
3600 Wilshire Blvd., Suite 2124
Los Angeles, CA 90010
(Defendant).

THIS DOCUMENT WAS SERVED BY FIRST CLASS MAIL
ON ALL COUNSEL (OR PARTY) IN THEIR MOST RECENT
ADDRESS OF RECORD) IN THIS ACTION ON THIS DATE:
DATED MAY 23 1994

BY DEPUTY CLERK (signed et al mailing)

RECEIVED
FEDERAL ELECTION COMMISSION



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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JUN 2 12 01 PM '94

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

FEDERAL ELECTION COMMISSION,)

Plaintiff,)

v.)

AMERICA'S PAC, and NEIL)
BARRY RINCOVER,)

Defendants.)

CV 92-2747 LGB (Tx)

ORDER RE: RESPONSE TO
ORDER TO SHOW CAUSE
REGARDING CONTEMPT;
MOTION TO SET ASIDE
DEFAULT JUDGMENT

Defendant Neil Barry Rincover's ("Rincover") response to this Court's April 18, 1994 Order to Show Cause, and Rincover's motion to set aside the default judgment entered by this Court on January 14, 1993, came on regularly for hearing before this Court on May 23, 1994. After reviewing the materials submitted by the parties, argument of counsel, and all other matters presented to the Court, it is hereby ORDERED that Rincover's motion to set aside the default judgment is DENIED, and that Defendants Rincover and America's PAC ("Ampac") be held in civil contempt.

I. Background

On May 6, 1992, the Federal Election Commission ("FEC") filed a complaint against Defendants Ampac and Rincover. According to the complaint, Rincover worked for a brief time in 1987 as a paid staff member for Bill Press's ill-fated U.S.

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1 Senate campaign. Plaintiff alleges that at a fundraising event,
2 a representative of a California state political action committee
3 known as Physician's Interindemnity/PAC ("PI/PAC") committed to
4 donating \$2,000 to Press's campaign. PI/PAC subsequently
5 delivered a \$2,000 check to Rincover, made payable to Ampac,
6 which Rincover never forwarded to Press's campaign committee.
7 Press thereafter filed a complaint with the FEC, and after
8 investigation of the matter, the FEC instituted this suit.

9 Plaintiff contends that Rincover violated federal election
10 campaign laws by, *inter alia*, accepting the contribution and
11 failing to forward it to Press's campaign committee. The FEC
12 sued on five counts for violations of various provisions of the
13 Federal Election Campaign Act ("FECA"), 2 U.S.C. §§ 431 et seq.:

- 14 1) violation of 2 U.S.C. § 432(b)(1) -- failure to
forward earmarked contribution;
- 15 2) violation of 2 U.S.C. § 432(b)(1) -- failure to
16 provide information regarding earmarked
contribution;
- 17 3) violation of 2 U.S.C. § 433(a) -- failure to file
18 a statement of organization with FEC;
- 19 4) violation of 2 U.S.C. § 434(a)(1) -- failure to
20 file FEC reports; and
- 21 5) violation of 2 U.S.C. § 441b(a) -- knowingly
accepting a corporate contribution.

22 On January 14, 1993 this Court entered an order granting the
23 FEC's motion for entry of default judgment. The order: (1) found
24 Defendants in violation of sections 432(b), 433, 434 and 441(a)
25 of the FECA; (2) ordered Defendants to refund the \$2,000 to
26 PI/PAC within 15 days from the date of entry of the default
27 judgment; (3) ordered Defendants to file a statement of

1 organization and periodic reports of receipts and expenditures
2 with the FEC within 15 days after the date of entry of the
3 default judgment; (4) assessed a civil penalty in the amount of
4 \$25,000 against Defendants payable to the FEC pursuant to section
5 437g(a)(6)(B) of the FECA; and (5) enjoined Defendants from
6 further violating sections 432(b), 433, 434 and 441(a) of the
7 FECA.

8 On March 11, 1994 the FEC filed a petition for an order to
9 show cause why Defendants should not be held in civil contempt.

