



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

THIS IS THE BEGINNING OF MUR # 2727

DATE FILMED 11-30-92 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 4, 1988

SENSITIVE
EXECUTIVE SESSION
OCT 12 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LM*
General Counsel

SUBJECT: Internally Generated Matter Pursuant
to Directive 6--Michael Goland and the
Committee to Elect Ed Vallen to Senate

This memorandum is prepared and submitted pursuant to Directive 6 and the discussion during the Executive Session of September 20, 1988.

Directive 6

With respect to internally-generated matters under review based on news articles and similar published sources, Directive 6 provides in relevant part:

News articles and similar published accounts of possible violations may, under certain conditions, constitute the source of internally generated MURs. ... Generally, the standard for determining whether such articles may be the basis for Commission action depends upon such factors as the particularity with which the alleged violations are set out in the article and whether the allegations set forth therein are supported by in-house documents. The Commission will take the ultimate responsibility for determining whether or not to open a MUR based on such accounts.

The directive also sets out a procedure by which a staff person may initiate the process.

Published News Accounts Relating to Michael Goland and Ed Vallen

The September 13, 1988, edition of The Washington Post contained a news account stating the FBI is investigating Michael Goland for allegedly funneling money through other individuals to the campaign of Ed Vallen, a candidate for the U.S. Senate for the American Independent Party, in California in 1986. See Attachment 1, page 1. The account states that another newspaper reported

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after the 1986 election that Vallen's campaign received more than \$100,000 in the two weeks prior to the election from individuals with ties to Goland.

One individual who contributed to Vallen, Edward Zelon of Santa Monica, is quoted as stating that he made the contribution at the request of a friend, who he declined to identify, and that this friend reimbursed him for his \$2,000 contribution. The article also quotes Michael Barnes, a Los Angeles political consultant, as saying he got involved in assisting Vallen's campaign at the request of a woman he knew from conservative circles and that after he got the campaign's approval, checks to buy ads started arriving at his office.

This Office is also aware of two earlier articles relating to these allegations. The first one appeared in the June 24, 1987, edition of the Wall Street Journal. See Attachment 1, page 2. This article identifies another contributor as Michael Altman, who is also described as the treasurer of Young Americans Political Action Committee, of which Michael Goland is assistant treasurer. The other article appeared in the September/October 1987 issue of Campaigns & Elections. See Attachment 1, page 3. Both of these articles identify the consultant who did Mr. Vallen's ads as Mark Barnes.

In-House Documents

This Office has copied all of the documents filed with the Commission by Edward Vallen and his campaign committee. See Attachment 2. These documents indicate that Mr. Vallen had some difficulty in raising funds for his 1986 Senate campaign and did not raise \$5,000 in contributions until sometime in August 1986. His committee filed only one report with the Commission, the Pre-General Election Report, which disclosed approximately \$5,293 in receipts and \$4,406 in disbursements. It included a Schedule A that itemized approximately \$2,722 in contributions. There were not Schedules B filed with this report.

The committee treasurer also filed 48-hour contribution notices on three occasions prior to the 1986 general election. These notices list \$98,000 in contributions in \$2,000, \$3,000, or \$4,000 amounts. Among this listing are David Zelon in Santa Monica and Judy and Michael Altman of Sherman Oaks. See Attachment 2, pages 25-31.

The committee did not file a 1986 Post-General Election Report, nor has it filed any other reports with the Commission. It has received several notices of failure to file.

Young Americans Political Action Committee is registered with the Commission as a nonconnected political committee. In its 1985 Statement of Organization, it listed Michael Altman as treasurer and Michael Goland as assistant treasurer, both at the same

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address, which is apparently the address for Goland's company, Balboa Construction. See Attachment 3. The 1988-89 National Edition of the Political Resource Directory lists Mark Barnes as the principal of Political Advertising & Consulting, a Los Angeles political consulting firm. See Attachment 4.

Therefore, this Office recommends that the Commission open a Matter Under Review and refer it to the Office of the General Counsel for further analysis and the preparation of the First General Counsel's Report.

RECOMMENDATION

1. Open a Matter Under Review.
2. Refer this matter to the Office of the General Counsel.

Attachments

1. News Articles
2. Filings by the Vallen committee
3. Statement of Organization
4. Excerpts from Political Resource Directory

Staff person: George F. Rishel

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FBI Probes Donor's Role In Senate Race

Funds Allegedly Given In Others' Names

By Charles R. Babcock
Washington Post Staff Writer

The FBI is investigating a Los Angeles area businessman known for his support of pro-Israel causes for allegedly funneling money through other individuals into the 1986 California Senate race to help Sen. Alan Cranston (D-Calif.), according to sources familiar with the investigation.

The investigation centers on Michael Goland's alleged role in the campaign of Edward B. Vallen, the American Independent Party candidate who got 1.5 percent of the vote in a race in which Cranston, a favorite of Israel's supporters, narrowly defeated then-Republican Rep. Ed Zschau.

The Los Angeles Times reported soon after the election that Vallen's campaign received more than \$100,000 in the last two weeks of the campaign from a group of about 40 contributors, many of whom were Jewish and some of whom had ties to Goland. Some of the contributors told the newspaper they gave to Vallen in hopes he would attract votes that might have gone to Zschau.

According to the Californian Secretary of State's office, Vallen received 109,916 votes, while Cranston's victory margin over Zschau was 104,868.

Edward Zelon of Santa Monica, who was listed as giving \$2,000 to Vallen, said in a phone interview yesterday that "an acquaintance" asked him and a business associate to make out checks to the firm buying the Vallen ads in hopes the media blitz would shift voters from Zschau. His friend then reimbursed him the \$2,000, Zelon said.

Zelon declined to identify who reimbursed him, but said it wasn't Goland.

It is against federal election law for someone to make a donation in the name of another. Zelon said an FBI agent, who had with him both his \$2,000 check and the reimbursement check, questioned him about the matter about a month ago.

Goland didn't return a call to his Balboa Construction Co. office in Chatsworth, Calif. He gained notoriety in 1984 when he claimed he spent more than \$1 million of his own money as "independent expenditures" aimed at defeating then Sen. Charles Percy (R-Ill.). Percy lost the race to then-Rep. Paul Simon (D-Ill.)



SEN. ALAN CRANSTON
... beneficiary of alleged action

Goland has been a major contributor to Jewish causes here and in Israel and was on the national council of the American Israel Public Affairs Committee (AIPAC), a major pro-Israel lobby, until 1986, according to an AIPAC official. The official noted that AIPAC and Goland had a falling out several years ago.

The sources familiar with the case said that at least one key participant is cooperating with authorities and the case may be presented to a grand jury for possible indictment in the next month.

Vallen said yesterday that his attorney had advised him not to make any comment. His wife said that an FBI agent had been to visit him within the past few weeks.

Several other donors declined to comment yesterday. The secretary for one donor said her employer had been reimbursed after his contribution to Vallen and that he too had talked to the FBI recently.

Michael Barnes, a Los Angeles political consultant who approached the Vallen campaign with the offer to do the last-minute 1986 ads, said yesterday that he got involved that summer after being contacted by a woman he knew from conservative political circles. She said she represented a group of people who wanted to help Vallen, and after he got the campaign's approval, checks to buy the ads started arriving at his office.

He said he had heard Goland's name mentioned in connection with the case, but wasn't sure whether he had heard it from the woman or from media accounts at the time. He added that the FBI asked him about the Vallen campaign more than a year ago, but he hadn't heard from the authorities since.

A spokeswoman for the U.S. Attorney's office, which would handle any prosecution, declined comment. Early this year, that office indicted Stuart Karl, a California video producer, for making donations to the 1984 Gary Hart presidential campaign, and other candidates, in the name of others. He pleaded guilty in the case this summer.

Cost Is Iss In Wiscor Senate Ra

Opponents Tilt Millionaire's

Associated Press

MADISON, Wis., Sep. 23—Spending has become Tuesday's Democratic p... tie for the seat held for Sen. William Proxmire retiring. Proxmire said election campaign \$145.10.

Milwaukee millionaire Kohl, running in his fir has been accused of tr the nomination by spe than \$2 million, much o vision advertising, and his own money.

"Politics should be p and leadership, not mult lar TV hype," said S State Douglas La Follet of Kohl's opponents.

Kohl, 53, owner of t kee Bucks of the Natio ball Association, said he advertisements to win recognition enjoyed by nents, La Follette, forme Anthony Earl and Edwa the Democratic Senat two years ago.

"I'm not looking to ge the others, Kohl said. "I get to the point whe even."

On the Republican Senate Minority Leader geleiter and Stephen D mer chairman of the sta running a more ideolog has labeled her a liber has called him a conserv

Proxmire, who devot his career in the Senat for budget cuts, said he pointed by the hefty spe candidates. Proxmire sa \$145.10 when he was elected in 1982.

Kohl, whose slogan is senator but yours," sai not be obligated to spe groups because most of he spent was his own.

In his last campaign st port, Kohl said he spent 1 million between June 1 at He reported more than 2 currently in his campaign

As of Aug. 24, Earl \$431,719 and Garvey \$3 Follette reported expes \$15,536. Engeleiter sai \$858,580 through Au King \$342,907.

Wisconsin is one of holding primary electio Here are highlights of elections:

■ Arizona—Many Rep islators who voted to convict former govern

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ATTACHMENT 1

Anti-Zionist's Candidacy Was Helped By Jewish Contributors in California

By JOHN J. FIALKA

Staff Reporter of THE WALL STREET JOURNAL

LOS ANGELES—Edward B. Vallens, a 67-year-old retired contractor, is an avowed anti-Zionist. Just how he wound up with \$120,000—much of it from Jewish contributors—to stage a television blitz in the final hours of the 1986 California Senate race still bothers him.

The \$120,000 might seem like a small amount in a race that consumed \$24 million and is believed to be the most expensive Senate race in history. But it is part of a larger story that might have affected the outcome of the close, bitter race between Democratic Sen. Alan Cranston and his unsuccessful GOP challenger, then-Rep. Edwin Zschau.

A key figure in the story appears to be Michael Goland, a Los Angeles developer who is one of the largest donors to the American Israel Public Affairs Committee and who has been active in opposing candidates he views as being unfriendly to Israel. He recently agreed to pay a \$5,000 fine for his role in running television commercials attacking former GOP Sen. Charles Percy of Illinois in Mr. Percy's losing 1984 race; the commercials were illegal because the source of the financing wasn't disclosed.

Mr. Goland, who couldn't be reached for comment, surfaced in the California race at a May 1986 reception for Mr. Zschau held by Jewish supporters in Los Angeles's San Fernando Valley. According to the accounts of both Mr. Zschau and campaign manager Ron Smith, he confronted the candidate and, in Mr. Smith's words, "said, 'I'm going to get you just like I got Percy.'"

A few weeks later, Mark Barnes, the operator of a Los Angeles political consulting firm, was approached to produce and buy time for a television ad for Mr. Vallens, the Senate candidate of the American Independent Party. Mr. Barnes says he can't divulge who his clients were.

About that time, Libertarian Party candidate Breck McKinley says he received a call from Mr. Barnes, who said he represented some potential contributors. Mr. McKinley says that when he pressed for more information, Mr. Barnes said he was working on behalf of Mr. Goland. Mr. Barnes confirms that he called Mr. McKinley but denies mentioning Mr. Goland's name. Mr. McKinley says he rejected the offer.

Mr. Vallens says that in mid-October, as his campaign struggled along with a few thousand dollars, he received a call from Mr. Barnes promising \$120,000 from "very conservative Republicans who don't want Zschau in there." Mr. Vallens was told to go to a Los Angeles television studio, where he made commercials asserting that he, and not Mr. Zschau, was the only real conservative in the race.

The commercials ran at least 60 times on Los Angeles and San Diego stations in the final hours before the election. Mr. Vallens, hitherto a political unknown, got 100,856 votes. Mr. Smith claims the ads siphoned off Zschau votes and depressed voter turnout in heavily Republican Orange County. Mr. Zschau lost the election by 116,000 votes.

The Los Angeles Times found two of the donors worked for companies controlled by Mr. Goland and another who lived in a house that is owned by Mr. Goland. One \$4,000 check came from Mr. and Mrs. Michael Altman. Mr. Altman says he is a close friend of Mr. Goland's and that he is treasurer of Young Americans Political Action Committee, a pro-Israel PAC of which Mr. Goland is assistant treasurer.

Asked specifically in a second call about the donation to Mr. Vallens, Mr. Altman, who operates a Sherman Oaks insurance agency, was much less expansive. "I don't want to talk about it," he says. "This has caused me nothing but grief. We got some misinformation. Let's just leave it at that."

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Was Zschau
a victim of
"poison pill?"

Ever since he lost his U.S. Senate seat in 1984 by less than two percentage points, Charles Percy of Illinois has blamed the defeat on the efforts of Michael Goland, a Los Angeles land developer. Now fellow Republican Ed Zschau, who narrowly lost his 1986 Senate race in California, might be singing the same tune.

Goland, a staunch supporter of Israel, appears more than willing to part with a portion of his fortune in the cause of defending its interests. He spent \$450,000 on negative television spots against Percy, whose support of the sale of AWACS radar-warning devices to Saudi Arabia had raised Goland's ire. Zschau evidently emulated some of the attitudes of his predecessor in Congress, Pete McCloskey, a vocal American critic of Israel.

Both Zschau and his campaign manager, Ron Smith, say Goland accosted them at a May, 1986, fund-raiser organized by Jewish supporters of the candidate. "I'm going to get you just like I got Percy," Smith says Goland told Zschau. But the California businessman mounted no independent campaign as he had against Percy. Now it appears Goland merely shifted gears.

Edward B. Vallens, a retired contractor who stood as the American Independent Party's entry in the race, says he received a call last October offering \$120,000 in television-production services from "conservative Republicans who don't want Zschau." The caller was Mark Barnes, principal in Political Advertising and Consulting, a bipartisan Los Angeles firm known for its production of free-swinging

media spots. Politically unknown and running a low-spending campaign, Vallens eagerly appeared in Barnes-produced commercials, blasting Zschau and extolling himself as the only "real conservative in the race." The spots aired more than 60 times on Los Angeles and San Diego stations in the campaign's waning hours. Smith claims the unexpected, last-minute blitz cost Zschau critical conservative support and depressed the turnout in Orange County, a powerful Republican bastion. Vallens polled a surprising 110,000 votes there; Zschau lost the race by 105,000 votes.

An investigation by the *Los Angeles Times* recently revealed that several of Barnes's "maxed out" contributors either had business dealings with Goland or were active in a pro-Israeli group of which he is an officer. Barnes has refused to divulge the name of his contracting client, but the Libertarian entry in the race says he turned down the same offer Barnes later made to Vallens after the consultant admitted he really was working for Goland.

Vallens was upset to learn of the source of his windfall: The candidate of a far-right fringe party that has been denounced as neo-Nazi by some critics, he had made anti-Zionism one of the planks of his platform. Goland's tactics also might upset the FEC, but he is hardly

quaking in his Guccis. The lack of attribution on his anti-Percy spots cost him a \$5,000 slap on the wrist. —David Beiler

Culver blasts
"sophists" for
lacking values

From beneath the growing pile of "how to get elected" information and advice, former Iowa Senator John C. Culver pulled a dusty little word to be the subject of his speech to the 1987 graduating class of Harvard University's Kennedy School of Government. The word is "values."

"We are training technicians, when we should be preparing leaders and stressing the fundamental priority of values," said Culver.

What inspired Culver was a conversation with a young man intent on entering politics. The man had chosen to remain in Washington, D.C., to cultivate knowledge of the news media, fund-raising, and polling. When Culver questioned him about what aspects of the country or his state he wished to improve, the young man replied, "But Senator, that just isn't the way you get elected anymore!"

Culver told graduates of his frustration that politics has become much more than men and women with ideals hoping to serve their country. With candidacy, he said, comes the "trappings of pollsters, consultants, image makers, campaign financing, and the role of the media." Acknowledging their import to the political process, Culver said he questions whether "the means justifies the ends they purport to serve."

"I am greatly concerned that much of what passes for political education in our

Quotable

"I kept telling Paula Hawkins she was Mother Theresa. She kept telling me she was George Patton. If we'd only been able to agree..." —
The defeated senator's media consultant, Robert Goodman, in *Campaigns & Elections: Effective Campaign Management Seminar*.

ATTACHMENT 1 4 (3)

C

5/12/86 CA AIP C1788

STATEMENT OF CANDIDACY

(see reverse side for instructions)

1 (a) Name of Candidate (in Full) EDWARD B. VILLEN
 (b) Address (Number and Street) 1670 FAIRFOL
 (c) City, State and ZIP Code MONTANA CALIFORNIA 92335

2 Identification No. _____

3 Party Affiliation SYNDICIST PARTY
AMERICAN INDEPENDEN-

4 Office Sought U.S. SENATE

5 District & State of Candidate 36th CA CALIFORNIA

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

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

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

(a) Name of Committee (in Full) N/A AT THIS TIME

(b) Address (Number and Street) _____

(c) City, State and ZIP Code _____

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

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

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

(a) Name of Committee (in Full) N/A AT THIS TIME

(b) Address (Number and Street) _____

(c) City, State and ZIP Code

Candidate not running in Primary (unopposed)

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

Edward B. Villen 13 May 1986
(Signature of Candidate) (Date)

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

CANDIDATES FOR -
President mail to:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

U.S. Senate mail to:

Secretary of the Senate
119 D Street, N.E.
Washington, D.C. 20510

U.S. House of Representatives
mail to:

Clerk of the House
1036 Longworth Office Bldg.
Washington, D.C. 20515

For further
information
contact

Federal Election Commission
Toll Free 800-424-6530
Voice 202-527-4052

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Attachment 2 (4)

96020113000

N/A at this time candidate ... primary ... committee ...

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee In Full _____ (1) Check if name or address is changed _____

(b) Address (Number and Street) _____

(c) City, State and ZIP Code _____

2. Date _____

3. FEC Identification Number _____

4. Is it an amended Statement? YES NO

5. TYPE OF COMMITTEE (check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
-------------------	-----------------------------	---------------	----------------

- (c) This committee supports/opposes only one candidate _____ (name of candidate) and is NOT an authorized committee.
- (d) This committee is a _____ (National, State or subordinate) committee of the _____ Party (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- Corporation
- Corporation w/o Capital Stock
- Labor Organization
- Membership Organization
- Trade Association
- Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
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8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
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9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
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I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer _____ SIGNATURE OF TREASURER _____

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Statement to the penalties of 18 U.S.C. 1015.

For further information contact: Federal Election Commission, Toll Free 800-424-9510, Local 202-527-4164

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FEC FORM 302

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CA AIP 4718

8/12/86

1 August 1986

To: Federal Election Commission
1325 K. Street, N.W. (3)
Washington, D.C. 20463

From - Edward B. Vallen
Candidate for United States Senate
16870 FAIRFAX
FONTANA, CALIFORNIA 92305

To Whom it MAY CONCERN;

This is the 2nd request for information regarding a nonexistence Political Campaign Committee.

The "completion" has now changed from the "tin cup" contributions of \$10⁰⁰ to \$20⁰⁰ (average) a week, ^{at} much larger contributions are now arriving due to a write up in the National tabloid The Weekly National Spot light from 300 Independence Ave Washington D.C. and a recent mail out from (6)

00020173-110

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State headquarters of the
American Independent Party.
~~What~~ Please tell me what I
should do as I, at present,
have NO Committee. I am the
Committee. ??

— I do not have a solid
(bookkeeper) Treasurer, therefore
can I ~~be~~ be my Own Treasurer?

— I finally have enough money
at one time, to open up a bank
account. A little over \$400⁰⁰ and I
hope more to come in. God willing!

— I had no primary companion as
I was unopposed. Therefore no
primary committee. I will try to
form a committee, if necessary or possible
starting now for the General Election
in November 1986.

(2)

3-3

Please send me the necessary
forms for this General
Election Campaign.

— As we being my own
Committee to date I want to
avoid any problems.

— Thank you for your
cooperation in this manner.

— Remember No Primary Election
Committee, but now we will
try to form a General Election
Committee.

Yours for Good Country
Ed Valpen

16870 Fairfax

Fontana, California

Ph. 714-875-4357
222-1454

72385

(8)

223 So. Palm Avenue
Riverside, California 92504
Tel. (714) 875-4389



AMERICAN INDEPENDENT - POPULIST PARTY

15 August 1986

16870 Fairfax
Fontana, California 92335

Candidate
EDWARD B. "ED" VALLEN
For United States Senate

ED VALLEN
16870 Fairfax
Fontana, California 92335
Tel. (714) 875-4389

Hello Patty;
Thank you for your
prompt reply. Your paper
enclosed F.E.C. Form 2 (3/80)
GPO: 1982-385-778 arrived on
15 August 1986 PM.

On 4 August 1986 I finally
accumulated enough money to
open a bank account in the
name of the Committee to Elect
Ed Vallen to the United
States Senate, 4/21/85.

Ed Vallen
4/21/85

Please send me, Ed, a FEC
number (identification No.) and all
the other paper to fill in. Thank you
Yours for God & Country

Ed Vallen
16870 Fairfax
Fontana,
California 92335



Ph 714-875-4389
822-1486
(HOME)

I hereby agree and affirm to uphold the basic principles
of the United States of America and adhere to all the
Articles of the United States Constitution.

(13)

2-2

188 So. Palm Avenue
Riverside, California 92506
Tel: (714) 978-4389



16780 Fairfax
Fontana, California 92335

AMERICAN INDEPENDENT - POPULIST PARTY

Candidate
EDWARD B. "ED" VALLEN
for United States Senate

EDWARD B. VALLEN
U.S. SENATE
CANDIDATE
AMERICAN INDEPENDENT PARTY
16780 FAIRFAX
FONTANA, CALIFORNIA 92335
TEL: (714) 978-4389

for this General
Election.

Over about the 10th
of August we took in
the \$5000⁰⁰ to qualify
for the U.S. Senate from
the State of California

Please send me that for
and a identification number

Thank You -
Yours for God &
Country

Edward B. "Ed" Valen
16780 Fairfax
Fontana, California



714-875-4389
822-1480

(15)

86020421189

STATEMENT OF ORGANIZATION

1. (a) Name of Committee (do not check if name or address is changed) **COMMITTEE TO ELECT ED VAUGHAN**
 (b) Address (Number and Street) **123 PALM**
 (c) City, State and ZIP Code **RIALTO CA 92376**

2. Date RECEIVED. **NOV 12 1986**
 3. PFC Identification Number: **1986 NOV -4 Pg 12 42**
 4. HAND DELIVERED? YES NO

5. TYPE OF COMMITTEE (check one):
- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- EDWARD "ED" VAUGHAN** AMERICAN IND. SENATE CA
 Name of Candidate Candidate Party Affiliation Office Sought State/Office
- (c) This committee supports/expresses only one candidate **EDWARD VAUGHAN** and is NOT an authorized committee.
 - (d) This committee is a _____ committee of the _____ Party (National, State or subordinate) (Democratic, Republican, etc.)
 - (e) This committee is a certain segregated fund.
 - (f) This committee supports/expresses more than one Federal candidate and is NOT a certain segregated fund nor a party committee.

Name of Any Connected Organization or Affiliated Organization	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, check which type of organization:

Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

6. Location of Records: Identify by name, address (phone number - optional) and section, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position

7. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any deputy (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
MURKEY III O'ROUR	P.O. Box 261 BLOOMINGTON, CA 92307	TREASURER

8. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents, or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
REDLAND FEDERAL S & L ASSN	750 S. GARLAND FAR HILLS, CA 92331

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

DORREY M. BURRILL Ind. Sec. Officer
 Type or Print Name of Treasurer SIGNATURE OF TREASURER

NOTE: Submission of false or misleading information may subject the person signing this Statement to the penalties of the law.

For form information contact: Federal Election Commission, Toll Free 800-424-9610 or 202-527-4358

STATEMENT OF CANDIDACY

Use reverse side for additional

RECEIVED
LIBRARY OF THE SENATE

1. (a) Name of Candidate (in Full)
EDWARD B. "ED" VALLEN

(b) Address (Number and Street)
16870 FAIREAX

(c) City, State and ZIP Code
FONTANA CA 92335

2. Interest, Issue No.
1986 NOV - 6 14 5 23

3. Party Affiliation
AMERICAN INDEPENDENT

4. Office Sought
SENATE

5. District & State of Candidate
36th DIST. OF CALIF.

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

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

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

Name of Committee (in Full)

COMMITTEE TO ELECT ED VALLEN TO SEN.

(a) Address (Number and Street)

16870 FAIREAX

(b) City, State and ZIP Code

FONTANA CA 92335

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

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

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

(a) Name of Committee (in Full)

(b) Address (Number and Street)

(c) City, State and ZIP Code

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

ED Vallen

(Signature of Candidate)

12-20-86

(Date)

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 5437b.

CANDIDATES FOR -

President mail to:

U.S. Senate mail to:

U.S. House of Representatives

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Secretary of the Senate
119 D Street, N.E.
Washington, D.C. 20510

Clerk of the House
1038 Longworth Office Bldg
Washington, D.C. 20515

For further information contact:
Federal Election Commission
Call Free 800-424-9530
or write: Call 202-671-4768

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18

STATEMENT OF RECEIPTS AND DISBURSEMENTS
 (Page 2, FEC FORM 3)

Name of Committee or Club

COMMITTEE TO ELECT ED VALLER

Report Covering the Period

From

To 12 15 68

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unlimited \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11 (a), 11 (b), 11 (c) and 11 (d))

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

13. LOANS:

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (add 13 (a) and 13 (b))

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Pretests, etc.)

15. OTHER RECEIPTS (Dividends, Interest, etc.)

16. TOTAL RECEIPTS (add 11 (a), 12, 13 (a), 14 and 15)

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))

20. CONTRIBUTION REFUNDS:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))

21. OTHER DISBURSEMENTS

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD

24. TOTAL RECEIPTS THIS PERIOD (from line 16)

25. SUBTOTAL (add line 23 and line 24)

26. TOTAL DISBURSEMENTS THIS PERIOD (from line 22)

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract line 26 from line 25)

	COLUMN A Total This Period	COLUMN C Total for Year-08-08-0	
11 (a)	5,640.26	5,640.26	11 (a)
11 (b)			11 (b)
11 (c)			11 (c)
11 (d)			11 (d)
11 (e)	5,640.26	5,640.26	11 (e)
12			12
13 (a)			13 (a)
13 (b)			13 (b)
13 (c)			13 (c)
14			14
15			15
16	5,640.26	5,640.26	16
17	4,753.14	4,753.14	17
18			18
19 (a)			19 (a)
19 (b)			19 (b)
19 (c)			19 (c)
20 (a)			20 (a)
20 (b)			20 (b)
20 (c)			20 (c)
20 (d)			20 (d)
21			21
22	4,753.14	4,753.14	22

3758

20

REPORT OF CONTRIBUTIONS AND DISBURSMENTS
For Political Committee

(Summary Page)

RECEIVED
CLERK OF THE SENATE

1. Name of Committee (in Full) COMMITTEE TO ELECT ED VANDER
 Address (Number and Street) 123 PALM
 City, State and Zip Code RIALTO CA 92376

2. FEC Identification Number 10-20-85

3. Is this Report on a GENERAL ELECTION
 YES NO

Check if address is different than previously reported

4. TYPE OF REPORT

April 15 Quarterly Report Twelfth day report preceding GENERAL ELECTION
 (Type of Election)
 election on Nov 4 in the State of CA

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

October 15 Quarterly Report

January 31 Year End Report

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

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

86020450025

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period	through <u>Oct 15</u>		
8. Net Contributions (other than loans)			
(a) Total Contributions (other than loans) (From Line 11 (a))		5,293.25	5,293.25
(b) Total Contribution Refunds (From Line 20 (a))		-	-
(c) Net Contributions (other than loans) (Subtract Line 6 (b) from 6 (a))		5,293.25	5,293.25
7. Net Operating Expenditures			
(a) Total Operating Expenditures (From Line 17)		4,406.13	4,406.13
(b) Total Offsets - Operating Expenditures (From Line 14)		-	-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))		4,406.13	4,406.13
9. Cash on Hand at Close of Reporting Period (From Line 27)		887.12	
10. Debts and Obligations Owed TO The Committee (Items are all on Schedule C or Schedule D)		-	
11. Debts and Obligations Owed BY The Committee (Items are all on Schedule C or Schedule D)		-	

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

For further information contact
 Federal Election Commission
 1101 L Street, N.W.
 Washington, D.C. 20542
 Telephone: 800-438-9535
 In D.C. 202-557-1121

AUDREY M. BARBOUR
 Type or Print Name of Treasurer

Audrey M. Barbour
 SIGNATURE OF TREASURER

10-20-85
 Date

NOTE: Exemption from filing this report or incomplete information may subject the person filing this report to civil or criminal penalties.

21

**SECOND SUPPLEMENTARY PAGE
of Receipts and Disbursements
(Page 2, FEC Form 3)**

Name of Committee (in Full)		Period Covering the Period	
COMMITTEE TO ELECT ED VALLAN		From	To
		COLUMN A Total This Period	COLUMN B Calendar Year to Date
I. RECEIPTS			
11	CONTRIBUTIONS (other than loans) FROM:		
(a)	Individuals/Persons Other Than Political Committees Exclude Every Unincorporated S	5,293.25	5,293.25
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	The Candidate		
(e)	TOTAL CONTRIBUTIONS (other than loans (add 11 (a), 11 (b), 11 (c) and 11 (d))	5,293.25	5,293.25
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
13	LOANS:		
(a)	Made or Guaranteed by the Candidate	0	0
(b)	All Other Loans	0	0
(c)	TOTAL LOANS (add 13 (a) and 13 (b))	0	0
14	OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
15	OTHER RECEIPTS (Dividends, Interest, etc.)		
16	TOTAL RECEIPTS (add 11 (a), 12, 13 (a), 14 and 15)	5,293.25	5,293.25
II. DISBURSEMENTS			
17	OPERATING EXPENDITURES	4,706.13	4,706.13
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
19	LOAN REPAYMENTS:		
(a)	Of Loans Made or Guaranteed by the Candidate		
(b)	Of All Other Loans		
(c)	TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))		
20	CONTRIBUTION REFUNDS:		
(a)	Individuals/Persons Other Than Political Committees		
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		
21	OTHER DISBURSEMENTS		
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (a), 20 (d) and 21)	4,706.13	4,706.13
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	5,293.25
25	SUBTOTAL (add Line 23 and Line 24)	\$	5,293.25
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	4,706.13
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	587.12

0
 6
 2
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 0
 4
 5
 8

22

SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)

COMMITTEE TO ELECT ED VALLEN

8602040027

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
F. PATRICK CHAMBERAS 223 S. LYNWOOD ST. BRIGHTON BEACH, FL 33445	MERRILL LYNN MAYN	7/27/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
KENNETH R. FITCH BOX 848 MONTANA, CA 92355	Retired	7/27/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
AMERICAN INDEPENDENT PARTY CALIFORNIA STATE CENTRAL BOM. 1089 W. MARSHALL BLVD SAN BERNARDINO, CA 92405		8/1/86 8/26/86 9/5/86 9/28/86	100.00 307.31 200.00 995.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 1,222.31			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
CLARK'S NUTRITIONAL CENTER 1230 NO. E ST SAN BERNARDINO, CA 92405	BANKER	8/10/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
MARTIN A. PRICE 1432 LANAI CIRCLE HUNTINGTON BEACH CA 92606	Retired	9/28/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
SURDON RISHA 105 1/2 NO. 1ST AVE WINTERSSET, BOWA 30273	Retired	11/2/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (in Period)
JAN J. GULLAS 778 THELGER ST. MIRAGE, CA 93444	Retired	9/28/86	100.00
Receipt For: <input type="checkbox"/> Other (specify): <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
Aggregate Year-to-Date \$ 100.00			

TOTAL of Receipts This Page (optional)

TOTAL This Period (copy page this line to page 2)

23

SCHEDULE A

INDIVIDUAL RECEIPTS

OF
PAGE NUMBER

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

NAME OF COMMITTEE IN FULL

COMMITTEE TO ELECT ED VALLEN

86020450028

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
CHARLES W. WININGER 3223 N. ACACIA AVE #5 SAN BERNARDINO, CA 92405	Retired	10/2/86	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

24

SUBTOTAL: # Receipts This Page (optional)

TOTAL This Period (with page, No. 1 and 2, only)

RECEIVED
SECRETARY OF THE SENATE
ESB NOV -6 AM 10 25
HAND DELIVERED

November 3, 1967

I spoke with three different this A.M. in regards to the report that I filed, and was told by one that everything was fine, by a second that no report had been received, and by a third that she would check it out and get back to me, which she did not. Therefore, I am sending copies of the report I filed, along with a list of contributors (in kind) that I received this weekend. Please be aware that the enclosed list are the names of the contributors along with the amounts, but I or the committee did not receive the checks. Therefore, I was told by one of the people at the Commission in Washington to list them as contributions "in kind".

I have told everyone I spoke with that I want to comply with all rules and regulations, but I need to be advised as to anything I need to do that I am not doing.

Thank you very much.

Sincerely,

Audrey M. Barbour

Audrey M. Barbour
Committee to Elect Ed Vallen to Senate
Treasurer

25

86020450016

8602045 12

Maury M. White, Pres.
Committee to Elect Sen. Valley to Senate

CONTRIBUTIONS "IN KIND" -- RECEIVED BY ME OCT. 31 1988

DAVID HULTQUIST
22208 TIoga PLACE
CANOGA PARK, CA. 91304

INDEPENDENT DEVELOPER
\$4,000.00

JERRY HANRAHAN
24683 PIUMA ROAD
MALIBU, CA. 90265

OWNER - ELECTRICAL
CONTRACTING CO.
\$4,000.00

SAMIR MOBASSALY
P.O. BOX 295
AZUSA, CA. 91702

OWNER - ENGINEERING CO.
\$4,000.00

CLIFTON A. SHERWOOD
17531 GARLAND COURT
CASTRO VALLEY, CA. 94546

SELF-EMPLOYED
\$4,000.00

MAURY M. WHITE
P.O. BOX 9002
CARLSBAD, CA. 92008

PRESIDENT OF PROJECTS
FOR PROPERTY MGMT. DEV.
\$2,000.00

RICHARD M. HOROWITZ
1144 SOUTH BEVERMIL DRIVE
LOS ANGELES, CA. 90035

\$3,000.00

ZVI SPERLING
401 EAST 54TH ST.
LOS ANGELES, CA. 90011

\$4,000.00

RENEE LYNG BORG
15751 REGAL WOODS PLACE
SHERMAN OAKS, CA. 91403

\$4,000.00

JACOB SPERLING
4247 HOLLY KNOLL DRIVE
LOS ANGELES, CA. 90027

\$4,000.00

DAVID S. WEISMAN
14001 VENTURA BLVD.
SHERMAN OAKS, CA. 91423-3558

\$2,000.00

SHIFRA WEISMAN
270 NO. CANON DRIVE, NO. 1303
BEVERLY HILLS, CA. 90210

\$1,500.00

86020450017

26

Andrey M. Barboor, Pres.
Committee to Elect and Reelect to Senate

CONTRIBUTIONS "IN KIND" -- RECEIVED BY ME NOV. 1, 1986

MICHAEL JAY BERGER
927 NO KINGS ROAD #216
WEST HOLLYWOOD, CA. 90069 \$2,000.00

GEORGE ROMAN KORZ
8787 SHOREHAM DRIVE
LOS ANGELES, CA. 90069 \$2,000.00

MARCEL M. VALDES
5348 VENTURA CANYON
VAN NUYS, CA. 91401 \$2,000.00

JAMES R. WHITE
P.O. BOX 10334
BEVERLY HILLS, CA. 90213 \$2,000.00

RITJ SANCHEZ
1255 NO. KINGS ROAD #104
LOS ANGELES, CA. 90048 \$2,000.00

JOSEPH V. NASH
449 SO. BEVERLY DRIVE
BEVERLY HILLS, CA. 90212 CERTIFIED PUBLIC ACCT.
\$2,000.00

ALAN J. SETLIN, C.L.U.
449 SO. BEVERLY DRIVE
BEVERLY HILLS, CA. 90212 \$2,000.00

MICHAEL DANIEL
BOX 1082
PEPPERDINE UNIVERSITY
MALIBU, CA. 90265 \$2,000.00

LESLIE A. LINDENBLATT
11147 ACAMA STREET
STUDIO CITY, CA. 91602 \$2,000.00

MARY E. SIEBUHR
2002 KERWOOD AVENUE
LOS ANGELES, CA. 91502 \$2,000.00

A. BRUCE ADAMS
17003 VENTURA BLVD
LA TINA, CA. 91416 \$2,000.00

28

86020450019

WACHMAN SHATZ
320 NO. FORMOSA AVENUE
LOS ANGELES, CA. 90036

\$4,000.00

ROBERT H. FRANK
10615 ROSE AVENUE #101
LOS ANGELES, CA. 90034

\$2,000.00

MARK COHEN
608 NO. ARDEN DRIVE
BEVERLY HILLS, CA. 90210

\$2,000.00

JUDY S. ALTMAN
MICHAEL B. ALTMAN
3585 ALANA DRIVE
SHERMAN OAKS, CA. 91403

\$4,000.00

Total 34,000.00

Audrey M. Garbauer

86020450020

(29)

Andrey Barbour, Treasurer
Committee to Elect Ed Vallen to Senate

RECEIVED
NOV 10 AM 9 00
HAND DELIVERED

THE FOLLOWING LIST IS "IN KIND" CONTRIBUTORS RECEIVED BY ME
ON NOVEMBER 4, 1986:

KELLY W. BIXBY 449 SOUTH BEVERLY DR. BEVERLY HILLS, CA. 90212	LAWYER \$2,000.00
CALVIN T. CROME 5926 WRIGHTCREST DR. CULVER CITY, CA. 90230	\$2,000.00
TODD SILVER 216 NORTH FOOTHILL ROAD BEVERLY HILLS, CA. 90210	\$2,000.00
JOEY PENTO 15442 MULHOLLAND DR. BEL AIR, CA. 90077	\$2,000.00
DANIEL NASH 449 SO. BEVERLY DR. BEVERLY HILLS, CA. 90212	\$2,000.00
DATI C. BRIDGES No address given.	\$2,000.00
DAVID ZELON 230 PACIFIC ST. SANTA MONICA, CA. 90405	\$2,000.00
MARC A. MASSIORECK 1647 OCEANFRONT WALK #6 SANTA MONICA, CA. 90401	\$2,000.00
JANAE E. DEDRICK 150 SO. MICHIGAN AVE. #1C2 PASADENA, CA. 91106	\$2,000.00
HELENE MERRIS SIMMS 10613 ROSE AVE. LOS ANGELES, CA. 90034	\$2,000.00

30

86020450291

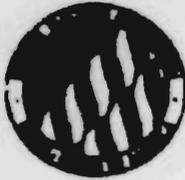
3602045

SLOANIA RAMIREZ
2201 ALABAMA ST #2
HUNTINGTON BEACH, CA. 92647 \$2,000.00

MILTON ZARACHOFF
10445 WILSHIRE BLVD.
LOS ANGELES, CA. 90024 \$2,000.00

8602040292

31



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

19-

December 17, 1986

Audrey M. Harbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, Ca 92376

Identification Number: C00212134

Reference: 30 Day Post-General Report (10/16/86-11/24/86)

Dear Ms. Harbour:

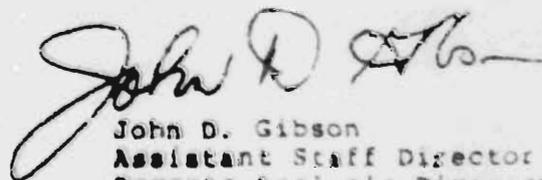
It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact me prepaid on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-5

DEC 24 1986

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
to Senate
123 Palm
Rialto, CA 92376

Identification Number: C00212134

Reference: 12 Day Pre-General Report (inception-10/15/86)

Dear Ms. Barbour:

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

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(s) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

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Any amendment or clarification should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510. If you need assistance, please to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

93043313772

13

34

SECRET

February 3, 1987

37 FEB 5 9 21

1987 Feb

HANDLING
Pat Sheppard, Sr. Reports Analyst
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C., 20463

RE: I.D. 000312134
R&F: 12-Day Pre-General Report (inception-10/15/86)

Dear Sirs:

On December 24, 1986, you wrote to:

Ms. Audrey M. Barbour, Treas.
Comm. to Elect Ed Vallen to U.S. Senate
123 Palm Street
Rialto, CA 92376

and requested further information from her - most specifically instructing her to follow certain procedures in order to bring candidate Vallen's financial reporting up-to-date and in line with FEC requirements concerning receipts of excessive amounts of campaign contributions.

If you have had any response from that letter - any further reporting, correspondence or other form of communication from Mr. Vallen or his associates, would you be so kind as to furnish me copies of that material, or otherwise apprise me of what action he is, or you are taking to comply with your requirements?

This information is needed for the files of the below listed duly elected political committees operating in the state of CA, and I make the request in the names of both committees. The writer of this letter is Treasurer of both committees.

I do have on hand copies of everything Mr. Vallen filed up to your December 24th letter. What I need now is what he has filed since the beginning of this year. Thank you.

Very truly yours,

Winifred S. Laymon

Mrs. Winifred S. Laymon, Treasurer
CA State Central Comm., AMERICAN INDEPENDENT PARTY

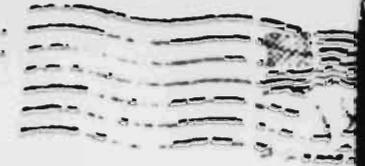
Chairman-Treasurer
San Bernardino County Central Committee
AMERICAN INDEPENDENT PARTY

1094 W. Marshall Blvd.
San Bernardino, CA 92408
(714) 992-5939

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Mrs. Leo L. Layman
1544 West Marshall Blvd.
Berkeley, CA 94705



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Pat Sheppard, Senior Reports Analyst
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

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(37)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RC

February 25, 1987

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, CA 92376

Identification Number: C00212134

Reference: Year End Report (through 12/31/86)

Dear Ms. Barbour:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

38

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

RO-7

AUG 21 1987

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, CA 92376

Identification Number: C00212134

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Ms. Barbour:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530. Our number is (202) 376-2480.

Sincerely,

for John D. Gibson
Assistant Staff Director
Reports Analysis Division

39



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-7

February 22, 1988

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, CA 92376

Notification Number: C00202134

Reference: Year End Report (Through 12/31/87)

Dear Ms. Barbour:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

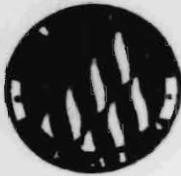
If you have any questions regarding this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

BQ-7

August 10, 1980

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, CA 92376

Identification Number: C00212134

Reference: Mid-Year Report (1/1/80-6/30/80)

Dear Ms. Barbour:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Paul Shepard on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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POLITICAL RESOURCE DIRECTORY

**National Edition
1988-1989**

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POLITICAL RESOURCE DIRECTORIES
A Division of Carol Hess Associates, Inc.

Editor/Publisher

P.O. Box 363

Rye, New York 10580

Attachment 4

(43)

PM CONSULTING CORPORATION
202 E Street, NE
Washington, DC. 20002
202-544-2120

GEOGRAPHIC REGION: National.
SPECIALIZATION: Fundraising Consultant, Direct Mail. SERVICES OFFERED: National fundraising consultant. Clients include: presidential, senatorial level campaigns. National PACs. Republicans only. POLITICS: 60% or less. PRINCIPALS: Bradley O'Leary, Pres.

POLITECH I - SD ASSOCIATES
1021-418 Asylum Avenue
Hartford, CT. 06105
203-278-3434

GEOGRAPHIC REGION: National.
SPECIALIZATION: Computer Svcs/ Software. SERVICES OFFERED: POLITECH software system: fundraising, campaign organization, media relations, vote contact. Comprehensive seven module system--\$950.00. POLITICS: 100% PRINCIPALS: Steven R. Doan,

GEOGRAPHIC REGION: National.
SPECIALIZATION: Newsletter. SERVICES OFFERED: Bi-weekly newsletter dealing with the analysis of events and trends. Subject matter focuses on: campaigns, policy, personalities and polls. POLITICS: 100% PRINCIPALS: Joseph Scott, Editor

POLITICAL CAMPAIGN INSTITUTE
205 Penn Ave, SE
Washington, DC. 20003
800-243-4401

GEOGRAPHIC REGION: National.
SPECIALIZATION: Study Program/Franchise. SERVICES OFFERED: Political consulting franchises to assist in building a political consulting business. POLITICS: 100% PRINCIPALS: John Aristotle Phillips, Director

POLITICAL CAMPAIGN MANAGEMENT SOFTWARE
P.O. Box 10616
Alexandria, VA. 22310
703-960-4454

GEOGRAPHIC REGION: National.
SPECIALIZATION: Computer Software. SERVICES OFFERED: Computer campaign software: covers major areas of campaign activity and needs. Any DOS personal computer system (IBM compatible). Powerful and easy to use with support documentation. \$300.00. See our ad for additional information. POLITICS: 100% PRINCIPALS: S.J. Guzzetta, Frank Flucke.

2 **PMMI INC.**
Drawer 567, Cnty Rd. 375
Old Ocean, TX. 77463
409-647-4421

POLITICAL ADVERTISING & CONSULTING
7056 Ramsgate Avenue
Los Angeles, CA. 90045
213-649-5916

GEOGRAPHIC REGION: National.
SPECIALIZATION: Full Campaign Services, Media Production, Media Placement. SERVICES OFFERED: Full campaign services. POLITICS: 100% PRINCIPALS: Mark Barnes, Pres.