10 Section 437g(a)(11) of the FECA provides that "[i]f the
11 Commission determines after an investigation that any person has
12 violated an order of the court entered in a proceeding brought
13 under paragraph (6), it may petition the court for an order to
14 hold such person in civil contempt." The FEC alleged that
15 Defendants have failed to comply with this Court's January 14,
16 1993 "Order and Default Judgment," and that therefore Defendants
17 should be held in civil contempt. On April 18, 1994 this Court
18 issued an Order to Show Cause, ordering Defendants to appear
19 before this Court on May 23, 1994 to show cause why they should
20 not be held in civil contempt.

21 On April 18, 1994, Defendant Rincover filed a motion to set
22 aside the default judgment entered by this Court on January 14,
23 1993, and on May 2, 1994 Rincover filed a response to the Order
24 to Show Cause.¹ Now before the Court is Rincover's response to

25 _____
26 ¹ Rincover has appeared pro per in both of these filings.
27 However, he was represented by counsel when he responded to
28 Plaintiff's petition for an order to show causing regarding
contempt.

1 the Order to Show Cause, and Rincover's motion to set aside the
2 default judgment. This Court has jurisdiction over this matter
3 pursuant to 28 U.S.C. section 1345.

4 **II. Discussion**

5 **A. Rincover's Response to the Order to Show Cause**

6 Rincover responds to the Order to Show Cause regarding
7 contempt by asserting that this Court should consider his failure
8 to comply with the court's default judgment as excusable neglect.
9 Rincover argues that "he wrongfully assumed that he was not
10 personally liable for any judgment resulting from this
11 litigation," and that he wrongfully assumed that "since the
12 complaint, completely without merit, arose from what can only be
13 termed a spat between himself and Bill Press, it would go away
14 after investigation by the FEC." (Response ¶ 1.) Rincover then
15 explains why the complaint is without merit, which is more
16 thoroughly addressed in his motion to set aside the default
17 judgment, discussed below.

18 Plaintiff responds by arguing that Rincover has offered no
19 competent excuse for ignoring this Court's default judgment
20 (especially considering that Rincover is an attorney), and that
21 Rincover's motion to set aside the default judgment is without
22 merit.

23 Defendant Ampac has not responded to the Order to Show
24 Cause.

25 **B. Rincover's Motion to Set Aside the Default Judgment.**

26 **1. Standard**

27 Federal Rule of Civil Procedure ("Rule") 60(b) provides:
28

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1 On motion and upon such term as are just, the
2 court may relieve a party or a party's legal
3 representative from a final judgment, order,
4 or proceeding for the following reasons: (1)
5 mistake, inadvertence, surprise, or excusable
6 neglect; (2) newly discovered evidence which
7 by due diligence could not have been
8 discovered in time to move for a new trial
9 under Rule 59(b); (3) fraud (whether
10 heretofore denominated intrinsic or
11 extrinsic), misrepresentation, or other
12 misconduct of an adverse party; (4) the
13 judgment is void; (5) the judgment has been
14 satisfied, released or discharged, or a prior
15 judgment upon which it is based has been
16 reversed or otherwise vacated, or it is no
17 longer equitable that the judgment should
18 have prospective application; or (6) any
19 other reason justifying relief from the
20 operation of the judgment.

21 As for the time within which such a motion must be filed, Rule
22 60(b) provides that "the motion shall be made within a reasonable
23 time, and for reasons (1), (2), and (3) not more than one year
24 after the judgment, order, or proceeding was entered or taken."

25 2. Excusable Neglect, Fraud, and Newly
26 Discovered Evidence

27 Rincover argues that his failure to respond to the complaint
28 in this matter should be considered excusable neglect because
Rincover wrongfully assumed (1) "that he was not personally
liable for any judgment resulting from this litigation," and (2)
that "since the complaint, completely without merit, arose from
what can only be termed a spat between himself and Bill Press, it
would go away after investigation by the FEC." (Motion at 2.)

"A motion to vacate a default judgment for excusable neglect
must be made within one year." Meadows v. Dominican Republic,
817 F.2d 517, 520 (9th Cir. 1987), cert. denied, 484 U.S. 976
(1987) (emphasis added); Fed. R. Civ. P. 60(b). Rincover brought

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1 | this motion over 15 months after this Court entered judgment
2 | against Rincover. Therefore, Rincover's motion, to the extent
3 | that it is based on excusable neglect, is untimely. Furthermore,
4 | the excuse offered does not rise to the level of "excusable
5 | neglect."

6 | Rincover also argues that at the time Bill Press complained
7 | to the FEC about Rincover's alleged unlawful conduct, Press knew
8 | that his complaint had no basis, and therefore the default
9 | judgment should be set aside on the basis of fraud. (Motion at
10 | 2.) As with excusable neglect, a motion to vacate a default
11 | judgment on the basis of fraud must be brought within one year.
12 | Fed. R. Civ. P. 60(b). Furthermore, Defendant has failed to
13 | present sufficient evidence that Press's complaint to the FEC was
14 | fraudulent.² Therefore, Defendant's motion to vacate the default
15 | judgment on the basis of fraud is without merit.

16 | Finally, Rincover argues:

17 | It has recently come to the attention of both
18 | Mr. Rincover and the [FEC] that the
19 | solicitation letter cited by Mr. Press and
20 | attached to the complaint was actually dated

20 | ² Rincover asserts that Press included with his complaint
21 | to the FEC a solicitation letter from Ampac to PI/PAC dated
22 | February 29, 1988. (Plaintiff's Ex. 5.) Rincover argues that
23 | this letter could not have been the catalyst of the contribution
24 | from PI/PAC because such contribution was made four months
25 | earlier. (Motion at 5.) Rincover also argues that Press knew
26 | that Rincover was affiliated with Ampac at the time Rincover was
27 | working for Press. (Motion at 5.) Finally, Rincover states (by
28 | hearsay) that after the FEC filed its complaint against Rincover
and Ampac, Press called Rincover and told him that "he (Press)
'never intended for it to go this far,' that he was 'sorry' and
that he (again, Press) was writing to the FEC to withdraw his
complaint." (Motion at 5-6.) However, these contentions, even
assuming that they are true, do not indicate that Press's filing
of the FEC complaint amounted to fraud.

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1 about four months after the contribution in
2 question was received by [Ampac]. In light
3 of this and other newly discovered evidence,
4 defendant's motion should not be granted.

5 (Motion at 2.) Again, a motion to vacate a default judgment on
6 the ground of "newly discovered evidence which by due diligence
7 could not have been discovered in time to move for a new trial
8 under Rule 59(b)" must be brought within one year after the
9 judgment is entered. Fed. R. Civ. P. 60(b). Furthermore,
10 Rincover has failed to show that the evidence upon which he
11 relies could not have been discovered by him with
12 reasonable diligence. In fact, the solicitation letter to which
13 Rincover refers is a letter written by Rincover himself.

14 (Defendant's Ex. 4.) Therefore, Rincover's motion to vacate the
15 default judgment on the basis of newly discovered evidence also
16 without merit.

17 3. "Any Other Reason Justifying Relief From the
18 Operation of the Judgment"

19 Although there is no one year time limit on bringing a
20 motion to set aside a default judgment on the ground of "other
21 reasons justifying relief," such a motion must be brought within
22 a "reasonable" amount of time. Fed. R. Civ. P. 60(b). However,
23 for the reasons discussed below, even if this Court were to find
24 that Rincover's motion was brought within a reasonable time, it
25 nonetheless does not meet the Rule 60(b)(6) standard.

26 A motion to set aside a judgment based on the "other
27 reasons" clause of Rule 60(b)(6) must be based on a reason other
28 than one of the five preceding reasons listed in the rule.
29 Molloy v. Wilson, 878 F.2d 313, 316 (9th Cir. 1989). The "other

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1 reasons" clause "vests power in courts adequate to enable them to
2 vacate judgments whenever such action is appropriate to
3 accomplish justice." Klapprott v. United States, 335 U.S. 601,
4 615 (1948). The clause is reserved for "extraordinary
5 circumstances." LaFarge Concrets Et Etudes, S.A. v. Kaiser
6 Cement & Gypsum Corp., 791 F.2d 1334, 1338 (9th Cir. 1986).

7 Rincover raises three arguments going to the merits of
8 Plaintiff's claims which he argues provides grounds for this
9 Court to vacate the default judgment.