POLITICAL AMERICANA
One Oak Plaza-Suite 301A
Asheville, NC. 28801
800-825-9000

GEOGRAPHIC REGION: National.
SPECIALIZATION: I.D. Promotion/Paraphernalia. SERVICES OFFERED: Designer and manufacturer of print packages: including brochures, posters, buttons, tabloids, etc. Overnight service. POLITICS: 100% PRINCIPALS: James D. Warlick, Pres.

THE POLITICAL ANIMAL
9920 La Cienega Blvd
Suite 517
Inglewood, CA. 90301
213-649-4400

3 GEOGRAPHIC REGION: Regional (Tx, Gulf Coast).
— SPECIALIZATION: I.D. Promotion/silk screen. SERVICES OFFERED: Full service printer & screen printer: signs, decals, bumper stickers. POLITICS: 10% or less. PRINCIPALS: Jamie Travis, Sales Mgr.

5 **POLICY CONCEPTS**
3 130 Adelaide St. W #3010
9 Toronto, Canada, . M5H3V4
416-366-4803

BRANCHES: Rochester, NY.
GEOGRAPHIC REGION: Nat'l/Int'l (Can, Ntheast). SPECIALIZATION: General Consultant, Polling Consultant, Candidate Training. SERVICES OFFERED: Survey research; strategic planning; government relations (lobbying); issues management. Offices: in Rochester, NY. Affiliation with "The Eisenhower Group", 918 16th St., NW #401, Washington, DC 20006. 202-223-5790. POLITICS: 100% PRINCIPALS: Peter Regenstreif Pres. George Boddington, VP Errick Willis, VP.

44



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: OCTOBER 6, 1988

SUBJECT: OBJECTION TO INTERNALLY GENERATED MATTER PURSUANT TO
DIRECTIVE 6 MICHAEL GOLAND AND THE COMMITTEE TO ELECT
ED VALLEN TO SENATE.

MEMORANDUM DATED OCTOBER 4, 1988
The above-captioned document was circulated to the
Commission on Tuesday, October 4, 1988 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	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for October 12, 1988.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR
2727)

In the Matter of)
Internally Generated Matter Pursuant)
to Directive 6 -- Michael Goland and)
the Committee to Elect Ed Vallen to)
Senate)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 12, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to the General Counsel's October 4, 1988 report on the above-captioned matter:

1. Open a Matter Under Review.
2. Refer this matter to the Office of the General Counsel.

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

Attest:

Oct. 13, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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U.S. Department of Justice

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7/10/88 2727

Washington, D.C. 20530

DEC 19 1988

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Noble:

Re: Indictment of Michael R. Goland, et al.

Pursuant to Paragraph Number 4 of the Memorandum of Understanding between the Federal Election Commission and the Criminal Division, this is to notify the Commission that on Wednesday, December 14, 1988, a federal grand jury in the Central District of California (Los Angeles) returned an indictment charging California businessman Michael R. Goland and three others with conspiracy to defraud the Commission in the administration and enforcement of the Federal Election Campaign Act (FECA) (18 U.S.C. § 371), with causing fraudulent campaign financing reports to be submitted to the Commission (18 U.S.C. § 371), with causing fraudulent campaign financing reports to be submitted to the Commission (18 U.S.C. § 1001), and with violating the FECA's prohibitions on excessive and conduit contributions (2 U.S.C. §§ 441a and 441f respectively). Charged with Mr. Goland were Lyle R. Weisman, Sandor E. Habalow and Michael B. Altman.

A copy of the Indictment returned by the grand jury is enclosed herewith.

This criminal case is the result of an extensive criminal investigation conducted by the Federal Bureau of Investigation and the United States Attorney for the Central District of California into a scheme to disguise a \$120,000 contribution which Mr. Goland made in the closing days of the 1986 California Senatorial campaign to benefit Edward Vallen, the candidate of the American Party.

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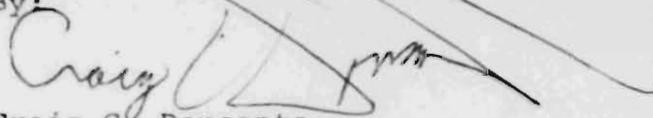
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FEDERAL ELECTION COMMISSION

This investigation is continuing, and we shall keep the Commission informed as future events warrant.

Sincerely,

Gerald E. McDowell
Chief, Public Integrity Section
Criminal Division

By:



Craig C. Donsanto
Director, Election Crimes Branch
Public Integrity Section
Criminal Division

Enclosure

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STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

June 1988 Grand Jury

10	UNITED STATES OF AMERICA,)	NO. CR-88-
)	
11	Plaintiff,)	<u>I N D I C T M E N T</u>
)	
12	v.)	[18 U.S.C. § 371: Conspiracy;
)	18 U.S.C. § 1001: False
13	MICHAEL R. GOLAND,)	Statements to a Government
	LYLE R. WEISMAN,)	Agency; 18 U.S.C. § 2(b):
14	SANDOR E. HABALOW,)	Causing an Act to be Done;
	MICHAEL B. ALTMAN,)	2 U.S.C. § 441a(a)(1)(A):
15)	Making Excessive Contributions
	Defendants.)	to a Federal Candidate;
16)	2 U.S.C. §§ 441f, 437g(d):
)	Making a Campaign Contribution
17)	in the Name of Another.]

18
19 The Grand Jury charges:

20 GENERAL ALLEGATIONS

21 A. INTRODUCTION

22 At all times material to each count of this indictment:

23 1. In November, 1986 an election was held in the State of
24 California to elect a United States Senator. The candidates for
25 this federal office included, among others, Senator Alan
26 Cranston, a Democrat, Rep. Ed Zschau, a Republican, and Ed
27 Vallen, for the American Independent Party.

28 ~~CONFIDENTIAL~~

23 2. Balboa Construction Company, Inc. ("Balboa Con-
24 was and is a corporation organized under the laws of the
25 State of California.

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1 3. MICHAEL R. GOLAND, defendant herein, was and is the
2 President and controlling shareholder of Balboa Construction.

3 4. LYLE R. WEISMAN, defendant herein, was a business
4 associate of defendant GOLAND and is a former employee of Balboa
5 Construction.

6 5. SANDOR E. HABALOW, defendant herein, was a business
7 associate of defendant GOLAND and is employed by Wilshire Savings
8 and Loan Association.

9 6. MICHAEL B. ALTMAN, defendant herein, was and is an
10 associate of defendant GOLAND.

11 7. The Committee to Elect Ed Vallen to U.S. Senate (the
12 "Vallen Campaign Committee") was a political committee which
13 supported the candidacy of Edward Vallen for nomination and
14 election to the office of U.S. Senator for California in 1986, and
15 as such was subject to the reporting provisions and the campaign
16 financing prohibitions of the Federal Election Campaign Act (the
17 "Act"), more fully described in paragraphs 8 through 12 below.

18 8. The Act, in particular Title 2, United States Code,
19 Section 434, requires each political committee that financially
20 supports a candidate for federal office to file periodic reports
21 with the Federal Election Commission, which reports should
22 accurately reflect the identities of all individuals and entities
23 who contributed in excess of \$200.00 to each such political
24 committee in any calendar year.

Attachment 1 (2)

1 9. The Act, in particular 2 U.S.C. § 441a(a),
2 renders illegal contributions to any federal
3 individual that exceed \$1,000 in connection with any
4 election (primary or general election). For the purpose of this
5 limitation on campaign contributions, the Act, in particular 2
6 U.S.C. §§ 441a(a)(7) and 441a(a)(8), provides that any and all
7 payments made by an individual to third parties, if made in
8 consultation and coordination with agents of a candidate for
9 federal office or his campaign committee, or on behalf of a
10 campaign committee or candidate, shall be treated as
11 contributions to that campaign committee and reported as such.

12 10. The Act, in particular 2 U.S.C. § 441(b), prohibits con-
13 tributions and expenditures from corporations made in connection
14 with the nomination or election of candidates to federal office.

15 11. The Act, in particular 2 U.S.C. § 441f, prohibits
16 contributions to the campaigns of federal candidates made in the
17 names of individuals other than the person actually making the
18 contribution.

19 12. The Federal Election Commission ("FEC") was and is the
20 agency of the United States Government entrusted with
21 responsibility for enforcement of the reporting requirements of
22 the Act and for detection, investigation and institution of
23 enforcement action against violations of the Act, including the
24 provisions referred to in paragraphs 8 through 11 above. In
25 addition, the FEC is responsible for making available to the
26 public specific information about the amounts and sources of
27 contributions to political committees supporting a candidate for
28 federal office.

COUNT ONE

[18 U.S.C. § 371]

B. OBJECTS OF THE CONSPIRACY

13. Beginning at a time unknown to the Grand Jury, but approximately on or about July 1, 1986 and continuing thereafter to on or about January 12, 1987, in Los Angeles County, within the Central District of California, and elsewhere, defendants MICHAEL R. GOLAND, LYLE R. WEISMAN and SANDOR E. HABALOW, unindicted co-conspirator Michael B. Altman, and others both known and unknown to the grand jury, combined, agreed and conspired together to commit the following crimes against the United States: (1) to defraud the United States, and in particular the FEC, by impairing, impeding and defeating its lawful function and duties under the Act, in violation of Title 18, United States Code, Section 371; and (2) to knowingly and willfully make, and cause others to make, false statements to the FEC, in violation of Title 18, United States Code, Section 1001.

14. It was the plan and purpose of the conspiracy to intentionally obstruct, impair and impede the FEC in the lawful discharge of its statutory duties, namely:

- a. The duty imposed on the FEC by the Act to make available to the public accurate information concerning the identities of contributors to federal campaigns, and the dates and amounts of such contributions; and
- b. The duty imposed on the FEC by the Act to detect violations of the limitations on excessive campaign contributions and to seek civil and administrative

Attachment (4)

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1 — sanctions against individuals who made illegal
2 contributions in violation of these limits.

3 15. It was the ultimate objective of the conspiracy to
4 permit defendant Michael R. Goland to make an illegal
5 contribution to The Committee to Elect Ed Vallen to U.S. Senate
6 in the amount of \$120,000 without detection by the FEC or by the
7 public, to permit this illegal contribution to be received and
8 accepted by the Vallen Campaign Committee, to which it was made,
9 without detection by the FEC or by the public, and to cause the
10 Treasurer of the Vallen Campaign Committee to mislead the FEC by
11 filing with the FEC a list of false and fictitious "contributors"
12 to the Vallen Campaign in lieu of disclosing the unlawful,
13 excessive contribution made by defendant MICHAEL R. GOLAND.

14 C. MEANS OF THE CONSPIRACY

15 The events underlying and the means and methods used to
16 accomplish this conspiracy were as follows:

17 16. In June, 1986, defendant GOLAND hired Colleen Morrow,
18 then based in Washington, D.C., to work for Balboa Construction
19 and to run a \$250,000 campaign against the efforts of Republican
20 Ed Zschau to get elected to the United States Senate from
21 California.

22 17. In September, 1986, Morrow made at least two trips to
23 California at the request of GOLAND, in order to work on the
24 campaign against candidate Zschau. In October, 1986 defendant
25 GOLAND and Morrow decided to publicly promote the candidacy of
26 American Independent Party candidate Ed Vallen, in an effort to
27 assist the incumbent, Senator Alan Cranston, a Democrat, by
28 diverting votes from his Republican challenger, Ed Zschau.

1 Moscow was assigned the task by GOLAND of arranging with The
2 Committee to Elect Ed Vallen to U.S. Senate to produce \$120,000
3 worth of television commercials promoting Vallen's candidacy and
4 attacking Zschau's candidacy.

5 18. On October 27, 1986, GOLAND caused \$120,000 to be
6 delivered to Greenstripe Media, Inc. ("Greenstripe Media"), for
7 purposes of producing a political television advertisement
8 featuring and promoting the candidacy of Ed Vallen. GOLAND
9 advanced \$90,000 through personal funds held for that purpose by
10 unindicted co-conspirator Michael B. Altman, and sent the
11 remaining \$30,000 to Greenstripe in funds drawn on an account of
12 Balboa Construction.

13 19. In order to avoid having to report the advance as a
14 contribution from Goland to the Vallen Campaign Committee to the
15 FEC, GOLAND, HABALOW and WEISMAN then asked various persons known
16 to the Grand Jury to make political contributions to the Vallen
17 Campaign with the express understanding that said persons
18 (hereafter referred to as "conduits") would be reimbursed for
19 their "contributions".

20 20. Between October 31, 1986 and December 20, 1986,
21 approximately fifty-six conduits were contacted, directly or
22 indirectly, and induced by defendants GOLAND, HABALOW, and
23 WEISMAN, and those working at their request and direction, to
24 make political contributions to the Vallen Campaign. The
25 conduits wrote personal and/or business checks payable to
26 Greenstripe Media, and such checks were ultimately collected and
27 delivered to Greenstripe Media on the instructions of defendant
28 GOLAND.

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21. After the conduits wrote the contribution checks, they were reimbursed in full, as promised, by funds held or controlled by defendant GOLAND.

22. It was part of the conspiracy that the defendants MICHAEL R. GOLAND, SANDOR E. HABALOW and LYLE R. WEISMAN, would and did cause illegal contributions made by GOLAND to the Vallen Campaign to appear to have been made lawfully by the conduits in whose names the "contributions" were given.

23. It was a further part of the conspiracy that the list of names of the conduits would then be provided to the Treasurer of the Vallen Campaign, who would report them to the FEC as individual, lawful contributions, instead of the unlawful \$120,000 contribution made by defendant GOLAND to the Vallen Campaign Committee.

D. OVERT ACTS

24. In furtherance of the conspiracy, and to accomplish its objectives, the defendants MICHAEL R. GOLAND, SANDOR E. HABALOW, and LYLE R. WEISMAN and unindicted co-conspirator Michael B. Altman, committed various overt acts in the Central District of California, and elsewhere, among which were the following:

- a. On or about July 9, 1986, defendant MICHAEL R. GOLAND provided Michael B. Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co., with the instructions that Altman should deposit the check and hold the funds for future disbursement at Goland's direction.

- 1 b. In or about mid-October, 1986, defendant MICHAEL R.
2 GOLAND directed Colleen Morrow, then an employee of
3 Balboa Construction, to arrange for the production and
4 airing of a television commercial featuring candidate Ed
5 Vallen and attacking Representative Ed Zschau.
- 6 c. In or about mid-October, 1986, MICHAEL R. GOLAND wrote
7 the script for the television advertisement featuring
8 candidate Ed Vallen.
- 9 d. In or about mid-October, 1986, Colleen Morrow met with
10 defendant MICHAEL R. GOLAND and informed him that to
11 produce the commercials for Vallen, it was necessary to
12 provide \$120,000 in cash or cashier's checks for payment
13 to Greenstripe Media, the company producing and airing
14 the commercials.
- 15 e. On October 27, 1986, MICHAEL R. GOLAND contacted Michael
16 B. Altman by telephone and directed him to write a check
17 to Greenstripe Media, Inc. in the amount of \$90,000 from
18 funds GOLAND had previously provided.
- 19 f. On October 27, 1986, MICHAEL R. GOLAND caused a
20 corporate check of Balboa Construction to be issued,
21 payable to Greenstripe Media, Inc. in the amount of
22 \$30,000.
- 23 g. On October 27, 1986, MICHAEL R. GOLAND caused \$120,000,
24 in the form of two cashier's checks, neither of which
25 revealed the identity of the true donor, to be delivered
26 to Greenstripe Media in payment of the advertising
27 campaign for Ed Vallen.
- 28

Attachment 1(8)

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- h. On or about October 28, 1986, MICHAEL R. GOLAND had a conversation with Colleen Morrow in which GOLAND was advised that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen Campaign Committee. GOLAND told Morrow that he was working on raising individual contributors who would refund the money he had advanced to pay for the ads.
- i. On or about October 28, 1986, defendant SANDOR E. HABALOW approached a Los Angeles certified public accountant and requested his assistance in soliciting a large number of individual "contributors" to the campaign of Ed Vallen. HABALOW explained that such individuals would be reimbursed for their checks by defendant GOLAND.
- j. On or about October 30, 1986, defendant LYLE R. WEISMAN contacted the following conduits and obtained "contributions" to the Vallen Campaign Committee from them, for which he provided reimbursement: Mike Berger (\$2,000), Jules and Renee Burg (\$4,000), Richard and Beverly Horowitz (\$3,000), Jacob and Shelly Sperling (\$4,000), Zvi and Miki Sperling (\$4,000) and David Weisman (\$2,000).
- k. On or about October 31, 1986, defendant LYLE R. WEISMAN, contacted the following conduits and obtained "contributions" to the Vallen Campaign Committee from them for which he provided reimbursement: Mark Cohen (\$2,000) and George Korz (\$2,000).

- 1 1. On or about November 1, 1986, defendant SANDOR E.
2 HABALOW asked Michael Katz to make a political
3 contribution by writing a check to Greenstripe Media in
4 the amount of \$2,000. HABALOW then provided Katz with a
5 check in the amount of \$2,000, drawn at the account of a
6 Los Angeles public accounting firm, as compensation for
7 writing the check.
- 8 m. On or about November 1, 1986, defendant LYLE R. WEISMAN
9 met with Colleen Morrow at his office located on
10 Wilshire Blvd., Los Angeles, and accepted from Morrow an
11 envelope containing approximately \$5,000 to \$10,000 in
12 cash. WEISMAN handed back to Morrow a stack of
13 approximately ten personal checks in amounts of \$1,000,
14 \$2,000 and \$4,000, all payable to Greenstripe Media.
- 15 n. On or about November 1, 1986, defendant LYLE R. WEISMAN
16 handed \$4,000 in cash to Colleen Morrow and instructed
17 her to deliver the cash to a residence in Los Angeles
18 and to collect a \$4,000 check from the person in such
19 residence, payable to Greenstripe Media.
- 20 o. On or about November 4, 1986, the Treasurer of The
21 Committee to Elect Ed Vallen to U.S. Senate filed a
22 report of campaign contributions with the FEC, which
23 report falsely attributed \$74,000 in campaign
24 contributions made by defendant MICHAEL R. GOLAND as
25 having been made by other individuals.

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Attachment (1/19)

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- p. On or about November 10, 1986, the Treasurer of The Committee to Elect Ed Vallen to U.S. Senate filed a report of campaign contributions with the FEC, which report falsely attributed \$24,000 in campaign contributions made by defendant MICHAEL R. GOLAND as having been made by other individuals.
- q. On or about November 14, 1986, defendant SANDOR E. HABALOW asked Monte Morrow to make a political contribution by writing a check to Greenstripe Media, on behalf of defendant MICHAEL R. GOLAND, in the amount of \$2,000. HABALOW then provided Morrow with a check in the amount of \$2,000, drawn on the account of a Los Angeles public accountancy firm, as compensation for writing the check.
- r. On or about November 24, 1986, defendant MICHAEL R. GOLAND caused Balboa Construction to wire transfer \$6,000 to the account of Collen Morrow, Washington, D.C., in exchange for additional contributions to the campaign of Ed Vallen, to be made payable to Greenstripe Media.
- s. On or about November 18, 1986, unindicted co-conspirator Michael B. Altman received a check from Greenstripe Media, Inc., in the amount of \$104,000, which he promptly remitted to defendant GOLAND's company, Balboa Construction.

Attachment 1 (11)

t. On or about January 12, 1987, unindicted co-conspirator Michael B. Altman received a check from Greenstripe Media, Inc., in the amount of \$16,000, which he promptly remitted to defendant GOLAND's company, Balboa Construction.

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Attachment 1 (12)

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COUNT TWO

[18 U.S.C. § 1001; 2(b)]

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3 25. The Grand Jury realleges and incorporates by reference
4 herein the allegations made in paragraphs 1 through 24 of this
5 Indictment, and further alleges as follows:

6 26. On or about November 4, 1986, in Los Angeles County,
7 within the Central District of California, defendants MICHAEL R.
8 GOLAND, SANDOR E. HABALOW and LYLE R. WEISMAN knowingly and
9 willfully caused the Treasurer for The Committee to Elect Ed
10 Vallen to U.S. Senate to make false and fictitious statements and
11 representations to the Federal Election Commission concerning
12 matters within the jurisdiction of the Federal Election
13 Commission; to wit, that an illegal contribution of approximately
14 \$120,000 which defendant MICHAEL R. GOLAND made and caused to be
15 made to The Committee to Elect Ed Vallen to U.S. Senate, in
16 violation of the contribution limitations imposed by the Federal
17 Election Campaign Act and specifically Title 2, United States
18 Code, § 441a(a)(1)(A), had been made in part in lawful amounts by
19 the following individuals: David Hultquist, Jerry Hanrahan,
20 Samir Mobassaly, Clifton A. Sherwood, Maury M. White, Richard M.
21 Horowitz, Zvi Sperling, Renee Lang Burg, Jacob Sperling, David S.
22 Weisman, Shifra Weisman, Robert Ives, Michael Jay Berger, George
23 Roman Korz, Marcel M. Valdes, James R. White, Ruth Sanchez,
24 Joseph V. Nash, Alan J. Setlin, Michael Daniel, Leslie A.
25 Lindenblatt, Mary E. Siebuhr, A. Bruce Adams, Nachman Shatz,
26 Robert H. Frank, Mark Cohen, Judy S. Altman and Michael B.
27 Altman, in violation of Sections 1001 and 2(b) of Title 18,
28 United States Code.

Attachment (13)

COUNT THREE

[18 U.S.C. § 1001, 2(b)]

27. The Grand Jury realleges and incorporates by reference herein the allegations made in paragraphs 1 through 24 of this Indictment, and further alleges as follows:

28. On or about November 10, 1986, in Los Angeles County, within the Central District of California, defendants MICHAEL R. GOLAND, SANDOR E. HABALOW and LYLE R. WEISMAN, knowingly and willfully caused the Treasurer for The Committee To Elect Ed Vallen to U.S. Senate to make false, fictitious and fraudulent statements and representations to the Federal Election Commission: to wit, that an illegal contribution of \$120,000 which defendant MICHAEL R. GOLAND made and caused to be made to The Committee To Elect Ed Vallen to U.S. Senate in violation of the contribution limitations imposed by the Federal Election Campaign Act, specifically by Title 2, United States Code, § 441a(a)(1)(A), had been made in part in lawful amounts by the following individuals: Kelly W. Bixby, Calvin T. Crowe, Todd Silver, Joey Pento, Daniel Nash, Patti C. Bridges, David Zelon, Marc A. Missioreck, James E. Dedrick, Helene Merrie Simms, Sloan Ramirez and Milton Zarachoff, in violation of Sections 1001 and 2(b) of Title 18, United States Code.

Attachment 1(14)

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COUNT FOUR

[18 U.S.C. §§ 441a(a)(1)(A); 437g(d)]

29. The Grand Jury realleges and incorporates by reference herein the allegations made in paragraphs 1 through 24 of this Indictment, and further alleges as follows:

30. In or about October, 1986, in Los Angeles County, within the Central District of California, defendant MICHAEL R. GOLAND knowingly and willfully violated the Federal Election Campaign Act by making a contribution in the approximate amount of \$120,000 to The Committee To Elect Ed Vallen to U.S. Senate, in violation of Sections 441a(a)(1)(A) and 437g(d) of Title 2, United States Code.

Attachment 1 (15)

COUNT FIVE

[2 U.S.C. §§ 441f; 437g(d); 18 U.S.C. § 2(a)]

31. The Grand Jury realleges and incorporates by reference herein the allegations made in paragraphs 1 through 24 of this Indictment, and further alleges as follows:

32. In or about October and November 1986, in Los Angeles County, within the Central District of California, defendant MICHAEL R. GOLAND knowingly and willfully violated the Federal Election Campaign Act by making a contribution in the approximate amount of \$120,000 to The Committee To Elect Ed Vallen to U.S. Senate in the names of other persons, to wit: A. Bruce Adams, Michael B. and Judy Altman, Michael Berger, Kelly Bixby, Patsy Bridge, Jules and Renee Burg, Mark Cohen, Calvin and Ernestine Crowe, Mike Daniel, Jane Dedrick, Dick Famiglietti, Bob Frank, Jerry Hanrahan, Susan Herbst, Dick and Beverly Horowitz, David Hultquist, Maurice Hyman, Paula Hyman, Bob and Ann Ives, Mike and Sandy Katz, Tom Kindle, George Korz, Herb and Mollie Krause, Robert Krause, Steven Lee, Leslie Lindenblatt, Marc Missiorech, Samir Mobassaly, Monte Morrow, Daniel Nash, Joe Nash, Joe Noriega, Jeff Pandin, Joey Pento, Sloan Ramirez, Peter Roff, Ruth Sanchez, Alan Setlin, Tova and Nachman Shatz, Clifton Sherwood, Mary Siebuhr, Todd Silver, Helene Simms, Warren Stone, Jacob and Shelly Sperling, Zvi and Miki Sperling, Marcel Valles, Mark Victor, David Weisman, Shifra Weisman, James White, Harry White, Gary Willett, Milt Zarachoff and David Zelon, in violation of Sections 441f and 437g(d) of Title 2, United States Code.

Attachment 1/6

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1 33. At the above time and place, defendants SANDOR E.
2 HABALOW and LYLE R. WEISMAN and MICHAEL B. ALTMAN aided, abetted,
3 counseled, induced and procured the commission of the offense
4 alleged above.

5
6 A TRUE BILL:

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9 Foreperson

10 ROBERT C. BONNER
11 United States Attorney

12 ROBERT L. BROSIO
13 Assistant United States Attorney
14 Chief, Criminal Division

Attachment 1 (17)

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

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR 2727

STAFF MEMBER:

Anthony Buckley

SOURCE: I N T E R N A L L Y G E N E R A T E D
Directive 6

RESPONDENTS: Michael Goland
Balboa Construction, Inc.
Lyle R. Weisman
Sandor E. Habalow
Colleen Morrow
Michael Altman
Committee to Elect Ed Vallen to Senate and
Audrey M. Barbour, as treasurer
Edward Zelon
David Hultquist
Jerry Hanrahan
Samir Mobassaly
Clifton Sherwood
Richard Horowitz
Zvi Sperling
Renee Lang Burg
Jacob Sperling
Nachman Shatz, et al.

RELEVANT STATUTES: 2 U.S.C. § 434(a)(2)(A)(ii)
2 U.S.C. § 434(b)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b
2 U.S.C. § 441f

INTERNAL REPORTS
CHECKED: Public Records

FEDERAL AGENCIES
CHECKED: Department of Justice

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I. GENERATION OF MATTER

On October 12, 1988, the Commission voted 6-0 to open a MUR based upon newspaper articles regarding allegations that Michael Goland funneled over \$100,000 to Edward Vallen's Senate campaign, and upon in-house documents which supported the allegations. Vallen was the American Independent Party candidate in the 1986 Senate race in California.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Background

The September 13, 1988 edition of the Washington Post carried a news account stating that the FBI was investigating Michael Goland for allegedly funneling money through other individuals to the Committee to Elect Ed Vallen to Senate ("the Committee"). The article states that Goland's support of the Vallen campaign was essentially an effort to attract conservative voters away from Ed Zschau in a tight race between Representative Ed Zschau and incumbent Senator Alan Cranston. The article quotes another newspaper account which states that Goland made over \$100,000 of such contributions to the Committee within two weeks of the general election. This article, along with two earlier articles in the Wall Street Journal (June 24, 1987) and Campaigns and Elections (September/October 1987), indicates that the contributions were paid to Mark Barnes, a political consultant and a principal in Political Advertising &

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Consulting,¹ to produce and buy time for a television ad for Vallen. Vallen told reporters that Barnes called him in October 1986 offering \$120,000 in television production services from "conservative Republicans who don't want Zschau." These articles state that Barnes also contacted the Libertarian Party with a similar offer but that party turned him down once he revealed that he was really working for Goland.

The Justice Department recently forwarded a copy of the December 1988 indictment against Michael R. Goland, Lyle R. Weisman, Sandor E. Habalow and Michael Altman.² (Attachment 1). The indictment alleges that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f by making an excessive \$120,000 contribution to the Committee through the use of 65 named conduits.³ In addition, the indictment charges that Goland and two other individuals - Habalow and Weisman - knowingly and willfully caused the treasurer of the Vallen Committee to make false statements to the Commission in

1. The 1988-89 National Edition of the Political Resource Directory lists Mark Barnes as the principal of Political Advertising & Consulting, a Los Angeles political consulting firm.

2. The indictment describes Lyle Weisman as a business associate of Goland and a former employee of Balboa Construction. Sandor Habalow is described as a business associate of Goland and an employee of Wilshire Savings and Loan Association and Michael Altman is also described as an associate of Goland.

3. Although Count 5 of the indictment lists 65 individual conduits, the indictment also contains a statement that Goland, Weisman and Habalow and their agents contacted about 56 conduits between October 31 and December 20, 1986. This discrepancy may be due to fact that 10 of the 65 individuals listed in Count 5 were married couples and may have been counted as one conduit.

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violation of 18 U.S.C. § 1001 when the Committee treasurer reported that the Goland contributions represented lawful contributions from the conduits. These same three defendants are also charged with unlawful conspiracy in connection with the conduit scheme. The grand jury also indicted Michael Altman, as well as Habalow and Weisman for aiding and abetting the commission of the offenses alleged above.⁴

Specifically, the indictment alleges that the conduit scheme came about in the following manner. In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from Washington D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow decided to promote the candidacy of American Independent Party candidate, Ed Vallen, to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials.

4. In January 1989, Altman pled guilty to a misdemeanor count of assisting Goland in making illegal campaign contributions in connection with the 1986 Senate race. According to newspaper articles, Altman has agreed to testify against Goland and the two other men charged in the case. See Attachment 2(1).

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In July 1986, Goland provided Michael Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co. with instructions that Altman deposit the check and hold the funds for disbursement at Goland's direction in the future.⁵ On October 27, 1986, Goland directed Altman to write a \$90,000 check to Greenstripe Media with these funds. Goland also caused a \$30,00 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advanced to pay for the ads. Goland, Habalow and Weisman then contacted approximately 56 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Goland's company, Balboa Construction.

5. There was no indication in the indictment that Bateman, Eichler, Hill, Richards & Co. were connected in any way with Goland's reimbursement scheme. Accordingly, this Office does not make any recommendations at this time regarding Bateman, Eichler, Hill & Co. This Office has, however, included a question about the purpose and the identity of the payee of this check in the proposed questions to Michael Goland. See Attachment 4(5).

There is no mention in the indictment of Mark Barnes, the individual named in the newspapers as the political consultant who produced and aired the Vallen television ad.

A review of the Committee's 48-Hour Contribution Notices indicates that forty of the individuals named in the indictment made a total of \$98,000 in "in-kind" contributions to the Committee between October 31 and November 4, 1986.⁶ These individuals are:

David Hultquist, Jerry Hanrahan, Samir Mobassaly, Clifton Sherwood, Maury White, Richard Horowitz, Zvi Sperling, Renee Lang Burg, Jacob Sperling, David Weisman, Shifra Weisman, Robert Ives, Michael Berger, George Korz, Marcel Valdes, James White, Ruth Sanchez, Joseph Nash, Alan Setlin, Michael Daniel, Leslie Lindenblatt, Mary Siebuhr, A. Bruce Adams, Nachman Shatz, Robert Frank, Mark Cohen, Judy and Michael Altman, Kelly Bixby, Calvin Crowe, Todd Silver, Joey Pento, Daniel Nash, Patti Bridges, David Zelon, Marc Massioreck, Janae Dedrick, Helene Simms, Sloan Ramirez and Milton Zarachoff.

6. Of the individuals listed by the Committee as contributors, one individual was specifically mentioned in the newspaper articles as an individual who may have been reimbursed for his contribution. Edward Zelon told reporters that "an acquaintance" had asked him and a business associate to make out checks to the firm buying television ads for Vallen. He stated that he made a \$2,000 contribution and was reimbursed by this person, whom he refused to name. He did, however, tell reporters that Goland did not reimburse him.

Some of the other individuals listed by the Committee as contributors within two weeks of the election were identified by newspaper articles as connected to Goland in various ways. Judy and Michael Altman, who contributed \$4,000 to the Committee on November 1, 1986, lived in a house owned by Goland. Mr. Altman is also a personal friend of Goland and is the treasurer of Young Americans Political Action Committee, of which Goland is assistant treasurer. The Los Angeles Times claims that two of the other donors worked for companies controlled by Goland.

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According to the indictment these contributions were reimbursed in amounts of \$1,500 to \$4,000. As the Committee did not file a Post-General Election Report or any subsequent reports, this Office is unable to determine from the reports the extent of any further contributions received by the Committee in connection with this election.⁷ However, the indictment lists 25 individuals in addition to those named above who permitted their names to be used as conduits for Goland and who were reimbursed. They are:

Jules Burg, Ernestine Crowe, Dick Famiglietti, Susan Herbst, Beverly Horowitz, Maurice Hyman, Paula Hyman, Ann Ives, Mike and Sandy Katz, Tom Kindle, Herb and Mollie Krause, Robert Krause, Steven Lee, Monte Morrow, Joe Noriega, Jeff Pandin, Peter Roff, Tova Shatz, Warren Simms, Shelly Sperling, Miki Sperling, Mark Victor and Gary Willet.

B. Legal Analysis

1. Relevant Provisions of the Act

The Federal Election Campaign Act of 1971, as amended ("the Act") places a \$1,000 limit on the aggregate contributions which an individual may make to a candidate and his authorized political committees with respect to any election for Federal office, 2 U.S.C. § 441a(a)(1)(A), and places a \$25,000 limit on the aggregate contributions that an individual may make in a calendar year. 2 U.S.C. § 441a(a)(3). The Act also prohibits committees from knowingly accepting contributions in excess of these limitations. 2 U.S.C.

7. We note that although the Committee has not filed a 1986 Post-General Election Report or any subsequent reports, the Committee has not crossed any of the RAD referral thresholds.

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Pursuant to 2 U.S.C. § 441f, individuals are prohibited from making contributions in the name of another person or knowingly permitting their names to be used to effect such contributions. This section also prohibits the knowing acceptance by committees of contributions made by one person in the name of another person. The Commission has further interpreted this provision to cover situations where an individual who neither made a contribution in his own name nor permitted his name to be used to effect a contribution in the name of another actively assists in the making of such contributions. See MURs 1611, 2555, 2575.

Pursuant to 2 U.S.C. § 441b, corporations are prohibited from making contributions and expenditures in connection with federal elections. This provision further prohibits corporate officers from consenting to such contributions and political committees from knowingly receiving such contributions.

The Act also imposes reporting requirements on all political committees. See 2 U.S.C. § 434. Each report submitted to the Commission must include an itemization of each contribution over \$200 received during that reporting period. Pursuant to 2 U.S.C. § 434(a)(2)(A)(ii), principal campaign committees of candidates for the Senate are required to file a Post-General Election Report no later than the 30th day after the general election.

2. Analysis

Because the allegations set forth in the newspaper articles, and supported by reports filed with the Commission

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and by the indictment, indicate that Michael Goland made over one hundred thousand dollars in contributions in the names of others, the Office of the General Counsel recommends that the Commission find reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. § 441f. The Office of the General Counsel further recommends that the Commission find reason to believe that Goland violated 2 U.S.C. § 441a(a)(1)(A) by knowingly and willfully making excessive contributions to the Committee to Elect Ed Vallen to Senate and reason to believe that Goland knowingly and willfully violated 2 U.S.C. § 441a(a)(3) by making aggregate contributions in excess of \$25,000 in 1986.

Information in the indictment indicates that Goland, in his capacity as president of Balboa Construction, Inc., caused the corporation to employ an individual for the specific purpose of running a campaign to defeat Ed Zschau and caused the company to issue a \$30,000 check to pay a portion of the costs of the Vallen ad. Accordingly, this Office recommends that the Commission find reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. § 441b by consenting to the use of corporate funds in connection with a federal election. This Office further recommends that the Commission find reason to believe that Balboa Construction, Inc. violated 2 U.S.C. § 441b by using corporate funds for this purpose.⁸

8. As there is no indication that the Committee to elect Ed Vallen to Senate knew that these funds came from a corporate source, this Office does not make any Section 441b recommendations against the Committee at this time.

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The indictment further indicates that Sandor Habalow and Lyle Weisman solicited individuals for contributions to be reimbursed and arranged for their reimbursement by Goland in knowing contravention of the Act, and that Colleen Morrow actively assisted Goland in funneling reimbursement payments to the individual contributors. Therefore, this Office recommends that the Commission find reason to believe that Sandor Habalow, Lyle Weisman and Colleen Morrow violated 2 U.S.C. § 441f by actively assisting Michael Goland to make contributions in the names of others.

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The Office of the General Counsel further recommends that the Commission find reason to believe that all forty of the "in-kind" contributors listed in the Committee's 48-Hour Contribution Notices and in the indictment, and the additional 25 individuals listed only in the indictment, violated 2 U.S.C. § 441f, and send orders to submit written answers to determine whether they were, in fact, reimbursed for their contributions by Goland or other individuals.⁹ This Office does not presently know the addresses of Dick Famiglietti, Susan Herbst, Maurice Hyman, Paula Hyman, Mike and Sandy Katz, Tom Kindle, Herb and Mollie Krause, Robert Krause, Steven Lee, Monte

9. The Committee's 48-Hour Contribution Notices indicate that nine of these individuals made contributions to the Committee which were more than twice the Act's contribution limits. They are David Hultquist (\$4,000), Jerry Hanrahan (\$4,000), Samir Mobassaly (\$4,000), Clifton Sherwood (\$4,000), Richard Horowitz (\$3,000), Zvi Sperling (\$4,000), Renee Lang Burg (\$4,000), Jacob Sperling (\$4,000) and Nachman Shatz (\$4,000). Because they were made with funds other than the individual's own, no violation of § 441a(a)(1)(A) result.

Morrow, Colleen Morrow, Joe Noriega, Jeff Pandin, Peter Roff, Warren Simms, Shelly Sperling, Mark Victor, Gary Willet, Sandor Habalow, Robert and Ann Ives or Patti Bridges.¹⁰ Therefore, this Office has included questions to Michael Goland, Lyle Weisman, Michael Altman and Greenstripe Media in order to obtain the addresses of these individuals.¹¹

The Committee's reports list Michael Altman as one of the in-kind contributors to the Vallen campaign and the indictment alleges that Altman aided and abetted Goland, Weisman and Habalow in the reimbursement scheme. Therefore, this Office recommends that the Commission find reason to believe that Michael Altman knowingly and willfully violated 2 U.S.C. § 441f both by permitting his name to be used to effect a contribution in the names of others and by assisting Goland and others to make contributions in the names of others.

Whether or not the Committee knew that the above contributions were being reimbursed by Goland, it clearly knew that it was accepting excessive contributions as it reported many "in-kind" contributions of over \$1,000. Therefore, the Office of the General Counsel recommends that the Commission

10. The indictment indicates that Renee Burg "contribution" was assertedly shared with Julia Burg, Richard Horowitz's with Beverly Horowitz, Jacob Sperling's with Shelly Sperling, and Zvi Sperling's with Miki Sperling. If these individuals were in fact reimbursed by Michael Goland, the contributions would be considered his, not theirs. Therefore, no recommendation regarding possible excessive contributions by such individuals is being made at this time.

11. This Office will send notification to the individuals against whom the Commission makes reason to believe findings as soon as we obtain their addresses.

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find reason to believe that the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly receiving excessive contributions.

The Committee's reports also indicate that it received less than \$104,000 in total contributions (\$5,640 reported in Pre-General Report and \$98,000 as in "in-kind" contributions within two weeks of the election). However, the newspapers report, and the indictment indicates, that Vallen received television production services worth \$120,000. Therefore, it appears that the Committee may have failed to report the full value of the television ad. On this basis this Office also recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(b). And, because the Committee failed to file the 1986 Post-General Election Report, this Office further recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(a)(2)(A)(ii).

It appears that Mark Barnes, the political consultant named by the newspaper articles as the individual who produced the Vallen ad, possesses much information relevant to the proposed investigation. Accordingly, the Office of the General Counsel recommends that the Commission approve the attached order to submit written answers and subpoena to produce documents to Mark Barnes as a non-respondent witness. Similarly, as it appears that Greenstripe Media possesses information relevant to this matter, this Office also

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recommends that the Commission approve the attached subpoena and order to Greenstripe Media as a non-respondent witness.

III. DISCOVERY

This Office is recommending that the Commission approve numerous subpoenas for documents and orders for answers to interrogatories. Three of the respondents, Michael Goland, Lyle Weisman and Sandor Habalow, were defendants in a trial which commenced on May 17, 1989, in U.S. District Court in Los Angeles on the charges contained in the indictment discussed above. A mistrial was declared on July 10, 1989, but the Department of Justice has announced that it will retry the defendants. Because of these criminal charges, Michael Goland has invoked his Fifth Amendment rights against self-incrimination in response to discovery requests in MUR 2570 and can be expected to do so again in the present matter. Mr. Weisman and Mr. Habalow will probably follow suit. This Office recommends, however, that the Commission go forward with the proposed discovery at this time. Should respondents refuse to comply with the subpoenas, this Office will consider all circumstances of the matter when making appropriate recommendations as to how to proceed.

IV. RECOMMENDATIONS

1. Find reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441b, 441a(a)(3) and 441f.

2. Find reason to believe that David Hultquist, Jerry Hanrahan, Samir Mobassaly, Clifton Sherwood, Maury White, Richard Horowitz, Zvi Sperling, Renee Lang Burg, Jacob Sperling, David Weisman, Shifra Weisman, Robert Ives, Michael Berger, George Korz, Marcel Valdes, James White, Ruth Sanchez, Joseph Nash, Alan Setlin, Michael Daniel, Leslie Lindenblatt, Mary Siebuhr, A.

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Bruce Adams, Nachman Shatz, Robert Frank, Mark Cohen, Judy and Michael Altman, Kelly Bixby, Calvin Crowe, Todd Silver, Joey Pento, Daniel Nash, Patti Bridges, David Zelon, Marc Massioreck, Janae Dedrick, Helene Simms, Sloan Ramirez, Milton Zarachoff, Jules Burg, Ernestine Crowe, Dick Famiglietti, Susan Herbst, Beverly Horowitz, Maurice Hyman, Paula Hyman, Ann Ives, Mike Katz, Sandy Katz, Tom Kindle, Herb Krause, Mollie Krause, Robert Krause, Steven Lee, Monte Morrow, Joe Noriega, Jeff Pandin, Peter Roff, Tova Shatz, Warren Simms, Shelly Sperling, Miki Sperling, Mark Victor and Gary Willet violated 2 U.S.C. § 441f.

3. Find reason to believe that Balboa Construction, Inc. violated 2 U.S.C. § 441b.

4. Find reason to believe that Lyle R. Weisman violated 2 U.S.C. § 441f.

5. Find reason to believe that Sandor E. Habalow violated 2 U.S.C. § 441f.

6. Find reason to believe that Colleen Morrow violated 2 U.S.C. § 441f.

7. Find reason to believe that the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, violated 2 U.S.C. §§ 441a(f), 434(a)(2)(A)(ii) and 434(b).

8. Approve the attached order to submit written answers and subpoena to produce documents to Mark Barnes as a non-respondent witness.

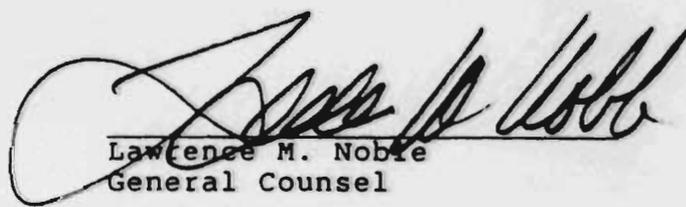
9. Approve the attached order to submit written answers and subpoena to produce documents to Greenstripe Media as a non-respondent witness.

10. Approve the attached orders to submit written answers and subpoenas to produce documents to Michael Goland, Lyle Weisman, Sandor Habalow, Colleen Morrow, the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, and to the individuals listed in recommendation 2.

11. Approve the attached letters and Factual and Legal Analyses.

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Date 7/31/89


Lawrence M. Noble
General Counsel

Attachments:

1. December 1988 Indictment of Michael Goland, Lyle Weisman, Michael Altman and Sandor Habalow
2. Recent Newspaper Articles

3. Proposed Letters and Factual and Legal Analyses (73)
4. Orders and Subpoenas

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Michael Goland)
Balboa Construction, Inc.)
Lyle R. Weisman)
Sandor E. Habalow)
Colleen Morrow)
Michael Altman)
Committee to Elect Ed Vallen to Senate and)
Audrey M. Barbour, as treasurer)
Edward Zelon)
David Hultquist)
Jerry Hanrahan)
Samir Mobassaly)
Clifton Sherwood)
Richard Horowitz)
Zvi Sperling)
Renee Lang Burg)
Jacob Sperling)
Nachman Shatz, et al.)