10 a. Ampac was the intended recipient of
11 the contribution

12 Rincover first argues that the contribution that is the
13 subject of this action was intended for Ampac. In October of
14 1987, Rincover and Bill Press attended a party at the home of
15 Mahmoud and Hana El Farra. According to Rincover, Mahmoud El
16 Farra and his brother, Dr. Sabri El Farra, were two leaders of a
17 special interest lobbying group that had been raising and
18 donating money in an effort to elect political candidates who
19 shared their views. (Motion at 4.)³

20 ³ Rincover has introduced an affidavit (actually it is a
21 declaration) in which he states that all of the statements made
22 in his motion are true and accurate to the best of his knowledge
23 and belief. Therefore, Rincover's statements in his motion may
24 be considered as evidence. Plaintiff has filed a notice of
25 request to cross-examine Rincover at oral argument pursuant to
26 Local Rule 7.5.4. Local Rule 7.5.4. states:

27 Except where the declarant is beyond the
28 subpoena power of the Court and not
reasonably available to the party offering
his declaration, no declaration of a
declarant with respect to whom [a notice of
request to cross-examine] has been filed
shall be considered unless such declarant is

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1 At a meeting that occurred subsequent to the party, Dr. El
2 Farra, as treasurer of Physician's Interindemnity/PAC ("PI/PAC"),
3 delivered to Rincover a \$2,000 check payable to Ampac. The check
4 indicated that it was for "Bill Press for U.S. Senate." Rincover
5 argues that when this notation was brought to Rincover's
6 attention, he called El Farra's office, and Rincover was told
7 that "these types of notations were routine as a reminder of how
8 the connection to that particular committee or candidate was
9 made." (Motion at 4.) Rincover further alleges that he asked if
10 a new check could be issued without the potentially misleading
11 reference, and that a new check was issued on which the notation
12 "Political Contribution" was placed. (Motion at 4.)⁴

13 Plaintiff, on the other hand, argues that the notation on
14 the check was changed without the authorization of PI/PAC or Dr.
15 El Farra. (Complaint ¶ 26.) Furthermore, Plaintiff has
16 introduced Dr. Farra's responses to interrogatories⁵ in which he
17 states that the check was intended to be a donation to Bill
18 Press, that no individual associated with PI/PAC was authorized
19 to change the notation on the check, that, to the best of his
20 knowledge, no individual associated with PI/PAC actually changed
21 the notation on the check, and that he is unable to explain how

22 personally present and available at the
23 hearing for such cross-examination as the
24 Court may permit.

25 ⁴ Rincover contends that the check was received by Ampac
26 for the purchase of two tables at a fundraising dinner honoring
27 California Supreme Court Justice Cruz Reynoso. (Motion at 4.)

28 ⁵ These interrogatories were issued in connection with an
administrative proceeding before the FEC.

1 the notation was changed. (Plaintiff's Ex. 5.2.)

2 Rincover also argues that the disputed check could not have
3 been intended for Press, because such a contribution would have
4 been illegal. (Motion at 9.) However, Plaintiff is quick to
5 point out that PI/PAC and Dr. El Farra were pursued by the FEC as
6 a result of this and other contributions, and that a settlement
7 agreement was entered into in which PI/PAC and Dr El Farra
8 admitted that they had violated federal election laws by making
9 the \$2,000 contribution to Press's campaign. (Opp. at 8;
10 Plaintiff's Exs. 6.2, 6.5.)

11 **b. Rincover was not the treasurer of**
12 **Ampac**

13 Rincover also argues that he cannot be held liable because
14 Rincover was never the treasurer of Ampac. (Motion at 7.)
15 Rincover cites Federal Election Commission v. John A. Dramesi for
16 Congress Committee, CV 85-4039 (1990) (unpublished opinion
17 attached to Plaintiff's Memorandum in Support of its Petition for
18 an Order to Show Cause Re Contempt at 66), where the district
19 court stated:

20 Because political committees have a tendency
21 to dissolve after an unsuccessful campaign,
22 FECA's provisions require political
23 committee's to designate an individual who
24 will act on behalf of the Committee, 2 U.S.C.
25 § 432(a), and who will make a personal best
26 effort to ensure that the Committee is
27 complying with the law, 2 U.S.C. § 432(c)(i),
28 11 C.F.R. §§ 102.9(d). A necessary corollary
to these principals is that an individual
will also stand responsible for his
indiscretions as a treasurer. It is because
of the ephemeral nature of such political
committees that Congress chose to place this
burden upon treasurers.