MUR 2727

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(Continued)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 3, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2727:

1. Find reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441b, 441a(a)(3) and 441f.
2. Find reason to believe that David Hultquist, Jerry Hanrahan, Samir Mobassaly, Clifton Sherwood, Maury White, Richard Horowitz, Zvi Sperling, Renee Lang Burg, Jacob Sperling, David Weisman, Shifra Weisman, Robert Ives, Michael Berger, George Korz, Marcel Valdes, James White, Ruth Sanchez, Joseph Nash, Alan Setlin, Michael Daniel, Leslie Lindenblatt, Mary Siebuhr, A. Bruce Adams, Nachman Shatz, Robert Frank, Mark Cohen, Judy and Michael Altman, Kelly Bixby, Calvin Crowe, Todd Silver, Joey Pento, Daniel Nash, Patti Bridges, David Zelon, Marc Massioreck, Janae Dedrick, Helene Simms, Sloan Ramirez, Milton Zarachoff, Jules Burg, Ernestine Crowe, Dick Famiglietti, Susan Herbst, Beverly Horowitz, Maurice Hyman, Paula Hyman, Ann Ives, Mike Katz, Sandy Katz, Tom Kindle, Herb Krause, Mollie Krause, Robert Krause, Steven Lee, Monte Morrow, Joe Noriega, Jeff Pandin, Peter Roff, Tova Shatz, Warren Simms, Shelly Sperling, Miki Sperling, Mark Victor and Gary Willet violated 2 U.S.C. § 441f.
3. Find reason to believe that Balboa Construction, Inc. violated 2 U.S.C. § 441b.
4. Find reason to believe that Lyle R. Weisman violated 2 U.S.C. § 441f.

(Continued)

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5. Find reason to believe that Sandor E. Habalow violated 2 U.S.C. §441f.
6. Find reason to believe that Colleen Morrow violated 2 U.S.C. §441f.
7. Find reason to believe that the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, violated 2 U.S.C. §§441a(f), 434(a)(2)(A)(ii) and 434(b).
8. Approve the order to submit written answers and subpoena to produce documents to Mark Barnes as a non-respondent witness, as recommended in the First General Counsel's Report signed July 31, 1989.
9. Approve the order to submit written answers and subpoena to produce documents to Greenstripe Media as a non-respondent witness, as recommended in the First General Counsel's Report signed July 31, 1989.
10. Approve the orders to submit written answers and subpoenas to produce documents to Michael Goland, Lyle Weisman, Sandor Habalow, Colleen Morrow, the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, and to the individuals listed in recommendation 2, as recommended in the First General Counsel's Report signed July 31, 1989.

(Continued)

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11. Approve the letters and Factual and Legal Analyses,
as recommended in the First General Counsel's Report
signed July 31, 1989.

Commissioners Alkens, Elliott, Josefiak, McGarry and
Thomas voted affirmatively for the decision;
Commissioner McDonald did not vote.

Attest:

8-4-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	8-1-89	9:35
Circulated on 48 hour tally basis:	8-1-89	4:00
Deadline for vote:	8-3-89	4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Michael Goland
5311 Topanga Cyn. Blvd.
Woodland Hills, CA 91364

RE: MUR 2727
Michael Goland

Dear Mr. Goland:

On August 3, 1989, the Federal Election Commission found that there is reason to believe you knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441b, 441a(a)(3) and 441f, 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Michael Goland
5311 Topanga Cyn. Blvd.
Woodland Hills, CA 91364

RE: MUR 2727
Michael Goland

Dear Mr. Goland:

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

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Michael Goland
Page 2

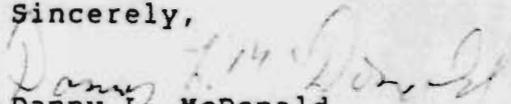
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513824

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Michael Goland
5311 Topanga Cyn. Blvd.
Woodland Hills, CA 91364

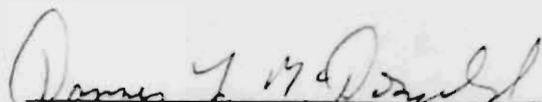
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

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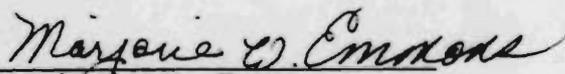
Michael Goland
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
MUR 2727 has hereunto set his hand in Washington, D.C. on this
2nd day of *October*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (8 pages)

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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.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1985 to the present.

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.

"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 the 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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INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State whether you wrote one or more checks on a personal account or caused a check to be issued from Balboa Construction Company to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. If so, please provide a copy of both sides of each such check and copies of all documents pertaining to the authorization of each corporate check.
2. Explain the circumstances under which you wrote or issued the check(s) identified in response to Question 1.
3. State the maker and the payee of the \$100,000 check which you provided to Michael Altman on or about July 9, 1986, and the purpose of the check, e.g., whether it was received in payment for work done by Balboa Construction and/or work done by yourself. Provide a copy of the \$100,000 check and all invoices which were sent out from or by Balboa Construction in connection with any debt(s) which were paid or partially paid with this check.
4. Provide a copy of the employment contract between Balboa Construction and Colleen Morrow, all documents pertaining to her duties and responsibilities at Balboa Construction and all documents pertaining to her responsibility to conduct a campaign against the efforts of Ed Zschau to win election to the United States Senate from California.
5. Provide copies of all invoices paid by Balboa Construction in connection with Colleen Morrow's trips to California in 1986 and copies of all checks issued to pay for or reimburse Morrow for these expenses.
6. State the total funds spent by yourself and the total funds spent by Balboa Construction in 1985 through 1987 to prevent Ed Zschau from being elected to the United State Senate from California.
7. State whether you solicited any person(s) to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of a television commercial featuring Ed Vallen. Please identify these people, state whether you promised them reimbursement for their payments and whether you reimbursed them, and explain the way in which you provided such reimbursement to them.

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8. State whether you solicited any person(s) in 1986 to help you find people to make the payments for the production and airing of a television commercial featuring Ed Vallen. Please identify these individuals; state whether they solicited any persons to make such payments, whether you provided them with funds to reimburse others for their payments, whether these funds were provided with Balboa Construction funds; and explain how the reimbursements were executed.

9. Explain the roles of Michael Altman, Sandor Habalow, Lyle Weisman and Colleen Morrow with respect to the solicitation and reimbursement of people who made payments for the production and airing of a television commercial featuring Ed Vallen in 1986.

10. Provide the addresses of the following individuals:

- a) Dick Famiglietti,
- b) Susan Herbst,
- c) Maurice Hyman,
- d) Paula Hyman,
- e) Mike and Sandy Katz,
- f) Tom Kindle,
- g) Herb and Mollie Krause,
- h) Robert Krause,
- i) Steven Lee,
- j) Monte Morrow,
- k) Colleen Morrow,
- l) Joe Noriega,
- m) Jeff Pandin,
- n) Peter Roff,
- o) Warren Simms,
- p) Shelly Sperling,
- q) Mark Victor,
- r) Gary Willet,
- s) Sandor Habalow,
- t) Robert and Ann Ives, and
- u) Patti Bridges.

11). State your relationship to the following individuals in 1986 (e.g. employer, employee, business associate, relative, co-member of an association or political committee, etc.).

- a) A. Bruce Adams,
- b) Michael and Judy Altman,
- c) Michael Berger,
- d) Kelly Bixby,
- e) Patti C. Bridges,
- f) Jules and Renee Burg,
- g) Mark Cohen,
- h) Calvin and Ernestine Crowe,

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MUR 2727
Michael Goland
Page 7

11) State your relationship to the following individuals in 1986
(continued).

- i) Mike Daniel,
- j) Jane Dedrick,
- k) Dick Famiglietti,
- l) Bob Frank,
- m) Jerry Hanrahan,
- n) Susan Herbst,
- o) Dick and Beverly Horowitz,
- p) David Hultquist,
- q) Maurice Hyman,
- r) Paula Hyman,
- s) Bob and Ann Ives,
- t) Mike and Sandy Katz,
- u) Tom Kindle,
- v) George Korz,
- w) Herb and Mollie Krause,
- x) Robert Krause,
- y) Steven Lee,
- z) Leslie Lindenblatt,
- aa) Mark Massioreck,
- bb) Samir Mobassaly,
- cc) Monte Morrow,
- dd) Daniel Nash,
- ee) Joe Nash,
- ff) Joe Noriega,
- gg) Jeff Pandin,
- hh) Joey Pento,
- ii) Sloan Ramirez,
- jj) Peter Roff,
- kk) Ruth Snachez,
- ll) Alan Setlin,
- mm) Tova and Nachman Shatz,
- nn) Clifton Sherwood,
- oo) Mary Siebuhr,
- pp) Todd Silver,
- qq) Helene Simms,
- rr) Warren Simms,
- ss) Jacob and Shelly Sperling,
- tt) Zvi and Miki Sperling,
- uu) Marcel Valles,
- vv) Mark Victor,

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MUR 2727
Michael Goland
Page 8

11) State your relationship with the following individuals in 1986 (continued).

- ww) David Weisman,
- xx) Shifra Weisman,
- yy) James White,
- zz) Maury White,
- aaa) Gary Willett,
- bbb) Milt Zarachoff,
- ccc) Lyle Weisman,
- ddd) Sandor Habalow, and
- eee) David Zelon.

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Michael Goland

MUR: 2727

The Federal Election Campaign Act of 1971, as amended ("the Act"), places a \$1,000 limit on the aggregate contributions which an individual may make to a candidate and his authorized political committee with respect to any election for Federal office, 2 U.S.C. § 441a(a)(1)(A), and places a \$25,000 limit on the aggregate contributions that an individual may make in a calendar year. 2 U.S.C. § 441a(a)(3). Furthermore, pursuant to 2 U.S.C. § 441f, individuals are prohibited from making contributions in the name of another person or knowingly permitting their names to be used to effect such contributions.

Pursuant to 2 U.S.C. § 441b, corporations are prohibited from making contributions and expenditures in connection with federal elections. This provision further prohibits corporate officers from consenting to such contributions and political committees from knowingly receiving such contributions.

Information obtained by the Committee in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December 1988.

The September 13, 1988 edition of the Washington Post carried a news account stating that the FBI was investigating Michael Goland for allegedly funneling money through other

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individuals to the Committee to Elect Ed Vallen to Senate ("the Committee"). The article states that Goland's support of the Vallen campaign was essentially an effort to attract conservative voters away from Ed Zschau in a tight race between Representative Ed Zschau and incumbent Senator Alan Cranston. The article quotes another newspaper account which states that Goland made over \$100,000 of such contributions to the Committee within two weeks of the general election. This article, along with two earlier articles in the Wall Street Journal (June 24, 1987) and Campaigns and Elections (September/October 1987), indicates that the contributions were paid to Mark Barnes, a political consultant and a principal in Political Advertising and Consulting, to produce and buy time for a television ad for Vallen. Vallen told reporters that Barnes called him in October 1986 offering \$120,000 in television production services from "conservative Republicans who don't want Zschau." These articles state that Barnes also contacted the Libertarian Party with a similar offer but that party turned him down once he revealed that he was really working for Goland.

The Justice Department recently forwarded a copy of the December 1988 indictment against Michael R. Goland, Lyle R. Weisman and Sandor E. Habalow to the Commission. The indictment alleges that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f by making an excessive \$120,000 contributions to the Committee through the use of 65

named conduits. In addition, the indictment charges that Goland and two other individuals - Habalow and Weisman - knowingly and willfully caused the treasurer of the Vallen Committee to make false statements to the Commission in violation of 18 U.S.C. § 1001 when the Committee treasurer reported that the Goland contributions represented lawful contributions from the conduits. These same three defendants are also charged with unlawful conspiracy in connection with the conduit scheme.

Specifically, the indictment alleges that the conduit scheme came about in the following manner: In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from Washington, D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow decided to promote the candidacy of American Independent Party candidate Ed Vallen, to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials.

On or about July 9, 1986, Goland provided Michael Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co. with instructions that Altman deposit the

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check and hold the funds for disbursement at Goland's direction in the future. On October 27, 1986, Goland directed Michael Altman to write a \$90,000 check to Greenstripe Media with these funds. Goland also caused a \$30,000 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advanced to pay for the ads. Goland, Habalow and Weisman then contacted over 50 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Goland's company, Balboa Construction.

As the allegations set forth in the newspaper articles and the December 1988 indictment, and supported by reports filed with the Commission, indicate that Michael Goland made one hundred and twenty thousand dollars in contributions in the names of others, there is reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. § 441f. There is also reason to

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believe that Goland knowingly and willfully violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to the Committee to Elect Ed Vallen to Senate with knowledge of the Act's limitations. Furthermore, there is reason to believe that Goland knowingly and willfully violated 2 U.S.C. § 441a(a)(3) by making aggregate contributions in excess of \$25,000 in 1986.

Information in the indictment also indicates that Goland, in his capacity as president of Balboa Construction, Inc., caused the corporation to employ an individual for the specific purpose of running a campaign to defeat Ed Zschau and caused the company to issue a \$30,000 check to pay a portion of the costs of the Vallen ad. Accordingly, there is reason to believe that Michael Goland also knowingly and willfully violated 2 U.S.C. § 441b by consenting to the use of corporate funds in connection with a federal election.

93043513837



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Colleen Morrow
c/o Balboa Construction Company, Inc.
20221 Prairie Street
Chastworth, CA 91311

RE: MUR 2727
Colleen Morrow

Dear Ms. Morrow:

On August 3, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

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Colleen Morrow
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

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

93043513839

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Colleen Morrow
c/o Balboa Construction Company, Inc.
20221 Prairie Street
Chastworth, CA 91311

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 receipt of this Order and Subpoena.

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MUR 2727
Colleen Morrow
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
as hereunto set his hand in Washington, D.C. on this *6th* day of
October 1989.

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (6 pages)

93043513841

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State the nature of your relationship with Michael Goland, Sandor Habalow, Mark Barnes, Michael Altman and Lyle Weisman in 1986, (e.g. employer, employee, partner, business associate, relative, co-member of association or political committee).
2. State whether you were employed by Balboa Construction Company or Michael Goland in 1986. If so, state the duties and responsibilities of the position and your monthly salary. Please provide a copy of your job description and a copy of all salary checks received from Balboa Construction and Michael Goland in 1985, 1986 and 1987. Please also provide copies of all expenses paid for or reimbursed by Balboa and Michael Goland in 1985, 1986 and 1987.
3. State whether one of your responsibilities or duties for Balboa Construction or Michael Goland in 1986 was to organize a campaign against Ed Zschau's efforts to win election to the United States Senate from California. If so, please explain how you carried out this responsibility or duty, state the total amount spent by Balboa Construction on the campaign and provide copies of all documents relating to these expenditures.
4. State whether you contacted Mark Barnes, Political Advertising & Consulting, or Greenstripe Media to make arrangements for the production and airing of a television commercial featuring Ed Vallen.
5. State whether Michael Goland or Balboa Construction paid \$120,000 to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 to produce and air a television advertisement featuring Ed Vallen. Please provide copies of all documentation relating to such payments.
6. State whether Michael Goland solicited any person to make payments to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 for the production and airing of the advertisement referred to in Question 5. State whether he promised these persons reimbursement for such payments, whether he provided reimbursement, and whether you assisted him in reimbursing these persons. If so, please explain your part in the execution of the reimbursement.
7. Explain the roles of Michael Altman, Sandor Habalow, and Lyle Weisman with respect to the solicitation and reimbursement of persons who made payments for the production and airing of a television advertisement featuring Ed Vallen in 1986.

93043513842

MUR 2727
Colleen Morrow
Page 6

8. State whether you solicited any person to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of a television commercial featuring Ed Vallen. Please identify these people, state whether you promised them reimbursement for their payments, whether you reimbursed them and explain the way in which you provided such reimbursement to them.

9. State the total funds spent by Balboa Construction in 1985 through 1987 to prevent Ed Zschau from being elected to the United State Senate from California.

10. Provide the addresses of the following individuals:

- a) Dick Famiglietti,
- b) Susan Herbst,
- c) Maurice Hyman,
- d) Paula Hyman,
- e) Mike and Sandy Katz,
- f) Tom Kindle,
- g) Herb and Mollie Krause,
- h) Robert Krause,
- i) Steven Lee,
- j) Monte Morrow,
- k) Joe Noriega,
- l) Jeff Pandin,
- m) Peter Roff,
- n) Warren Simms,
- o) Shelly Sperling,
- p) Mark Victor,
- q) Gary Willet,
- r) Sandor Habalow,
- s) Robert and Ann Ives, and
- t) Patti Bridges.

9 3 0 4 3 5 1 3 8 4 3

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Colleen Morrow

MUR: 2727

9 3 0 4 3 5 1 3 8 4 4

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their names to be used to effect such contributions. This section also prohibits the knowing acceptance by committees of contributions made by one person in the name of another person. The Commission has further interpreted this provision to cover situations where an individual who neither made a contribution in his own name nor permitted his name to be used to effect a contribution in the name of another actively assists in the making of such contributions.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December 1988.

The September 13, 1988 edition of the Washington Post carried a news account stating that the FBI was investigating Michael Goland for allegedly funneling money through other individuals to the Committee to Elect Ed Vallen to Senate ("the Committee"). The article states that Goland's support of the Vallen campaign was essentially an effort to attract conservative

voters away from Ed Zschau in a tight race between Representative Ed Zschau and incumbent Senator Alan Cranston. The article quotes another newspaper account which states that Goland made over \$100,000 of such contributions to the Committee within two weeks of the general election. This article, along with two earlier articles in the Wall Street Journal (June 24, 1987) and Campaigns and Elections (September/October 1987), indicates that the contributions were paid to Mark Barnes, a political consultant and a principal in Political Advertising and Consulting, to produce and buy time for a television ad for Vallen. Vallen told reporters that Barnes called him in October 1986 offering \$120,000 in television production services from "conservative Republicans who don't want Zschau." These articles state that Barnes also contacted the Libertarian Party with a similar offer but that party turned him down once he revealed that he was really working for Goland.

The Justice Department recently forwarded a copy of the December 1988 indictment against Michael Goland and others. The indictment alleges that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f by making an excessive \$120,000 contribution to the Committee through the use of 65 named conduits. The indictment alleges that the conduit scheme came about in the following manner: In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from

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Washington, D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow decided to promote the candidacy of American Independent Party candidate Ed Vallen to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials.

In July 1986, Goland provided Michael Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co. with instructions that Altman deposit the check and hold the funds for Goland's future direction. On October 27, 1986, Goland directed Michael Altman, who was holding \$100,000 of Goland's personal funds, to write a \$90,000 check to Greenstripe Media with these funds. Goland also caused a \$30,000 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advanced to pay for the ads. Goland, Habalow and Weisman then contacted approximately 56 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to

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Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Goland's company, Balboa Construction.

The indictment indicates that Colleen Morrow actively assisted Goland in funneling reimbursement payments to individual contributors. Therefore, there is reason to believe that Colleen Morrow violated 2 U.S.C. § 441f by actively assisting Michael Goland in making contributions in the names of others.

93043513847



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Ann Ives

Ann Ives
DSJ Investment Company
9454 Wilshire Boulevard
Beverly Hills, California 90212

Dear Ms. Ives:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513848

Ann Ives
Page 2

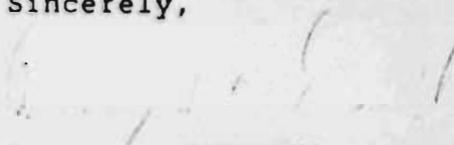
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513849

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Ann Ives
DSJ Investment Company
9454 Wilshire Boulevard
Suite 800
Los Angeles, California 90212

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 receipt of this Order and Subpoena.

93043513850

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *6th* day of
Oct., 1989.

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513851

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State whether you wrote one or more checks or caused a check to be issued to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. If so, please provide a copy of both sides of each such check.

2. State whether you received reimbursement for the check(s) identified in response to Question 1. If so, state the date you received such reimbursement, the identity of the individual(s) who provided the reimbursement to you and the form of reimbursement.

3. Provide a copy of both sides of each check received as reimbursement for the check(s) identified in response to Question 1.

4. Explain the circumstances under which you wrote or issued the check(s) identified in response to Question 1, identify who suggested that you write or issue such a check and state whether that individual told you that you would receive reimbursement for that check.

5. State whether you know of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. Please identify those individuals and state whether they received reimbursement for their checks and, if so, from whom.

6. Provide copies of your bank statements for the months of October, November and December 1986 and identify the deposit of any cash reimbursement received for the checks identified in response to Question 1.

7. State the nature of your relationship with Michael Goland in 1986 (e.g., employer, employee, business associate, partner, relative, co-member of an organization or political committee).

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Ann Ives

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Ann Ives made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Ann Ives received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Ann Ives violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513853



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Judy S. Altman

Judy S. Altman
3585 Alana Drive
Sherman Oaks, California 91403

Dear Mrs. Altman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513854

Judy S. Altman
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513855

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Judy S. Altman
3585 Alana Drive
Sherman Oaks, California 91403

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.

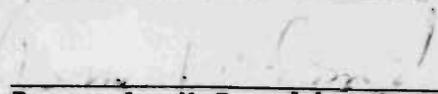
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

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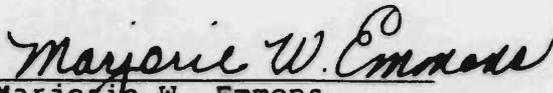
MUR 2727
Judy S. Altman
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513857

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Judy Altman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Tova Shatz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Judy Altman received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Judy Altman violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513858



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Michael B. Altman

Michael B. Altman
3585 Alana Drive
Sherman Oaks, California 91403

Dear Mr. Altman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513859

Michael B. Altman
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Order and Subpoena
Factual and Legal Analysis
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93043513860

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Michael B. Altman
3585 Alana Drive
Sherman Oaks, California 91403

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 receipt of this Order and Subpoena.

93043513861

MUR 2727
Michael B. Altman
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.

[Signature]

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

[Signature]

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513862



FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Michael B. Altman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Michael B. Altman made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Michael B. Altman received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Michael B. Altman violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513863



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Mollie Krause

Mollie Krause
120 South Clark Road
Beverly Hills, California 90211

Dear Ms. Krause:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513864

Mollie Krause
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
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93043513865

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Mollie Krause

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Mollie Krause made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Mollie Krause received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Mollie Krause violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513867



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Mark Victor

Mark Victor
c/o Pacific Rim Equities, Inc.
1880 Century Park East
Suite 811
Los Angeles, California 90067

Dear Mr. Victor:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513868

Mark Victor
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

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

93043513869

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

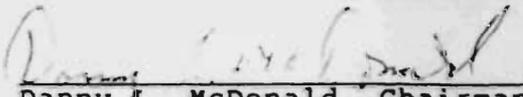
SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mark Victor
c/o Pacific Rim Equities, Inc.
1880 Century Park East
Suite 811
Los Angeles, California 90067

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 receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513870

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Mark Victor

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Mark Victor made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Mark Victor received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Mark Victor violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513871



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Sandy Katz

Sandy Katz
11645 Wilshire Blvd.
Suite 800
Los Angeles, California 90025

Dear Ms. Katz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513872

Sandy Katz
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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Designation of Counsel Form

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

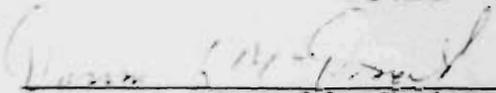
SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Sandy Katz
11645 Wilshire Blvd.
Suite 800
Los Angeles, California 90025

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.

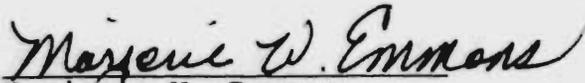
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513874

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Sandy Katz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Sandy Katz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Sandy Katz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Sandy Katz violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513875



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Robert Krause

Robert Krause
120 South Clark Road
Beverly Hills, California 90211

Dear Mr. Krause:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513876

Robert Krause
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

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

93043513877

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Robert Krause
120 South Clark Road
Beverly Hills, California 90211

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.

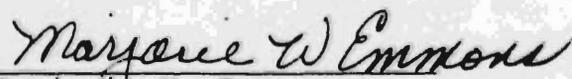
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513878

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Robert Krause

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Robert Krause made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Robert Krause received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Robert Krause violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513879



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Marcel Valdez

Marcel Valdez
5348 Ventura Canyon
Van Nuys, California 91401

Dear Mr. Valdez:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513880

Marcel Valdez
Page 2

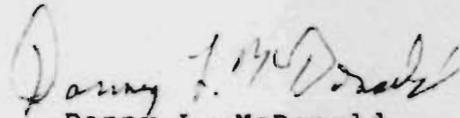
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
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9 3 0 4 3 5 1 3 8 8 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Marcel Valdez
5348 Ventura Boulevard
Sherman Oaks, California 91401

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 receipt of this Order and Subpoena.

93043513882

MUR 2727
Marcel Valdez
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513883

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Marcel Valdez

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Marcel Valdez made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Marcel Valdez received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Marcel Valdez violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513884



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Zvi Sperling

Zvi Sperling
999 South Hatcher Avenue
City of Industry, California 91744

Dear Mr. Sperling:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513885

Zvi Sperling
Page 2

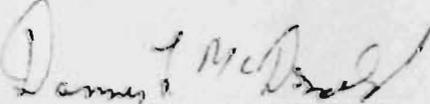
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Zvi Sperling
999 South Hatcher Avenue
City of Industry, California

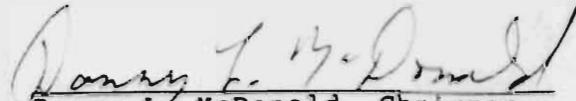
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513887

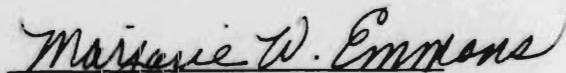
MUR 2727
Zvi Sperling
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513888

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Zvi Sperling

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Zvi Sperling made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Zvi Sperling received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Zvi Sperling violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513889



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Jerry Hanrahan

Jerry Hanrahan
24883 Piuma Road
Malibu, California 90255

Dear Mr. Hanrahan:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. Any additional materials or statements you wish to submit should accompany the response to the order and subpoena.

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

93043513890

Jerry Hanrahan
Page 2

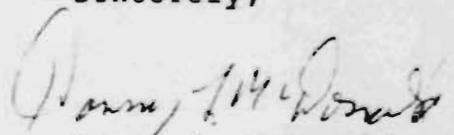
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043513891

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Jerry Hanrahan
24883 Piuma Road
Malibu, California 90255

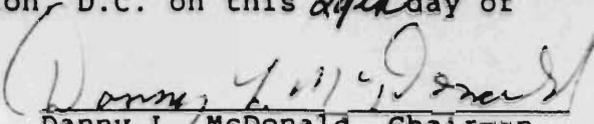
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513892

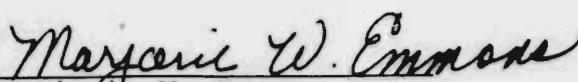
MUR 2727
Jerry Hanrahan
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513893

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Jerry Hanrahan

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Jerry Hanrahan made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Jerry Hanrahan received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Jerry Hanrahan violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513894



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Calvin T. Crowe

Calvin T. Crowe
5926 Wrightcrest Drive
Culver City, California 90232

Dear Mr. Crowe:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513895

Calvin T. Crowe
Page 2

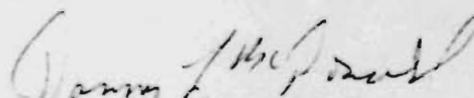
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513896

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)

MUR 2727

)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Calvin T. Crowe
5926 Wrightcrest Drive
Culver City, California 90232

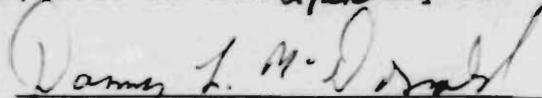
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513897

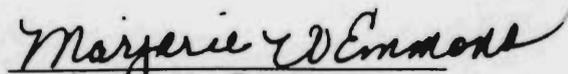
MUR 2727
Calvin T. Crowe
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513898

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Calvin T. Crowe

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Calvin T. Crowe made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Calvin T. Crowe received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Calvin T. Crowe violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513899



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Richard M. Horowitz

Richard M. Horowitz
9301 Wilshire Boulevard
Suite 206
Beverly Hills, California 90212

Dear Mr. Horowitz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513900

Richard M. Horowitz
Page 2

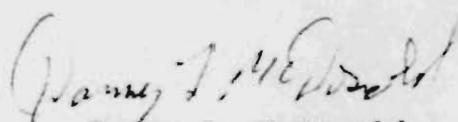
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



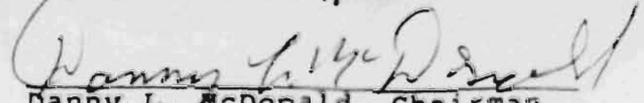
Danny L. McDonald
Chairman

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

93043513901

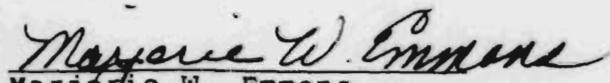
MUR 2727
Richard M. Horowitz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513903

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Richard M. Horowitz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Richard M. Horowitz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Richard M. Horowitz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Richard M. Horowitz violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513904



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Marc A. Missioreck

Marc A. Missioreck
Promuscle
202 Main Street
Venice, California 93001

Dear Mr. Missioreck:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513905

Marc A. Missioreck
Page 2

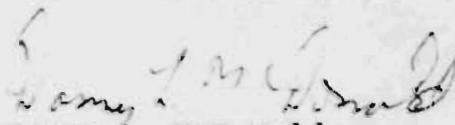
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

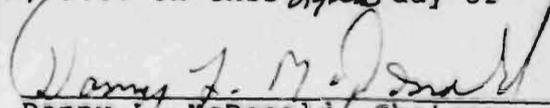

Danny L. McDonald
Chairman

Enclosures
Order and Subpoena
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Procedures
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93043513906

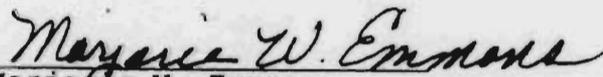
MUR 2727
Marc A. Missioreck
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513907

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Marc A. Missioreck

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Marc A. Missioreck made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Marc A. Missioreck received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Marc A. Missioreck violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513909



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Samir Modaggaly

Samir Modaggaly
P.O. Box 295
Azusa, California 91702

Dear Mr. Modaggaly:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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.

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

93043513910

Samir Modaggaly
Page 2

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

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Sincerely,


Danny L. McDonald
Chairman

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

93043513911

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Samir Modaggaly
P.O. Box 295
Azusa, California 91702

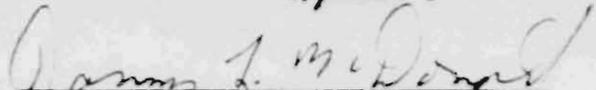
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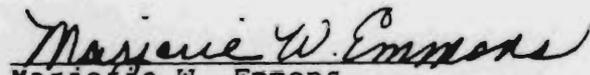
93043513912

MUR 2727
Samir Modaggaly
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.


Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513913

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Samir Modaggaly

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Samir Modaggaly made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Samir Modaggaly received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Samir Modaggaly violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513914



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Monte Morrow

Monte Morrow
13900 Panay Way
Marina Del Rey, California 90292

Dear Mr. Morrow:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. Any additional materials or statements you wish to submit should accompany the response to the order and subpoena.

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93043513915

Monte Morrow
Page 2

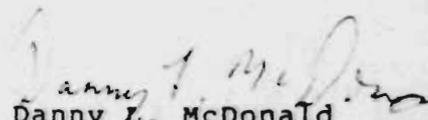
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Sincerely,


Danny L. McDonald
Chairman

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

93043513916

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Monte Morrow
13900 Panay Way
Marina Del Rey, California 90292

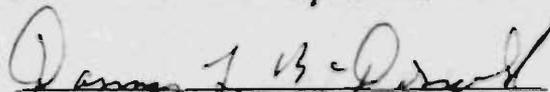
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Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order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

93043513917

MUR 2727
Monte Morrow
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513918

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Monte Morrow

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Monte Morrow made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Monte Morrow received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Monte Morrow violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513919



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
David Hultquist

David Hultquist
4702 Baywind Drive
Pensacola, Florida 32514

Dear Mr. Hultquist:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513920

David Hultquist
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

9 3 0 4 3 5 1 3 9 2 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: David Hultquist
4702 Baywind Drive
Pensacola, Florida 32514

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 receipt of this Order and Subpoena.

93043513922

MUR 2727
David Hultquist
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.* 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513923

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: David Hultquist

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that David Hultquist made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that David Hultquist received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that David Hultquist violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513924



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Steven J. Lee

Steven J. Lee
The Mortgage Capital Group
9701 Wilshire Boulevard
Suite 1010
Beverly Hills, California 90035

Dear Mr. Lee:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513925

Steven J. Lee
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043513926

MUR 2727
Steven J. Lee
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513928

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Steven J. Lee

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Steven J. Lee made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Steven J. Lee received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Steven J. Lee violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513929



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Michael Katz

Michael Katz
Spectrum Realty
11645 Wilshire Boulevard
Suite 800
Los Angeles, California 90025

Dear Mr. Katz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513930

Michael Katz
Page 2

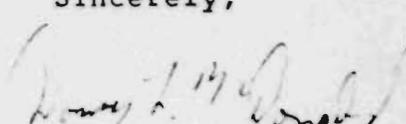
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043513931

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Michael Katz
Spectrum Realty
11645 Wilshire Boulevard
Suite 800
Los Angeles, California 90025

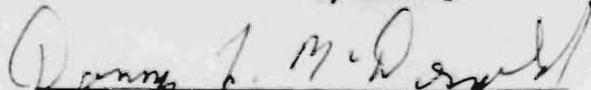
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513932

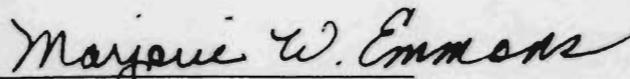
MUR 2727
Michael Katz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny E. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513933

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Michael Katz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Michael Katz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Michael Katz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Michael Katz violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513934



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Tom Kindle

Tom Kindle
1127 1/2 Kenmore Avenue
Los Angeles, California 90004

Dear Mr. Kindle:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513935

Tom Kindle
Page 2

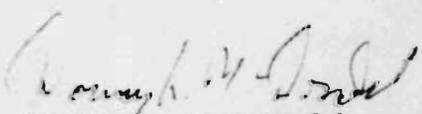
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513936

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Tom Kindle
1127 1/2 Kenmore Avenue
Los Angeles, California 90004

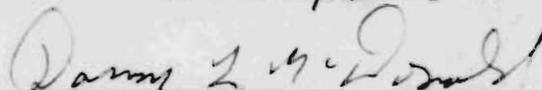
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513937

MUR 2727
Tom Kindle
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513938

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Tom Kindle

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Tom Kindle made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Tom Kindle received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Tom Kindle violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513939



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Richard R. Famiglietti

Richard R. Famiglietti
18836 Tulsa Street
Northridge, California 91326

Dear Mr. Famiglietti:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513940

Richard R. Famiglietti
Page 2

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513941

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Richard R. Famiglietti
18836 Tulsa Street
Northridge, California 91326

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 receipt of this Order and Subpoena.

93043513942

MUR 2727
Richard R. Famiglietti
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513943

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Richard R. Famiglietti

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Richard R. Famiglietti made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Richard R. Famiglietti received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Richard R. Famiglietti violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513944



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Renee Burg

Renee Burg
5445 Laurel Canyon Boulevard
North Hollywood, California 91607

Dear Ms. Burg:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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.

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

93043513945

Renee Burg
Page 2

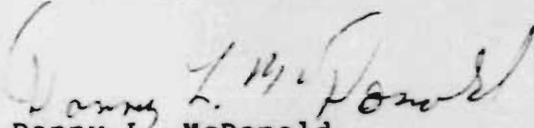
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513946

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Renee Burg
5445 Laurel Canyon Boulevard
North Hollywood, California 91607

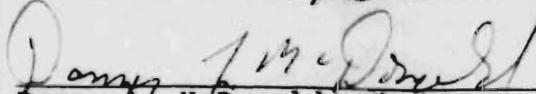
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513947

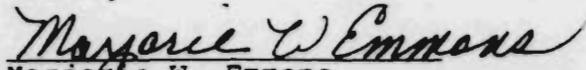
MUR 2727
Renee Burg
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

9 3 0 4 3 5 1 3 9 4 8

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Renee Burg

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Renee Burg made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Renee Burg received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Renee Burg violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513949



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Daniel Nash

Daniel Nash
429 South Beverly Drive
8th Floor
Beverly Hills, California 90212

Dear Mr. Nash:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513950

Daniel Nash
Page 2

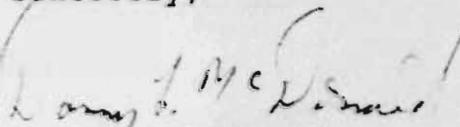
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



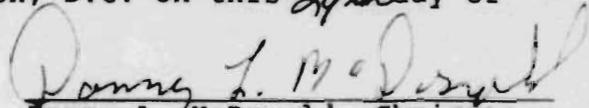
Danny L. McDonald
Chairman

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

93043513951

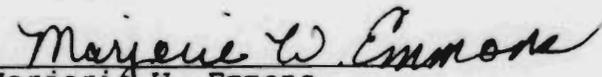
MUR 2727
Daniel Nash
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513953

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Daniel Nash

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Daniel Nash made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Daniel Nash received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Daniel Nash violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513954



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Maurice Hyman

Maurice Hyman
10415 Ravenwood Court
Los Angeles, California 90077

Dear Mr. Hyman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513955

Maurice Hyman
Page 2

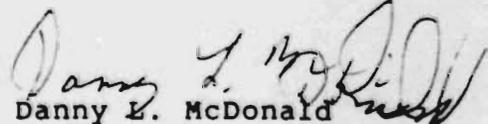
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

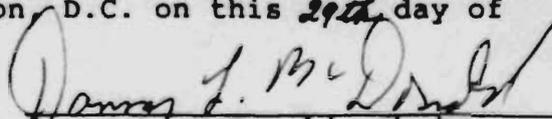

Danny E. McDonald
Chairman

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

93043513956

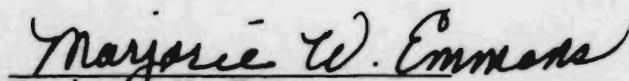
MUR 2727
Maurice Hyman
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has
hereunto set his hand in Washington, D.C. on this 29th day of
Sept, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513958

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Maurice Hyman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Maurice Hyman made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Maurice Hyman received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Maurice Hyman violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513959



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Robert Krause

Robert Krause
1222 South Hayworth Avenue
Los Angeles, California

Dear Mr. Krause:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513960

Robert Krause
Page 2

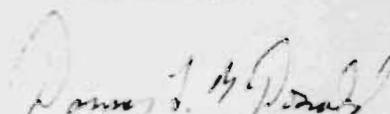
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513961

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Robert Krause
1222 South Hayworth Avenue
Los Angeles, California

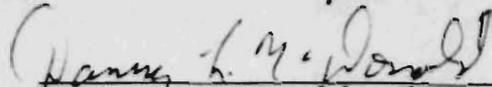
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513962

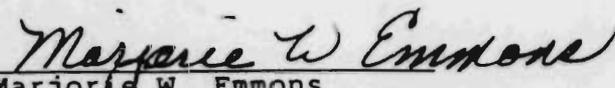
MUR 2727
Robert Krause
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny V. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513963

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Robert Krause

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Robert Krause made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Robert Krause received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Robert Krause violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513964



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
George Korz

George Korz
Crestview Financial Group
Suite 201
Beverly Hills, California 90212

Dear Mr. Korz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513965

George Korz
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513966

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: George Korz
Crestview Financial Group
Suite 201
Beverly Hills, California 90212

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 receipt of this Order and Subpoena.

93043513967

MUR 2727
George Korz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513968

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: George Korz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that George Korz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that George Korz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that George Korz violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513969



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Tova Shatz

Tova Shatz
Schaul's Carbide
9745 Washburn Road
Downey, California 90241

Dear Mrs. Shatz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513970

Tova Shatz
Page 2

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513971

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Tova Shatz
Schauhl's Carbide
9745 Washburn Road
Downey, California 90241

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 receipt of this Order and Subpoena.

93043513972

MUR 2727
Tova Shatz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 2nd day of Oct, 1989.

Danny L. McDonald
Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513973

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Tova Shatz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Tova Shatz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Tova Shatz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Tova Shatz violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513974



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Miki Sperling

Miki Sperling
999 South Hatcher Avenue
City of Industry, California 91744

Dear Mrs. Sperling:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513975

Miki Sperling
Page 2

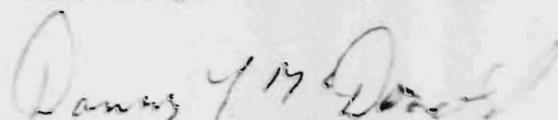
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513976

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Miki Sperling
999 South Hatcher Avenue
City of Industry, California

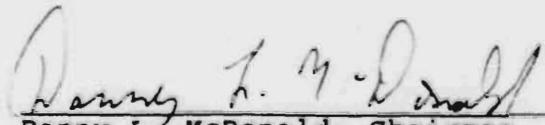
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513977

MUR 2727
Miki Sperling
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513978

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Miki Sperling

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Miki Sperling made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Miki Sperling received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Miki Sperling violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043513979



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Nachman Shatz

Nachman Shatz
Schaul's Carbide
9745 Washburn Road
Downey, California 90241

Dear Mr. Shatz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513980

Nachman Shatz
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043513981

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Nachman Shatz
Schaul's Carbide
9745 Washburn Road
Downey, California 90241

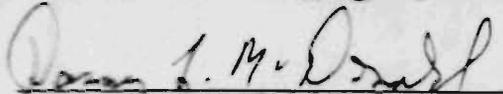
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513982

MUR 2727
Nachman Shatz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny J. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

9 3 0 4 3 5 1 3 9 8 3

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Nachman Shatz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Nachman Shatz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Nachman Shatz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Nachman Shatz violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513984



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Michael Daniel

Michael Daniel
Box 1082 Pepperdine University
Malibu, California 90265

Dear Mr. Daniel:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513985

Michael Daniel
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043513986

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Michael Daniel
Box 1082 Pepperdine University
Malibu, California 90265

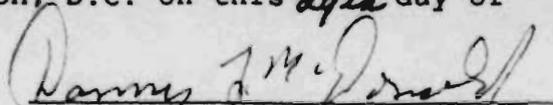
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513987

MUR 2727
Michael Daniel
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513988

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Michael Daniel

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Michael Daniel made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Michael Daniel received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Michael Daniel violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513989



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Robert Ives

Robert Ives
DSJ Investment Company
9454 Wilshire Boulevard
Beverly Hills, California 90212

Dear Mr. Ives:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513990

Robert Ives
Page 2

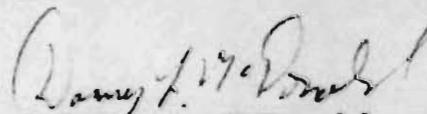
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



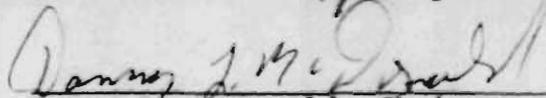
Danny L. McDonald
Chairman

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

93043513991

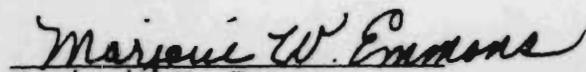
MUR 2727
Robert Ives
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this ^{29th} day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513993

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Robert Ives

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Robert Ives made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Robert Ives received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Robert Ives violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513994



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Kelly W. Bixby

Kelly W. Bixby
421 South Beverly Drive
Beverly Hills, California 90212

Dear Mr. Bixby:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043513995

Kelly W. Bixby
Page 2

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043513996

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Kelly W. Bixby
421 South Beverly Drive
Beverly Hills, California 90212

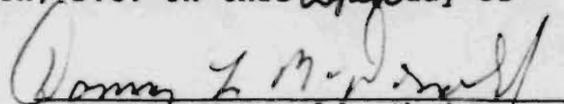
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043513997

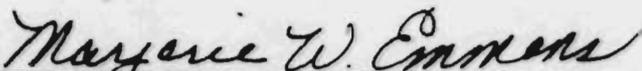
MUR 2727
Kelly W. Bixby
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.* 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043513998

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Kelly W. Bixby

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Kelly W. Bixby made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Kelly W. Bixby received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Kelly W. Bixby violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043513999



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Michael J. Berger

Michael J. Berger
9454 Wilshire Boulevard
Suite 302
Beverly Hills, California

Dear Mr. Berger:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514000

Michael J. Berger
Page 2

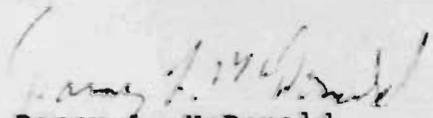
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514001

MUR 2727
Michael J. Berger
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has
hereunto set his hand in Washington, D.C. on this *29th* day of
Sept., 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514003

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Michael J. Berger

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Michael J. Berger made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Michael J. Berger received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Michael J. Berger violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514004



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
A. Bruce Adams

A. Bruce Adams
16055 Ventura Boulevard
Suite 433
Encino, California 91436

Dear Mr. Adams:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514005

A. Bruce Adams
Page 2

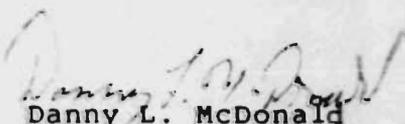
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514006

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: A. Bruce Adams
16055 Ventura Boulevard
Suite 433
Encino, California 91436

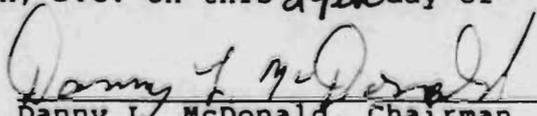
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514007

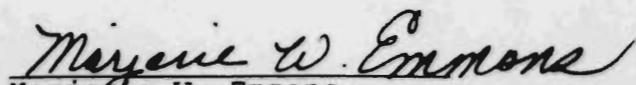
MUR 2727
A. Bruce Adams
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.* 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514008

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: A. Bruce Adams

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that A. Bruce Adams made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that A. Bruce Adams received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that A. Bruce Adams violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514009



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Todd Silver

Todd Silver
216 North Foothill Road
Beverly Hills, California 90210

Dear Mr. Silver:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514010

Todd Silver -
Page 2

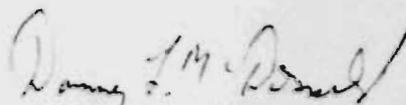
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514011

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Todd Silver
216 North Foothill Road
Beverly Hills, California 90210

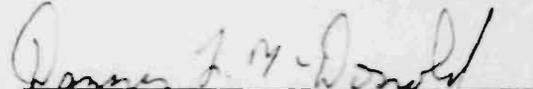
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514012

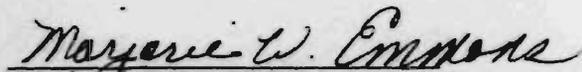
MUR 2727
Todd Silver
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514013

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Todd Silver

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Todd Silver made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Todd Silver received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Todd Silver violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514014



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Mark H. Cohen

Mark H. Cohen
9454 Wilshire Boulevard
Suite 201
Beverly Hills, California 90212

Dear Mr. Cohen:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514015

Mark H. Cohen
Page 2

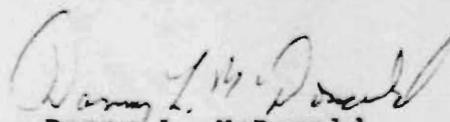
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514016

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mark H. Cohen
9454 Wilshire Boulevard
Suite 201
Beverly Hills, California 90212

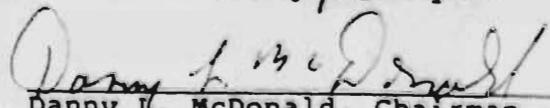
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514017

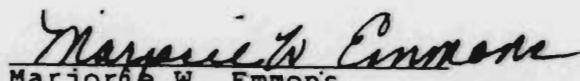
MUR 2727
Mark H. Cohen
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

9 3 0 4 3 5 1 4 0 1 8

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Mark H. Cohen

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Mark H. Cohen made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Mark H. Cohen received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Mark H. Cohen violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514019



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Jules Burg

Jules Burg
5445 Laurel Canyon Boulevard
North Hollywood, California 91607

Dear Mr. Burg:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514020

Jules Burg
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514021

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Jules Burg
5445 Laurel Canyon Boulevard
North Hollywood, California 91607

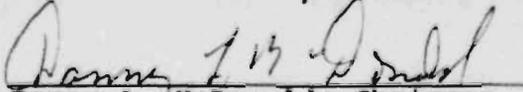
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514022

MUR 2727
Jules Burg
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514023

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Jules Burg

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Jules Burg made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Jules Burg received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Jules Burg violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

23043514024



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Robert H. Frank

Robert H. Frank
Willowtree Data Systems
421 South Beverly Drive
Beverly Hills, California 90212

Dear Mr. Frank:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514025

Robert H. Frank
Page 2

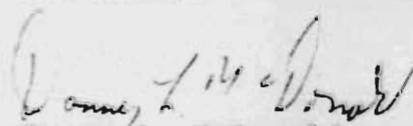
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514026

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Robert H. Frank
Willowtree Data Systems
421 South Beverly Drive
Beverly Hills, California 90212

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 receipt of this Order and Subpoena.

93043514027

MUR 2727
Robert H. Frank
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald
Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514028

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Robert H. Frank

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Robert H. Frank made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Robert H. Frank received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Robert H. Frank violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514029



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Jacob Sperling

Jacob Sperling
999 South Hatcher Avenue
City of Industry, California 91744

Dear Mr. Sperling:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514030

Jacob Sperling
Page 2

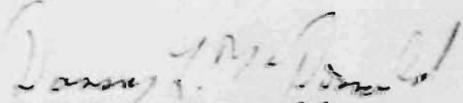
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514031

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Jacob Sperling
999 South Hatcher Avenue
City of Industry, California

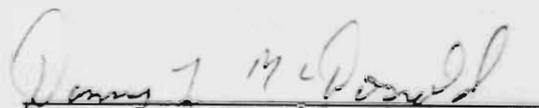
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514032

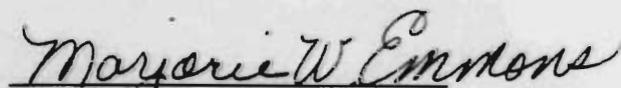
MUR 2727
Jacob Sperling
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514033

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Jacob Sperling

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Jacob Sperling made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Jacob Sperling received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Jacob Sperling violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514034



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Peter Roff

Peter Roff
2120 South 2nd
Apartment 4
Arlington, Virginia 22204

Dear Mr. Roff:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514035

Peter Roff
Page 2

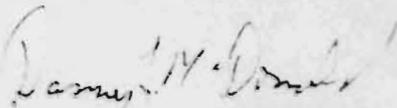
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

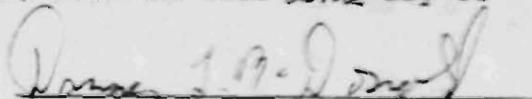

Danny L. McDonald
Chairman

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

93043514036

MUR 2727
Peter Roff
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514038

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Peter Roff

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Peter Roff made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Peter Roff received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Peter Roff violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514039



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
David Zelon

David Zelon
Promuscle
202 Main Street
Venice, California 90291

Dear Mr. Zelon:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514040

David Zelon
Page 2

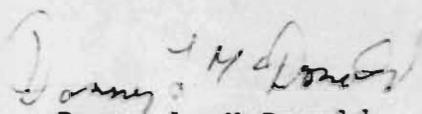
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514041

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: David Zelon
Promuscle
202 Main Street
Venice, California 90291

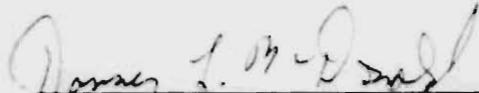
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514042

MUR 2727
David Zelon
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514043

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: David Zelon

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that David Zelon made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that David Zelon received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that David Zelon violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514044



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Gary Willitt

Gary Willitt
222 Parker Street, N.E.
Washington, D.C. 20002

Dear Mr. Willitt:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514045

Gary Willitt
Page 2

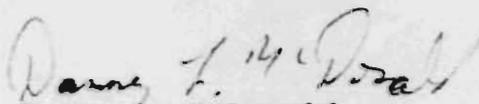
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

9 3 0 4 3 5 1 4 0 4 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Gary Willitt
222 Parker Street, N.E.
Washington, D.C.

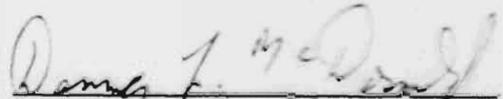
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514047

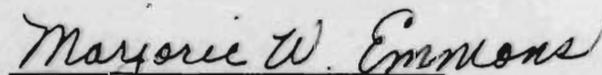
MUR 2727
Gary Willitt
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514048

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Gary Willitt

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Gary Willitt made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Gary Willitt received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Gary Willitt violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514049



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
James White

James White
P.O. Box 10334
Beverly Hills, California 90213

Dear Mr. White:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514050

James White
Page 2

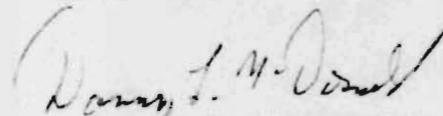
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

9 3 0 4 3 5 1 4 0 5 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: James White
P.O. Box 10334
Beverly Hills, California

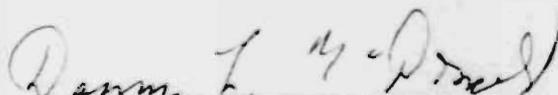
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514052

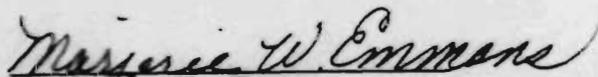
MUR 2727
James White
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514053

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: James White

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that James White made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that James White received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that James White violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514054



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Joseph R. Noriega

Joseph R. Noriega
901 West Whittier Boulevard
Montebello, California 90640

Dear Mr. Noriega:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514055

Joseph R. Noriega
Page 2

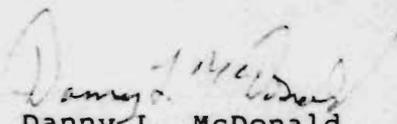
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514056

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Joseph R. Noriega
901 West Whittier Boulevard
Montebello, California 90640

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 receipt of this Order and Subpoena.

93043514057

MUR 2727
Joseph R. Noriega
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514058

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Joseph R. Noriega

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Joseph R. Noriega made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Joseph R. Noriega received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Joseph R. Noriega violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514059



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Patti C. Bridges

Patti C. Bridges
Revel Travel Service
449 South Beverly Drive
Beverly Hills, California 90212

Dear Ms. Bridges:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514060

Patti C. Bridges
Page 2

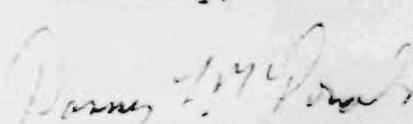
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514061

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Patti C. Bridges
Revel Travel Service
449 South Beverly Drive
Beverly Hills, California 90212

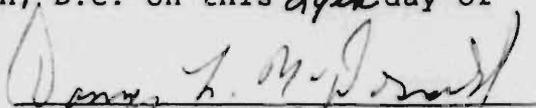
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514062

MUR 2727
Patti C. Bridges
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514063

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Patti C. Bridges

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Patti C. Bridges made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Patti C. Bridges received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Patti C. Bridges violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514064



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Ernestine Crowe

Ernestine Crowe
5926 Wrightcrest Drive
Culver City, California 90232

Dear Mrs. Crowe:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514065

Ernestine Crowe
Page 2

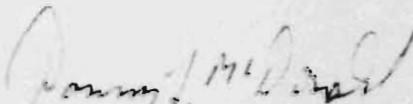
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514066

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Ernestine Crowe
5926 Wrightcrest Drive
Culver City, California 90232

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 receipt of this Order and Subpoena.

93043514067

MUR 2727
Ernestine Crowe
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514068

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Ernestine Crowe

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Ernestine Crowe made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Ernestine Crowe received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Ernestine Crowe violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

23043514069



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Paula Hyman

Paula Hyman
10415 Ravenwood Court
Los Angeles, California 90077

Dear Mrs. Hyman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514070

Paula Hyman
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514071

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Paula Hyman
10415 Ravenwood Court
Los Angeles, California 90077

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 receipt of this Order and Subpoena.

93043514072

MUR 2727
Paula Hyman
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514073

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Paula Hyman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Paula Hyman made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Paula Hyman received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Paula Hyman violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514074



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Ruth Sanchez

Ruth Sanchez
1255 North Kings Road
Number 104
Los Angeles, California 90048

Dear Ms. Sanchez:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514075

Ruth Sanchez
Page 2

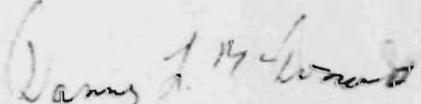
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514076

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Ruth Sanchez
1255 North Kings Road
Number 104
Los Angeles, California 90048

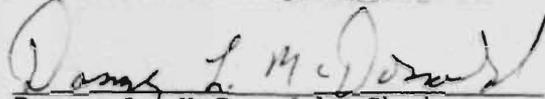
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514077

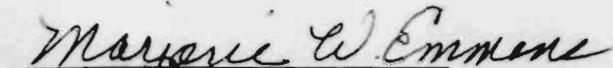
MUR 2727
Ruth Sanchez
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514078

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Ruth Sanchez

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Ruth Sanchez made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Ruth Sanchez received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Ruth Sanchez violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514079



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Mary Siebuhr

Mary Siebuhr
2002 Kerwood Avenue
Los Angeles, California 90025

Dear Ms. Siebuhr:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514080

Mary Siebuhr
Page 2

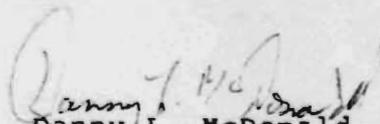
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514081

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mary Siebuhr
2002 Kerwood Avenue
Los Angeles, California 90025

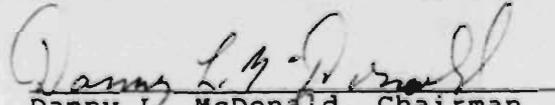
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514082

MUR 2727
Mary Siebuhr
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514083

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Mary Siebuhr

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Mary Siebuhr made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Mary Siebuhr received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Mary Siebuhr violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514084



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Helene Simms

Helene Simms
10615 Rose Avenue
Los Angeles, California 90034

Dear Ms. Simms:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514085

Helene Simms
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514086

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Helene Sims
10615 Rose Avenue
Los Angeles, California 90034

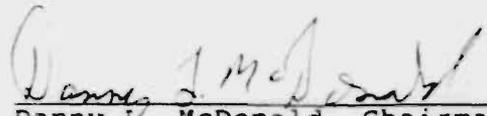
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514087

MUR 2727
Helene Sims
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny V. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514088

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Helene Simms

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Helene Simms made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Helene Simms received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Helene Simms violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514089



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Shelly Sperling

Shelly Sperling
999 South Hatcher Avenue
City of Industry, California 91744

Dear Ms. Sperling:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514090

Shelly Sperling
Page 2

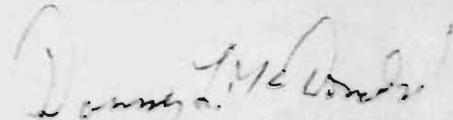
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043514091

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

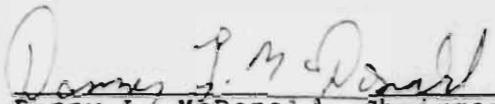
TO: Shelly Sperling
999 South Hatcher Avenue
City of Industry, California

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 receipt of this Order and Subpoena.

93043514092

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514093

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Shelly Sperling

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Shelly Sperling made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Shelly Sperling received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Shelly Sperling violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514094



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Shifra Weisman Hastings

Shifra Weisman Hastings
270 North Canon Drive
Number 1303
Beverly Hills, California 90212

Dear Ms. Hastings:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514095

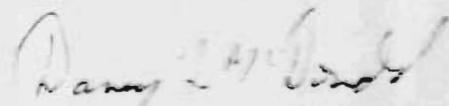
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



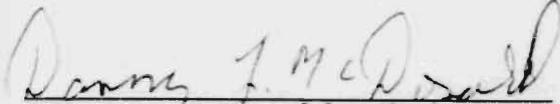
Danny L. McDonald
Chairman

Enclosures
Order and Subpoena
Factual and Legal Analysis
Procedures

93043514096

MUR 2727
Shifra Weisman Hastings
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514098

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Shifra Weisman Hastings

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Shifra Weisman Hastings made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Shifra Weisman Hastings received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Shifra Weisman Hastings violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514099



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Beverly Horowitz

Beverly Horowitz
9301 Wilshire Boulevard
Suite 206
Beverly Hills, California 90212

Dear Mrs. Horowitz:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514100

Beverly Horowitz
Page 2

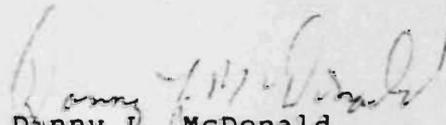
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-6200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514101

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Beverly Horowitz
9301 Wilshire Boulevard
Suite 206
Beverly Hills, California 90212

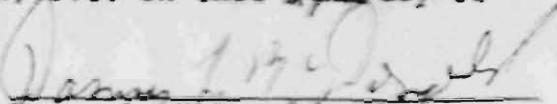
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514102

MUR 2727
Beverly Horowitz
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 29th day of Sept., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514103

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Beverly Horowitz

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Beverly Horowitz made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Beverly Horowitz received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Beverly Horowitz violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514104



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Janae Dedrick

Janae Dedrick
Nash and Company
420 South Beverly Drive
Beverly Hills, California 90212

Dear Ms. Dedrick:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514105

Janae Dedrick
Page 2

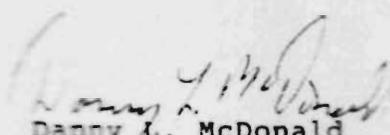
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 30 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.

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

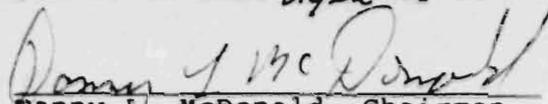

Danny L. McDonald
Chairman

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

93043514106

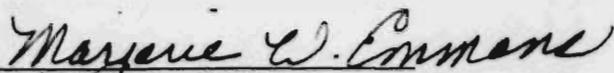
MUR 2727
Janae Dedrick
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514108

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Janae Dedrick

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Janae Dedrick made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Janae Dedrick received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Janae Dedrick violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514109



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Solania Ramirez

Solania Ramirez
2201 Alabama Street
Number 2
Huntington Beach, California 92647

Dear Mr. Ramirez:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514110

Solania Ramirez
Page 2

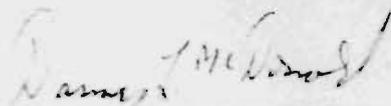
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

9304351411

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Solania Ramirez
2201 Alabama Street
Number 2
Huntington Beach, California 92647

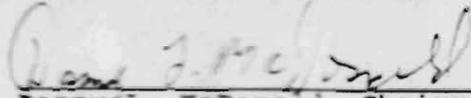
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514112

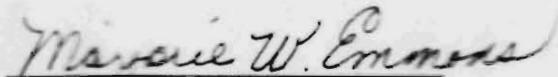
MUR 2717
Solania Ramirez
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 2nd day of Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

9 3 0 4 3 5 1 4 1 1 3

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Solania Ramirez

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Solania Ramirez made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Solania Ramirez received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Solania Ramirez violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

9304351414



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Susan Herbst

Susan Herbst
104 Howard Street
Apartment M
Fredonia, New York 10463

Dear Ms. Herbst:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514115

Susan Herbst
Page 2

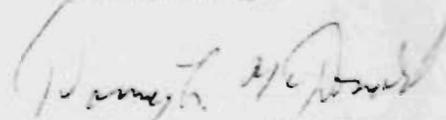
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

9 3 0 4 3 5 1 4 1 1 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Susan Herbst
104 Howard Street
Apartment M
Fredonia, New York 10463

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 receipt of this Order and Subpoena.

93043514117

MUR 2727
Susan Herbst
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *29th* day of *Sept.*, 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514118

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Susan Herbst

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Susan Herbst made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Susan Herbst received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Susan Herbst violated 2 U.S.C. § 441f by permitting her name to be used to effect a contribution in the name of another.

93043514119



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Clifton Sherwood

Clifton Sherwood
17531 Garland Court
Castro Valley, California 94546

Dear Mr. Sherwood:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514120

Clifton Sherwood
Page 2

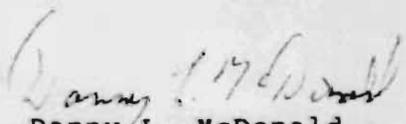
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

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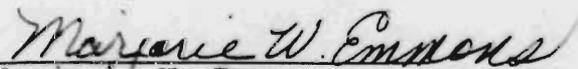
MUR 2727
Clifton Sherwood
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514123

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Clifton Sherwood

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Clifton Sherwood made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Clifton Sherwood received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Clifton Sherwood violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514124



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Alan Setlin

Alan Setlin
449 South Beverly Drive
Suite 206
Beverly Hills, California 90212

Dear Mr. Setlin:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514125

Alan Setlin
Page 2

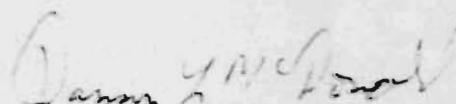
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514126

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Alan Setlin
449 South Beverly Drive
Suite 206
Beverly Hills, California 90212

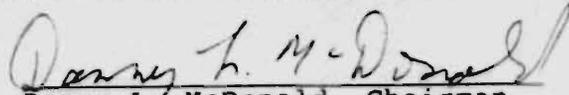
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

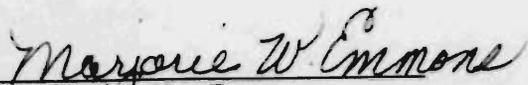
93043514127

MUR 2727
Alan Setlin
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 2nd day of Oct., 1989.


Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514128

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Alan Setlin

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Alan Setlin made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Alan Setlin received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Alan Setlin violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514129



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Jeffrey Pandin

Jeffrey Pandin
220 G Street, N.E.
Washington, D.C. 20002

Dear Mr. Pandin:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514130

Jeffrey Pandin
Page 2

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

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Order and Subpoena
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Designation of Counsel Form

93043514131

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Jeffrey Pandin
220 G Street, N.E.
Washington, D.C. 20002

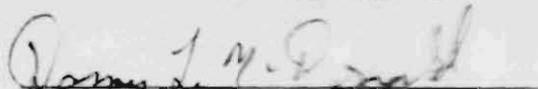
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514132

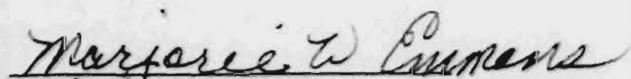
MUR 2727
Jeffrey Pandin
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514133

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Jeffrey Pandin

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Jeffrey Pandin made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Jeffrey Pandin received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Jeffrey Pandin violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514134



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Joey Pento

Joey Pento
15442 Mulholland Drive
Bel Air, California 90077

Dear Mr. Pento:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514135

Joey Pento
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald
Chairman

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

93043514136

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Joey Pento
15442 Mulholland Drive
Bel Air, California 90077

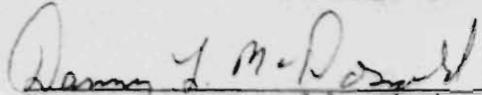
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514137

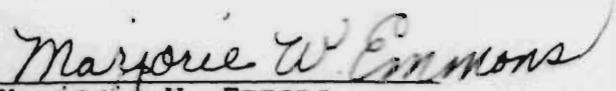
MUR 2727
Joey Pento
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 2nd day of Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514138

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Joey Pento

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Joey Pento made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Joey Pento received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Joey Pento violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514139



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
Milton Zarachoff

Milton Zarachoff
10445 Wilshire Boulevard
Apartment 306
Los Angeles, California 90212

Dear Mr. Zarachoff:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514140

Milton Zarachoff
Page 2

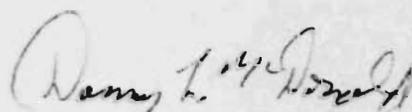
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

9304351411

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Milton Zarachoff
10445 Wilshire Boulevard
Apartment 306
Los Angeles 90212

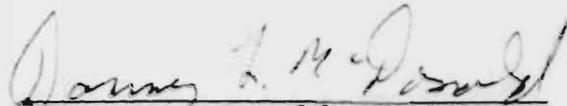
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514142

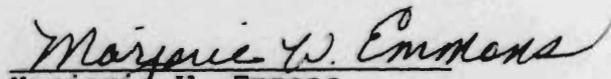
MUR 2727
Milton Zarachoff
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514143

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Milton Zarachoff

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Wallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Milton Zarachoff made an "in-kind" contribution to the Committee by writing a check to Greenstrips Media for the production and airing of a television commercial featuring Wallen. The indictment further indicates that Milton Zarachoff received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Milton Zarachoff violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514144



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Warren Simms

Warren Simms
1326 G Street, S.E.
Washington, D.C. 20003

Dear Mr. Simms:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514145

Warren Simms
Page 2

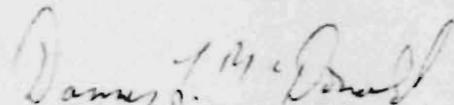
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514146

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Warren Simms
216 North Foothill Road
Beverly Hills, California 90210

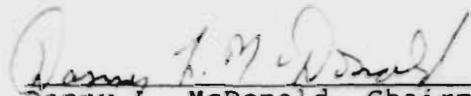
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514147

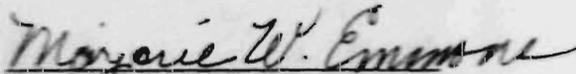
MUR 2727
Warren Simms
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514148

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Warren Simms

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Warren Simms made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Warren Simms received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Warren Simms violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514149



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Joseph Nash

Joseph Nash
429 South Beverly Drive
8th Floor
Beverly Hills, California 90212

Dear Mr. Nash:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514150

Joseph Nash
Page 2

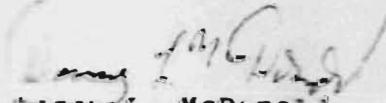
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 10 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.

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514151

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Joseph Nash
429 South Beverly Drive
8th Floor
Beverly Hills, California 90212

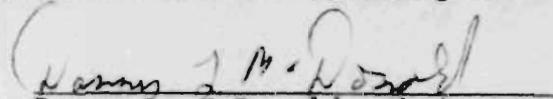
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

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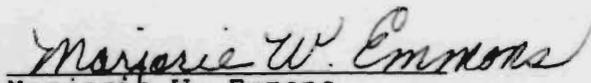
MUR 2727
Joseph Nash
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514153

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Joseph Nash

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Joseph Nash made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Joseph Nash received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Joseph Nash violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

9 3 0 4 3 5 1 4 1 5 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Leslie Lindenblatt

Leslie Lindenblatt
Adams-Linden Public Relations
17003 Ventura Boulevard
Encino, California 91436

Dear Ms. Lindenblatt:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514155

Leslie Lindenblatt
Page 2

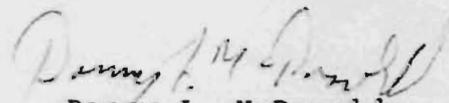
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514156

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)

MUR 2727

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Leslie Lindenblatt
Adams-Linden Public Relations
17003 Ventura Boulevard
Encino, California 91436

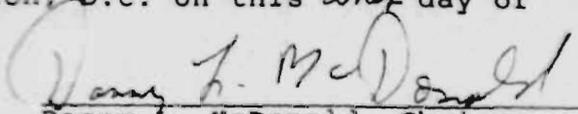
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

93043514157

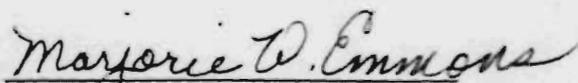
MUR 2727
Leslie Lindenblatt
Page 2

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *2nd* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514158

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Leslie Lindenblatt

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that Leslie Lindenblatt made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that Leslie Lindenblatt received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that Leslie Lindenblatt violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514159



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MUR: 2727
David Weisman

David Weisman
14001 Ventura Boulevard
Sherman Oaks, California 91403

Dear Mr. Weisman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514160

David Weisman
Page 2

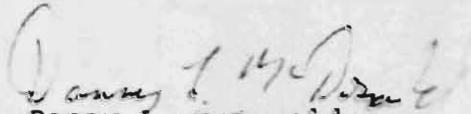
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514161

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: David Weisman
14001 Ventura Boulevard
Sherman Oaks, California

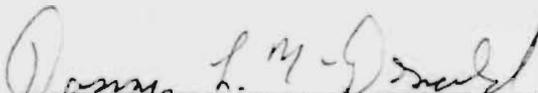
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment 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 receipt of this Order and Subpoena.

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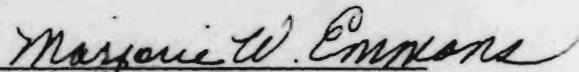
MUR 2727
David Weisman
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514163

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: David Weisman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their name's to be used to effect such contributions. 2 U.S.C. § 441f.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December, 1988. The indictment also states that David Weisman made an "in-kind" contribution to the Committee by writing a check to Greenstripe Media for the production and airing of a television commercial featuring Vallen. The indictment further indicates that David Weisman received reimbursement from Michael Goland or his associates for this contribution. Therefore, there is reason to believe that David Weisman violated 2 U.S.C. § 441f by permitting his name to be used to effect a contribution in the name of another.

93043514164



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
123 Palm
Rialto, CA 92376

RE: MUR 2727
Committee to Elect Ed
Vallen and Audrey M.
Barbour, as treasurer

Dear Ms. Barbour:

On August 3, 1989, the Federal Election Commission found that there is reason to believe the Committee to Elect Ed Vallen ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 434(a)(2)(A)(ii) and 434(b), 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. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and

93043514165

Audrey Barbour, Treasurer
Page 2

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 you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

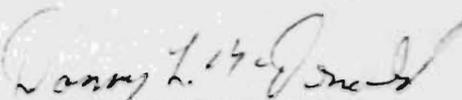
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514166

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Audrey Barbour, Treasurer
 Committee to Elect Ed Vallen
 123 Palm
 Rialto, CA 92376

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 receipt of this Order and Subpoena.

93043514167

MUR 2727
Audrey Barbour, Treasurer
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *29th* day of
Sept. 1989.

Danny L. McDonald

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514168

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

1. State whether Ed Vallen was featured in a television advertisement in October or November 1986.
2. Explain how the advertisement referred to in Question 1 came about.
3. Identify the persons who produced and aired the advertisement referred to in Question 1.
4. Identify the persons who paid for the production and airing of the advertisement referred to in Question 1 and state the amount paid by each person identified.
5. State the dates on which the advertisement referred to in Question 1 was aired on television.
6. State the total cost of the production and airing of the advertisement referred to in Question 1 and provide copies of all documents regarding the financing of this advertisement.
7. Provide the addresses of the following individuals:
 - a) Dick Famiglietti,
 - b) Susan Herbst,
 - c) Maurice Hyman,
 - d) Paula Hyman,
 - e) Mike and Sandy Katz,
 - f) Tom Kindle,
 - g) Herb and Mollie Krause,
 - h) Robert Krause,
 - i) Steven Lee,
 - j) Monte Morrow,
 - k) Colleen Morrow,
 - l) Joe Noriega,
 - m) Jeff Pandin,
 - n) Peter Roff,
 - o) Warren Simms,
 - p) Shelly Sperling,
 - q) Mark Victor,
 - r) Gary Willet,
 - s) Sandor Habalow,
 - t) Robert and Ann Ives, and
 - u) Patti Bridges.

93043514169

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer MUR 2727

The Federal Election Campaign Act of 1971, as amended ("the Act") places a \$1,000 limit on the aggregate contributions which an individual may make to a candidate and his authorized political committees with respect to any election for Federal office, 2 U.S.C. § 441a(a)(1)(A). The Act also prohibits committees from knowingly accepting contributions in excess of these limitations. 2 U.S.C. § 441a(f).

The Act also imposes reporting requirements on all political committees. See 2 U.S.C. § 434. Each report submitted to the Commission must include an itemization of each contribution of over \$200 received during that reporting period. 2 U.S.C. § 434(b).

Information obtained by the Federal Election Commission in the normal course of carrying out its supervisory responsibilities indicates that Ed Vallen for Senate ("the Committee") may have failed to report the full value of a television ad which was produced and aired in late October and early November 1986, accepted excessive contributions and failed to file a Post-General Election Report.

Newspaper articles, including the September 13, 1988 edition of the Washington Post, the June 24, 1987 edition of the Wall Street Journal and the September/October 1987 edition of Campaigns and Elections indicate that the Committee received

93043514170

approximately \$120,000 in "in-kind" contributions in the form of a television ad featuring Ed Vallen which was aired toward the end of Vallen's 1986 campaign for the United States Senate. A December 1988 indictment against Michael Goland and others for soliciting individual contributors to "pay" for the ad and for reimbursing those contributors also states that a total of \$120,000 was paid for the production for the ad and air time.

The Committee's 48-Hour Contribution Notices indicates that the following forty individuals named in the indictment made a total of \$98,000 in "in-kind" contributions to the Committee between October 31 and November 4, 1986:

David Hultquist, Jerry Hanrahan, Samir Mobassaly, Clifton Sherwood, Maury White, Richard Horowitz, Zvi Sperling, Renee Lang Burg, Jacob Sperling, David Weisman, Shifra Weisman, Robert Ives, Michael Berger, George Korz, Marcel Valdes, James White, Ruth Sanchez, Joseph Wash, Alan Setlin, Michael Daniel, Leslie Lindenblatt, Mary Siebuhr, A. Bruce Adams, Nachman Shatz, Robert Frank, Mark Cohen, Judy and Michael Altman, Kelly Bixby, Calvin Crowe, Todd Silver, Joey Pento, Daniel Nash, Patti Bridges, David Zelon, Marc Massiorck, Janae Dedrick, Helene Sims, Sloan Ramirez and Milton Zarachoff.

According to the indictment, their contributions were made in amounts of \$1,500 to \$4,000. The Committee did not file a Post-General Election Report or any subsequent reports.

The Committee apparently knew that it was accepting excessive contributions for individuals because it reported many "in-kind" contributions of over \$1,000. Therefore, there is

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reason to believe that the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly receiving excessive contributions.

The Committee's reports indicate that it had received less than \$104,000 in total contributions (\$5,640 reported in Pre-General Report and \$98,000 as "in-kind" contributions within two weeks of the election). However, the newspaper reports and the indictment indicate that Vallen received television production services worth \$120,000. Therefore, it appears that the Committee may have failed to report the full value of the ad. There is reason to believe that the Committee and Audrey Barbour, as treasurer, violated 2 U.S.C. § 434(b). Further, because the Committee failed to file the 1986 Post-General Report, there is also reason to believe that the Committee and Audrey Barbour, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(ii).

93043514172



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joe Winkelmann, President
Greenstripe Media, Inc.
901 Dove Street, Suite 220
Newport Beach, CA 92660

RE: MUR 2727

Dear Mr. Winkelmann:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Commission has issued the attached order and subpoena which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

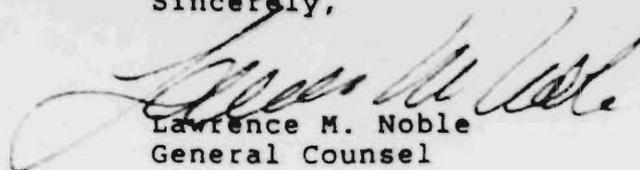
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information within 15 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

93043514173

Joe Winkelmann
Page 2

If you have any questions, please contact Anthony Buckley,
the attorney assigned to this matter, at (800) 424-9530.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

93043514174

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Joe Winkelmann, President
Greenstripe Media
901 Dove Street, Suite 220
Newport Beach, CA 92660

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 receipt of this Order and Subpoena.

93043514175

MUR 2727
Greenstripe Media
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *4th* day
of *Oct.*, 1989.

Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (6 pages)

93043514176

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State whether Greenstripe Media was hired in 1986 to produce and air a television advertisement featuring Ed Vallen. If so, please provide a copy of any such contract and all documents relating to this contract.
2. Identify all persons who contacted Greenstripe Media to arrange for the production of the advertisement referred to in Question 1 and identify the person at Greenstripe Media who was responsible for handling the production of this advertisement.
3. State generally how Greenstripe Media determines the amount to charge for the production and airing of a television advertisement.
4. State how much Greenstripe Media charged to produce or arrange for the production and airing of the advertisement referred to in Question 1 and state the basis for that charge.
5. Provide copies of all documents relating to the financing of the advertisement referred to in Question 1 and copies of both sides of all checks received in payment for the advertisement.
6. State whether Greenstripe Media returned any funds received for the production and airing of the advertisement referred to in Question 1. If so, please identify to whom such funds were remitted and provide a copy of both sides of each such check.
7. Provide the addresses of the following individuals:
 - a) Dick Famiglietti,
 - b) Susan Herbst,
 - c) Maurice Hyman,
 - d) Paula Hyman,
 - e) Mike and Sandy Katz,
 - f) Tom Kindle,
 - g) Herb and Mollie Krause,
 - h) Robert Krause,
 - i) Steven Lee,
 - j) Monte Morrow,
 - k) Colleen Morrow,
 - l) Joe Noriega,
 - m) Jeff Pandin,
 - n) Peter Roff,
 - o) Warren Simms,

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7. Provide the addresses of the following individuals
(continued):

- p) Shelly Sperling,
- q) Mark Victor,
- r) Gary Willet,
- s) Sandor Habalow,
- t) Robert and Ann Ives, and
- u) Patti Bridges.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 5, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Michael Goland
Balboa Construction Company, Inc.
20221 Prairie Street
Chastworth, CA 91311

RE: MUR 2727
Balboa Construction
Company, Inc.

Dear Mr. Goland:

On August 3, 1989, the Federal Election Commission found that there is reason to believe you knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441b, 441a(a)(3) and 441f, 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

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Michael Goland
Balboa Construction Company, Inc.
Page 2

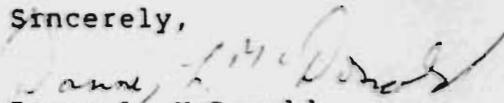
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending 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, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514180

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Michael Goland, President
Balboa Construction Company, Inc.
20221 Prairie Street
Chatsworth, CA 91311

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.

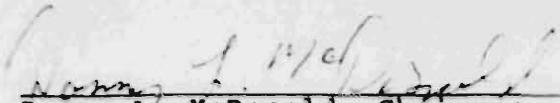
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission

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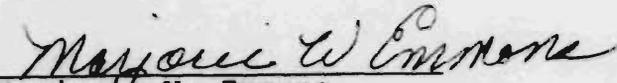
MUR 2727
Balboa Construction Company, Inc.
Page 2

has hereunto set his hand in Washington, D.C. on this *2nd* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514182

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State the nature of the relationships of Michael Goland, Sandor Habalow, Mark Barnes, Michael Altman and Lyle Weisman to Balboa Construction Company, Inc. in 1986, (e.g. officer, employee, consultant).

2. State whether Colleen Morrow and Lyle Weisman were employed by Balboa Construction Company in 1986. If so, state the duties and responsibilities of their positions and their monthly salaries. Please provide copies of their job descriptions and of all salary and expense payments made by Balboa Construction to these individuals in 1986.

3. State whether one of the responsibilities or duties of Colleen Morrow or Lyle Weisman for Balboa Construction in 1986 was to organize a campaign against Ed Zschau's efforts to win election to the United States Senate from California. If so, please explain how they carried out this responsibility or duty, state the total amount spent by Balboa Construction on the campaign, and provide copies of all documents relating to these expenditures.

4. State whether Balboa Construction paid \$120,000 or less to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 to produce and air a television advertisement featuring Ed Vallen. Please provide copies of all documentation relating to such payments.

5. State the total funds spent by Balboa Construction in 1985 through 1987 to prevent Ed Zschau from being elected to the United State Senate from California.

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: **Balboa Construction Company, Inc.**

MUR: 2727

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits corporations from making contributions and expenditures in connection with federal elections. 2 U.S.C. § 441b. For purposes of Section 441b, the Act defines "contributions" and "expenditures" to include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value. 2 U.S.C. § 441b(b)(2).

Information obtained by the Federal Election Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in "in-kind" contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits. Michael Goland was indicted for these activities in December 1988.

The Justice Department recently forwarded to the Commission a copy of the December 1988 indictment against Michael Goland and others. The indictment alleges that the conduit scheme arose in the following manner: In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from Washington, D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow

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decided to promote the candidacy of American Independent Party candidate Ed Vallen, to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials. On October 27, 1986, Goland directed Michael Altman, who was holding \$100,000 of Goland's personal funds, to write a \$90,000 check to Greenstripe Media with the money he had previously given him. Goland also caused a \$30,000 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advanced to pay for the ads. Goland, Sandor Habalow and Lyle R. Weisman then contacted over 50 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Balboa Construction.

93043514185

Information in the indictment indicates that Balboa Construction Company, Inc. employed an individual, Colleen Morrow, for the specific purpose of running a campaign to defeat Ed Zschau and issued a \$30,000 check to pay a portion of the costs of the Vallen ad. Therefore, there is reason to believe that Balboa Construction Company, Inc. violated 2 U.S.C. § 441b by using corporate funds for these purposes.

93043514186



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Sandor Habalow

Sandor Habalow
11645 Wilshire Blvd.
Suite 800
Los Angeles, California 90025

Dear Mr. Habalow:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514187

Sandor Habalow
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

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

93043514188

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
)

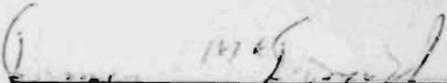
SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Sandor Habalow
11645 Wilshire Blvd
Suite 800
Los Angeles, California 90025

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 receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514189

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State the nature of your relationships with Michael Goland, Lyle Weisman, Mark Barnes, Michael Altman and Colleen Morrow in 1986, (e.g. employer, employee, co-worker, business associate, relative, co-member of association or political committee).
2. State whether you solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of a television commercial featuring Ed Vallen. Please identify these people, state whether you promised them reimbursement for their payments, whether you reimbursed them and explain the way in which you provided such reimbursement to them. Please provide copies of all documents relating to these reimbursement payments.
3. State whether Michael Goland solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 for the production and airing of the advertisement referred to in Question 2. State whether he promised these persons reimbursement for such payments, whether he provided reimbursement, and whether you assisted him in reimbursing these persons. If so, please explain your part in the execution of the reimbursement.
4. Explain the roles of Michael Altman, Colleen Morrow and Lyle Weisman with respect to the solicitation and reimbursement of persons who made payments for the production and airing of a television advertisement featuring Ed Vallen in 1986.
5. State the total funds spent by Michael Goland to prevent Ed Zschau from being elected to the United State Senate from California.
6. Provide the addresses of the following individuals:
- a) Dick Famiglietti,
 - b) Susan Herbst,
 - c) Maurice Hyman,
 - d) Paula Hyman,
 - e) Mike and Sandy Katz,
 - f) Tom Kindle,
 - g) Herb and Mollie Krause,
 - h) Robert Krause,
 - i) Steven Lee,
 - j) Monte Morrow,
 - k) Colleen Morrow,

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MUR 2727
Sandor Habalow
Page 5

6. Provide the addresses of the following individuals
(continued):

- l) Joe Noriega,
- m) Jeff Pandin,
- n) Peter Roff,
- o) Warren Simms,
- p) Shelly Sperling,
- q) Mark Victor,
- r) Gary Willet,
- s) Robert and Ann Ives, and
- t) Patti Bridges.

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Sandor Habalow

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their names to be used to effect such contributions. 2 U.S.C. § 441f. This section also prohibits the knowing acceptance by committees of contributions made by one person in the name of another person. The Commission has further interpreted this provision to cover situations where an individual who neither made a contribution in his own name nor permitted his name to be used to effect a contribution in the name of another actively assists in the making of such contributions.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits and that Sandor Habalow was involved in this conduit reimbursement scheme. The September 13, 1988, edition of the Washington Post carried a news account stating that the FBI was investigating Michael Goland for allegedly funneling money through other individuals to the Committee to Elect Ed Vallen to Senate ("the Committee"). The article states that Goland's support of the Vallen campaign was essentially an effort to attract conservative voters away from Ed

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Zschau in a tight race between Representative Ed Zschau and incumbent Senator Alan Cranston. The article quotes another newspaper account which states that Goland made over \$100,000 of such contributions to the Committee within two weeks of the general election. This article, along with two earlier articles in the Wall Street Journal (June 24, 1987) and Campaigns and Elections (September/October 1987), indicates that the contributions were paid to Mark Barnes, a political consultant and a principal in Political Advertising and Consulting, to produce and buy time for a television ad for Vallen. Vallen told reporters that Barnes called him in October 1986 offering \$120,000 in television production services from "conservative Republicans who don't want Zschau." These articles state that Barnes also contacted the Libertarian Party with a similar offer but that party turned him down once he revealed that he was really working for Goland.

The Justice Department recently forwarded a copy of the December 1988 indictment against Michael Goland, Lyle R. Weisman, Michael Altman and Sandor E. Habalow. The indictment alleges that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f by making an excessive \$120,000 contribution to the Committee through the use of 65 named conduits. In addition, the indictment charges that Goland and two other individuals - Habalow and Weisman - knowingly and willfully caused the treasurer of the Vallen Committee to make

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false statements to the Commission in violation of 18 U.S.C. § 1001 when the Committee treasurer reported that the Goland contributions represented lawful contributions from the conduits. These same three defendants are also charged with unlawful conspiracy in connection with the conduit scheme. Michael Altman is charged, along with Habalow and Weisman, with aiding and abetting Goland to make contributions in the names of others.

Specifically, the indictment alleges that the conduit scheme came about in the following manner. In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from Washington, D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow decided to promote the candidacy of American Independent Party candidate, Ed Vallen, to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials.

In July 1986, Goland provided Michael Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co. with instructions that Altman deposit the check and hold the

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funds for disbursement at Goland's direction in the future. On October 27, 1986, Goland directed Altman to write a \$90,000 check to Greenstripe Media with these funds. Goland also caused a \$30,00 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advance to pay for the ads. Goland, Habalow and Weisman then contacted approximately 56 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Goland's company, Balboa Construction.

The indictment indicates that Sandor Habalow solicited individuals for contributions to the Vallen campaign with promises that they would be reimbursed and arranged for their reimbursement by Goland in knowing contravention of the Act. Therefore, there is reason to believe that Sandor Habalow violated 2 U.S.C. § 441f by actively assisting Michael Goland in making contributions in the names of others.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

October 5, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Barnes
Political Advertising & Consulting
7056 Ramsgate Avenue
Los Angeles, CA 90045

RE: MUR 2727

Dear Mr. Barnes:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Commission has issued the attached order and subpoena which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

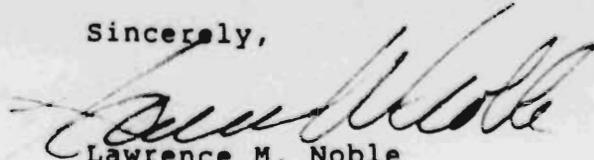
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information with 15 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

93043514196

Mark Barnes .
Page 2

If you have any questions, please contact Anthony Buckley,
the attorney assigned to this matter, at (800) 424-9530.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

93043514197

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 2727
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mark Barnes
Political Consulting & Advertising
7056 Ramsgate Avenue
Los Angeles, CA 90045

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 receipt of this Order and Subpoena.