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1 Id. at 9. Rincover introduces evidence that Ampac's treasurer
2 was Lawrence Olson of Olson, Connely, & Hagel. (Motion at 8;
3 Defendant's Exs. 10, 11.) Plaintiff responds that because
4 Rincover accepted the contribution from PI/PAC, and because Ampac
5 never designated a treasurer with the FEC pursuant to 2 U.S.C. §
6 432(a), Rincover performed the functions of a treasurer and can
7 be held liable as one. (Opp. at 11-12.)

8 In any event, Plaintiff's first two counts allege violations
9 of section 432b(1) of the FECA which requires every "person" who
10 receives a contribution for an authorized political committee to
11 forward the contribution to the committee, and, in cases where
12 the contribution exceeds \$50, to include the name and address of
13 the donor. See 2 U.S.C.A § 432b(1) (West 1985). Furthermore,
14 Plaintiff's fifth count alleges violation of section 441b(a),
15 which makes it unlawful for, inter alia, "persons" to knowingly
16 accept a corporate contribution in connection with any election
17 at which a senator is to be voted for. See 2 U.S.C.A. § 441b(a)
18 (West 1985). These provisions are not limited to political
19 committees or their treasurers.

20 c. Ampac was not a "political
21 committee"

22 Finally, Rincover argues that Ampac was not a "political
23 committee" under the FECA, and therefore Rincover and Ampac are
24 not subject to the jurisdiction of that statute.⁶ Plaintiff

25 ⁶ Counts II and III of Plaintiff's complaint are in fact
26 dependent on Ampac's status as a political committee. Section
27 433(a)(1) of the FECA requires political committees designated by
a candidate for federal office to file statements of organization
no later than 10 days after it is so designated, and section

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1 alleges that Defendants' conversion of the \$2,000 check caused
2 Ampac to become a political committee within the meaning of 2
3 U.S.C. § 431(4)(A).⁷ (Complaint ¶ 36.) Rincover responds that
4 because the facts "lead to the inescapable conclusion that the
5 subject contribution was not intended for the Press committee . .
6 . there was no basis for federal jurisdiction over America's PAC
7 or Neil Barry Rincover. (Motion at 8.)⁸

8 C. Conclusion

9 All of the foregoing does in fact raise issues as to whether
10 Plaintiff would ultimately be successful as to some or all of its
11 claims if this matter were to go to trial. However, as Rincover

12
13
14 434(a)(1) requires the treasurer of a political committee to file
15 various reports with the FEC. See 2 U.S.C.A. §§ 433(a)(1),
434(a)(1) (West 1985).

16 ⁷ Section 431(4)(A) provides that:

17 The term "political committee" means --
18 (A) any committee, club, organization, or
19 other group of persons which receives
20 contributions aggregating in excess of \$1,000
during a calendar year or which makes
expenditures aggregating in excess of \$1,000
during a calendar year

21 2 U.S.C.A. § 431(4)(A) (West 1985).

22 ⁸ Plaintiff's contention that because Ampac was not a
23 political committee this Court lacks subject matter jurisdiction
is erroneous, "[f]or it is well settled that the failure to state
24 a proper cause of action calls for a judgment on the merits and
not for a dismissal for want of jurisdiction. Bell v. Hood, 327
25 U.S. 678, 682 (1945). See also Black v. Payne, 591 F.2d 83, 86
n.1 (9th Cir. 1979), cert. denied, 444 U.S. 857 (1979) (finding
26 that the issue as to whether appellant's participation in a
retirement system satisfied the definition of a "security" under
27 the federal securities laws went to the merits and not to
jurisdiction).

1 | concedes,' the merits of a complaint are not controlling in a
2 | motion to set aside a default judgment. Falk v. Allen, 739 F.2d
3 | 461, 463 (9th Cir. 1984) (finding that "[a] Rule 60(b) motion
4 | should not be treated as a substitute for appeal").

5 | Furthermore, a Court should consider the compelling interest
6 | in finality of judgments in determining whether to set aside a
7 | default judgment. Rogers v. Watt, 722 F.2d 456, 459 (9th Cir.
8 | 1983) (en banc). This interest is especially significant here
9 | where Rincover waited for 15 months to challenge this Court's
10 | judgment.