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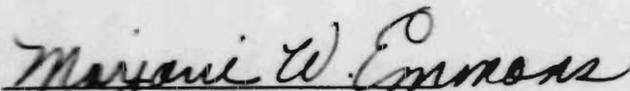
MUR 2727
Mark Barnes
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *4th* day of
Oct., 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514199

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State whether you were employed by or contracted with Greenstripe Media in 1986. If so, please state your title and responsibilities and provide a copy of your contract with Greenstripe Media.
2. State whether you were employed by or contracted with Political Advertising & Consulting in 1986. If so, please state your title and responsibilities and provide a copy of your contract with Political Advertising and Consulting.
3. Explain the nature of your relationship with Michael Goland in 1986 (e.g., employer, employee, partner, consultant, relative).
4. State whether Political Advertising & Consulting contracted with Greenstripe Media in 1986 to produce and air a television advertisement featuring Ed Vallen. If so, please provide a copy of any such contract and all documents relating to this contract.
5. State generally how Political Advertising & Consulting determines the amount to charge to produce and/or arrange for the airing of a television advertisement.
6. State how much Political Advertising & Consulting charged to produce and/or arrange for the production and airing of the advertisement referred to in Question 4 and state the basis for that charge.
7. Provide copies of all documents relating to the financing of the advertisement referred to in Question 4 and copies of both sides of all checks received to pay for the advertisement.
8. Identify all persons that made payments in connection with the advertisement referred to in Question 4.
9. State whether the persons identified in response to Question 8 were reimbursed for their payments and whether you assisted with such reimbursement.
10. State whether you personally paid for any portion of the advertisement referred to in Question 4.
11. State whether you solicited funds from anyone to pay for the advertisement referred to in Question 4. If so, identify whom you solicited.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 10, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MUR: 2727
Lyle Weisman

Lyle Weisman
220 North Canyon Drive
Suite 1303
Beverly Hills, California 90210

Dear Mr. Weisman:

On August 3, 1989, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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 you. 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 and Subpoena to Produce Documents must be submitted within 15 days of your receipt of this order and subpoena. 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 and subpoena. If you intend to be represented by counsel, 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 or other communications from the Commission.

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

93043514201

Lyle Weisman
Page 2

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

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

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 Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Danny L. McDonald
Chairman

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

93043514202

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 2727
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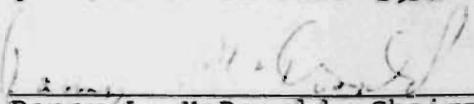
SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Lyle Weisman
220 North Canyon Drive
Suite 1303
Beverly Hills, California 90210

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.

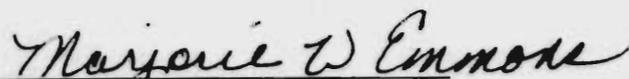
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *6th* day of *Oct.*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Order and Subpoena (5 pages)

93043514203

INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. State the nature of your relationships with Michael Goland, Sandor Habalow, Mark Barnes, Michael Altman and Colleen Morrow in 1986, (e.g. employer, employee, co-worker, business associate, relative, co-member of association or political committee).

2. State whether you were employed by Balboa Construction Company or Michael Goland in 1986. If so, state the duties and responsibilities of the position and your monthly salary. Please provide copies of your job description and salary and expense payments from Balboa Construction and Michael Goland in 1986.

3. State whether one of your responsibilities or duties for Balboa Construction or Michael Goland in 1986 was to organize or assist in organizing a campaign against Ed Zschau's efforts to win election to the United States Senate from California. If so, please explain how you carried out this responsibility or duty, state the total amount spent by Balboa Construction on the campaign and provide copies of all documents relating to these expenditures.

4. State whether you contacted Mark Barnes, Political Advertising & Consulting, or Greenstripe Media to make arrangements for the production and airing of a television commercial featuring Ed Vallen.

5. State whether Michael Goland or Balboa Construction paid \$120,000 to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 to produce and air a television advertisement featuring Ed Vallen. Please provide copies of all documentation relating to such payments.

6. State whether Michael Goland solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising & Consulting in 1986 for the production and airing of the advertisement referred to in Question 5. State whether he promised these persons reimbursement for such payments, whether he provided reimbursement, and whether you assisted him in reimbursing these persons. If so, please explain your part in the execution of the reimbursement.

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MUR 2727

Lyle R. Weisman

Page 5

7. State whether you solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of a television commercial featuring Ed Vallen. Please identify these people, state whether you promised them reimbursement for their payments, whether you reimbursed them and explain the way in which you provided such reimbursement to them.

8. Explain the roles of Michael Altman, Sandor Habalow, and Lyle Weisman with respect to the solicitation and reimbursement of persons who made payments for the production and airing of a television advertisement featuring Ed Vallen in 1986.

9. State the total funds spent by Balboa Construction in 1985 through 1987 to prevent Ed Zschau from being elected to the United State Senate from California.

10. Provide the addresses of the following individuals:

- a) Dick Famiglietti,
- b) Susan Herbst,
- c) Maurice Hyman,
- d) Paula Hyman,
- e) Mike and Sandy Katz,
- f) Tom Kindle,
- g) Herb and Mollie Krause,
- h) Robert Krause,
- i) Steven Lee,
- j) Monte Morrow,
- k) Colleen Morrow,
- l) Joe Noriega,
- m) Jeff Pandin,
- n) Peter Roff,
- o) Warren Simms,
- p) Shelly Sperling,
- q) Mark Victor,
- r) Gary Willet,
- s) Sandor Habalow,
- t) Robert and Ann Ives, and
- u) Patti Bridges.

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 2727

RESPONDENT: Lyle Weisman

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits individuals from making contributions in the name of another person or knowingly permitting their names to be used to effect such contributions. 2 U.S.C. § 441f. This section also prohibits the knowing acceptance by committees of contributions made by one person in the name of another person. The Commission has further interpreted this provision to cover situations where an individual who neither made a contribution in his own name nor permitted his name to be used to effect a contribution in the name of another actively assists in the making of such contributions.

Information obtained by the Commission in the normal course of carrying out its supervisory responsibilities indicates that Michael Goland made \$120,000 in excessive contributions to Ed Vallen for Senate ("the Committee") in 1986 through the use of approximately sixty-five conduits and that Sandor Habalow was involved in this conduit reimbursement scheme. The September 13, 1988, edition of the Washington Post carried a news account stating that the FBI was investigating Michael Goland for allegedly funneling money through other individuals to the Committee to Elect Ed Vallen to Senate ("the Committee"). The article states that Goland's support of the Vallen campaign was essentially an effort to attract conservative voters away from Ed

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Zschau in a tight race between Representative Ed Zschau and incumbent Senator Alan Cranston. The article quotes another newspaper account which states that Goland made over \$100,000 of such contributions to the Committee within two weeks of the general election. This article, along with two earlier articles in the Wall Street Journal (June 24, 1987) and Campaigns and Elections (September/October 1987), indicates that the contributions were paid to Mark Barnes, a political consultant and a principal in Political Advertising and Consulting, to produce and buy time for a television ad for Vallen. Vallen told reporters that Barnes called him in October 1986 offering \$120,000 in television production services from "conservative Republicans who don't want Zschau." These articles state that Barnes also contacted the Libertarian Party with a similar offer but that party turned him down once he revealed that he was really working for Goland.

The Justice Department recently forwarded a copy of the December 1988 indictment against Michael Goland, Lyle R. Weisman, Michael Altman and Sandor E. Habalow. The indictment alleges that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f by making an excessive \$120,000 contribution to the Committee through the use of 65 named conduits. In addition, the indictment charges that Goland and two other individuals - Habalow and Weisman - knowingly and willfully caused the treasurer of the Vallen Committee to make

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false statements to the Commission in violation of 18 U.S.C. § 1001 when the Committee treasurer reported that the Goland contributions represented lawful contributions from the conduits. These same three defendants are also charged with unlawful conspiracy in connection with the conduit scheme. Michael Altman is charged, along with Habalow and Weisman, with aiding and abetting Goland to make contributions in the names of others.

Specifically, the indictment alleges that the conduit scheme came about in the following manner. In June 1986, Goland, as president and controlling shareholder of Balboa Construction Company, Inc. ("Balboa Construction"), hired Colleen Morrow to work for Balboa Construction and to run a \$250,000 campaign against Ed Zschau. Morrow made two trips from Washington, D.C. to Los Angeles for this purpose in September 1986, and in October Goland and Morrow decided to promote the candidacy of American Independent Party candidate, Ed Vallen, to divert votes from Ed Zschau. Goland directed Morrow to arrange for the production and airing of a television commercial promoting Vallen as the real conservative in the race and attacking Ed Zschau. Morrow informed Goland that \$120,000 was needed to pay Greenstripe Media, the company producing and airing the commercials.

In July 1986, Goland provided Michael Altman with a \$100,000 check drawn on the account of Bateman, Eichler, Hill, Richards & Co. with instructions that Altman deposit the check and hold the

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funds for disbursement at Goland's direction in the future. On October 27, 1986, Goland directed Altman to write a \$90,000 check to Greenstripe Media with these funds. Goland also caused a \$30,000 check from Balboa Construction to be issued to Greenstripe Media. On or about the following day, Morrow told Goland that it would be illegal for a single contributor to make a \$120,000 contribution to the Vallen campaign. Goland addressed her concern by stating that he was seeking individual contributors to refund the money he had advanced to pay for the ads. Goland, Habalow and Weisman then contacted approximately 56 conduits to make the payments in return for promises of reimbursement. The conduits wrote checks to Greenstripe and were then reimbursed by Goland. Colleen Morrow assisted Goland in funneling funds from him to Habalow, Weisman and individual contributors in return for their checks to Greenstripe. After receiving individual checks, Greenstripe Media sent two checks totaling \$120,000 to Michael Altman which he remitted to Goland's company, Balboa Construction.

The indictment indicates that Lyle Weisman solicited individuals for contributions to the Vallen campaign with promises that they would be reimbursed and arranged for their reimbursement by Goland in knowing contravention of the Act. Therefore, there is reason to believe that Lyle Weisman violated 2 U.S.C. § 441f by actively assisting Michael Goland in making contributions in the names of others.

060 4320

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 23 AM 9:33

LAW OFFICES
HARLAND W. BRAUN

PROFESSIONAL CORPORATION
2049 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067

SUITE 1800
TWO CENTURY PLAZA BUILDING

AREA CODE 213
277-4777

October 20, 1989

Anthony Buckley, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

MUR 2727

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
89 OCT 23 PM 1:37

Re: Michael Goland Investigation

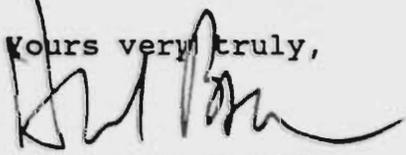
Dear Mr. Buckley:

This letter is to confirm the fact that I will be representing the following persons in the above captioned investigation: 1) Robert Ives, 2) Ann Ives, 3) Richard Horowitz, 4) Beverly Horowitz, 5) Michael Altman, and 6) Judy Altman.

I am in the process of obtaining designation of counsel forms from each client and must discuss with each the ramifications of any conflict of interest. I should be able to get these to you within the next 10 days.

With respect to the order to answer questions and produce documents, as you probably understand we will need at least several weeks to get the documents and answer the questions.

Each of the clients wishes to avail themselves of conciliation and hopefully we'll be able to settle the matter with the Commission.

Yours very truly,

Harland W. Braun

HWB/jjk

93043514210

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Alan J. Setlin,
Chairman

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

DOC 4341
Buckley
Insurance
Established 1960

89 OCT 23 PM 4:09

McMURTRY & BELL, INC.

449 SOUTH BEVERLY DRIVE
SUITE 210
BEVERLY HILLS, CALIFORNIA 90212

89 OCT 23 PM 1:56

(213) 274-8875

October 17, 1989

Via Certified Mail-
Return Receipt Req'd

FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

RE: MUR: 2727 - Alan J. Setlin

Gentlemen:

On or about November 4th 1986, I wrote a check for \$2000.00 to a company called Greenstripe Media. I did not know what the check was for. I did it as a favor which I will explain later.

I do not have a copy of the check. It's my understanding that the FBI have it since when I gave my statement to the agent, he had a copy of the check and it was then that I realized he had it and it had never been returned.

I am enclosing my bank statement for the month of October and November 1986. As you can see, a check of \$2000.00 was paid on November 4th and a check of \$2000.00 was deposited on November 4th.

The reimbursement was given to me by my friend and client, Joseph Nash. On November 4th 1986, Joe Nash who owned the building my office was in and had offices on the third floor of the building, came down to my office and asked me to write a check for \$2000.00 to Greenstripe Media and he said he would give me a check of \$2000.00 to cover it. I asked him why and he said he needed it as a favor for a friend. Since Joe is not only a friend but through the businesses he controls a large clientele. Doing a favor like this did not seem extraordinary.

I do not know of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for television advertising fees featuring Ed Vallan.

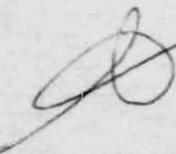
93043514211

October 17, 1989
FEDERAL ELECTION COMMISSION
Page Two

I have never met nor had any knowledge other than that which I read in the paper when this came up last year about Mr. Michael Goland. I am not familiar with any organization to which he belongs nor any political committee.

Had I known the circumstances about the issuance of my check for Mr. Nash, I would not have done it. Should you wish any information other than which I had explained, I would be happy to render it.

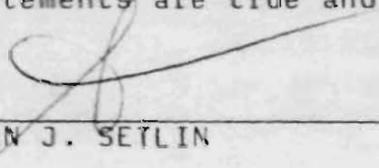
Sincerely,



ALAN J. SETLIN, CLU

AJS:mt

I declare and state as follows: Under the penalty of perjury, all my statements are true and correct.

Signed: 

ALAN J. SETLIN

Dated: October 17th 1989

9 3 0 4 3 5 1 4 2 1 2

GREENSTRIP MEDIA, INC.

PLANNING • PLACEMENT • SYNDICATION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 OCT 25 PM 2:47

06C #364
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 25 AM 10:27

Mr. Anthony Buckley
FEDERAL ELECTION COMMISSION
999 E. Street, NW
Washington, D.C. 20463

October 23, 1989

RE: MUR 2727

Dear Mr. Buckley,

As requested in the FCC, "Order and Subpoena" dated October 5, 1989 the following, to the best of my knowledge, answers the INTERROGATORIES AND REQUEST FOR DOCUMENTS. As you know, the information has been previously provided to George B. Newhouse Jr., the U.S. Attorney, who is handling the related case in United States District Court. George can be reached at (213) 894-3542.

Per, page 5, MUR 2727, the following answers your request by item number:

1. Greenstripe Media was hired to handle broadcast media placement for Ed Vallen in 1986. It should be noted that Greenstripe Media was not involved in any "production," of said campaign, but served only as a "media buying service". (See Enclosure #1, Letter of Authorization.)
2. Again, Greentripe Media was not involved in any "production" only airtime placement. All communications on said placement was between Joe Winkelmann of Greenstripe Media and Mr. Mark Barnes of P.A.C. who handled the actual production. You will note on the enclosed Greenstripe Political Recap, dated 10/27/86 "Special Comment 1," a \$5,500 check to P.A.C. for production. This reimbursement was at the request and direction of Mr. Mark Barnes of P.A.C. (See Enclosure #2)
3. Again, we do not do production. Placement or as you call it "airing" is at 5%. (See Enclosure #2 "GSM Commission @ 5%.)
4. Same answer as question 3 above.
5. See Enclosure #3 which are checks initially received from campaign committee. Also, See Enclosure #4 checks received, unsolicited from individual parties. Also included in both Enclosure #3 and #4 are copies of Greenstripe Media's "Certified Letter" returning said funds at the instruction of Mr. Mark Barnes of P.A.C. This particular letter, should be studied closely, since it clearly covers the most pertinent information on your investigation.
6. Yes, Greestripe Media Inc. returned funds. (See Enclosure #5) this includes a letter from Mr. Mark Barnes instructing us to take such action. Note we do not have copies of the cancelled or "backride" of said checks. You will need to obtain these copies from the banks in question.

7. Addresses for all of the listed persons are included in Enclosure #3 and #4 on the checks. Note this is the only record available on these addresses...since we had no dealings with the listed donors. Furthermore, we do not have any record of addresses for:

HERB AND MOLLIE KRAUSE
COLLEEN MORROW

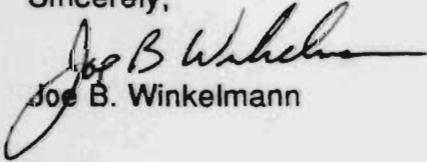
Nor did we have any dealings with these parties.

8. Same answer as question 7 above. Also we show no address for:

SANDOR HABALOW

To the best of my knowledge the above answers all of the requested items.

Sincerely,


Joe B. Winkelmann

9 3 0 4 3 5 1 4 2 1 4

123 So. Palm Avenue
Rialto, California 92376
Tel: (714) 875-4389



16870 Fairfax
Fontana, California 92335

AMERICAN INDEPENDENT - POPULIST PARTY

Candidate
EDWARD B. "ED" VALLEN
FOR United States Senate

Committee to Elect
ED VALLEN for
U.S. Senator
of California

October 22, 1986

Campaign Manager
IRIS L. SHIDLER
State Chairman of Women
American Independents -
Populist Party
123 So. Palm Avenue
Rialto, California

Mr Joe Winklemann
Greenstripe Media
901 Dove St., # 220
Newport Beach, Ca 92660

Executive Manager
CONRAD LACY
Newspaper & Business
Property Manager
HAROLD FERGUSON
Business & Promotion Manager

AUDREY BARBOUR
Auditor
Bookkeeper American Legion
Post 722
Fontana, California

Dear Joe:
You are authorized to
purchase broadcast time
and sign all necessary
forms on behalf of The
Committee to Elect Edward
B. (Ed) ValLEN to United States
Senate.

Iris L. Shidler
Campaign Manager
Edward B. "Ed" ValLEN
Audrey M. Barbour, Treasurer



I pledge every word and effort to uphold the present Constitution
of the United States of America and endeavor to rid the
Country of the evil and Communist threats.

"The Right of the People to Keep and Bear Arms, Shall not be Infringed"

93043514215

GREENSTRIP MEDIA, INC.

PLANNING • PLACEMENT • SYNDICATION

ENCLOSURE # 2

DATE 10/27/86

RADIO _____ TV XX

POLITICAL RECAP

ACCOUNT Committee To Elect Ed Vallen to U.S. Senate

DATE FUNDS RECEIVED AT GSM 10/27/86

AMOUNT RECEIVED \$ 120,000.00

BANK CAL FED/ SEC PACIFIC - Cashiers Checks

LESS: NON-COMMISSIONABLE ITEMS \$ 5,598.00

AGENCY P.A.C., Inc.

AGENCY COMMISSION @ 10% \$ 11,440.20

GSM COMMISSION @ 5% \$ 5,720.10

TOTAL NET PURCHASES \$ 97,241.70

UNSPENT FUNDS \$.00

SPECIAL COMMENTS:

1. PAC Production - \$5,500.00
2. Cashiers Ck fees - 6.00
3. Fed Express - 92.00

93043514216

PURCHASES

STATION	GROSS	NET	B/O*	CK*	STATION	GROSS	NET	B/O*	CK*
KTLA	\$16,950	\$14,407.50	0948	12255					
KCBS	6,000	5,100.	0949	12259					
KRBC	45,950	39,057.50	0950	12253					
KFMB	7,000	5,950.	0952	12260					
KABC	20,000	17,000.	0951	12256					
KCST	5,200	4,420.	0953	12261					
KDOC	170	144.50	0954	12262					
KGTU	13,000	11,050.	0955	12263					
KDOC	132	112.20	0958	12266					

9 3 0 4 3 5 1 4 2 1 7

332 pay to the order of 3321 3 9 2

16-66
AND CONSOLIDATED BANK, F.R.G.
03520 - 00235 Westchester
Los Angeles, California
332

OCT 28 86

10-18
01 86 29
R.E.A.
F.R.B. LOS ANGELES
1288-0018-0

OCT 28 1986
PAY TO THE ORDER OF
BANK OF AMERICA, NT & SA
LOS ANGELES, CA



PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660

FOR production

PAY TO THE ORDER OF

P A C

Five Thousand Five Hundred & 00/100

GREEN STRIPE MEDIA, INC.
801 DOVE STREET, SUITE 220
NEWPORT BEACH, CA 92660

Committee to Elect Ed Valden

PAID

October 27, 1986

\$5,500.00

[Handwritten signature]

9 3 0 4 3 5 1 4 2 1 8

PAY TO THE ORDER OF * * * * * GREEN STRIPE MEDIA, INC. * * * * * \$30,000.00 * * * * *	
S.P.N.B. FED. SAVINGS DEPOSITARY OF THE FEDERAL RESERVE	
129650 2-8111	
SECURITY PACIFIC NATIONAL BANK Bank Check Accounting Services Brea, California 92621-6398	
OFFICE NUMBER 110	DATE OCTOBER 27, 1986
No. 00896881	
16 4 / 1220	

CASHIER'S CHECK

CALIFORNIA FEDERAL

SHERMAN OAKS OFFICE
15054 VENTURE BOULEVARD
SHERMAN OAKS, CA 91403

061587 1986000005

16-7001/3220

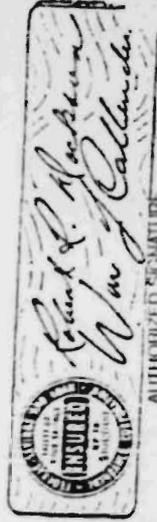
CALIFORNIA FEDERAL SAVINGS
FED. SAVINGS \$90,000.00

PAY TO THE ORDER OF

* GREEN STRIPE MEDIA, INC. ***

AMOUNT

\$90,000.00*****


 AUTHORIZED SIGNATURE
 JUDY ALTMAN

REMITTER *** JUDY ALTMAN ***

CALIFORNIA FEDERAL SAVINGS AND LOAN, LOS ANGELES, CALIFORNIA

93043514219

PAULA HYMAN BEHRENS 2449

10415 RAVENWOOD COURT
LOS ANGELES, CA 90077

11/5/86 10-7151/2222

GREEN STRIPE MEDIA, INC. \$ 2000.00

TWO THOUSAND ⁰⁰/₁₀₀ ~~3002400~~

BEVERLY GLEN
FAR WEST SAVINGS & LOAN
2920 BEVERLY GLEN CIRCLE
LOS ANGELES, CALIFORNIA 90077

[Signature]

MAURICE J. HYMAN 1262

10415 RAVENWOOD CT. 2047-2048
LOS ANGELES, CA 90077

11/5/86 10-7151/2222

PAY TO THE ORDER OF GREEN STRIPE MEDIA, INC. \$ 2000.00

TWO THOUSAND ⁰⁰/₁₀₀ DOLLARS

BEVERLY GLEN
FAR WEST SAVINGS & LOAN
2920 BEVERLY GLEN CIRCLE
LOS ANGELES, CALIFORNIA 90077

[Signature]

STEVEN J. LEE 597

4337 MARINA CITY DR., APT. 102E
MARINA DEL REY, CA 90292

Nov. 4 86 10-7151/2222

Pay to the Order of Green Stripe Media, Inc. \$ 2000.00

Two Thousand only

Bank of America
Century City Main Office 0740
2049 Century Park East
Los Angeles, Ca 90067

Valencia Senator *[Signature]*

93043514220

JERRY HANRAHAN
24883 PIUMA RD.
MALIBU, CA 90295

1134

10/30/96

16-1608 24
1220

Pay to the Order of Green Stripe Media

Four Thousand and No/100

4000.00

CITY NATIONAL BANK
1411 VENTURA BOULEVARD
PICO, CALIFORNIA 91372

Ed Vellen for Senate
Primary General

Jerry Hanrahan

A. BRUCE ADAMS
17003 VENTURA BLVD. 1621 OCEAN BLVD.
SANDINO, CA 91314 PADING BEACH, CA 92026

3067

10-30-96

PAY TO THE ORDER OF Greenstrip Media \$ 2,000.00

Two Thousand and No/100 DOLLARS

INDEPENDENCE BANK
1700 VENTURA BLVD
SANDINO, CA 91314

Ed Vellen for Senator

Cassie Indar

CLIFTON A. SHERWOOD
17531 GARLAND CT.
CASTRO VALLEY, CA 94546

1713

10-30-96

Pay to the Order of Green Stripe Media Inc \$ 4,000.00

Four Thousand and No/100 Dollars

Bank of America
Castro Valley Branch #137
P O Box 2778
Castro Valley, CA 94546

[Signature]

DAVID S. WEISMAN 871
 14001 VENTURA BLVD.
 SHERMAN OAKS, CA 91423-3558
 10-22-86 86-406L
 1222
 PAY TO THE ORDER OF Green Stripe Media Inc \$2,000.00
Two thousand DOLLARS
 BURBANK NATIONAL BANK
 FOR Political Contribution D.P.M.

JACOB SPERLING 257
 SHELLY SPERLING
 4247 HOLLY KNOLL DR.
 LOS ANGELES, CA 90027
 10/30/86 86-406L
 1222
 PAY TO THE ORDER OF Green Stripe Media Inc \$4,000.00
Four thousand dollars DOLLARS
 BURBANK NATIONAL BANK
 FOR Volunteer for Senate Jacob Sperling

SIFRA WEISMAN 0354
 270 N. CANYON DR. NO 1300
 BEVERLY HILLS, CA 90210
 10/29/86 86-406L
 1222
 PAY TO THE ORDER OF GREEN STRIPE MEDIA INC \$1,500.00
One thousand five hundred DOLLARS
 CALIFORNIA FIRST BANK
 FOR Volunteer for Senate Sifra Weisman

SAMIR MOBASSALY 3929
 P. O. BOX 295
 AZUSA, CA 91702
 10-30-86 86-406L
 1222
 PAY TO THE ORDER OF Green Stripe Media Inc \$4,000.00
Four thousand dollars only DOLLARS
 SECURITY PACIFIC NATIONAL BANK
 2001 Eastland Tower Dr.
 West Covina, CA 91791
 W.M. Ed Walker President
[Signature]

93043514221

MILES S. BURG
NEE LANG BURG
81 REGAL WOODS PL.
SHERMAN OAKS, CA 91403

181

10/30 1986

92-7084
3222

PAY TO THE ORDER OF Green Stripe Media, Inc \$ 4,000.00

Four Thousand
MERCURY SAVINGS

NORTH HAVEN BRANCH REGIONAL OFFICE
3071 E. Main Canyon Blvd.
North Hollywood, CA 91607

MONEY MARKET SAVINGS

FOR Valley for Senate Reverie Lang Burg

RICHARD M. HOROWITZ
BEVERLY HOROWITZ
1144 SOUTH BEVERLY DRIVE
LOS ANGELES, CA 90035

499

Oct 30 1986

92-4087
1222

PAY TO THE ORDER OF Green Stripe Media Inc \$ 3,000.00

Three thousand dollars



FIRST NATIONAL BANK

FOR VALLEY FOR SENATE

Richard Horowitz

MIMI SPERLING
ZVI SPERLING
401 E. 54TH ST.
LOS ANGELES, CA 90011

184

10-27 1986

GREEN STRIPE MEDIA INC \$ 4,000.00
four thousand

CITY NATIONAL BANK
22400 HAWTHORNE BLVD
HAWTHORNE, CALIFORNIA 90255

MONEY MARKET ACCOUNT

FOR Donovan UELER

MURRY M. WHITE
P. O. BOX 9002
CARLSBAD, CA 92008

184

10-29 1986

164/1220

PAY TO THE ORDER OF Green Stripe Media \$ 2,000.00

Two Thousand Dollars and 00/100

SECURITY PACIFIC NATIONAL BANK
North Chatsworth Office #431
4002 Chatsworth Mass Blvd, San Diego, CA 92117

Murray White

FOR Bullen for Senate

93043514222

TOVA SHATZ
NACHMAN SHATZ
320 N. FORMOSA AVE
LOS ANGELES, CA 90038

10/31 1986 1269

Pay to the order of Green Strip Media Inc. \$ 4,000.00
Four thousand 00/100 Dollars

ENCINO SAVINGS BANK
VALLEN FOR SENATE

Nachman Shatz

LESLIE A. LINDENBLATT
1147 ACAMA ST
STUDIO CITY, CA 91602

10-30 1986 903

Pay to the order of Greenstrip Media \$ 2,000.00
two thousand 00/100 Dollars

INDEPENDENCE BANK

Leslie Lindenblatt

MARY E. SIEBUHR
2002 KERWOOD AVENUE
LOS ANGELES, CA 90025

OCTOBER 30 1986 928

PAY TO THE ORDER OF ** GREEN STRIP MEDIA, INC. ** \$ 2,000.00**
** Two Thousand Dollars and no/100's ***** DOLLARS

Bank of America
FOR Valen for Senator

Mary Siebuh

DAVID HULTQUIST
22708 1100A PL
CANOGA PARK, CA 91304

OCTOBER 29 1986 2375

Pay to the order of Green Strip Media Inc \$ 4,000.00
Four thousand 00/100 Dollars

CITY NATIONAL BANK
VALLEN FOR SENATE

David Hultquist

93043514223

93043514224

MICHAEL JAY BERGER
 927 N. KINGS RD #216
 WEST HOLLYWOOD, CA 90069

Oct 30 1986 0121

Pay to the order of Green Stripe Media, Inc \$ 2,000⁰⁰
two thousand & 00/100 Dollars

Bank of America
 Beverly Hills Office #213
 9451 Wilshire Blvd
 Beverly Hills, CA 90210

Memo: Vallin G. Senate Michael J. Berger

MICHAEL B. ALTMAN
 JUDY S. ALTMAN
 3585 ALANA DR.
 SHERMAN OAKS, CA 91403

JA 729
 Oct 31 1986 86-7001/3220

Green Stripe Media, Inc \$ 4,000.00
four thousand and 00/100 DOLLARS

CALIFORNIA FEDERAL
 BANKS AND TRUST ASSOCIATION
 15000 Wilshire Boulevard
 Sherman Oaks, California 91408

Judy S. Altman

ROBERT H. FRANK
 10615 ROSE AVE., NO. 101
 LOS ANGELES, CA 90034

172
 Oct 31 1986 86-7011/3222

PAY TO THE ORDER OF Green Stripe Media, Inc \$ 2,000⁰⁰
Two thousand & 00/100 DOLLARS

**WEST LOS ANGELES BRANCH
 LINCOLN SAVINGS**
 11700 Wilshire Blvd., West Los Angeles, CA 90048

Talen G. Senator [Signature]

MARK COHEN
 805 N. ARDEN DR.
 BEVERLY HILLS, CA 90210

JA 330
 10/31 1986 86-7017/3220

Green Stripe Media, Inc \$ 2,000⁰⁰
Two thousand DOLLARS

COLUMBIA
 9010 Beverly Boulevard
 Los Angeles, CA 90048

Vallin G. Senate Mark Cohen

93043514225

JAMES R. WHITE
 P O BOX 1034
 BEVERLY HILLS, CA 90213

October 31, 86

Green Stripe Media Inc. \$ 2,000.00

Two Thousand and 00/100

Bank of West
 Beverly Hills Office
 9700 Wilshire Blvd
 Beverly Hills, California 90212

MEMO: Valen for Senator.

[Signature]

RUTH SANCHEZ
 LIC. C5481830
 1255 N. KINGS RD., NO. 104
 LOS ANGELES, CA 90048

Oct 31, 86

PAY TO THE ORDER OF *Green Stripe Media Inc.* \$ 2,000.00

Two thousand and no/100 DOLLARS

HOME SAVINGS
 OF AMERICA
 PICO-DORNEY OFFICE 134
 580 PICO BLVD. LOS ANGELES, CA 90071

MEMO: Valen for Senator

Ruth Sanchez

MARCEL N. VALDES
 5348 VENTURA CANYON
 VAN NUYS, CA 91401

OCT 30 86

PAY TO THE ORDER OF **GREEN STRIPE MEDIA INC.** \$ 2000.00

TWO THOUSAND AND NO/100. DOLLARS

FIDELITY FEDERAL
 290 SOUTH BEVERLY DRIVE, BEVERLY HILLS, CA 90212

FOR: *Valdes*

GEORGE ROMAN KORZ
 8787 SHOREHAM DRIVE
 LOS ANGELES, CALIFORNIA 90069

October 31, 1986

PAY TO THE ORDER OF *Greenstripe Media Inc.* \$ 2,000.00

Two thousand DOLLARS

Unity Savings
 AND LOAN ASSOCIATION
 6800 SANTA MONICA BLVD. PH 213 851-1100
 WEST HOLLYWOOD, CALIFORNIA 90260

MEMO: Valen for Senate

George Roman Korz

CASHIER'S CHECK
 BEVERLY HILLS 3035254
 ORDER OF JAN Ives GREEN STRIPE MEDIA, INC.
 \$ 2,500.00
 2500
CALIFORNIA FIRST BANK
 3500 2500 00 00
 OCT. 30, 1986
 [Signature]

JOSEPH V. NASH 2588
 CERTIFIED PUBLIC ACCOUNTANT
 449 SO. BEVERLY DRIVE
 BEVERLY HILLS, CALIF. 90212
 10/30/86
 Valen for Senator
 PAY TO THE ORDER OF ** GREEN STRIPE MEDIA, INC. ** \$ 2,000.00**
 ** Two Thousand Dollars and no/100's ** DOLLARS
UNION BANK
 3482 Wilshire Blvd., Beverly Hills, CA 90212
 JOSEPH V. NASH
 [Signature]

ALAN J. SETLIN, C.L.U. 3511
 449 SO. BEVERLY DR.
 BEVERLY HILLS, CA 90212
 10-31-86
 PAY TO THE ORDER OF Green Stripe Media, Inc. for Invoice 2000
Two Thousand and no/100's DOLLARS
WELLS FARGO BANK
 348 W. BEVERLY DRIVE
 BEVERLY HILLS, CALIFORNIA 90212
 [Signature]

MICHAEL DANIEL 9359
 BOX 1082
 PEPPERDINE CHAPEL
 MALIBU, CA 90265
 10-31-86
 PAY TO THE ORDER OF GREEN STRIPE MEDIA, INC. \$ 2,000
TWO THOUSAND X/100
Bank of America
 P.O. Box 340
 Malibu, CA 90261
 [Signature]

93043514226

SLOANIA RAMIREZ
 2201 ALABAMA ST. #2
 HUNTINGTON BEACH, CA 92647

10/31/86 0179

PAY TO THE ORDER OF Green Stripe Media, Inc. \$ 2,000.00
Two thousand Exact DOLLARS

Bank of America
 Santa Ana Main Office 0990
 P. O. Box 326
 Santa Ana, CA 92702

MEMO Valen for Senator

NSF

MILTON ZARACHOFF
 10445 WILSHIRE BLVD.
 LOS ANGELES, CA 90024

2055

Nov 1, 1986 18-3228/1222

PAY TO THE ORDER OF Green Stripe Media, Inc. \$ 2,000.00
Two thousand Dollars DOLLARS

First Los Angeles Bank
 2019 WILSHIRE BOULEVARD
 BEVERLY HILLS, CALIFORNIA 90210

Valen for Senator Milton Zarachoff

TODD SILVER 924
 216 NORTH FOOTHILL ROAD
 BEVERLY HILLS, CA 90210 1624/645
 1220(7)

Nov. 3 1986

PAY TO THE ORDER OF GREEN STRIPE MEDIA, INC. \$ 2,000.00

*****Two Thousand and no/100's***** DOLLARS

BEVERLY HILLS OFFICE
 WELLS FARGO BANK..
 9000 SANTA MONICA BLVD., BEVERLY HILLS, CA 90210

FOR Todd Silver

DANIEL NASH 1323
 440 S BEVERLY DR
 BEVERLY HILLS, CA 90212

Nov. 3 1986 8-77/281
 1220

PAY TO THE ORDER OF GREEN STRIPE MEDIA, INC. \$ 2,000.00

*****Two Thousand and no/100's***** DOLLARS

Beverly Hills - West Los Angeles Regional Office
 UNION BANK
 9460 Wilshire Blvd., Beverly Hills, CA 90212

Valen for Senator Daniel Nash

93043514227

DAVID ZELON
230 PACIFIC STREET
SANTA MONICA, CA 90405

0886

16 66/1229

PAY TO THE ORDER OF Green Stripe Media Inc. Nov. 3 1986
Two thousand 2,000.00
DOLLARS

BANK OF AMERICA
SANTA MONICA BRANCH 0218
1301 FOURTH STREET
P.O. BOX 910
SANTA MONICA, CA 90406
David A. Zelon
Valerie for Senator

MARC A. MISSIORECK

1647 OCEANFRONT WALK #0
SANTA MONICA, CA 90401

0107

DATE 11/3 1986

16 66/1220

PAY TO THE ORDER OF Green Stripe Media Inc. 2,000.00
Two thousand and 00/100 DOLLARS

BANK OF AMERICA
SANTA MONICA BRANCH 0218
1301 FOURTH STREET
P.O. BOX 910
SANTA MONICA, CA 90406
Marc A. Missioreck

Valerie for Senator

JANAE E. DEDRICK
150 50 MICHIGAN AVE. NO. 102
PASADENA, CA 91108

Nov. 3 1986

2134
16 66/1220

PAY TO THE ORDER OF Green Stripe Media Inc. 2,000.00
Two thousand and 00/100 DOLLARS

BANK OF AMERICA
BEVERLY HILLS BRANCH 0212
3401 WILSHIRE BOULEVARD
BEVERLY HILLS, CA 90212
Valerie for Senator *Janae Dedrick*

HELLENE MERRIE SIMMS

10615 ROSE AVE.
LOS ANGELES, CA 90034

101

10/31 1986

16 66/1220

Pay to the order of Green Stripe Media Inc. 2,000.00
Two - thousand 00/100 Dollars

Bank of America
Westwood Village Branch 0209
P.O. Box 24287
Los Angeles, CA 90024
Valerie for Senator *Hellene Simms*

93043514228

93043514229

LAW OFFICES OF
KELLY W. BIXBY
448 SOUTH BEVERLY DRIVE 213 553 8350
BEVERLY HILLS, CA 90212

REMISSANCE ADVICE			

1246

16-3776/1220

BY ACCOUNT

Two Thousand & no/100

DOLLARS

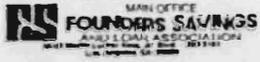
DATE 11/3/86	TO THE ORDER OF <i>Green Stripe Media, Inc.</i>	Value for Sender <i>Valeri for Sender</i>
-----------------	--	--

\$ 2,000.-

GREAT AMERICAN BANK - BEVERLY HILLS REGIONAL HEAD OFFICE
175 50 BEVERLY DRIVE, BEVERLY HILLS, CA 90212

GENERAL ACCOUNT

Kristin K. Laffer
Sup

CALVIN T. CROWE ERNESTINE CROWE 5926 WRIGHTCREST DR. CULVER CITY, CA 90230	NOV. 3, 1986	2051 16-7023 3220
PAY TO THE ORDER OF ** GREEN STRIPE MEDIA, INC. **		\$ 2,000.00**
** Two Thousand Dollars and no/100's **		DOLLARS
 MAIN OFFICE FOUNDERS SAVINGS BANK ASSOCIATION <small>MEMBER OF THE NATIONAL ASSOCIATION OF PUBLIC SAVINGS INSTITUTIONS</small> 10000 Wilshire Blvd., Suite 2000 Los Angeles, CA 90024		<i>Calvin Crowe</i>

PATTI C. BRIDGES 148	NOV 31 1986	16-21/1220
Pay to the order of <i>Green Stripe Media, Inc.</i>		\$ <u>2,000.00</u>
<i>Two thousand and no/100</i>		Dollars
 First Interstate Bank 17500 Wilshire Blvd., Suite 2000 Beverly Hills, CA 90212		<i>NSF</i>
Memo <i>Valeri for Sender</i>	Signed <i>Patti C. Bridges</i>	

← NSF CHECK

JOEY PENTO 35441 MULNOLLAND DR. BEL AIR, CA 90717	11/3/1986	4034 16-7181/3222
PAY TO THE ORDER OF <i>Green Stripe Media, Inc.</i>		\$ <u>2,000.00</u>
<i>Two thousand</i>		DOLLARS
 THE WEST SAVINGS BANK ASSOCIATION BEVERLY GLEN BRANCH 2000 BEVERLY BLVD. SUITE 200 BEVERLY HILLS, CA 90212		<i>Valeri for Sender</i>

November 13, 1986

Mr. Michael B. Altman
Linden Court, Suite 400
15315 Magnolia Blvd.
Sherman Oaks, CA 91403

Dear Mr. Altman:

Per instructions from Mr. Mark Barnes (see attached letter dated 11/18/86), enclosed is a cashier's check for \$104,000. This amount was covered by checks forwarded to my office from supporters of the Committee to Elect Ed Vallen to the U.S. Senate. For your convenience I have enclosed copies of said checks. For the record, neither myself nor any of my employees ever requested or implied that these checks be sent to Greenstripe Media, Inc. It was our understanding that the certified checks (copies attached):

Security Pacific National Bank, Brea Dated 10/27/86
\$30,000.00

California Federal, Sherman Oaks Office Dated 10/27/86
\$90,000.00

which we received on October 27th were the result of contributions to the Committee to Elect Ed Vallen and these funds were used to pay for all air time purchased for the campaign. Greenstripe Media, Inc. is nothing more than a media buying service and does not collect campaign funds. However, our only contact on this account has been Mr. Mark Barnes of P.A.C., thus we are reacting to his instructions since we never should have received the donor checks and we do not want the money since all expenditures on this campaign were covered by the original, previously mentioned, cashier's checks.

Through this letter I am advising Audrey Barbour, Treasurer of the Committee to Elect Ed Vallen, of this entire transaction for her reporting needs. I am sure that the Committee is aware of this situation. However, as a precaution I feel obligated to pass all information on to the Campaign Treasurer... since it is her responsibility to report any loans and/or contributions.

93043514230

Mr. Michael B. Altman
Page Two

If you should have any questions on this situation, please
feel free to contact my office.

Sincerely,

Joe Winkelmann
President

JW/sab

cc: Mark Barnes
Audrey Barbour
Ed Vallen

Original sent express mail; all copies sent certified mail.

9 3 0 4 3 5 1 4 2 3 1

RICHARD R. FAMIGLIETTI
1808 TULSA ST.
NORTHRIDGE, CA 91325

588

PAY TO THE ORDER OF Green Stripe Media \$ 2000.00
Two Thousand & 00/100 DOLLARS

INDEPENDENCE BANK
ENCINO BRANCH
ENCINO, CALIF.

Richard R. Famiglietti

MENC _____

93043514232

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MARC VICTOR
10751 WILSHIRE BLVD., STE. 908
LOS ANGELES, CA 90024

6028

PAY TO THE ORDER OF Green Stripe Media \$ 2000.00
Two Thousand only DOLLARS

Marc Victor

THIS CHECK IS VALID FOR PAYMENT ON THE ACCOUNTS LISTED

GREENSTRI
MEDIA, INC.

PLANNING • PLACEMENT • SYNDICATION

January 12, 1987

Mr. Michael B. Altman
Linden Court, Suite 400
15315 Magnolia Blvd.
Sherman Oaks, CA 91403

Dear Mr. Altman:

The enclosed check is being sent to you at the request of Mr. Mark Barnes. This transaction is on the same basis as our communication of November 18th, 1986 (copy attached).

If you should have any questions, please contact my office.

Sincerely,

Joe Winkelmann
President

JW/td

cc: Mark Barnes
Audrey Barbour
Ed Vallen

Rec'd 11/18

MICHAEL KATZ
SANDY KATZ

Cash Management Account⁸³⁴

15149 MAGNOLIA BLVD., NO. D
SHERMAN OAKS, CA 91403

11/11 19 26 25.80
430

Pay to the
Order of GREEN STRIPE MEDIA \$ 2,000^{00/100}

MADE AND PRINTED IN U.S.A.

TWO THOUSAND 00/100 Dollars

FOR
Merrill Lynch

BANK ONE, COLUMBUS, N.A. Columbus, Ohio 43271

Memo _____

[Signature]

93043514234

MONTE MORROW P. O. BOX 141 BEVERLY HILLS, CA 90210		11/14 86	1542
PAY TO THE ORDER OF <u>Green Stripe Media</u>		\$ <u>2,000</u>	18-21253 1000
<u>Two thousand 00/100</u>			DOLLARS
 First Interstate Bank	First Interstate Bank of California Wilshire-Culverston Office 9132 Wilshire Boulevard Beverly Hills, CA 90212	<i>[Signature]</i>	
FOR _____		_____	

paid up

PATTI C. BRIDGES

Nov. 01 1955

1954
16-21/1220



Pay to the order of

Greenstep Medical Assoc \$ 1000.00
Two Thousand 00/100 Dollars



First Interstate Bank
of California 2261
Wilshire Garbhuri Office
8132 Wilshire Boulevard
Beverly Hills, CA 90212

signed *Patti C. Bridges*

Memo

2 3 4 3 5 1 4 2 3 5

Rec'd 12/3

JOSEPH R. NORIEGA
901 W. WHITTIER BLVD.
MONTEBELLO, CA 90640

190

11-1-86

90-1643/1222

Pay to the Order of Green Stripe Media \$ 2,000⁰⁰
Two thousand and 00/100



MONTEREY PARK BRANCH
GARFIELD BANK
MONTEREY PARK, CA 91754

Jose R. Noriega

7848

931043514236

TOM KINDLE 5-31

1296

8029 W. NORTON AVE., NO. 1
LOS ANGELES, CA 90046

Nov 1 86

18-2342/1222

Pay to the Order of Green Stripe Media \$ 2000.00
Two thousand and 00/100



First Pacific Bank
630 North La Cienega Boulevard
Los Angeles, California 90069

Tom Kindle

7848

Rec'd 12/17/79

2703

ROBERT KNAUSE
SERIAL ACCOUNT

1222 S. HAYWOOD III AVE.
LOS ANGELES, CA 90035

Dec. 15 19 86 80-7006/3222

PAY TO THE ORDER OF News-Stroke Media, Inc. \$ 11,000.00
Ele Thousand DOLLARS

FOR YOUR CONVENIENCE
GLENNDALE FEDERAL
SAVINGS AND LOAN ASSOCIATION
2300 W. SHIRAZ BLVD.
LOS ANGELES, CALIF. 90018

Robert Knauer

93043514237

93043514238

100-126

JEFFREY L. PANDIN 919
 1328 G ST., S.E.
 WASHINGTON, D.C. 20003 10/31 1986 15-55/540

PAY TO THE ORDER OF Green Stripe Media Inc. \$ 1,000.00
One Thousand and 00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.
 Ed Vallen Media Bur. *[Signature]*

GARY L. WILLET 254
 1522 K STREET, N. E., SUITE 820
 WASHINGTON, D.C. 20005 11/22 1986 15-50/540 02

PAY TO THE ORDER OF Greenstripe Media Inc. \$ 1,000.00
One Thousand 00/100 DOLLARS

SECURITY NATIONAL BANK
 WASHINGTON, D. C.
 MEMO VALLEN FOR SENATE 92 Willet

WARREN A. SIMMS 551
 1328 G STREET, S.E.
 WASHINGTON, D.C. 20003 10-31 1986 15-55/540

[Stamp] PAY TO THE ORDER OF Green Stripe Media Inc. \$ 1,000.00
One Thousand and 00/100 DOLLARS

AMERICAN SECURITY BANK, N.A.
 Ed Vallen Media Warren A. Simms

SUSAN G. HEFERT 103
 1800 S JOYCE ST., NO. A1803
 ARLINGTON, VA 22202 Nov. 21 1986 15-115/540 500

PAY TO THE ORDER OF Green Stripe Media Inc. \$ 1,000.00
One Thousand and 00/100 DOLLARS

FIRST VIRGINIA BANK
 1000 CHURCH, VIRGINIA 22016
Vallen for senate Susan G. Hefert

PETER ROFF 166
 2115 F STREET, N. W.
 WASHINGTON, D.C. 20038 October 31 1986 15-52/540

PAY TO THE ORDER OF Green Stripe Media Inc. \$ 1,000.00
One Thousand 00/100 DOLLARS

NS&T BANK
 WASHINGTON, D.C. 20004
 MEMO Vallen for senate [Signature]

RETRND VALLFN CONTRIBUTIONS
PER P.A.C. LETTER OF 11/18/86

CASHIER'S CHECK

No 23239

REMITTER Greenstripe Media, Inc

DATE November 18 19 86

90-2040
1223

PAY TO THE ORDER OF Michael H Altmann \$ 104,000.00

BY THE ORDER OF TOXICOLOGISTS SOCIETY

PACIFIC NATIONAL BANK
4005 MACARTHUR COURT
HEWLETT BEACH, CALIFORNIA 92660

Mary Camp
Authorized Signatory

VOID IF NOT PREPARED WITHIN 180 DAYS FROM DATE OF ISSUE

9 3 0 4 3 5 1 4 2 3 9

RETEND VALLEN CONTRIBUTIONS
PER REQUEST FROM MARK IARINS ON
1-12-87

CASHIER'S CHECK

NO 24024

REMITTER Greenstripe Media, Inc,

DATE January 12 19 87

PAY TO THE ORDER OF ** Michael R. Altmann *****

\$ 16,000.00**

PACIFIC NATIONAL BANK
4665 MACARTHUR COURT
NEWPORT BEACH, CALIFORNIA 92660



VOID IF NOT PRESENTED WITHIN 180 DAYS FROM DATE OF ISSUE

[Signature]
Authorized Signature

93043514240

PAC

Political
Advertising &
Consulting Inc.

November 18, 1986

Mr. Joe Winkelmann
Greenstripe Media, Inc.
901 Dove Street, Suite 220
Newport Beach, CA 92660

Dear Joe:

As per our phone conversation, please refund \$104,000.00 of the \$120,000.00 received October 27, 1986 to guarantee the purchase of TV time for the Committee to Elect Ed Vallen to the U.S. Senate.

Please send a cashier's check in that amount to:

Mr. Michael B. Altman
Linden Court, Suite 400
15315 Magnolia Boulevard
Sherman Oaks, CA 91403

Thank you.



Mark Barnes

8820 S. Sepulveda Blvd., Suite 108/Los Angeles, California 90045
Telephone 213/649-5916

93043514241

GREENSTRIPE MEDIA, INC.

PLANNING • PLACEMENT • SYNDICATION

DATE 12-12-86

RADIO _____ TV XX

POLITICAL RECAP

ACCOUNT Committee to Elect Ed Vallen to the US Senate

DATE FUNDS RECEIVED AT GSM _____

AMOUNT RECEIVED REFUND FROM KNBC-TV \$ 14,747.50

BANK _____

LESS: NON-COMMISSIONABLE ITEMS \$ _____

AGENCY P.A.C., Inc.

AGENCY COMMISSION @ 10% \$ _____

GSM COMMISSION @ 5% \$ _____

TOTAL NET PURCHASES \$ _____

UNSPENT FUNDS \$ 14,747.50*

SPECIAL COMMENTS:

*Cashiers check remitted by Greenstripe Media to the Committee on Dec. 11, 1986 :

Cashiers ck.#23542
issued by: Pacific National Bank,
Newport Beach

PURCHASES

STATION	GROSS	NET	B/O*	CK*	STATION	GROSS	NET	B/O*	CK*
<p>THE ABOVE AMOUNT WAS REFUNDED BY KNBC-TV DUE TO PARTIAL SCHEDULE CANCELLATION AT THE DISCRETION OF STATION MANAGEMENT.</p>									

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HARLAND

CASHIER'S CHECK

NO 23542

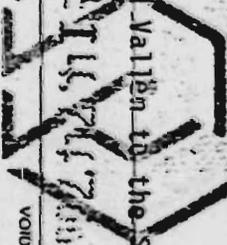
REMITTER Greenslide Media, Inc.

DATE December 11 19 86

90-3848
1222

PAY TO THE ORDER OF ** Committee to Elect Ed Vailpen to the Senate ***** \$**14,747.50**

PACIFIC NATIONAL BANK
NEWPORT BEACH, CALIFORNIA 92660
REFUND KNBC-TV



VOID IF NOT PRESENTED WITHIN 180 DAYS FROM DATE OF ISSUE

Deborah A. Smith
Authorized Signatory

7 3 9 4 3 5 1 4 2 4 3

OGE 4363

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

OCT 25 AM 10:34

Allen H. Zelon

Law Offices

1740 BROADWAY, 24th FLOOR • NEW YORK, N. Y. 10019

(212) 247-2521

October 24, 1989

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

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
89 OCT 25 PM 2:47

Re: MUR 2727

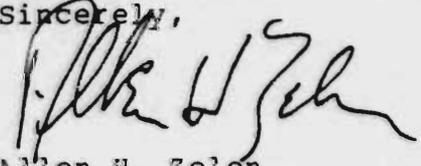
Dear Mr. Buckley,

I would like to thank you again for your courtesy during our conversation yesterday.

Enclosed find DESIGNATION OF COUSEL forms that I hope will be satisfactory.

As I have been newly assigned to the case (by my son) I would request a twenty(20) day extension so that I might gather the facts.

Sincerely,



Allen H. Zelon

Enc. 4
AHZ/na

93043514244

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2737

NAME OF COUNSEL:

Alan H. Zelon

ADDRESS:

1740 Broadway, 24th Floor, New York, N.Y. 10019

TELEPHONE:

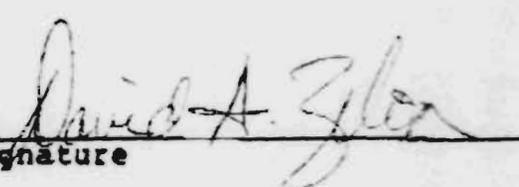
(212) 663 8800

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

October 14, 1989

Date

Signature



RESPONDENT'S NAME:

David A. Zelon

ADDRESS:

130 Fraser Av.
Santa Monica, CA 90405

HOME PHONE:

BUSINESS PHONE:

(213) 396 6568

9 3 0 4 3 5 1 4 2 4 5

STATEMENT OF DESIGNATION OF COUNSEL

NO. _____

NAME OF COUNSEL: Alan H. Belon

ADDRESS: Midway, 24th floor

New York, N.Y. 10019

TELEPHONE:

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

October 24, 1989
Date

Marc Missioreck
Signature

RESPONDENT'S NAME: Marc Missioreck

ADDRESS: 20 Topail #2

Marina Del Rey, CA 90292

HOME PHONE:

BUSINESS PHONE: (213) 396 6788

93043514246

PRO MUSCLE

MANAGEMENT, INC.

202 MAIN STREET, SUITE 8, VENICE, CA 90291 (213) 396-6568

Mr. Allen H. Zelon
1740 Broadway, 24th floor
New York, N.Y. 10019

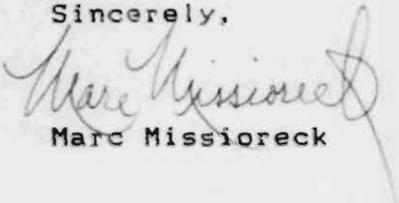
October 23, 1989

Dear Mr. Zelon:

This letter will hereby authorize you to represent me as my legal counsel with regards to the enclosed documents from the Federal Elections Commission.

Please contact me after you have reviewed the matter.

Sincerely,


Marc Missioreck

93043514247

PRO MUSCLE

MANAGEMENT, INC.

202 MAIN STREET, SUITE 8, VENICE, CA 90291 (213) 396-6568

Mr. Allen H. Zelon
1740 Broadway, 24th floor
New York, N.Y. 10019

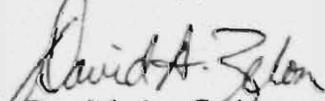
October 23, 1989

Dear Mr. Zelon:

This letter will hereby authorize you to represent me as my legal counsel with regards to the enclosed documents from the Federal Elections Commission.

Please contact me after you have reviewed the matter.

Sincerely,


David A. Zelon

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

4383

CARLSMITH, WICHMAN, CASE, MUKAI AND ICHIKI
ATTORNEYS AT LAW

89 OCT 26 AM 10:19

A PARTNERSHIP INCLUDING LAW CORPORATIONS

515 SOUTH FIGUEROA STREET
MANULIFE BUILDING, NINTH FLOOR
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 955-1200

TELECOPIER (213) 623-0032

October 23, 1989

HILO
21 WAIANUENUE AVE
HILO, HAWAII 96721
(808) 935-6644

KONA
75-5742-J HUALALAI RD
KAILUA-KONA, HAWAII 96745
(808) 329-6454

MAUI
2145 WELLS ST, SUITE 201
WAILUKU, HAWAII 96791
(808) 242-4535

Our Ref No:
030985.1

HONOLULU
1001 BISHOP STREET
PACIFIC TOWER, SUITE 2200
HONOLULU, HAWAII 96809
(808) 523-2500

GUAM
34 W. SOLEDAD AVE., SUITE 401
AGANA, GUAM 96910
(671) 472-6813

SAIPAN
FLAMETREE TERRACE OFFICE BLDG.
SUITE 300
SAIPAN, MP 96950
(670) 322-3455

VIA TELECOPY

Anthony Buckley, Esq.
OFFICE OF THE GENERAL COUNSEL
Federal Election Commission
999 East Street, N.W.
Washington D.C. 20463

Re: **MUR 2727**
Michael Katz

Dear Mr. Buckley:

This letter will confirm our telephone discussion of October 17, 1989 wherein the undersigned advised you that our firm has been retained to represent the interests of Michael Katz in regards to the above-referenced matter. We enclose for your files an executed Statement of Designation of Counsel designating the undersigned to act on behalf of Michael Katz before the Commission.

Mr. Katz gave testimony about his donation on June 2, 1989 in the United States District Court, Central District of California, in a case entitled United States v. Michael Goland, CR88-1009 (A-RSWL). We are in the process of obtaining the transcript from this trial and, upon its receipt, will prepare a complete response to the Request for Interrogatories and Request for Documents ("Requests"). We are confident that once you obtain all the information from Mr. Katz, you will realize that Mr. Katz honestly believed that he was making a donation for the Alan Cranston reelection campaign and was completely ignorant of Ed Valen or Michael Goland.

This letter will further confirm that you have granted Michael Katz an extension of an additional twenty (20) days to prepare and serve our response to Requests. Michael Katz received the Requests on October 16, 1989 by certified

93043514249

89 OCT 26 PM 12:04

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

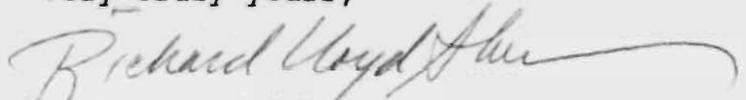
Anthony Buckley, Esq.
October 23, 1989
Page Two

mail. Accordingly, we will calendar our response to the Requests for November 20, 1989. We will do our best to get our responses to you well before that date, but appreciate the additional extension of time.

We would appreciate your contacting the undersigned immediately if your recollection of our telephone discussion differs in any material fashion. Please feel free to give me a call if, upon receipt of all information, you have any questions concerning the facts surrounding my client's donation to the Alan Cranston reelection campaign.

Your cooperation in this matter is greatly appreciated.

Very truly yours,



Richard Lloyd Sherman

RLS/ts
L8909424

cc: Mr. Michael Katz

93043514250

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: Richard Lloyd Sherman, Esq.
CARLSMITH, WICHMAN, CASE, MUKAI AND ICHIKI

ADDRESS: 515 So. Figueroa Street
Ninth Floor
Los Angeles, CA 90071

TELEPHONE: (213) 955-1200

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

10/17/89
Date

Sandy Katz
Signature

RESPONDENT'S NAME: SANDY KATZ

ADDRESS: 11645 WILSHIRE BLVD. #800
L.A. CA 90025

HOME PHONE: _____

BUSINESS PHONE: (213) 207-3630

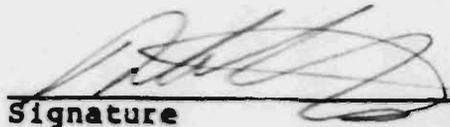
93043514251

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727
NAME OF COUNSEL: Richard Lloyd Sherman, Esq.
CARLSMITH, WICHMAN, CASE, MUKAI AND ICHIKI
ADDRESS: 515 So. Figueroa Street
Ninth Floor
Los Angeles, CA 90071
TELEPHONE: (213) 955-1200

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

10/17/89
Date


Signature

RESPONDENT'S NAME: MICHAEL KATZ
ADDRESS: 11645 WILSHIRE BLVD. #900
LOS ANGELES, CA 90025
HOME PHONE: _____
BUSINESS PHONE: (213) 207-3630

9 3 0 4 3 5 1 4 2 5 2

SGC 4396

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 27 AM 9:41

LAW OFFICES OF
MELVIN D. HONOWITZ
ONE EMBARCADERO CENTER
27TH FLOOR
SAN FRANCISCO, CALIFORNIA 94111
(415) 421-6110

MELVIN D. HONOWITZ

FAX (415) 397-5949

October 23, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 OCT 27 PM 1:22

Office of the General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463
Attention: Anthony Buckley, Esq.

Re: MUR 2727 - Clifton Sherwood

Dear Mr. Buckley:

Thank you for your thoughts and understanding in light of the earthquake. As we discussed last week I needed the additional few days to respond to your subpoena requests.

Accordingly, please find enclosed a Statement of Designation of Counsel, Answers to Interrogatories and Production of Documents and Verification by Mr. Sherwood.

While I see no violations of 2 U.S.C. Section 441(f) or any other violation of law by me client, I do hereby request conciliation pursuant to 11 C.F.R. Section 111.18 D. Please direct all further inquiries and documents to my office.

If there are any problems or questions please call me at once.

Sincerely,

LAW OFFICES OF MELVIN D. HONOWITZ


Melvin D. Honowitz

MDH/ahc

cc: Clifton Sherwood

93043514253

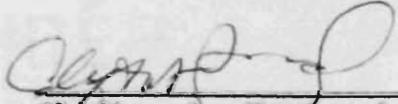
BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of) MUR 2727
) Clifton Sherwood

ANSWERS TO INTERROGATORIES AND REQUESTS FOR DOCUMENTS

1. Yes, copies enclosed (both sides of each check as Exhibit A). However, I did not know the specific use of the monies as asked in this interrogatory.
2. No
3. Not applicable
4. Michael Goland asked me to contribute to Edward B. Vallen and Larry Horner (See Exhibit A). I did not know either candidate. I did not receive reimbursement for either contribution.
5. No.
6. See Exhibit B. Since I received no reimbursement I cannot identify any deposit as requested. However, I did receive a refund of \$2,000 from Mr. Vallen's campaign in February of 1987. See the attached Vallen correspondence Exhibit C.
7. In 1986, I was a general partner with Balboa Construction Company, Inc. which is owned by Michael Goland. Our partnership was known as S.B. Development Company, a California General Partnership. I was also hired as an independent contractor (consultant) by Balboa Construction, Company, Inc. during 1986 and advised Mr. Goland and Balboa regarding certain real estate and financing problems they were experiencing.

Dated: October 24, 1989


Clifton A. Sherwood

93043514254

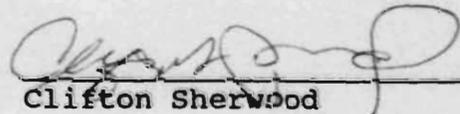
1
2
3 VERIFICATION
4

5 I, Clifton Sherwood declare:

6 I have read the foregoing Answers to
7 Interrogatories and Requests for Production of Documents and
8 the same are true of my own knowledge, except as to the
9 matters which are therein stated as information and belief,
10 and as to those matters, I believe it to be true.

11 I declare under penalty of perjury the foregoing is
12 true and correct.

13 Executed at Winters Creek California, on the 24
14 day of October, 1989.
15

16 
17 Clifton Sherwood
18
19
20
21
22
23
24
25
26
27
28

93043514255

1
2 PROOF OF SERVICE
3

4 I, the undersigned, declare that I am a citizen of the United
5 States; employed in the City and County of San Francisco, State of
6 California; over the age of 18 years; not a party to the within
7 entitled cause; and my business address is One Embarcadero Center,
8 27th Floor, Francisco, CA 94111. I am readily familiar with the
9 firm's business practice for collection and processing of
10 correspondence/documents for mailing with the United States Postal
11 Service.

12 On October 24, 1989, I served the foregoing ANSWERS TO
13 INTERROGATORIES AND REQUESTS FOR DOCUMENTS and VERIFICATION on the
14 interested parties in this action by placing a true copy thereof,
15 enclosed in a sealed envelope, postage prepaid, in the United
16 States mail at San Francisco, California addressed as follows:

17 Office of the General Counsel
18 Federal Election Commission
19 999 E. Street, NW
20 Washington, D.C. 20463
21 Attention: Anthony Buckley, Esq.

22 I declare under penalty of perjury under the laws of the State
23 of California that the above is true and correct, and that this
24 declaration was executed on October 24, 1989, at San Francisco,
25 California.

26 

27 Autherin Canada

93043514256

CLIFTON A. SHERWOOD
17531 GARLAND CT.
CASTRO VALLEY, CA 94

10-30-86 1713
11-35
1210

Pay to the Order of Green Juice Med. Inc \$ 400.00

Four Hundred

Bank of America
Castro Valley Branch 0437
P.O. Box 2736
Castro Valley, CA 94546

[Signature]
Dollars

93043514257

CLIFTON A. SHERWICK
17531 GARLAND CT.
CASTRO VALLEY, CA 94546

10-30

86

1712

11-33
1210

Pay to the Order of *Larry Hansen for City Council*

\$ 250.00

TWO HUNDRED FIFTY & 00/100 Dollars

 **Bank of America**
Castro Valley Branch 0437
P.O. Box 2738
Castro Valley, CA 94546

[Signature]

93043514258

STATEMENT OF DESIGNATION OF COUNSEL

MUR 5727

NAME OF COUNSEL: Melvin D. Honowitz

ADDRESS: One Embarcadero Center
27th Floor
San Francisco, CA 94111

TELEPHONE: (415) 421-6110

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

10/16/89
Date


Signature

RESPONDENT'S NAME: Clifton A. Sherwood

ADDRESS: 17531 Garland Court
Castro Valley, Calif. 94546

HOME PHONE: _____

BUSINESS PHONE: (415) 582-3666

93043514259

CGC 4428

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 30 AM 9:58

LAW OFFICE OF
VICTOR B. KENTON

2400 BROADWAY
FIFTH FLOOR

SANTA MONICA, CALIFORNIA 90404

TELEPHONE
(213) 828-1413

TELEX 698218
TELECOPIER (213) 829-5811

October 25, 1989

Anthony Buckley, Esq.
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

RE: Shelly Sperling
MUR: #2727

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF ATTORNEY GENERAL
COUNSEL
89 OCT 30 AM 12:30

23043514260

Dear Mr. Buckley:

I represent Shelly Sperling, who received a letter and enclosures from the Federal Election Commission concerning this matter. Enclosed with this letter is the Statement of Designation of Counsel.

I understand from reviewing the documents contained in the enclosures with the letter sent to Shelly Sperling that she is named in the indictment filed against Michael Goland and others in the Central District of California. Of course, as you know, neither Zvi, Jacob, Shelly or Miri Sperling, all of whom are my clients in this matter, were named as defendants in that case.

Shelly Sperling is the wife of Jacob Sperling. Shelly Sperling had absolutely no knowledge or involvement whatsoever in making any campaign contribution which is the subject of this MUR. I am enclosing signed Declarations of Jacob and Shelly Sperling which indicate that Shelly Sperling had no such involvement. Jacob Sperling, also, was the signator on the check which constituted the contribution.

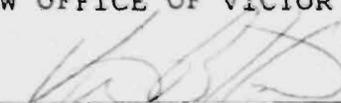
Based on this information, and the declarations of Jacob and Shelly Sperling attached hereto, it is requested that the Federal Election Commission dismiss any proceedings it now has or it may have concerning Shelly Sperling's involvement in MUR #2727.

October 25, 1989
Re: Shelly Sperling
Page Two:

If additional information is required, please notify this office and we will attempt to comply.

Sincerely,

LAW OFFICE OF VICTOR B. KENTON



VICTOR B. KENTON

VBK: cg
Encl: Declaration of Jacob Sperling
Declaration of Shelly Sperling
Statement of Designation of Counsel

SPR1019.LTR

93043514261

DECLARATION OF ZVI SPERLING

I, Zvi Sperling, declare, and state that:

1. I am over the age of 21, and I have personal knowledge of the following facts, and if sworn, could competently testify thereto.

2. I am married to Miri Sperling. There is no individual known to me as Miki Sperling.

3. On or about October 29, 1986, I drew up and signed a check payable to Green Stripe Media, Inc., in the amount of four thousand dollars (\$4,000.00). A true and correct copy of that check, drawn on the account of City National Bank, and bearing number 164, on account No. _____ is attached hereto and is incorporated herein by reference.

4. My wife, Miri Sperling, had no involvement, whether directly or indirectly, with this check or with this contribution. The check was written, and the contribution was made, solely by me.

I declare under penalty of perjury under the laws of the State of California that the foregoing, executed on October ____, 1989 at City of Industry, California, is true and correct to the best of my knowledge.


ZVI SPERLING

93043514262

COC 4426

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 30 AM 9: 58

TELEX 698218
TELECOPIER (213) 829-5811

LAW OFFICE OF
VICTOR B. KENTON
2400 BROADWAY
FIFTH FLOOR
SANTA MONICA, CALIFORNIA 90404

TELEPHONE
(213) 828-1413

October 25, 1989

Anthony Buckley, Esq.
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

RE: Miki Sperling
MUR: #2727

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
89 OCT 30 AM 12: 38

Dear Mr. Buckley:

A letter and enclosures, dated October 5, 1989 and addressed to "Miki Sperling" was received at the offices of Maxim Lighting Company, 999 South Hatcher Avenue, City of Industry, California 91744. Please be advised that there is no such individual as "Miki Sperling."

I understand from reviewing the documents contained in the enclosures with your October 5, 1989 letter that Miki Sperling's name is mentioned in the indictment filed against Michael Goland and others in the Central District of California. As I discussed with you by telephone on October 16, it would appear that "Miki Sperling," in fact, refers to Miri Sperling, the wife of respondent Zvi Sperling, whom I also represent.

At your suggestion, I am enclosing a Declaration of Zvi Sperling stating that his wife, Miri Sperling, had no involvement whatsoever in any contributions made to the "Ed Vallen for Senate" campaign, whether directly or indirectly.

As noted in the Declaration of Zvi Sperling, the check for four thousand dollars (\$4,000.00) dated October 29, 1986 written to Green Stripe Media, Inc., is signed by Zvi Sperling.

Based on this information, and the Declaration of Zvi Sperling, it is requested that the Federal Election Commission dismiss any proceedings it now has or it may have concerning Miri Sperling's involvement with MUR #2727.

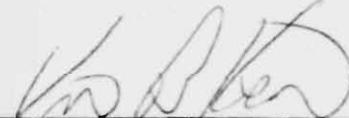
93043514263

October 20, 1989
Miki Sperling
Page Two:

If additional information is required by the Federal Election Commission, please notify this office and we will attempt to comply.

Sincerely,

LAW OFFICE OF VICTOR B. KENTON



VICTOR B. KENTON

VBK: cg
Encl: Declaration of Zvi Sperling

93043514264

DECLARATION OF SHELLY SPERLING

I, Shelly Sperling, declare and state: that

1. I have personal knowledge of the following facts, and if sworn as a witness, could competently testify thereto.

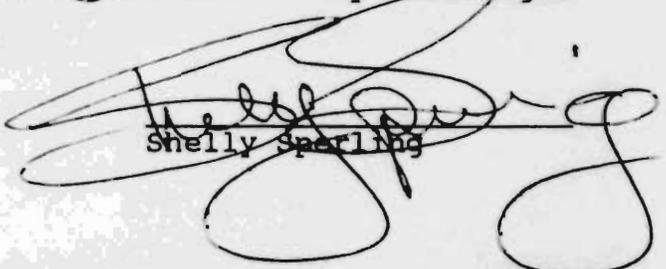
2. I am married to Jacob Sperling.

3. My husband and I maintain a joint checking account drawn on Burbank National Bank, Account No. I have seen check number 257 drawn on this account, which is payable to Green Stripe Media, Inc., in the amount of four thousand dollars (\$4,000.00), and is signed by Jacob Sperling. My recollection is that on or about October 30, 1986, my husband asked me to write a check for four thousand dollars (\$4,000.00); and I complied, writing the date, the amount, and the numerical amount of four thousand dollars (\$4,000.00). I did not write the payee, the memo portion of the check, nor did I sign it. My husband did not explain to me the purpose of the check, and I did not know the purpose of the check at that time. It was only at a much later time, when I learned of the indictment against Michael Goland, that I became apprised of the purpose of this check.

4. I have never knowingly made a political contribution to the "Vallen for Senate" campaign, whether directly or indirectly.

I declare, under penalty of perjury, that the foregoing, executed at Los Angeles, California, this

11/25 day of 1989 is true and correct to the best of my knowledge.


Shelly Sperling

93043514265

DECLARATION OF JACOB SPERLING

I, Jacob Sperling, declare and state: that

1. I have personal knowledge of the following facts, and if sworn, could competently testify thereto.

2. On or about October 30, 1986, I endorsed check #257 drawn on the account of Burbank National Bank, Account No, C

in the amount of four thousand dollars (\$4,000.00). I signed this check, a true and correct copy of which is attached to this declaration. This check was drawn on the joint account of myself and my wife, Shelly Sperling. However, my wife had no knowledge whatsoever of the purpose of this check. My wife typically writes checks which are needed on this account. On this occasion, I asked her to write a check for four thousand dollars (\$4,000.00), and to the best of my recollection, she wrote the date, the amount, and the numerical amount of the check. She did not write the payee, the memo, nor did she sign the check. As indicated, I did not discuss this check with her, other than to request that she write the amounts. The decision to write this check was my sole decision.

I declare, under penalty of perjury, that the foregoing, executed at City of Industry, California, this 10/25 day of 1989 is true and correct to the best of my knowledge.


Jacob Sperling

93043514266

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: LAW OFFICE OF Victor B. Kenton

ADDRESS: 2400 Broadway

Fifth Floor

Santa Monica, CA 90404

TELEPHONE: (213) 828-1413

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

11/1/84
Date

Shelly Sperling
Signature

RESPONDENT'S NAME: Shelly Sperling

ADDRESS: 999 South Hatcher Street

City of Industry, CA 91744

(818) 964-7500

HOME PHONE:

BUSINESS PHONE: (818) 964-7500

93043514267

060 4427

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 30 AM 9:58

TELEX 698218
TELECOPIER (213) 629-5811

LAW OFFICE OF
VICTOR B. KENTON
2400 BROADWAY
FIFTH FLOOR
SANTA MONICA, CALIFORNIA 90404

TELEPHONE
(213) 629-1413

October 20, 1989

Anthony Buckley, Esq.
Federal Elections Commission
999 E. Street, NW
Washington, D.C. 20463

RE: Jacob and Zvi Sperling
MUR: #2727

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 OCT 30 AM 12:30

Dear Mr. Buckley:

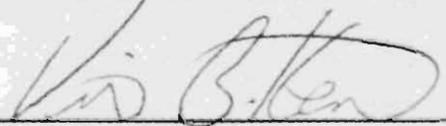
Pursuant to letters sent by the Federal Election Commission to my clients, Jacob and Zvi Sperling, please be advised that I will be acting as counsel for both of these individuals with regard to this matter. A completed Statement of Designation of Counsel is enclosed with this letter for each of my clients.

Pursuant to the authority of the Federal Election Commission, and under 11 C.F.R. section 111.18(d), this constitutes a request by Jacob and Zvi Sperling to pursue probable cause conciliation.

Please contact this office with regard to any additional information required with regard to the conciliation request contained herein.

Sincerely,

LAW OFFICE OF VICTOR B. KENTON


VICTOR B. KENTON

VBK: cg
Encl.: Stmt. of Dsgn. of Counsel

93043514268

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

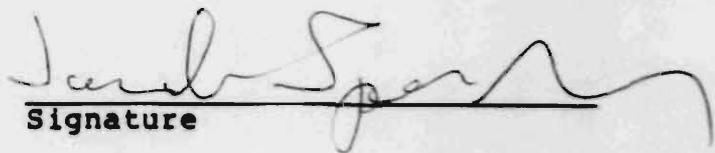
NAME OF COUNSEL: LAW OFFICE OF VICTOR B. KENTON

ADDRESS: 2400 Broadway
Suite 500
Santa Monica, CA 90404

TELEPHONE: (213) 828-1413

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

Date



Signature

RESPONDENT'S NAME: Jacob Sperling

ADDRESS: 999 S. Hatcher Street
City of Industry, CA
91744

HOME PHONE: _____

BUSINESS PHONE: (818) 964-7500

93043514269

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: LAW OFFICE OF VICTOR B. KENTON

ADDRESS: 2400 Broadway

Fifth Floor

Santa Monica, CA 90404

TELEPHONE: (213) 828-1413

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

10-17-89
Date


Signature

RESPONDENT'S NAME: Zvi Sperling

ADDRESS: 999 South Hatcher Street

City of Industry, CA

91744

HOME PHONE: _____

BUSINESS PHONE: (818) 964-7500

93043514270

OGC 4425

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 OCT 30 AM 9:19

MARGOLIS, HERTZBERG & MORIN

ATTORNEYS AT LAW

3550 WILSHIRE BOULEVARD

SUITE 1418

LOS ANGELES, CALIFORNIA 90010-2415

TELEPHONE (213) 381-1121

CABLE: "HERTZLAW"

FACSIMILE (213) 381-1986

OF COUNSEL
KAREN MOSKOWITZ

VIA FAX TRANSMISSION

October 23, 1989

Mr. Anthony Buckley
Office of the General Counsel
Federal Elections Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Re: Todd Silver
MUR No.: 2727

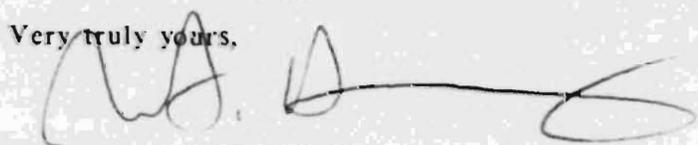
Dear Mr. Buckley:

I am writing to confirm our telephone conversation in which I indicated to you that I am an attorney for Mr. Todd Silver. As I explained, although I have had experience in Washington at both Capital Hill and the White House, I am not familiar with your recent regulations. As such, I am requesting an extension of time to and including November 20, 1989 for which Mr. Silver and I to obtain and consult with a local Washington, D.C. attorney who specializes in FEC matters. Please be advised that Mr. Silver received your letter on October 15, 1989 and pursuant to the terms of your letter, would have until October 30, 1989 to respond.

As you suggested, I am enclosing with this letter a statement of designation of counsel indicating that, at least for the present time, my office will be counsel of record until such time as we can be substituted with local counsel.

I would appreciate it if you would confirm an extension to me in writing at your earliest convenience.

Very truly yours,



ROBERT M. HERTZBERG

RMH:sdj
cc. Mr. Silver

89 OCT 30 AM 12:30

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

93043514271

STATEMENT OF DESIGNATION OF COUNSEL

NO. 2727

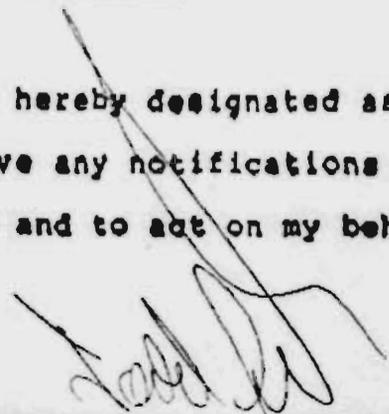
NAME OF COUNSEL: Robert M. Hertzberg, Esq.

ADDRESS: Marqolis, Hertzberg & Morin
3550 Wilshire Blvd., #1418
Los Angeles, CA 90010

TELEPHONE: (213) 381-1121

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

October 23, 1989
Date


Signature

RESPONDENT'S NAME: TODD SILVER

ADDRESS: 216 Foothill Road
Beverly Hills, CA 90210

HOME PHONE: _____

BUSINESS PHONE: _____

93043514272

OGC 4442

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES OF

CONRAD LEE KLEIN

14001 VENTURA BOULEVARD
SHERMAN OAKS, CALIFORNIA 91423

89 OCT 31 AM 10:42

CONRAD LEE KLEIN
OF COUNSEL
JOEL S. AARONSON
JOHN E. DEBRALDWERE
RICHARD S. ADAMS
KENNETH A. KREKORIAN
MARY FRANCES MCKUSH
VALERIE VASAGIAN

TELEPHONE
AREA CODE 818
986-8600
TELECOPIER
(818) 501-1300

October 30, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
Office of General Counsel
89 OCT 30 PM 1:31

Anthony Buckley, Staff Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

SENT VIA EXPRESS MAIL

Re: MUR 2727
Renee and Jules Berg

Dear Mr. Buckley:

Thank you for taking the time on October 24, 1989 to discuss your agency and the background of the Goland type cases you are handling.

At your request, this is to confirm the following representations which I made to you by telephone:

1. I have represented Renee and Jules Berg, with respect to events related to the subject, for over one year.
2. They each have received your "MUR" notification on or about October 15, 1989 and have requested that I represent them with respect thereto and respond on their behalf.
3. On October 13, 1989 I underwent minor surgery and I was scheduled to return to the office following recuperation on October 30, 1989.
4. I have requested an extension to respond until November 30, 1989.

To the foregoing, I add that I will be in Washington D.C. during the period of November 7th through 14th and would like an opportunity to review with you the basis for the belief of the Commission, on August 3, 1989, that 2 U.S.C. § 441f may have been violated by each of my clients. Tuesday, the 8th of November, anytime before 3 p.m. would be best.

930435142/3

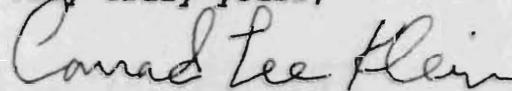
Anthony Buckley, Staff Counsel
October 30, 1989
Page Two

Please advise me, at your convenience, regarding the requested extension and the requested appointment to review the matter with you on November 8, 1989.

In closing, I emphasize the Berg's desire that the matter remain confidential as provided by statute. Their respective designation of counsel forms, fully executed, are returned herewith.

Your cooperation is appreciated.

Very truly yours,



CONRAD LEE KLEIN

CLK/kee
cc: Jules and Renee Berg

9 3 0 4 3 5 1 4 2 7 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL:

CONRAD KLEIN

ADDRESS:

14001 VENTURA BLVD

SHERMAN OAKS, CA

91423

TELEPHONE:

818 986-8600

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

Date

10/16/89

Signature

Renee Lang Burg

RESPONDENT'S NAME:

RENEE LANG BURG

ADDRESS:

5445 LAUREL CYN

No. HOLLYWOOD, CA

91607

HOME PHONE:

BUSINESS PHONE:

818 761-2227

93043514275

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: CONRAD KLEIN

ADDRESS: 14001 VENTURA BLD
SHERMAN OAKS, CA
91423

TELEPHONE: 818 986-8600

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

10/16/89
Date

Jules S. Bure
Signature

RESPONDENT'S NAME: JULES S. BURE

ADDRESS: 5445 LAUREL CYN
NO. HOLLYWOOD
CA 91607

HOME PHONE: _____

BUSINESS PHONE: 818 761-2227

93043514276

CRESTVIEW FINANCIAL GROUP
CRESTVIEW LENDING CORPORATION
MORTGAGE BANKERS/BROKERS

MUR 2727

October 30, 1989

Mr. Anthony Buckley
Federal Election Committee
999 E. Street Northwest
Washington, DC 20403

RE: GREENSTRIPE MEDIA

Dear Mr. Buckley:

Pursuant to our conversation, I have enclosed the responses to the interrogation on the following pages. Once again, I have no relationship with any of the parties mentioned in this subpoena. I am totally innocent and am extremely frustrated and upset by being implicated with these people. I apologize to being late in returning this to you but I have been ill for the past two weeks. Please contact me if there are any further questions or comments.

Very truly yours,


Mark H. Cohen

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
89OCT 31 PM 3:08

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89OCT 31 AM 3:55



RESPONSES TO INTERROGATORIES

1. I did write a check for \$2000 to Greenstrip Media in 1986 for the Ed Vallen Campaign. Unfortunately, I don't have the check as I have moved two times in the past few years.

2. I did receive reimbursement for the check. I don't recall the date that this occurred.

3. I don't have the copies of the check.

4. In late 1986, Lyle Weisman who was a friend of an associate (Josh Weinberg) in my office approached me and asked if I could do him a favor and write a check to a local political campaign. I was not friendly with Mr. Weisman and initially said no. After his repeated pressuring, I gave him a \$2000 check payable to Greenstrip Media and he immediately gave me the \$2000 back in cash. I asked what this was for and he stated that "he was over his limit" and that by doing this I would be doing him a big favor. I don't even know what office Ed Vallen was running for.

5. The only other person who I know that write a check to Greenstripe Media is George Korz who also works in my office. As a matter of fact, Mr. Weisman approached us at the same time.

6. Once again, I don't have copies of my bank statements as I have moved twice in the past few years and have been unable to locate the records.

7. I have never met Michael Golan and have no relationship whatsoever with him. I also don't know the first thing about his political background or how he is involved with the Ed Vallen campaign.



Mark Cohen



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23 Oct 1989

000444

COMMITTEE OF PATRIOTS

An organization within the 36th Congressional Conservation Caucus
16870 Fairfax Fontana, California 92335 Phone: (714) 822-1486

RECEIVED
OCT 31 AM 11:32

- ✓ ED VALLEN
NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Juniata Retired Businessman
Fontana, California
- ✓ IRIS SHIDLER
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
BUSINESS WOMAN
Walton, California
- CONRAD LACY
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Publisher & Editor
EPIC Source Digest
Rialto San Bernardino
- ✓ ALDREY BARKINER
TREASURER
Auditor Bookkeeper
Fontana, California
- NATIONAL HONORARY MEMBERS
- OLEN SKOLSEN
President The Farmers Institute
507 1st St. USA
- ROY ROGERS
Cauliflower Farmer
Victorville, California
- JOHN GRADY M.D.
President
American Fiddly & Bitty
Association
Boston Tennessee 37307
- EXECUTIVE & BUSINESS
CONSULTANTS
- CLY GARDINON
President & Chief Pilot
Tampa May Inc.
Former Chief of Intelligence N.W.I.
Sarpan Island
- JAMES LIME TOMBINENO
Editor & Publisher
The National Educator
Fullerton, California
- LON LEVISON
Jewelry Candy Company
Colton, California
- EDTA MILLER
Jewelry Hobby Company
Colton, California
- DR. V.H. CAPARDESE, M.D.
President
Oncology Foundation
Newark, Ohio 44657
- RAY & CAROL CLARK
Clark's Naturopathic Center
San Bernardino-Riverside
- "MAY" HETHWOOD
General Overseas Advertising
San Bernardino, California
- LEITH & DORIS KOHNWITZ
Ingrid Food of Home
Costata, California
- ARMY MOTHS
NATIONAL OVERSEAS
THE LIBERTY ADJUSTMENT
P.O. Box 23
El Cajon, California
- ADVISORY COMMITTEE
- CECIL DUNSON Ph.D.
Beverly CA College &
KERIC Radio Talk Show
Professor of Biology
San Bernardino, California
- HAROLD CRAMFORD
Tinsmith's Drug Store
Oxnard-Pharmacist
Oxnard, California
- LT. COL. JAMES "BOY" GRITZ RET.
United States Army Special Forces
Commander JMAA & POWWU
Operations Liaison
Box 472 NCB-78
Lordsburg Nevada 89018
- ICE & HARRY VAGEL
Ice's Tinsmith's Retailer
Oxnard, California
- LEGAL ADVISORS
- WILLIAM A. ALLUM
Constitutional Attorney
San Bernardino, California
- CONSTITUTIONAL ATTORNEY
DONALD MCFERRISON
Attorney at Law
1401 W. Chard Drive
Suite A250
Phoenix, Arizona 85051
PH-6027 866-9544

Hi Darryl L. Mc Donald;
On the 14th of October 1989 (Friday)
Mr. Barbour, the past Treasurer of
the Committee to elect Ed Vallen to
the United States Senate, received
a letter from the Federal Election
Commission asking for an
Explanation concerning the partial
contributions - ????