11 | Also, a court may deny a motion to set aside a default where
12 | the defendant's culpable conduct led to the default. See Meadows
13 | v. Dominican Republic, 817 F.2d 517, 522 (9th Cir. 1987); Pena v.
14 | Seguros La Comercial, S.A., 770 F.2d 811, 814 (9th Cir. 1985).
15 | This issue turns on whether the defendant received actual or
16 | constructive notice of the filing of the action. Id. Rincover
17 | admits as much as he states that "[i]t is unfortunately true that
18 | Rincover virtually ignored mail from the FEC, believing that he
19 | was not responsible for providing a legal defense to the
20 | complaint, that he was not personally liable for any judgment
21 | resulting from the underlying lawsuit, and that Mr. Press's
22 | allegation was frivolous." (Motion at 6.) Rincover, an
23 | attorney, cannot seriously argue that he was unaware of the
24 | consequences of failing to respond to a federal complaint.

25 | In sum, Rincover's contentions do not indicate

26 | _____
27 | ' (Motion at 6.)

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1 "extraordinary circumstances" that would allow this Court to set
2 aside the default judgment under Rule 60(b)(6).

3 For all of these reasons, the Court hereby ORDERS that
4 Rincover's motion to set aside the default judgment is DENIED.

5 Furthermore, the Court finds that Rincover and Ampac are in
6 civil contempt for failing to comply with this Court's January
7 14, 1993 "Order and Default Judgment." Judicial sanctions in
8 civil contempt proceedings may, in a proper case, be employed for
9 either or both of two purposes: (1) to coerce the defendant into
10 compliance with the court's order, and (2) to compensate the
11 complainant for losses sustained. United States v. Mine Workers,
12 330 U.S. 258, 303-04 (1946). The Court hereby ORDERS that
13 Rincover and Ampac are to comply with this Court's January 14,
14 1993 "Order and Default Judgment" no later than 30 days after the
15 entry of this Order, and that for every day after such 30 day
16 period that Rincover or Ampac are not in compliance with this
17 Court's January 14, 1993 "Order and Default Judgment," the party
18 not in compliance will be assessed a \$50 penalty.

19 D. Modification of the Default Judgment

20 The default judgment ordered Rincover and Ampac to pay the
21 FEC a \$25,000 civil penalty. Section 437g(a)(6)(B) of the FECA
22 provides:

23 In any civil action instituted by the
24 Commission under subparagraph (A), the court
25 may grant . . . a civil penalty which does
26 not exceed the greater of \$5,000 or an amount
27 equal to any contribution or expenditure in
28 such violation, upon a proper showing that
the person involved has committed, or is
about to commit . . . a violation of this Act
. . . .

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1 The \$25,000 awarded to the FEC pursuant to section 437g(a)(6)(B)
2 was calculated by multiplying \$5,000 by the number of violations
3 of the FECA committed by Defendants. However, although Rincover
4 and Ampac may have technically committed 5 violations of the
5 FECA, all of the violations arose out of a single incident (i.e.,
6 Rincover's failure to forward the \$2,000 check).

7 Therefore, pursuant to Rule 60(a), the Court hereby modifies
8 the January 14, 1993 "Order and Default Judgment" by finding that
9 Rincover and Ampac are liable for a civil penalty of \$5,000,
10 rather than \$25,000.

11 SO ORDERED.

12 Dated:

5/23/94


13 LOURDES G. BAIRD
14 United States District Judge
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AUG 22 1994
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EARL E. ROAMS (1892-1986)
HERBERT S. HAZELTINE (1907-1993)

SAN FRANCISCO OFFICE
500 WASHINGTON STREET
SIXTH FLOOR
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE (415) 982-1240
FAX (415) 982-0130

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August 17, 1994

Mary Ann Bumgarner, Esq.
Attorney
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99 E Street, NW
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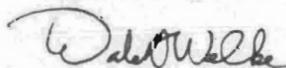
Re: MUR 2604-Physicians Interindemnity/PAC

Dear Ms. Bumgarner:

Receipt is acknowledged of your letter of July 27, 1994 to William Kopesky of this office. We will discuss with our client whether there is anything that would be desirable to have in the public record.

Please accept my thanks for your courtesy and cooperation in this matter.

Sincerely,



DALE A. WELKE

DAW:efs

cc: Sabri M. El Farra, M.D.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2604

DATE FILMED 11-7-96 CAMERA NO. 4

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