At Present Audrey is
sick and we are trying to get
her to go to a doctor.
In the beginning of the
(venture) Company for Ed Vallen
to the United States Senate
there were (and still are) the
Blind leading the Blind. He
with advice of (his wife) the
(retired Business woman) Myself
Ed Vallen a retired Combat
Military Disabled Veteran
with the consent of
Audrey we are a professional
Auditor - Bookkeeper and Treasurer
it was suggest to contact
the headquarter of the

93043514279

COMMITTEE OF PATRIOTS

An organization within the 16th Congressional Conservation Caucus
16670 Fairfax Fontana, California 92335 Phone: (714) 822-1486

✓ ED SULLIN
NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Semi-Retired Businessman
Fontana, California

IRIS SHOLDER
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
BUSINESS WOMAN
Kettle, California

CONRAD LACY
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Publisher & Editor
EPA Society Digest
Kettle-Lan Bernardino

✓ ALBERT BARBOUR
TREASURER
Auditor Bookkeeper
Fontana, California

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President The Freedom Institute
Salt Lake City, Utah

BOY BICKERS
Lawman Actor Farmer
Kettle-Lan California

ELVIN CREADY M.D.
President
American Pistol & Rifle
Association
Benton, Tennessee 37301

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CONSULTANTS

GUY CARALDON
President & Chief Pilot
Trans - Mar Inc.
Former Chief of Intelligence N.M.I.
Surgeon Island

JAMES LIME TOWNSEND
Editor & Publisher
The National Educator
Fullerton, California

LON LAYMON
Laymon Candy Company
Colton, California

DITA MILLER
Miller's Honey Company
Colton, California

DR. N.M. CAMARDESE M.D.
President
American Foundation
Newark, Ohio, 44657

RAY & CAROL CLARK
Clark's Nutritional Center
San Bernardino-Bronwood

"YAK" HAYWOOD
Hummer Outdoor Advertising
San Bernardino, California

WIRTH & DOBIS SCHWARTZ
Ingrid Funeral Home
Fontana, California

ADMIN MOYHS
NATIONAL CHAIRMAN
THE LIBERTY AGREEMENT
P.O. Box 27
El Cajon, California

ADVISORY COMMITTEE

CECIL JOHNSON Ph.D.
Riverside City College &
CICIC Radio Talk Show
Professor of Biology
San Bernardino, California

HAROLD CRAWFORD
Crawford's Drug Store
Chemist-Pharmacist
Fontana, California

LT COL JAMES "BOY" GIBTZ BEY
Lined Team Army Special Forces
Commander, JMWOC POW/MIA
Operation Lazarus
Box 472 HCB-70
Sandy Valley, Nevada 89615

JOE & MARY VAGLE
Joe's Tazodony, Artform
Fontana, California

LEGAL ADVISORS

WILLIAM A. SULLIN
Constitutional Attorney
San Bernardino, California

CONSTITUTIONAL ATTORNEY
DONALD MURPHY
Attorney at Law
1484 W. Chard Drive
Suite A250
Phoenix, Arizona 85011
PH-6227 866-9544

Federal Election Commission for instructions, etc. which she followed to the tee or tea. Now 4 of four years later we are ask to produce data pertaining to this Committee. First off the letter from the Federal Election Commission was sent to Audrey in dated the 9th of [unclear] [unclear] takes a [unclear] to get to California [unclear] Washington D.C.) This letter was sent to an [unclear] address 123 Palm Riata California 92374. Iris Sholder the Past Camping Manager lived at that address until about a year ago. Iris's mother did die and was [unclear] two @ doors down the [unclear] into another house [unclear] 137 South Palm Riata California. The [unclear] knowing [unclear] deliver Audrey Barbour Certified letter of which

93043514280

COMMITTEE OF PATRIOTS

An organization within the 36th Congressional Conservation Caucus
16870 Fairfax Fontana, California 92335 Phone: (714) 822-1486

- ED VALLEN
NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Semi-Retired Businessman
Fontana, California
- IRIS SHIDLER
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
BUSINESS WOMAN
Rialto, California
- CONRAD LACY
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Publisher & Editor
EPA Society Digest
Rialto San Bernardino
- ALBERT BARBOLIV
TREASURER
Auction-Bookkeeper
Fontana, California
- NATIONAL HONORARY MEMBERS
- CLEON SKOLSEN
President The Foreman Institute
Salt Lake City, Utah
- ROY ROGERS
Cowboy-Near Patriot
Victorville, California
- JOHN GRADY M.D.
President
American Pistol & Rifle
Association
Benton, Tennessee 37307
- EXECUTIVE & BUSINESS
CONSULTANTS
- GUY CABALDON
President & Chief Pilot
Trans - Mar Inc.
Former Chief of Intelligence N.M.I.
Saipan Island
- JAMES LIME TOWNSEND
Editor & Publisher
The National Educator
Fullerton, California
- LON LAYMAN
Layman Candy Company
Colton, California
- BITA MILLER
Miller's Health Company
Colton, California
- DR. N.M. CAHARDESE, M.D.
President
American Foundation
Newark, Ohio, 44237
- RAY & CAROL CLARK
Clark's Nutritional Center
San Bernardino-Bronwood
- "HAL" REYWOOD
Hummer Outdoor Advertising
San Bernardino, California
- KEITH & DORIS SCHWARTZ
Legal Funeral Home
Fontana, California
- ADAM MITHS
NATIONAL CHAIRMAN
THE LIBERTY MOVEMENT
Hj Box 23
St. Cajon, California
- ADVISORY COMMITTEE
- CECIL JOHNSON Ph.D.
Benedict City College &
KCLC Radio Talk Show
Professor of Biology
San Bernardino, California
- HAROLD CRIBFORD
Cribford's Drug Store
Chemist-Pharmacist
Fontana, California
- LT. COL. JAMES "BO" GRITZ (RET.)
United States Army Special Forces
Commander, JAG & POWs
Operation Letters
Box 472 HCB-78
Sandis Valley, Nevada 89019
- JOE & MARY VAGLE
Joe's Tasselry, Retired
Fontana, California
- LEGAL ADVISORS
- WILLIAM A. ALLUM
Constitutional Attorney
San Bernardino, California
- A CONSTITUTIONAL ATTORNEY
DONALD HANFORDSON
Attorney at Law
3484 W. Cheryl Drive
Suite A236
Placentia, Arizona 85911
PH-5527 886-9546

love signed for in hopes
to get the package letter to
Audrey. This did not happen
because Audrey was out of
town till Monday the 16th.
at present she is very sick
and we are trying to get her
to a doctor.
Audrey, despite her illness,
very sick is going over her
to find out what is wrong
and comply with your
request.
We DID NOT receive
or handle any money.
This was taken care of by
a Mark Barnes who head
a Political Advertising Committee
and had the individual
contributor send or place
his or her money to
Barnes for distribution
to the T.V. stations.
We did NOT handle
any money and did NOT
see any copies of the
checks sent to the T.V.

93043514281

COMMITTEE OF PATRIOTS

An organization within the 36th Congressional Conservation Caucus
16870 Fairfax Fontana, California 92335 Phone (714) 822-1488

ED VALLEN
NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
San-Ronald Supremacy
Fontana, California

IRIS SHIDLER
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
BUSINESS WOMAN
Kaiser, California

CONRAD LACY
ASSISTANT NATIONAL DIRECTOR
COMMITTEE OF PATRIOTS
Publisher & Editor
EPRA South Digital
Radio-San Bernardino

NATIONAL HONORARY MEMBERS

CELEST SKOLSEN
President The Foreman Institute
Salt Lake City, Utah

ROY BOKERS
Cachon Nite Patriot
Coronilla, California

JOHN GRADY, M.D.
President
American Pistol & Rifle
Association
Benton, Tennessee 37307

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Layton Candy Company
Colton, California

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Miller's Honey Company
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DR. N.W. CAMARDESE, M.D.
President
American Foundation
Newark, Ohio 44657

RAY & CAROL CLARK
Clark's Nutritional Center
San Bernardino-Bronade

"MAY" HEYWOOD
Horticultural Outdoor Advertising
San Bernardino, California

KATH & DOBS SCHWARTZ
Ingold Funeral Home
Fontana, California

MARVIN MOTHIS
NATIONAL CHAIRMAN
THE LUXURY ADORNMENT
P.O. Box 23
El Cerrin, California

ADVISORY COMMITTEE

CECIL JOHNSON Ph.D.
Riverside City College &
KCRK Radio Talk Show
Professor of Biology
San Bernardino, California

HAROLD CRANFORD
Cranford's Drug Store
Chemist-Pharmacist
Fontana, California

LT COL JAMES "BOY" GIBTZ (RET.)
United States Army Special Forces
Commander, USAF & POWs
Operation Lazrus
Box 472 HCR 78
Sandy Valley, Nevada 89419

JOE & MARY VANCE
Joe's Feedstore, Retailer
Fontana, California

LEGAL ADVISORS

WILLIAM A. HELLUM
Constitutional Attorney
San Bernardino, California

A CONSTITUTIONAL ATTORNEY
DONALD HOFFERSON
Attorney at Law
3484 W. Chard Drive
Suite A236
Phoenix, Arizona 85061
PH-660 886-9566

Statements after the Election.

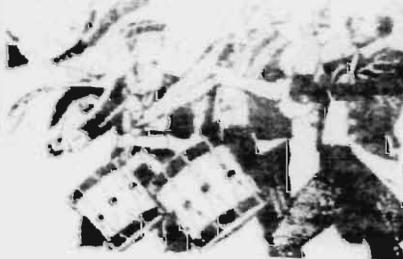
We we sent a check for \$14000 plus to return each contributor his contribution because it was over the legal amount.

This was done after the election.

Please remember I am disabled being over seas in this Republic.

Be careful I am soon 77 years of age and never would it harm my country.

Ed Vallen
16870 Fairfax
Fontana
California
92385



P.S. By the way we have Pony Express here. Takes about 5 days for delivery Ed

MAIL GOVERNMENT

93043514282



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1989

Richard Lloyd Sherman, Esq.
Carlsmith, Wichman, Case,
Mukai & Ichiki
515 South Figueroa Street
Manulife Building, Ninth Floor
Los Angeles, CA 90071

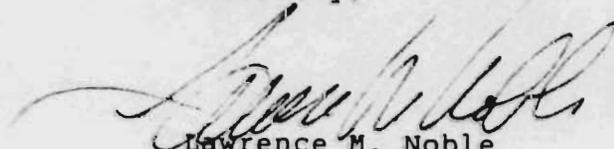
RE: MUR 2727
Michael Katz

Dear Mr. Sherman:

This is in response to your letter dated October 23, 1989, which we received on October 26, 1989, requesting an extension of 20 days to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Michael Katz. 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 November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

93043514283



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1989

Harland W. Braun, Esq.
2049 Century Park East
Los Angeles, CA 90067

RE: MUR 2727
Beverly Horowitz

Dear Mr. Braun:

This is in response to your letter dated October 20, 1989, which we received on October 23, 1989, requesting an extension of several weeks to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Beverly Horowitz. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514284



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1989

Harland W. Braun, Esq.
2049 Century Park East
Los Angeles, CA 90067

RE: MUR 2727
Ann Ives

Dear Mr. Braun:

This is in response to your letter dated October 20, 1989, which we received on October 23, 1989, requesting an extension of several weeks to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Ann Ives. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514285



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1989

Allen H. Zelon, Esq.
1740 Broadway, 24th Floor
New York, NY 10019

RE: MUR 2727
David Zelon

Dear Mr. Zelon:

This is in response to your letter dated October 24, 1989, which we received on October 25, 1989, requesting an extension of 20 days to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, David Zelon. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514286



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1989

Allen H. Zelon, Esq.
1740 Broadway, 24th Floor
New York, NY 10019

RE: MUR 2727
Marc Missioreck

Dear Mr. Zelon:

This is in response to your letter dated October 24, 1989, which we received on October 25, 1989, requesting an extension of 20 days to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Marc Missioreck. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 16, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514287



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 1989

Harland W. Braun, Esq.
2049 Century Park East
Los Angeles, CA 90067

RE: MUR 2727
Richard M. Horowitz

Dear Mr. Braun:

This is in response to your letter dated October 20, 1989, which we received on October 23, 1989, requesting an extension of several weeks to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Richard M. Horowitz. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 17, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514288



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1989

Harland W. Braun, Esq.
2049 Century Park East
Los Angeles, CA 90067

RE: MUR 2727
Robert Ives

Dear Mr. Braun:

This is in response to your letter dated October 20, 1989, which we received on October 23, 1989, requesting an extension of several weeks to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Robert Ives. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 17, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

93043514289



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1989

Robert M. Hertzberg, Esq.
Margolis, Hertzberg & Morin
3550 Wilshire Boulevard
Suite 1418
Los Angeles, CA 90010-1121

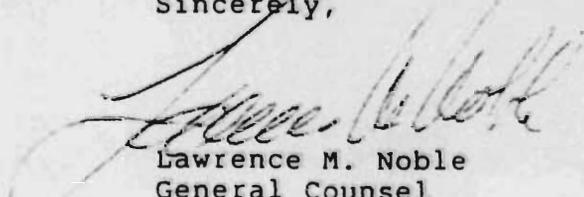
RE: MUR 2727
Todd Silver

Dear Mr. Hertzberg:

This is in response to your letter dated October 23, 1989, which we received on October 30, 1989, requesting an extension of 20 days to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Todd Silver. 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 November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

93043514290



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 3, 1989

Conrad Lee Klein, Esq.
14001 Ventura Boulevard
Sherman Oaks, CA 91423

RE: MUR 2727
Renee and Jules Berg

Dear Mr. Klein:

This is in response to your letter dated October 30, 1989, requesting an extension until November 30, 1989 to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your clients, Renee and Jules Berg. Although unable to grant your full request, after considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 20, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anne A. Weissenborn".

Anne A. Weissenborn
Assistant General Counsel

93043514291

OGC 4457

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV -3 AM 10:29

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 NOV -3 PM 2:22

October 30, 1989

Federal Election Commission
Washington, D.C. 20463

RE: David Hultquist

TO WHOM IT MAY CONCERN:

Please allow this letter to serve as a written request for an extension of time in response to your MUR #2727. The documents and information that you are requesting, are in the possession of the Federal Bureau of Investigation. If you have any questions in this matter, please call.

Sincerely,


David Hultquist

9 3 0 4 3 5 1 4 2 9 2

Osc 4471

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM 334
Beverly Hills
California 90233 3334
89 NOV 6 AM 12:44
U.S.A.

October 27th, 1989.

Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463.

Att: Mr. Danny L. McDonald./ Mr. Anthony Buckley.
Re: MUR 2727
James White.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 NOV -6 PM 2:34

Dear Mr. McDonald / Mr. Buckley.

Pursuant to your request in your letter of October 5th, 1989, recieved October 16th, please find following and attached the information and document copies that you require.

ANSWER TO INTERROGATORIES

1. Yes, I wrote one check in the amount of \$2,000.00 made payable to Green Stripe Media, Inc and dated October 31st, 1986.
2. Yes, I received a check in the amount of \$2,000.00 in exchange for my check on October 31st, 1986. This check was given to me by Mr. Joseph Nash of Nash & Company, South Beverly Dr, Beverly Hills, California 90212.
3. I did not copy the check given to me in exchange for mine.
4. The circumstances surrounding my issuance of the check are as follows:

I was dining one evening with some friends (October 30th, 1986 to my recollection) and Mr. Joseph Nash arrived at the restaurant and joined our table for a few drinks. During the ensuing conversation Mr. Nash asked me if I could do him a small favor. I asked what it was and he replied that he had made some sort of committment to raise some funds for a charity that were going to make a movie or some sort of commercial, and I seem to recall that the Green Peace conservation group was mentioned. I wasnt really paying a great deal of attention, as I was more interested in finding a gracious way of saying no to what I considered to be the expected request for a donation. Mr. Nash went on to say that he would immediately exchange his check for mine and it would not cost me anything, and it would save him some embarrassment to the point that he had not had the time to get around and collect donations from all of his friends and acquaintences. I was relieved and saved from an embarrassing situation of having to say no to a request for a donation, and seeing nothing at all wrong in his request, I agreed to do him the small favour he requested. At no time did he ever mention that this was a political contribution or that there was anything

93043514293

illegal about his request, if he had mentioned anything at all to the point that my favour to him was in any way illegal, I would not have accomodated his request. The next morning I spoke to him and he told me how to write the check explaining that Valen was the spokesman being represented by the movie/commercial.

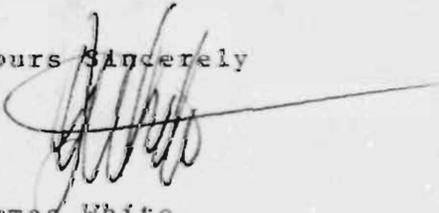
Up until that day I had never even heard of Valen, however I was aware of the efforts of the Green Peace Conservation group. I have never seen the movie or commercial that resulted from this, and I was never interested in doing so in the first place.

5. I do not know of any other individuals who wrote or issued checks.
6. Copies of my bank statements for the months requested are attached.
7. I have no relationship with Michael Goland. I have never met him, or even heard of him, nor am I a member of any political committee or organization connected with him or anyone else mentioned in your letter, and with the exception of the reference to Valen on one occasion outlined in paragraph 4, I had up until the receipt of your letter not been aware of the existence of anyone mentioned in your correspondence.

I trust that this may be of some assistance to you, and that the contents be reviewed without prejudice and with complete confidentiality.

I Hereby make this statement under oath this 27th Day of October 1989.

Yours Sincerely



James White.

93043514294

9 3 0 4 3 5 1 4 2 9 5



JAMES R. WHITE
P. O. BOX 10034
BEVERLY HILLS, CA 90213

50M 90-78
October 31st

867
211401244
86
16-3015/1220

Green Stripe Media Inc.

Two Thousand and 00/100

\$ 2,000.00

Bank of the West

Beverly Hills Office
3500 Wilshire Blvd.
Beverly Hills, CA 90210
Valen for Senator.

44210412 50 6511 10
84-06 15EM EMT JD
PROCESS BANK OF THE WEST 90-78
11/11

PAY TO THE ORDER OF
PACIFIC NATIONAL BANK
FOR DEPOSIT ONLY
GREEN STRIPE MEDIA INC.
10011078 01

CGC 4713

STATEMENT OF DESIGNATION OF COUNSEL RECEIVED SECTION COMMISSION

NUM 2727

89 NOV -6 AM 10:37

NAME OF COUNSEL: SHELDON I. LODMER, ESQ.

ADDRESS: 2049 Century Park East, #3080

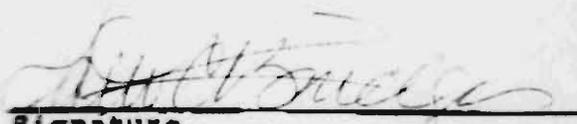
Los Angeles, CA 90067

TELEPHONE: (213) 552-1670

RECEIVED
FEDERAL ELECTION COMMISSION
89 NOV -6 PM 2:33

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

November 1, 1989
Date


Signature

RESPONDENT'S NAME: PATTI C. BRIDGES

ADDRESS: c/o Revel Travel Service

449 So. Beverly Drive

Beverly Hills, CA 90212

HOME PHONE:

BUSINESS PHONE: (213) 553-5555

93043514296

LAW OFFICES OF
SHELDON I. LODMER
A PROFESSIONAL CORPORATION
TWO CENTURY PLAZA, SUITE 3080
2049 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (213) 552-1670
FAX (213) 552-2536

Attorneys for

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	MUR2727
)	
PATTI C. BRIDGES,)	
)	RESPONSE TO INTERROGATORIES
)	AND REQUEST FOR PRODUCTION OF
Respondent.)	DOCUMENTS
)	
_____)	

RESPONDENT, PATTI C. BRIDGES, responds to the Interrogatories and requests for documents as follows:

1. I wrote a total of two checks to Greenstripe Media. Both checks were for \$2,000.00. The first check was returned as a result of non-sufficient funds and the second check was written, to replace the first. I never wrote a check to Mark Barnes or Political Advertising and Consulting. I never wrote any checks, including the ones to Greenstripe Media, with any knowledge that the funds were to be used for a television advertisement featuring Ed Vallen. I do not have the original checks in my possession. I have ordered a copy of my bank statement for the period covered and I assume that I will be able to identify the checks from the statement. At that time I will order copies of said checks. However, an FBI agent

93043514297

1 interviewed me some time ago and had copies of each of the indicated
2 checks.

3 2. I did receive a check for \$2,000.00 at or about the time
4 I provided the first check of \$2,000.00 payable to Greenstripe
5 Media. I do not recall the exact date but I believe it was, as
6 indicated, on or about the date that I wrote the first check. The
7 individual that provided the check to me was Joe Nash and the amount
8 was \$2,000.00.

9 3. I have ordered a copy of my bank statement covering the
10 period in Question No. 1. As soon as I receive said bank statement
11 I will be able to identify the check numbers and I will order copies
12 of the same. I do not have the original checks in my possession.

13 4. Sometime in October or November of 1986 I was asked if
14 I would write a check for \$2,000.00 payable to Greenstripe Media.
15 I was told the money was to be used for advertising of some sort but
16 I did not know, nor was I told, exactly what it was for. I was new
17 in California and needed some help in establishing my credit. I was
18 told that if I would write a check to Greenstripe Media, as
19 aforementioned, I would receive back immediately a check for the
20 same amount of money. I was also told that the check of \$2,000.00
21 that I wrote would not be utilized immediately although I could use
22 the return check of \$2,000.00 for instant credit. I was told that
23 my check would not be cashed for two to three weeks. I was further
24 told that the individual who wanted me to write the check could help
25 me establish the credit previously mentioned. All of the
26 information provided herein came from the offices of Joe Nash
27 through his secretary, Jennette. Joe Nash had an office in the
28 building in which I worked. My recollection is that the replacement

93043514298

1 check came directly from Joe Nash but I do not know upon what
2 account it was drawn. As it turned out, the check that I had given
3 to Mr. Nash, and which was to be held for three weeks, was actually
4 deposited immediately by Mr. Nash or whomever he gave it to.
5 Obviously, this check did not clear my bank and I was asked by
6 Jennette to supply a replacement check. Not only did I have to
7 supply the replacement check for the \$2,000.00 but I also had to pay
8 bank fees for the returned check.

9 At no time did I have any understanding or inclination that
10 the money I was providing had anything to do with an election or
11 campaign contribution. In fact, the first time I had any indication
12 of this was when an FBI agent showed up at my office and questioned
13 me about the funds. At this time the FBI agent mentioned the names
14 of Ed Vallen and Michael Goland. I had never heard of these
15 individuals before. On one of the checks shown to me by the FBI
16 agent the words "Vallen for Senate" were written. I did not write
17 these words on the check.

18 5. I know of no other person who wrote any checks to
19 Greenstripe Media or any of the other entities or individuals
20 mentioned in this Question No. 5.

21 6. I have requested copies of my October, November and
22 December, 1986, statements and will provide the same upon receipt.

23 7. I have never had a relationship with Michael Goland.

24 DATED: November 2, 1989

LAW OFFICES OF SHELDON I. LODMER
A Professional Corporation

25
26
27 By: _____
SHELDON I. LODMER

93043514299

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing RESPONSE TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS and know its contents.

[X] CHECK APPLICABLE PARAGRAPH

[X] I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

[] I am [] an Officer [] a partner [] a [] of []

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. [] I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. [] The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

[] I am one of the attorneys for [] a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on [] 19 [] at [] California.

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

PATTI C. BRIDGES

Type or Print Name

Patti C. Bridges

Signature

PROOF OF SERVICE

1013A (3) CCP Revised 1/1/88

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California.

I am over the age of 18 and not a party to the within action; my business address is:

2049 Century Park East, #3080, Los Angeles, CA 90067

On 11/1, 19 89, I served the foregoing document described as:

RESPONSE TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

[] on the interested parties in this action

[] by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:

[X] by placing [X] the original [] a true copy thereof enclosed in sealed envelopes addressed as follows:

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

[X] BY MAIL

[X] *I deposited such envelope in the mail at Los Angeles, California.

The envelope was mailed with postage thereon fully prepaid.

[] I caused such envelope to be deposited in the mail at [] California.

The envelope was mailed with postage thereon fully prepaid.

I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

Executed on November 1, 19 89, at Los Angeles, California.

[] *(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on [] 19 [] at [] California.

[] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

[X] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

PAMELA M. JOSEPH

Type or Print Name

Pamela M. Joseph

Signature

93043514300

OGC 4478

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

KEITH C. MONROE, INC.
A PROFESSIONAL CORPORATION
ATTORNEY AT LAW
1428 NORTH BROADWAY
SANTA ANA, CALIFORNIA 92706
TELEPHONE (714) 835-3883

89 NOV -6 AM 11:21

November 1, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 NOV -6 PM 2:33

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

Re: SLOANIA RAMIREZ

Dear Mr. Buckley:

Pursuant to our telephone conversation of yesterday, enclosed is a statement of designation of counsel which has been executed by my client, Ms. Sloan Ramirez, and a request for additional time to respond to subpoena. Copies of these documents were sent to your office via FAX this morning at 9:35 Pacific Standard Time.

Yours truly,

Keith C. Monroe
Keith C. Monroe

KCM:s
Enclosures

93043514301

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: Keith C. Monroe

ADDRESS: 1428 North Broadway

Santa Ana, California 92706

TELEPHONE: (714) 835-3883

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

October 31, 1989

Date

Sloania Ramirez
Signature

RESPONDENT'S NAME: Ms. Sloan Ramirez

ADDRESS: 2201 Alabama Street, #2

Huntington Beach, California 92648

HOME PHONE: _____

BUSINESS PHONE: (714) 547-6077

93043514302

tice Department for Mr. Donsanto on October 31, 1989, but he was apparently not in his office at the time thereof and no contact was made.

The time requested is necessary, in the opinion of counsel, to attempt or to achieve a resolution of the problem explained above.

RESPECTFULLY SUBMITTED,

KEITH C. MONROE, Inc.

By



Keith C. Monroe

Attorney for Sloanie Hoebeke
1428 North Broadway
Santa Ana, California 92706

Telephone (714) 835-3883

93043514304

06C 4474

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV -6 AM 11: 14

FAX: (213) 275-1312

LAW OFFICES
MICHAEL JAY BERGER

INCORPORATED
9454 WILSHIRE BOULEVARD
SUITE 302

BEVERLY HILLS, CALIFORNIA 90212-2904
TELEPHONE (213) 271-6223

MICHAEL JAY BERGER
STEVEN R. STOLAR*
CYNTHIA L. GRIDLEY
GARY R. LIVINGSTON**

* ALSO ADMITTED TO FLORIDA BAR
** ALSO ADMITTED TO WASHINGTON, D.C. BAR

October 23, 1989

Lawrence M. Noble
999 E Street Northwest
Washington D.C. 20463

RE: Our File: Berger Adv. F.E.C.
Your File Reference Number: MUR 2727

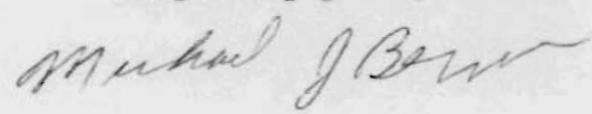
Dear Mr. Noble:

This letter is my official request for conciliation of the above referenced matter. I will be sending answers to your interrogatories and document requests under separate cover.

Please note that I have already discussed this matter fully with U.S. Attorney George Newhouse. I have also provided a statement to the F.B.I. on this matter for use in the case of the United States vs. Goland. Mr. Newhouse's number is (213) 894-3542. Also, on October 16, 1989, I had a brief discussion of this matter with Tony Barclay, Esq.

I am eager to proceed with conciliation on this matter at your earliest possible convenience.

Very truly yours,



MICHAEL J. BERGER

MJB:hv

89 NOV -6 PM 2: 33

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

9 3 0 4 3 5 1 4 3 0 5



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 6, 1989

David Hultquist
4702 Baywind Drive
Pensacola, Florida 32514

RE: MUR 2727
David Hultquist

Dear Mr. Hultquist:

This is in response to your letter dated October 30, 1989, which we received on November 3, 1989, requesting an extension of time to respond to our Order to Answer Questions and Subpoena to Produce Documents. After considering the circumstances presented in your letter, I have granted an extension of 20 days. Accordingly, your response is due by the close of business on November 21, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Anne A. Weissenborn
Assistant General Counsel

93043514306

PRE Inc.

Pacific Rim Equities

RECEIVED
FEDERAL ELECTION COMMISSION

89 NOV -7 PM 1:12

606 4487
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV -7 PM 12:25

Real Estate Investors

Answers to Interrogatories

MUR 2727

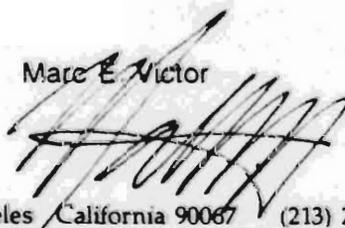
1. This question is confusing. Nonetheless, I will answer it to the best of my ability. I did write a check to Greenstripe Media in 1986. However, I did not write it in order to pay for television advertisement featuring Ed Vallen. I have not been able to locate the check (see statement regarding documents below).
2. (Yes) To the best of my recollection, I received the reimbursement on November 10, or 11, 1986. Sandy Habalow, who is a business acquaintance of mine, provided me with the reimbursement. It was in the form of a check on the account of Joe Nash (Accountant).
3. I do not have a copy of the reimbursement check.
4. Sandy Habalow came to my office November 7, 1986, and asked to borrow \$2,000 from me. He told me that he would bring me a check for reimbursement the following week. I wrote him a check for \$2,000, made out to cash. Then he requested that I make it out to "Greenstripe Media" instead. I scratched out the word "cash" and wrote in "Greenstripe Media" and initialed the change. I had never heard of Greenstripe Media, and asked Sandy what the check was for. He told me that it was for some kind of campaign, but did not elaborate.
5. I have no personal knowledge or independent information about any other individuals. I am only aware that there were other such individuals from the U.S. Attorney and F.B.I., who were involved in the prosecution of Michael Goland.
6. See statement regarding documents below.
7. None.

Documents

I spoke with the F.B.I. I told him that I couldn't find the check that I wrote, and asked him for a copy of it. He said that he and the government have all documents, and that you could obtain the documents you requested from them.

I declare, under penalty of perjury, that the answers set forth above are true to the best of my recollection.

Marc E Victor

 11/1/89

93043514307

LAW OFFICES

/
MAGINNIS & ERWIN

11973 SAN VICENTE BOULEVARD-SUITE 219

LOS ANGELES, CALIFORNIA 90049

(213) 472-1033 (213) 476-5444

ROBERT F. ERWIN
RUSSELL F. MAGINNIS

November 3, 1989

Federal Election Commission
Washington, D.C. 20463
Att: Mr. Anthony Buckley

In re the matter of ROBERT KRAUSE and
MOLLIE KRAUSE MUR 2727

Dear Mr. Buckley:

ROBERT KRAUSE, in response to Interrogatories numbered 1 - 7 served on him by Federal Election Commission, states as follows:

1. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

2. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

3. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

93043514308

5. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

6. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

7. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

93043514309

LAW OFFICES

d
MAGINNIS & ERWIN

11973 SAN VICENTE BOULEVARD SUITE 219

LOS ANGELES, CALIFORNIA 90049

(213) 472-1033 (213) 476-5444

ROBERT F. ERWIN
RUSSELL F. MAGINNIS

November 3, 1989

Federal Election Commission
Washington, D.C. 20463
Att: Mr. Anthony Buckley

In re the matter of ROBERT KRAUSE and
MOLLIE KRAUSE MUR 2727

Dear Mr. Buckley:

MOLLIE KRAUSE, in response to Interrogatories numbered 1 - 7 served on him by Federal Election Commission, states as follows:

1. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

2. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

3. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

93043514310

5. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

6. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

7. It appearing to the respondent that the acts charged have a criminal as well as a civil penalty, respondent respectfully declines to answer the subject interrogatory on the grounds that such answer might tend to incriminate him in violation of his rights under the Fifth and Fourteenth Amendments to the Constitution of the United States. (See Curcio v. United States (1957) 354 U.S. 118; United States v. Doe (1984) 465 U.S. 605) and In re Leavitt (1959) 174 Cal.App.2d 535.

23043514311

(VERIFICATION - 446 and 2015.5 C.C.P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, the undersigned, declare: I am the respondent

in the above-entitled action; I have read the foregoing RESPONSE TO INTERROGATORIES

and know the contents thereof; and the same is true of my own knowledge, except as to the matters which are therein stated upon my information and belief, and as to those matters, I believe it to be true.

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

6 November, 1989
Date

Robert Krause
Signature of Declarant

Robert Krause
Type or Print Full Name of Declarant and Title, if applicable

(PROOF OF SERVICE BY MAIL - 1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a resident of/employed in the aforesaid county, State of California; I am over the age of eighteen years and not a party to the within action; my business address/residence address is: 11973 San Vicente Blvd.,

Suite 219, Los Angeles, CA. 90049

On November 10, 1989, I served the foregoing RESPONSE TO INTERROGATORIES

(set forth the exact title of the document served)

on the parties

in this action by placing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California, addressed as follows:

Federal Election Commission
Washington, D.C., 20463
Att: Mr. Anthony Buckley

I certify (or declare), under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

November 10, 1989
Date

Nick P. Maginnis
Signature of Declarant

Nick P. Maginnis
Type or Print Full Name of Declarant

93043514312

OGC 4493

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES

89 NOV -8 AM 11:10

f
MAGINNIS & ERWIN

ROBERT F. ERWIN
RUSSELL F. MAGINNIS

11973 SAN VICENTE BOULEVARD-SUITE 219
LOS ANGELES, CALIFORNIA 90049
(213) 472-1033 (213) 476-6444

November 3, 1989

Federal Election Commission
Washington, D.C. 20463
Att: Mr. Anthony Buckley

RECEIVED
FEDERAL ELECTION COMMISSION
89 NOV -7 PM 9:36

In re the matter of ROBERT KRAUSE and
MOLLIE KRAUSE MUR 2727

Dear Mr. Buckley:

Enclosed are Statements of Designation of Counsel. As I informed you, my clients object to the interrogatories on the grounds that to answer might tend to violate their rights against self-incrimination under the Fifth and Fourteenth Amendments to the Constitution of the United States. I enclose drafts of objections to the interrogatories. They have not yet had an opportunity to review and verify those responses. I will forward their verified objections when received. There was no "attachment" to your subpoena. All papers are loose except two pages of Description of Preliminary Procedures. Please clarify or reissue the subpoena.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
89 NOV -8 PM 1:18

No action should be taken against my clients. As I understand it, at no time did my clients agree or expect that their names would be used for any purpose, much less to make a contribution in someone else's name. In fact, we can't figure out how that could be done. You must agree the wording of the section is very awkward.

You may treat this letter both as a request that no action be taken and as a request for "pre-probable cause conciliation".

I look forward to your reply.

Very truly yours,

R. F. Maginnis
Russell F. Maginnis

RFM:nm
Encl.

93043514313

STATEMENT OF DESIGNATION OF COUNSEL

MUR 7727

NAME OF COUNSEL: MAGINNIS & ERWIN

ADDRESS: 11973 San Vicente Blvd.
Suite 219
Los Angeles, CA. 90049

TELEPHONE: (213) 472-1033

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

10/28/89
Date

Mollie Krause
Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

93043514314

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: MAGINNIS & ERWIN

ADDRESS: 11973 San Vicente Blvd.

Suite 219

Los Angeles, CA. 90049

TELEPHONE: (213) 472-1033

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

27 October, 1989
Date

Robert Krause
Signature

RESPONDENT'S NAME: ROBERT KRAUSE

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

93043514315

06C 4504

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV -9 AM 9:39

SULLIVAN, WALSH, ROSSBACHER & WOOD
LAWYERS

BILTMORE TOWER, EIGHTEENTH FLOOR
500 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 488-9200
TELECOPIER (213) 488-9664

COUNSEL
LAWRENCE D. WILLIAMS
M. YANCE HIRSCHI

November 4, 1989

FILE NO:
4206.000

89 NOV -9 PM 12:32

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF FEDERAL COUNSEL

Anthony Buckley, Esq.
Federal Election Commission
Washington D.C. 20463

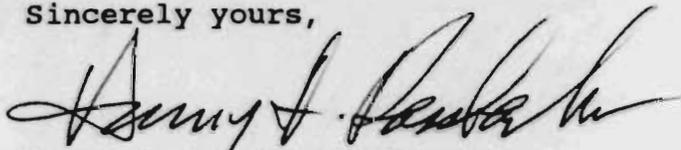
Re: Election Commission: MUR 2727

Dear Mr. Buckley:

It was a pleasure to speak with you. As I have confirmed, I have been retained by Mr. Samir Mobassaly.

As I told you, I will be out of the country and will not return until November 18th. Consequently, I have asked that you extend the time for me to respond on behalf of Mr. Mobassaly until December 1. I appreciate greatly your courtesy in this matter. I look forward to contacting you when I return. I have attached a signed statement of designation of counsel for your files. I look forward to talking to you when I return.

Sincerely yours,



Henry H. Rossbacher of
Sullivan, Walsh, Rossbacher & Wood

HHR:y1

93043514316

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

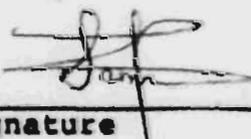
NAME OF COUNSEL: Henry H. Rossbacher, Esq.

ADDRESS: Sullivan, Walsh, Rossbacher & Wood
Biltmore Tower
500 S. Grand Avenue, Suite 500
Los Angeles, California 90071

TELEPHONE: (213) 488-9200

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

10-24-89
Date


Signature

RESPONDENT'S NAME: Mr. Samir Mobassaly

ADDRESS: P. O. Box 295
Azusa, California 91702

HOME PHONE: _____

BUSINESS PHONE: (818) 969-6066

93043514317

BGC 4508

JAMES A. TWITTY
Lawyer
9533 Brighton Way
Second Floor
Beverly Hills, California 90210
(213) 205-0505
Telecopier (213) 205-0567

November 13, 1989

SENT BY TELECOPIER TO 202-376-5280

Anthony Buckley, Esq.
Office of the General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
89 NOV 13 PM 10:53

Re: MUR 2727

Dear Mr. Buckley:

This confirms our telephone conversation on November 9, 1989 as follows:

I told you I had been trying to reach you for some time; I had been in trial for weeks and I represent a group of persons who received letters from the commission concerning a Matter Under Review as to Michael Goland (MUR 2727).

I also told you the people require an extension of time to respond to the Order and Subpoena. I told you Assistant United States Attorney George Newhouse Central District of California (Los Angeles) secured an indictment of Goland. (Trial ended in a mistrial; a superseding indictment was filed; and trial is pending.)

(Almost all the persons who received the MUR letters have been interviewed by the Federal Bureau of Investigation and/or have testified before a federal grand jury. Any statement made to the Commission now would have to be produced as to any witness who testifies at the new trial. The prosecutor does not appear anxious for these persons to begin answering your questions.)

A partial list of the persons whom I represent includes: Kelly W. Bixby; Robert H. Frank; Ernestine Crowe; and Mr. Crowe.

I am still in trial in the District Court here and am a sole practitioner. These listed persons require twenty days from today's date to reply to the Commission because of my trial schedule. There are others as well, but these are the ones that I can remember. I will furnish the balance of the names by Wednesday, November 15, 1989.

You agreed those whom I represent may have the additional twenty days. I promised to telecopy the request to you for receipt Monday morning, November 13.

Thank you for your assistance in this matter.

Sincerely,

James A. Twitty
James A. Twitty

93043514318

06C 4321

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

HANSON & EGGERS
ATTORNEYS AT LAW
205 SOUTH BROADWAY, SUITE 902
LOS ANGELES, CALIFORNIA 90012

89 NOV 13 PM 12: 13

TELEPHONE
626-6831

EARL L. HANSON
MITCHELL W. EGGERS, INC.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
89 NOV 13 PM 4: 00

November 6, 1989

CERTIFIED MAIL P330733708

Anthony Buckley, Esq.
Office of the General Counsel
Federal Collection Commission
999 E Street N.W.
Washington, D.C. 20463

Re: David Weisman
Your Reference 2727
Response to Interrogatories & Request for Documents

Dear Mr. Buckley:

Please be informed that this office represents David Weisman in connection with your inquiry concerning the Cranston/Zschau Election of 1986.

David Weisman respectfully declines to answer any interrogatories and asserts his right to refuse to answer pursuant to the Fifth Amendment to the United States Constitution in the absence of a grant of immunity from the United States Government.

Although Mr. Weisman asserts his Fifth Amendment privilege in not complying with the inquiries, I will take this opportunity to answer the questions you posed from my memory based on the evidence given at the criminal trial referred to above. It should be noted that David Weisman's involvement was so insignificant that the government did not bother to call him as a witness at the trial.

1. Mr. David Weisman wrote a check in late October 1986 with the payee blank. It is his understanding that the payee may later have been filled in to show "Greenstripe Media". This check represented \$1,000 from David Weisman and \$1,000 from his wife Michele Weisman. It was David Weisman's understanding and intention that the check be used for advertising (which was part of an INDEPENDENT EXPENDITURE involving Mr. Michael Goland). He did not know that the \$2,000 was to be for an advertisement featuring Ed Vallen. Mr. David Weisman never issued a check to Mark Barnes or Political Advertising and Consulting.

2. Mr. David Weisman did not specifically receive any reimbursement for the check referred to in question number 1. On

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the date of the giving of the check however, or shortly thereafter, Mr. David Weisman received a cashier's check in the amount of \$2,000 from his son Lyle Weisman, who owed him money from a previous business transaction. It was David Weisman's understanding at the time of the receipt of the cashier's check for \$2,000 that it was a partial repayment for said money owed.

3. The cashier's check is not available and its whereabouts are unknown to Mr. David Weisman.

4. Mr. David Weisman was approached by his son Lyle Weisman and asked to make a contribution in the name of David Weisman and his wife, Michele, which was to go to an advertising campaign (which was part of an independent expenditure). Mr. Michael Goland wanted Senator Cranston re-elected and the advertising was to assist in the reelection. David Weisman was not told that he would receive reimbursement for the check and knew nothing of the details of the advertising campaign.

5. David Weisman does not know of his own knowledge of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes, or Political Advertising and Consulting in 1986. He has read about others who wrote checks to Greenstripe Media but this knowledge is hearsay gained primarily from a reading of newspaper accounts of the trial of United States v. Michael Goland.

6. No cash reimbursement as such was received for the \$2,000 check given by David and Michele Weisman.

7. In 1986 the nature of the relationship with Michael Goland was a casual acquaintance. At that time he had met him only once or twice.

Most importantly, you should keep in mind that Mr. David Weisman and all the other contributors believe they were contributing to an advertising campaign (that was part of an independent election expenditure effort). Mr. David Weisman believed that what he was doing was perfectly legal and proper. Nothing that has happened after the giving of the check can possibly affect his thinking at the time that the check was written.

If I may be of assistance, please call me.

Very truly yours,

HANSON & EGGERS


MITCHELL W. EGGERS

MWE/le

93043514320

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: MITCHELL W. EGERS

ADDRESS: 205 So. Broaway, Suite 902
Los Angeles, CA 90012

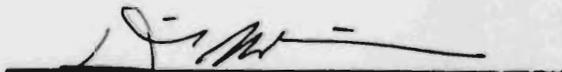
TELEPHONE: (213) 626-6831

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

November 3, 1989

Date

Signature



RESPONDENT'S NAME: DAVID WEISMAN

ADDRESS: 14001 Ventura Boulevard
Sherman Oaks, CA 91423-3558

HOME PHONE: _____

BUSINESS PHONE: (818) 789-0919

9 3 0 4 3 5 1 4 3 2 1

06 C4 533

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 13 PM 2:06

TELEPHONE
626-6831

EARL L. HANSON
MITCHELL W. EGGERS, INC.

HANSON & EGGERS
ATTORNEYS AT LAW
205 SOUTH BROADWAY, SUITE 902
LOS ANGELES, CALIFORNIA 90012

November 6, 1989

CERTIFIED MAIL P330733707

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

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 NOV 13 PM 3:59

Re: Shifra Weisman Hastings
Your Reference 2727
Response to Interrogatories & Request for Documents

Dear Mr. Buckley:

Please be informed that this office represents Shifra Weisman Hastings in connection with this inquiry concerning the Cranston/Zchau Election of 1986.

Mrs. Hastings respectfully declines to answer any interrogatories and asserts her right to refuse to answer pursuant to the Fifth Amendment to the United States Constitution in the absence of a grant of immunity from the United States Government.

As I indicated on the telephone, I believe answers from Mrs. Hastings would be of little value to you. There was a lengthy criminal trial in Los Angeles in which Mr. Michael Goland, Mr. Sandor Habalow, and Mr. Lyle Weisman were defendants. Although the trial resulted in a hung jury for Mr. Goland and Mr. Habalow, Mr. Lyle Weisman was acquitted.

The various contributors to the advertising campaign in which Mr. Goland may have taken part were asked to testify by the government. However, Mrs. Hastings' role was deemed so insignificant she was not called to the stand. Although, as stated above, Mrs. Hastings asserts her Fifth Amendment privilege in not complying with the inquiries, I will take this opportunity to answer the questions you posed from my memory based on the evidence given at the criminal trial referred to above.

1. Mrs. Hastings wrote one check for \$1,500 which was issued to Greenstripe Media.

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Anthony Buckley, Esq.
Page 2
October 24, 1989

2. Mrs. Hastings never received reimbursement for the \$1,500 check mentioned above.
3. Not applicable.
4. The check was written in response to a request from her brother Lyle Weisman. Mr. Lyle Weisman, and Shifra Weisman Hastings understood the check was to go to an advertising campaign (which was part of an independent expenditure by Mr. Goland) and that it was legal to give such check (for advertising in an independent expenditure campaign).
5. Of her own knowledge Mrs. Hastings does not know of any other individual that wrote checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting. Mrs. Hastings only knowledge is through hearsay which reached her primarily through the newspaper articles of the trial.
6. Mrs. Hastings received no reimbursement in any form and bank statements, if they existed, would be unproductive.
7. Mrs. Hastings had no relationship with Mr. Goland in 1986.

Most importantly, you should keep in mind that Mrs. Hastings and all the other contributors believe they were contributing to an advertising campaign (that was part of an independent election expenditure effort). Mrs. Hastings believed that what she was doing was perfectly legal and proper. Nothing that has happened after the giving of the check can possibly effect her thinking at the time that the check was written.

If I may be of assistance, please call me.

Very truly yours,

HANSON & EGGERS



MITCHELL W. EGGERS

MWE/le

93043514323

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: MITCHELL W. EGGERS

ADDRESS: 205 So. Broadway, Suite 902
Los Angeles, CA 90012

TELEPHONE: (213) 626-6831

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

November 3, 1989
Date

Mitchell W. Eggers
Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

9 3 0 4 3 5 1 4 3 2 4

0604532

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 13 PM 2:06 TELEPHONE
626-6831

EARL L. HANSON
MITCHELL W. EGGERS, INC.

HANSON & EGGERS
ATTORNEYS AT LAW
205 SOUTH BROADWAY, SUITE 902
LOS ANGELES, CALIFORNIA 90012

November 7, 1989

CERTIFIED MAIL P330733706

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

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
89 NOV 13 PM 3:59

Re: Your Reference 2727
Response to Interrogatories & Request for Documents

Dear Mr. Buckley:

The undersigned, Lyle Weisman, states that he asserts each and every privilege available to him in response to the inquiry contained in the Interrogatories and Requests for Documents transmitted by the Federal Election Commission including, but not limited to, an assertion of the right to remain silent pursuant to the Fifth Amendment of the United States Constitution.

Additionally, it should be noted that the undersigned Lyle Weisman was charged in a criminal case in the Central District of the United States District Court with charges relating to the subject matter of the present inquiry and was found "not guilty" of said charges in 1989.

Despite the assertion of all available privileges, and without waiving said privileges in any manner, the undersigned answers the interrogatories as follows:

1. I am and have been at times in the past an employee of Michael Goland and an acquaintance of Sandor Habalow. I know Michael Altman and on one occasion met Colleen Morrow in 1986. To the best of my knowledge I never met Mark Barnes in 1986.
2. I was employed by Balboa Construction Company in 1986. My duties were general in nature (usually I looked up documents, ran errands, etc.) and for most of the year was compensated at the rate of \$1,000 per month. I had no job description as such and I have no copies of salary and expense payments from Balboa Construction in 1986.

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3. I had no responsibility or duty to organize or assist in organizing a campaign against Ed Zschau's efforts to win election to the United States Senate from California.

4. I did not contact Mark Barnes, Political Advertising and Consulting or Greenstripe Media to make arrangements for the production and airing of a television commercial featuring Ed Vallen.

5. I do not know of my own knowledge whether Michael Goland or Balboa Construction paid \$120,000 to Greenstripe Media or Mark Barnes or Political Advertising and Consulting in 1986 to produce and air a television advertisement featuring Ed Vallen. That was the nature of the allegation against Mr. Goland in a criminal trial in which the jury could not reach a decision and was dismissed. Any information that I would have concerning this interrogatory would be hearsay based upon evidence heard at the trial. I do not have and cannot provide any documentation relating to such payments.

6. I have no personal knowledge of whether Michael Goland personally solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of the advertisement referred to in question 5. The evidence at the trial showed that through intermediaries Mr. Goland provided reimbursement to those contributors who made out checks payable to Greenstripe Media for an advertising campaign. I was one of several intermediaries who obtained checks for the advertising campaign and facilitated the reimbursement. AT ALL TIMES I BELIEVED THAT MR. GOLAND'S ACTIVITIES WERE LEGAL AND LAWFUL AND THAT THE CONTRIBUTIONS WERE LEGALLY MADE FOR AN ADVERTISING CAMPAIGN AND THE REIMBURSEMENTS WERE ALSO LAWFUL. THESE MATTERS WERE ADJUDICATED AT THE TRIAL IN WHICH I WAS NAMED A DEFENDANT AND I WAS FOUND NOT GUILTY.

7. I did solicit some persons to make payments to Greenstrip Media but not to Mark Barnes or Political Advertising Consulting Network in 1986. I did not know how the money would be spent that was going to Greenstripe Media other than it was for advertising in connection with the campaign. The following people were solicited by and reimbursed by me with money that originated from Michael Goland. As far as I was concerned, I had no knowledge of any improper activity and the jury so found when they acquitted me at the time of the trial in which I was accused. The names are as follows: Renee Berg, Michael Berger, Mark Cohen, Shifra Weisman Hastings, Richard Horowitz, Bob Ives, George Korz, Nachman Schatz, Zvi Sperling, Jacob Sperling.

8. I have no personal knowledge of the roles of Michael Altman or Sandor Habalow with respect to the solicitation or reimbursement of persons who made payments for the production and

93043514326

airing of a television advertising featuring Ed Vallen in 1986. From the testimony at trial, I heard from others that Sandor Habalow was one, among others, who was asked to solicit money for an advertising campaign.

9. I do not know the total funds spent by Balboa Construction in 1985 through 1987 to prevent Ed Zschau from being elected to the United States Senate from California. I know that Mr. Goland is accused of raising \$120,000 in the campaign. His guilt or innocence has not been determined by a jury and I always believed from the limited knowledge I had of Mr. Goland's activities that what he did was lawful.

10. I do not know the addresses of any of the individuals specified in this interrogatory other than the following: Robert Ann Ives, 9454 Wilshire Boulevard, Beverly Hills, California.

At all times pertinent herein I believed I was acting within the law and a jury has so found. I trust the above answers have been helpful to you.


LYLE WEISMAN

93043514327

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

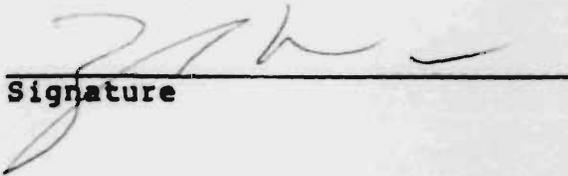
NAME OF COUNSEL: MITCHELL W. EGGERS

ADDRESS: 205 So. Broadway, Suite 902
Los Angeles, CA 90012

TELEPHONE: (213) 626-6831

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

November 3, 1989
Date


Signature

RESPONDENT'S NAME: LYLE WEISMAN

ADDRESS: C/O Hanson & Egers
205 So. Broadway
Suite 902
Los Angeles, CA 90012

HOME PHONE: _____

BUSINESS PHONE: (213) 626-6831

93043514328

66c 4591

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FEDERAL ELECTION COMMISSION
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89 NOV 17 AM 11:42

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 NOV 17 PM 1:58

November 15, 1989

Federal Election Commission
Washington, D.C. 20463
ATTN: Anthony Buckley

RE: MUR 2727

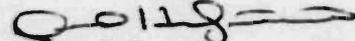
Dear Mr. Buckley:

Please allow this letter to serve as a formal request for an extension of time in responding to the requested information regarding involvment with Michael Goland.

As I have stated to you, all of the information that I would be able to provide you is in the hands of the U.S. Attorney in Los Angeles, California. I have talked with him regarding your request. He is indicating to me that until this matter comes to trial, I would not have access to any of the material. He further indicated, that a new trial date had been set for January 2, 1990. Again, as I have told you over the telephone, I would be happy to provide you with the information that I have as soon as it becomes available to me.

If I can be of any further assistance to you, please feel free to give me a call.

Sincerely,


David Hultquist

9 3 0 4 3 5 1 4 3 2 9

Doc 4596

EPSTEIN BECKER & GREEN, P.C.
ATTORNEYS AT LAW

1140 19TH STREET, N.W.
WASHINGTON, D.C. 20036-6601

(202) 861-0900

TELECOPIER: (202) 296-2882

DIRECT LINE

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-5954
(415) 398-3500

12201 MERIT DRIVE
DALLAS, TEXAS 75251-22131
(214) 490-3143

ONE WOODWARD AVENUE
DETROIT, MICHIGAN 48226-3412
(313) 965-3190

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1530
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-31321
(703) 684-1204

250 PARK AVENUE
NEW YORK, NEW YORK 10177-00771
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(213) 556-8861

SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-27041
(203) 348-3737

212 CARNEGIE CENTER
PRINCETON, NEW JERSEY 08540-6212
(609) 452-2445

27 SCHOOL STREET
BOSTON, MASSACHUSETTS 02108-4303
(617) 720-2555

P.O. NEW YORK, WASHINGTON, D.C.
CONNECTICUT, VIRGINIA AND
TEXAS ONLY

November 17, 1989

93043514330

HAND-DELIVERED

Anthony Buckley, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: MUR 2727: Respondent Todd Silver

Dear Mr. Buckley:

This letter serves as a follow-up to my conversation of today with Anne Weissenborn regarding MUR 2727. Specifically, on behalf of Todd Silver, I would like to request an extension of time until December 15, 1989 in which to respond to the Commission's Order to Answer Questions and Subpoena to Produce Documents in this matter.

As you are aware, Robert M. Hertzberg of Los Angeles, Mr. Silver's attorney, was granted an extension until November 20, 1989 to respond to the Commission's interrogatories and request for documents, and to show that no action should be taken by the Commission on its reason-to-believe determination. In his letter dated October 23, 1989, which requested the extension, Mr. Hertzberg also indicated that he was looking for local D.C. counsel to represent Mr. Silver in this matter. I was retained yesterday to serve in this capacity. A formal designation of counsel notification will be forwarded to your office by Mr. Silver shortly.

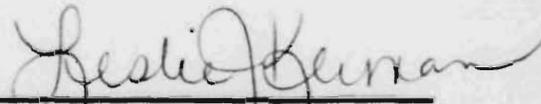
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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 NOV 17 PM 4:59

Anthony Buckley, Esquire
November 17, 1989
Page 2

Because Mr. Silver is a new client, an additional extension of time is necessary for me to consult with him, familiarize myself with the case and to accumulate the necessary information to respond to the Commission's request. Due to a previous commitment, I will be out of the country from November 21 through November 27. Thus, in order for me to adequately represent the interests of my client in this matter, I request an additional extension until December 15, 1989.

Therefore, for the reasons set forth herein, I respectfully request that the requested extension of time be granted. If you have questions regarding this matter, please do not hesitate to contact me at 202/861-1877.

Sincerely,



Leslie J. Kerman
Respondent's Counsel

93043514331

OGC 4600

11-20-89
8:35AM

TO: FEDERAL ELECTRON COMMISSION
ANTHONY BUCKLEY OR,
ANN WEISSENBORN

FROM: TODD SILVER

RE: MUR 2727

FEDERAL ELECTRON COMMISSION
89 NOV 20 AM 12:18

DEAR MR. BUCKLEY OR MS. WEISSENBORN,

²TER TALKING WITH MS. WEISSENBORN ON FRIDAY THE 17TH,
³SHE SAID THAT IF I WRITE A LETTER THAT SHE THOUGHT IT WOULD
⁴POSSIBLE TO GET AN EXTENTION ~~OF~~ OF TIME TO SUPPLY YOUR
⁵COMMISSION WITH ALL MY PAPER WORK. SO I ASK OF
⁶THE COMMISSION TO GRANT ME THREE MORE WEEKS TO GET
⁷THE INFORMATION THAT YOU HAVE ASKED FOR. ~~2~~

THANK YOU
TODD SILVER

P.S. CAN YOU FAX BACK THE ANSWER
OF EXTENTION? FAX. NO. 858-8901

LAW OFFICES
SONOSKY, CHAMBERS & SACHSE

SUITE 1000
1250 EYE STREET, N.W.
WASHINGTON, D.C. 20005
(202) 682-0240
TELECOPIER (202) 682-0249

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
WILLIAM R. PERRY
LLOYD BENTON MILLER
DONALD J. SIMON
DOUGLAS B. L. ENDRESON*
MARY V. BARNEY
ANNE D. NOTO
SAMUEL L. WINDER**

OF COUNSEL
LOFTUS E. BECKER, JR.

*ADMITTED IN WISCONSIN
**ADMITTED IN NEW MEXICO

ANCHORAGE OFFICE
SUITE 700
900 WEST FIFTH AVENUE
ANCHORAGE, ALASKA 99501
(907) 258-6377
TELECOPIER (907) 272-8332

LLOYD BENTON MILLER
JILL A. DYLLA HUNT
OF COUNSEL
ROGER W. DUBROCK

November 20, 1989

Anthony Buckley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2727 (Richard R. Famiglietti)

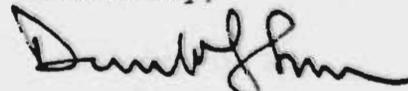
Dear Mr. Buckley:

As I indicated in our telephone conversation today, I have just been retained to represent Richard R. Famiglietti, a respondent in the above-captioned MUR. I am enclosing a Designation of Counsel signed by Mr. Famiglietti.

I am requesting an extension of time until December 8 to respond to the interrogatories and document requests propounded to Mr. Famiglietti. An extension until December 8 is warranted given the need to familiarize myself with the complex transactions at issue in this matter, to consult with my client regarding these transactions, and to prepare appropriate responses to the Commission's requests.

I appreciate your consideration of this request.

Sincerely,



Donald J. Simon

cc: Richard R. Famiglietti

93043514333

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: Donald J. Simon

ADDRESS: 1250 I Street NorthWest Suite 1000
Washington, D.C. 20005

TELEPHONE: 202 582 0240

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

November 17, 1989
Date


Signature

RESPONDENT'S NAME: Richard R. Famiglietti

ADDRESS: 18836 Tulsa Street
Northridge, Ca. 91326

HOME PHONE:

BUSINESS PHONE: 818 996 3333

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89 NOV 22 PM 12: 39

FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

OGC 4643

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

CARLSMITH, WICHMAN, CASE, MUKAI AND ICHIKI
ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING LAW CORPORATIONS
515 SOUTH FIGUEROA STREET
MANULIFE BUILDING, NINTH FLOOR
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 955-1200
TELECOPIER (213) 623-0032

89 NOV 24 AM 11:10
121 WAIANGUENUE AVE.
HILO, HAWAII 96721
(808) 935-6644

KONA
75-5742-J HUALALAI RD.
KAILUA-KONA, HAWAII 96745
(808) 329-6454

MAUI
2145 WELLS ST., SUITE 201
WAILUKU, HAWAII 96793
(808) 242-4535

HONOLULU
1001 BISHOP STREET
PACIFIC TOWER, SUITE 2200
HONOLULU, HAWAII 96809
(808) 523-2500

GUAM
134 W. SOLEDAD AVE., SUITE 401
AGANA, GUAM 96910
(671) 472-6813

SAIPAN
FLAMETREE TERRACE OFFICE BLDG.
SUITE 300
SAIPAN, MP 96950
(670) 322-3455

November 20, 1989

VIA TELECOPIER

Anthony Buckley, Esq.
Office of the General Counsel
FEDERAL ELECTION COMMISSION
999 E. Street, N.W.
Washington, D.C. 20463

Re: **MUR 2727**
Michael Katz

Dear Mr. Buckley:

Pursuant to our earlier telephone discussion, we enclose Michael Katz's Responses to Interrogatories and Request for Documents ("Responses"), which includes a copy of the pages of the June 2, 1989 Reporter's Transcript, which contains Michael Katz's testimony given on June 2, 1989 in the United States District Court, Central District in a case entitled United States of America v. Michael S. Goland, Lyle R. Weisman and Sandor E. Habalow, CR 88-1009(a)-RSWL.

We trust that once you review all this information you will concur that no further action should be taken against Michael Katz, since there has been no violation of the Federal Election Campaign Act of 1971.

If you have any further questions regarding this matter, please do not hesitate to contact the undersigned.

Very truly yours,

Richard Lloyd Sherman
Richard Lloyd Sherman

RLS/ts/encl.
cc: Mr. Michael Katz
L8911266

93043514335

89 NOV 24 AM 9:27

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

1 CARLSMITH, WICHMAN, CASE,
2 MUKAI AND ICHIKI
3 Richard Lloyd Sherman
4 515 South Figueroa Street
5 Ninth Floor
6 Los Angeles, California 90071
7 (213) 955-1200

8 Attorneys for Respondent Michael Katz

9 IN THE MATTER OF MICHAEL KATZ) MUR 2727
10)
11) **RESPONSES TO INTERROGATORIES AND**
12) **REQUEST FOR DOCUMENTS**
13)
14)

15 Respondent, MICHAEL KATZ, hereby submits the following
16 Responses to the Interrogatories and Requests for Documents
17 ("Response"):

18 1. I have never knowingly written any checks to pay
19 for a television advertisement featuring Ed Valen. On or about
20 October 30, 1989, Mr. Sandor Habalow requested I make a donation
21 to the Senator Alan Cranston Re-Election Campaign ("Cranston
22 Campaign"). Mr. Habalow represented to me that my donation was to
23 pay for media time for the Cranston Campaign. Mr. Habalow stated
24 that the check was to be made payable to Greenstripe Media
25 directly because it was late in the campaign. There was never any
26 mention of Ed Valen, nor did I even know of Ed Valen until after
27 the election. On November 1, 1986, I wrote a check payable to
28 Greenstripe Media in the amount of \$2,000 (the "Check") for the
Cranston Campaign. A true and correct copy of the Check is
attached to this Response as Exhibit "A."

93043514336

1 2. I now believe that I did receive a reimbursement
2 for the Check. On or about November 7, 1986, I received a check
3 from Mr. Habalow in the amount of \$2,000. I do not recall if the
4 check was for reimbursement, for funds not used, or for some other
5 business reason.

6 3. I have attached a copy of this check as Exhibit "B"
7 to this Response. I am not sure if it was given for reimburse-
8 ment.

9 4. Mr. Habalow, a business associate, asked me in
10 person for a donation for the Cranston Campaign. I routinely give
11 donations when asked by business associates because it is good
12 business and they generally respond in kind when asked to donate
13 to causes with which I am directly or indirectly associated. At
14 the time of the request, I did not give the donation much thought,
15 as the amount and circumstances were reasonable and the cause was
16 one to which I would normally consider donating. I do not recall
17 if there was any mention of reimbursement of any funds. I do
18 specifically recall that Mr. Habalow said the money was for
19 Senator Alan Cranston, but since it was so late in the campaign,
20 the media would only run ads if they were paid directly. I made
21 the check payable to Greenstripe Media based on Mr. Habalow's
22 representation.

23 5. On June 2, 1989, I testified under penalty of
24 perjury at the trial of Sandor E. Habalow in a case entitled
25 United States of America v. Michael S. Goland, Lyle R. Weisman and
26 Sandor E. Habalow, CR 88-1009(a)-RSWL. A true and correct copy of
27 the pertinent pages of the Reporter's Transcript of Daily Proceed-
28 / / /

93043514338

1 ings which contain my testimony are attached as Exhibit "C" to
2 this Response.

3 6. At the time I made the \$2,000 donation to the
4 Cranston Campaign, I was unaware of any other individuals who had
5 made similar donations. I learned at the time I testified on June
6 2, 1989, that Monte Morrow, a business associate of Mr. Habalow,
7 also wrote a check per Mr. Habalow's request. I do not know to
8 whom Mr. Morrow wrote the check nor the amount of the check.

9 7. I have enclosed copies of my bank statements from
10 the Manufacturers Bank for the months of October, November and
11 December, 1986. I have also enclosed the first page of my Merrill
12 Lynch Cash Management ("CMA") Account. I have been unable to
13 obtain my statements for the months of October through December,
14 1986 for this CMA Account. I have attached a copy of all these
15 documents as Exhibit "D" to this Response. I do not recall if any
16 amounts in the statements were for reimbursement.

17 8. I have never had any form of relationship with
18 Michael Goland. I have met Mr. Goland on one occasion. Sometime
19 in 1986-1987, I went to a business breakfast which was attended by
20 numerous business people, including Mr. Goland. I have never

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1 spoken or corresponded with Michael Goland and have never done any
2 business with him.

3
4 DATED: November 20, 1989

Respectfully submitted,
CARLSMITH, WICHMAN, CASE, MUKAI
AND ICHIKI

7
8 By: Richard Lloyd Sherman
RICHARD LLOYD SHERMAN
Attorneys for Respondent
MICHAEL KATZ

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I swear under penalty of perjury under the laws of the
United States of America that the above Responses to Interroga-
tories and Requests for Documents are true and correct.

DATED: November 20, 1989

Michael Katz
MICHAEL KATZ

93043514339

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing Responses to Interrogatories and Request for Documents and know its contents.

[X] CHECK APPLICABLE PARAGRAPH

[X] I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

[] I am [] an Officer [] a partner [] a [] of []

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. [] I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. [] The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

[] I am one of the attorneys for [] a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on November 20, 1989, at Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Michael Katz

Type or Print Name

[Handwritten Signature] Signature

PROOF OF SERVICE

1013A (3) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of [] State of California.

I am over the age of 18 and not a party to the within action; my business address is: []

On [] 19 [] I served the foregoing document described as []

[] on [] in this action

[] by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list; [] by placing [] the original [] a true copy thereof enclosed in sealed envelopes addressed as follows:

[] BY MAIL

[] *I deposited such envelope in the mail at [] California. The envelope was mailed with postage thereon fully prepaid.

[] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at [] California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on [] 19 [] at [] California.

[] *(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on [] 19 [] at [] California.

[] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

[] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

93043514340

9

Rec'd 11/18

MICHAEL KATZ
SANDY KATZ

1549 MAGNOLIA BLVD., NO. D
SHERMAN OAKS, CA 91403

Cash Management Account⁸³⁴

Pay to the order of GREEN STRIPE MEDIA 11/1 19 26 2,000^{00/100}

TWO THOUSAND 00/100 Dollars

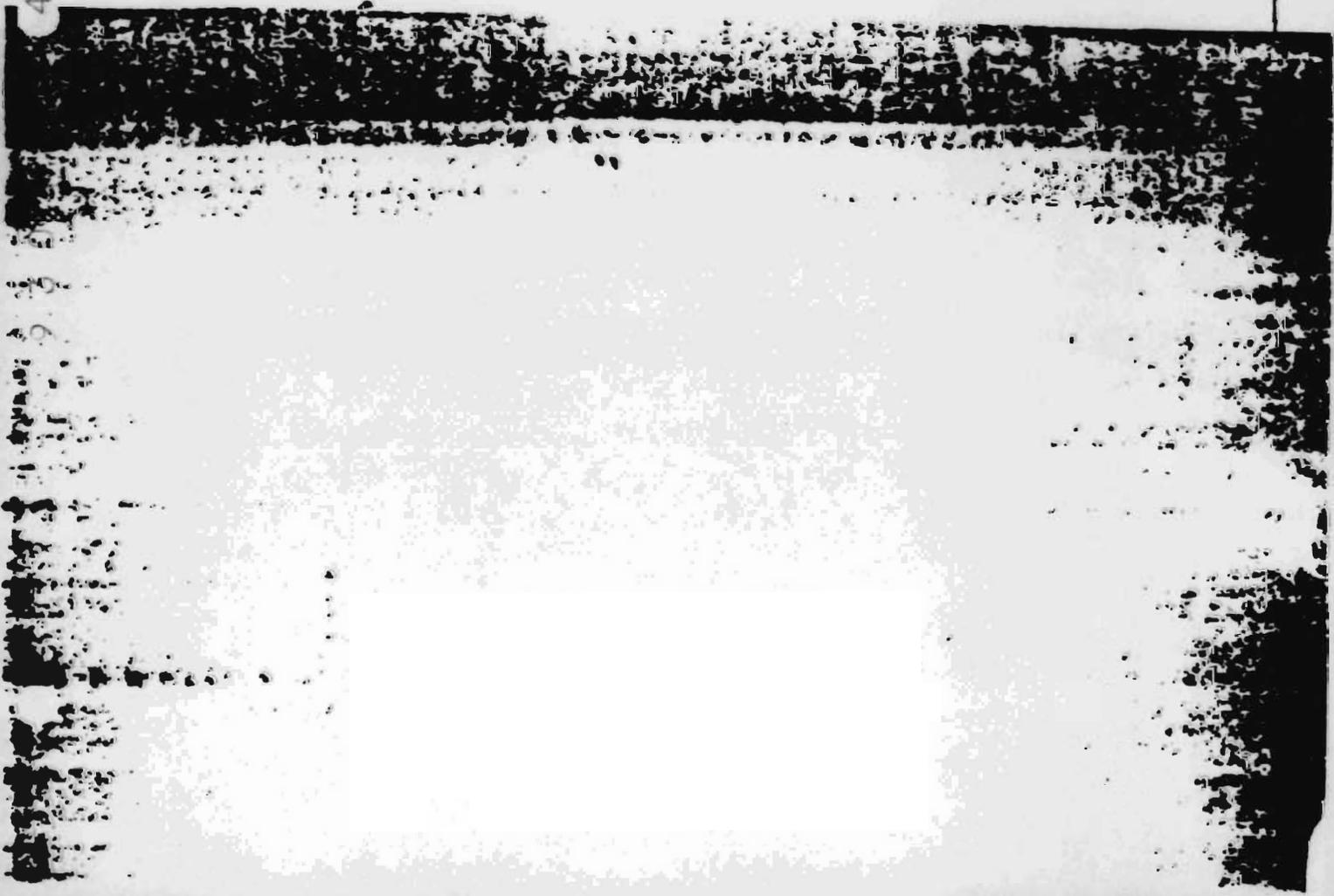
 Merrill Lynch

BANK ONE, COLUMBUS, PA. Certified Check 43211

Memo _____



4341



115

UNION BANK
440 W. 10th St.
Beverly Hills, CA 90212

NASH & CO.
CERTIFIED PUBLIC ACCOUNTANT
440 S. BEVERLY DR. (21st)
BEVERLY HILLS, CA 90212

NO 274

10/27/200
1220

November 1 19 86

*****Two thousand and no/100***** 2,000.00

MICHAEL R. ATZ

NASH & CO.

FBI
LABORATORY

25P

M

5 1 4 3 4 2



OGC 4658

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FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 27 AM 10:03

LAW OFFICES OF

CONRAD LEE KLEIN

14001 VENTURA BOULEVARD
SHERMAN OAKS, CALIFORNIA 91423

November 20, 1989

CONRAD LEE KLEIN
OF COUNSEL
JOEL S. AARONSON
JOHN E. DEBRAUWERE
RICHARD S. ADAMS
KENNETH A. KREMERIAN
MARY FRANCES McHUGH
VALERIE VANAMAN

TELEPHONE
AREA CODE 818
985-8600
TELECOPIER
(818) 501-1306

Anthony Buckley, Staff Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

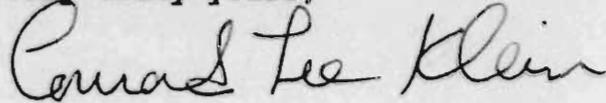
Re: Jules Burg - MUR 2727

Dear Mr. Buckley:

With respect to the above-referenced matter, and pursuant to our several prior communications regarding it, Jules Burg's response to the Federal Election Commission's subpoena and order for answers is enclosed.

In the unlikely event that any of his answers do not comport with other information gathered by your investigation, I trust you will so advise me so that any apparent discrepancy may be addressed and/or rebutted. Otherwise, we expect that the F.E.C. will close this matter in favor of Jules Burg as soon as possible. The concern and expense caused Mr. Burg by the F.E.C.'s premature and unfounded finding of "reason to believe" a violation of 2 U.S.C. § 441f occurred should be ameliorated with all possible speed.

Very truly yours,



CONRAD LEE KLEIN

CLK/kee

cc: Jules Burg

93043514343

1 CONRAD LEE KLEIN
2 Attorney at Law
3 14001 Ventura Blvd.
4 Sherman Oaks, CA 91423
5 (818) 986-8600

6
7
8 Attorney for Respondent, JULES BURG

9
10 BEFORE THE FEDERAL ELECTION COMMISSION

11 In the Matter of:) MUR 2727
12 JULES BURG,)
13 Respondent.)
14)
15)
16)
17)

18 I, Jules Burg, submit the following written Answers to
19 Interrogatories, under oath, propounded by the Federal Election
20 Commission by its Order dated September 29, 1989.

21 RESPONSE TO INTERROGATORY NO. 1

22 I did not write, issue or cause any such check to be written
23 or issued.

24 RESPONSE TO INTERROGATORY NO. 2

25 Not Applicable.

26 RESPONSE TO INTERROGATORY NO. 3

27 Not Applicable.

28 RESPONSE TO INTERROGATORY NO. 4

Not Applicable.

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93043514345

RESPONSE TO INTERROGATORY NO. 5

I have become advised that Renee Burg wrote or issued a check to Greenstripe Media. I cannot state under oath of own personal knowledge that such event took place and did not become informed about it until after it had occurred. I am also advised that the said check was intended to be an advance on account of Lyle Weisman and that, at some time thereafter, that advance was reimbursed. This, too, is based upon information supplied by others.

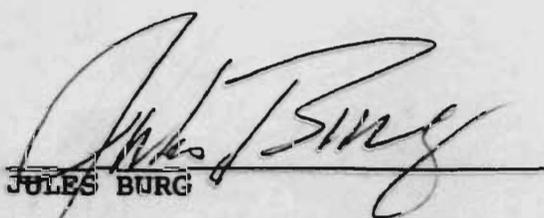
RESPONSE TO INTERROGATORY NO. 6

Not Applicable.

RESPONSE TO INTERROGATORY NO. 7

I did not have any relationship whatsoever with Michael Goland and I was not familiar with him or his name.

DATED: November 20, 1989



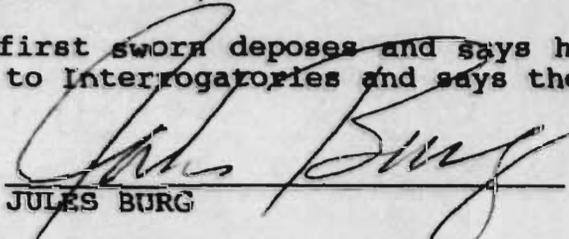
JULES BURG

State of California)

) ss
)

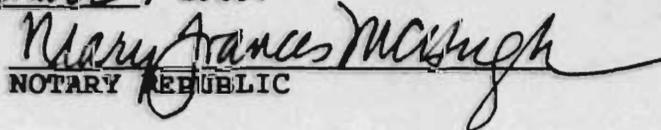
County of Los Angeles)

Jules Burg being first sworn deposes and says he has read the foregoing Answers to Interrogatories and says they are true and correct.



JULES BURG

Subscribed and sworn to before me, the undersigned notary public this 21st day of November, 1989.



NOTARY PUBLIC



OGC 4651

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89 NOV 27 PM 1:02 ONE
626-6831

EARL L. HANSON
MITCHELL W. EGGERS, INC.

HANSON & EGGERS
ATTORNEYS AT LAW
205 SOUTH BROADWAY, SUITE 902
LOS ANGELES, CALIFORNIA 90012

RECEIVED
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OFFICE OF GENERAL COUNSEL
89 NOV 27 AM 9:47

November 20, 1989

CERTIFIED MAIL P330733714

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

Re: Sandor Habalow
Your Reference 2727
Response to Interrogatories & Request for Documents

Dear Mr. Buckley:

The undersigned, Sandor Habalow, states that he asserts each and every privilege available to him in response to the inquiry contained in the Interrogatories and Requests for Documents transmitted by the Federal Election Commission including, but not limited to, an assertion of the right to remain silent pursuant to the Fifth Amendment of the United States Constitution. Mr. Habalow was named as a codefendant in United States v. Goland, et al., (at which time he was found "not guilty" on two of three felony charges; 10-2 on the misdemeanor and 10-2 for acquittal on the third felony count), and asserts a claim of once in jeopardy concerning the present inquiry.

Despite the assertion of all available privileges, and without waiving said privileges in any manner, the undersigned answers the interrogatories as follows:

1. Michael Goland: I knew Michael Goland because I worked as an independent loan broker and I, together with other brokers, competed for Mr. Goland's business whenever he wished to raise funds. When I succeeded in obtaining a loan for Mr. Goland, I would receive a commission out of the proceeds of the loan. I also knew Mr. Goland on a social basis.

Lyle Weisman: I am an acquaintance of Lyle Weisman.

Mark Barnes: I never met or talked to Mark Barnes.

93043514346

Michael Altman: I knew him only as a casual acquaintance. I met him perhaps three times.

Colleen Morrow: I never met or talked with Colleen Morrow.

2. I never knew or solicited anyone to give money to Mark Barnes or Political Advertising and Consulting. I did ask Monte Morrow, Michael Katz, Mark Victor and Richard Famiglietti to give money to an advertising campaign (which was part of an independent expenditure). I also asked an accountant, Joe Nash, to help Michael Goland and he asked several people to give a check for an advertising campaign. I never knew that there would be a television advertisement featuring Ed Vallen, I only knew the money would go towards an advertising campaign (which was part of an independent expenditure) which I believed to be completely legal in every way.

I did promise reimbursement to the four people mentioned in this response and reimbursement was made through Joe Nash and from his account. I cannot provide the requested documents to show the reimbursements since payment was made through Mr. Nash's account and I have no access to these documents. I have no direct personal knowledge of how the money for the reimbursement went into Joe Nash's account. However, the testimony at the trial of the United States v. Michael Goland, et al., indicated Michael Goland caused cashier's checks to be sent to Joe Nash.

3. I have no knowledge of whether Michael Goland solicited any persons to make payments to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 for the production and airing of the advertisement referred to in question number 2. My participation was as stated in response to question number 2.

4. I have no personal knowledge of the roles of Michael Altman, Colleen Morrow and Lyle Weisman with respect to the solicitation and reimbursement of persons who made payments for the production and airing of a television advertisement featuring Ed Vallen in 1986. The information I have was heard by me at the trial of United States v. Michael Goland, et al.

5. I have no personal knowledge of the funds spent by Michael Goland to prevent Ed Zschau from being elected to the United States Senate from California. The only information I have is derived from the trial of United States v. Michael Goland, et al. It is my understanding from that trial that it was Mr.

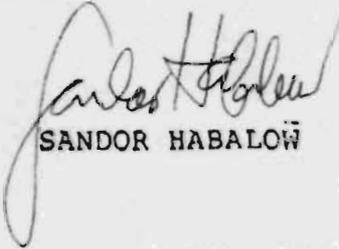
93043514347

Goland's intention to run a legal independent expenditure campaign in order to help Senator Cranston in reelection. It would appear from the testimony that the total funds spent by Mr. Goland was in the sum of \$120,000.

6. I do not personally know any of the individuals in question number 6 nor can I provide their addresses with the following exceptions.

Dick Famiglietti. 18836 Tulsa Street, Northridge, CA 91324.
Mike and Sandy Katz. 4821 Encino Terrace, Encino, CA 91316.
Monte Morrow. P.O. Box 141, Beverly Hills, CA 90210.
Mark Victor. 4520 Noeline Way, Encino, CA 91436.

It should be noted that I, as well as others, who contributed money or were asked to obtain contributions, from different people at all times believed that what Michael Goland was doing was legal. I would never have asked my friends and acquaintances to give money to an advertising campaign, nor would I have personally participated in anything that I believed was contrary to the law. At my trial I was found "not guilty" on two of three felony counts (10-2 on the misdemeanor and 10-2 for acquittal on the third felony count). I was in fact "not guilty" which was obvious from all of the evidence. The jury could not unanimously decide on my guilt or innocence for the one misdemeanor charge in the indictment but the foreman announced to the court that ten jurors were in favor my acquittal and only two for conviction on the misdemeanor count.


SANDOR HABALOW

93043514348

CBC 4655

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89 NOV 27 AM 10:03

LAW OFFICES OF
CONRAD LEE KLEIN

14001 VENTURA BOULEVARD
SHERMAN OAKS, CALIFORNIA 91423

CONRAD LEE KLEIN
OF COUNSEL
JOEL S. AARONSON
JOHN E. BRAUWERE
RICHARD S. ADAMS
KENNETH A. KREKORIAN
MARY FRANCES MCHUGH
VALERIE VANAMAN

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TELECOPIER
(818) 501-1306

November 20, 1989

89 NOV 27 AM 9:48

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Anthony Buckley, Staff Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Renee Burg - MUR 2727

Dear Mr. Buckley:

I appreciate your explanation regarding the referenced matter at our meeting on November 8, 1989. An understanding of your position is most helpful. Hopefully, you too will find value in the meeting.

As I suggested at that time, Mrs. Burg accepted my advice and respectfully declines to answer the questions postulated to her by the Federal Election Commission ("FEC") under cover of its letter dated October 5, 1989.

This position is pursuant to her various constitutional rights (e.g. self-incrimination) as well as to promises and representations made to her by our government's representative, George Newhouse, in the Department of Justice. As both he and I have informed your agency, representations of no punishment were exchanged for free and frank testimony.

The government received the testimony it sought, it should now honor its commitments. As was stated by one of our justices many years ago...if the government expects its citizens to cut square corners, it too should engage in rectangular rectitude.

Notwithstanding the foregoing, and in an effort to add to the body of information you are in the process of accumulating, I proffer the following responses to your agencies interrogatories from information gleaned from various reliable sources. (This is without prejudice to Mrs. Burg's previously expressed objections to the interrogatories and without any waiver by her of her "attorney-client" privilege.)

93043514349

Anthony Buckley
November 20, 1989
Page Two

1. Mrs. Burg wrote a check for \$4,000 in favor of Greenstripe Media in about October of 1986.
2. Although it was initially believed that Mrs. Burg was reimbursed the entire \$4,000 by Lyle Weisman it is indicated that \$2,000 came from Lyle Weisman and \$2,000 from the Ed Vallens Senatorial Campaign committee.
3. If any of the \$4,000 referred to in answer to question No. 2 was paid by check, that check should be in the possession of the maker or the bank on which it was drawn, not in Mrs. Burg's possession.
4. Lyle Weisman, a long time friend of Mr. Burg since he was a child, and an occasional business advisor asked Mrs. Burg to write a check to Greenstripe Media for \$4,000 and told her that he would reimburse her for that promptly. She was also told that by her advancing the funds she would be advancing the cause of Senator ALan Cranston's re-election campaign.

There was no discussion of whether the event should be reported, to whom it should be reported, by whom it should be reported and, whether it would be falsely reported. There is nothing whatsoever to evidence a contention that Mrs. Burg knew the event should or would be reported and/or that she should have known that the event would be falsely reported. She did not "knowingly" permit her name to be used to effect a contribution in the name of another.

5. Mrs. Burg was unaware of anyone who did any of acts enumerated in Interrogatory No. 5.
6. Those bank statements are not in her possession. Copies are probably available.
7. No relationship. Mrs. Burg did not know that he existed.

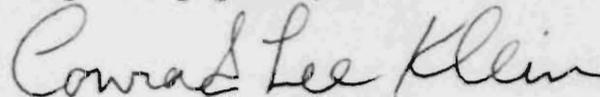
In connection with the foregoing, you might be interested to know that Lyle Weisman was acquitted of any wrongdoing in connection with the conduct described in this letter in the Federal District Court a few months ago.

93043514350

Anthony Buckley
November 20, 1989
Page Three

We trust that your investigation will confirm the information I have summarized for you in this letter and that based thereon you will recommend, and the FEC will determine, not to proceed further against Mrs. Burg. (If this expectation turns out to be inaccurate, I assume you will so advise me so that our opportunity for further response or communication will be available).

Very truly yours,



CONRAD LEE KLEIN

CLK/kee

cc: Renee Burg

93043514351

PERMANENT RECORDS
SOUTHWESTERN COLLEGE
15000 11th Avenue
DENVER, CO 80202



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 29, 1989

Leslie Kerman, Esq.
Epstein, Becker & Green, P.C.
1140 19th Street, N.W.
Ninth Floor
Washington, D.C. 20036

RE: MUR 2727
Todd Silver

Dear Ms. Kerman:

This is in response to your request for an extension of time to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Todd Silver. After considering the circumstances presented by you, I have granted the requested extension. Accordingly, your response is due by the close of business on December 15, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anne A. Weissenborn".

Anne A. Weissenborn
Assistant General Counsel

93043514352



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

November 29, 1989

Donald J. Simon, Esq.
Sonosky, Chambers & Sasche
Suite 1000
1250 Eye Street, N.W.
Washington, D.C. 20005

RE: MUR 2727
Richard R. Famiglietti

Dear Mr. Simon:

This is in response to your letter dated November 20, 1989, requesting an extension of time to respond to our Order to Answer Questions and Subpoena to Produce Documents on behalf of your client, Richard R. Famiglietti. 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 December 8, 1989.

If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, which appears to read "Anne A. Weissenborn".

Anne A. Weissenborn
Assistant General Counsel

93043514353

06 C 4751

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89 DEC -4 AM 9:49

KEITH C. MONROE, INC.
A PROFESSIONAL CORPORATION
ATTORNEY AT LAW
1428 NORTH BROADWAY
SANTA ANA, CALIFORNIA 92706
TELEPHONE (714) 835-3883

November 20, 1989

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OFFICE OF GENERAL COUNSEL

89 DEC -4 PM 12:34

Anthony Buckley, Esq.
Counsel for FEC
999 E Street
Washington, D. C.

Re: Sloanie Hoebeke
FEC No. MUR 2727

Dear Mr. Buckley:

Enclosed herewith please find the response of my above-named client to the interrogatories propounded by the Commission. As I indicated to you in our telephone conversation of this date, the response consists simply of Fifth Amendment privilege claims.

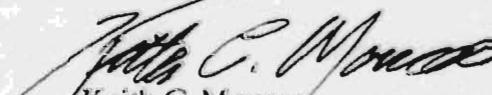
I wanted to confirm in this letter of transmittal that my client is anxious to, and I am quite in agreement, cooperate with the Commission in such manner as may be desired. However, as I told you I had done, I spoke with Assistant U. S. Attorney George Newhouse, and he declined to consider seeking any kind of immunity for my client from criminal prosecution. He did indicate that the Justice Department, so far as he knew, had no intention of mounting any prosecution against a person such as my client, assuming that she was nothing more than a conduit for a campaign contribution. Nevertheless, he was not willing to even reduce that opinion to letter form.

Nonetheless, I could probably justify advising my client to waive her claim of privilege and answer the interrogatories, simply on the basis of what I believe to be the candid and reliable statement by Mr. Newhouse that the Justice Department, in effect, had no real interest in her.

However, in my conversation with you of this date, you suggested a real possibility that the Commission might seek to impose a civil fine or other penalty if it should determine that my client had indeed improperly served as a conduit. In view of the fact, as you told me, that you cannot provide me or my client any assurance that such action would not be taken, I really have no choice but to advise her to claim her Fifth Amendment privilege.

Despite that, I want all concerned to be aware that Ms. Hoebeke will, with my concurrence, be quite happy to cooperate in the Commission's investigation in any manner that may be desired provided she is assured that her cooperation will not result in any fine or penalty being adjudicated against her.

Yours Truly,


Keith C. Monroe

KCM/me

93043514354

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2727
)

RESPONSE (PRIVILEGE CLAIM) TO INTERROGATORIES

Sloania Hoebeke, the person who is designated Solania Ramirez¹ in the FEC subpoena hereinafter referred to, does hereby respond to the Interrogatories and Request for Documents heretofore served upon her together with the undated subpoena apparently issued on or about October 5, 1989, as follows:²

INTERROGATORY NO. 1: On the ground that an answer to this interrogatory would tend to incriminate me, I respectfully decline to provide an answer thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

INTERROGATORY NO. 2: On the ground that an answer to this interrogatory would tend to incriminate me, I respectfully decline to provide an answer thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

INTERROGATORY NO. 3: On the ground that compliance with this request would tend to incriminate me, I respectfully decline to respond thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

1. The correct name of the respondent was Sloania Ramirez, but having since married, the correct name is now, as indicated, Sloania Hoebeke.
2. A copy of the Interrogatories and Request for Documents is attached hereto. The responses herein provided will be numbered in accordance with the numbering of the interrogatories.

9 3 0 4 3 5 1 4 3 5 5

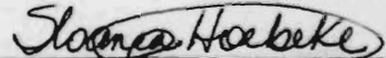
INTERROGATORY NO. 4: On the ground that an answer to this interrogatory would tend to incriminate me, I respectfully decline to provide an answer thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

INTERROGATORY NO. 5: On the ground that an answer to this interrogatory would tend to incriminate me, I respectfully decline to provide an answer thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

INTERROGATORY NO. 6: On the ground that compliance with this request would tend to incriminate me, I respectfully decline to respond thereto in accordance with my privilege under the Fifth Amendment to the federal Constitution.

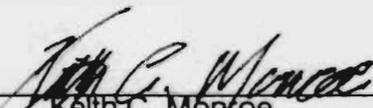
INTERROGATORY NO. 7: To my knowledge I have never met Michael Goland and I know of his name and existence only through his having been mentioned in the papers received in this proceeding from the FEC.

Dated: November 20, 1989.


Sloania (Ramirez) Hoebeke

RESPONSE DRAFTED BY:

KEITH C. MONROE, Inc.

By 
Keith C. Monroe
Attorney for Respondent

9 3 0 4 3 5 1 4 3 5 6

066 4741

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

2727

Anthony J. Spann, P.C. Attorneys at Law

89 DEC -4 AM 10:52

Anthony J. Spann

427 Central Avenue

David M. Civilette

Dunkirk, N.Y. 14048-0262

James J. Spann

Telephone (716) 366-2010

*Also admitted in
District of Columbia*

November 30, 1989

Mr. Anthony Buckley
Federal Election Commission
Washington, D.C. 20463

Re: Susan G. Herbst

Dear Mr. Buckley:

This will confirm our past telephone conferences in the above
entitled matter.

As discussed, I am awaiting confirmation from the Justice
Department that they will not seek criminal sanctions against
Ms. Herbst.

Also, I am seeking assurances from the New York State
Department of Education that professional sanctions will not be
sought.

I shall advise upon receipt.

Enclosed please find executed Statement of Designation of
Counsel for your records.

If your position requires a deadline, please advise.

Thank you for your cooperation in this matter.

Sincerely,

ANTHONY J. SPANN, P.C.

By: 

David M. Civilette

DMC/cam
Enc.

93043514357

89 DEC 4 PM 12 27

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: DAVID M. CILIKITTE

ADDRESS: 427 CENTRAL AVE

DURHAM CT 06426

TELEPHONE: 214 366 2010

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

11/28/89
Date

Susan Herbst
Signature

RESPONDENT'S NAME: SUSAN HERBST

ADDRESS: 104 HOWARD ST

APT M

FREDONIA NY 14063

HOME PHONE: _____

BUSINESS PHONE: N/A

93043514358

89DEC 11 PM 2:10

LAW OFFICES
SONOSKY, CHAMBERS & SACHSE
SUITE 1000

1250 EYE STREET, N.W.
WASHINGTON, D.C. 20005
(202) 682-0240
TELECOPIER (202) 682-0249

ANCHORAGE OFFICE
SUITE 700
900 WEST FIFTH AVENUE
ANCHORAGE, ALASKA 99501
(907) 258-6377
TELECOPIER (907) 272-8332

LLOYD BENTON MILLER
JILL A. DE LA HUNT
OF COUNSEL
ROGER W. DUBROCK

MARVIN J. SONOSKY
HARRY R. SACHSE
REID PEYTON CHAMBERS
WILLIAM R. PERRY
LLOYD BENTON MILLER
DONALD J. SIMON
DOUGLAS B. L. ENDRESON*
MARY V. BARNEY
ANNE D. NOTO
SAMUEL L. WINDER**

*ADMITTED IN WISCONSIN
**ADMITTED IN NEW MEXICO

December 11, 1989

BY HAND

Anthony Buckley, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

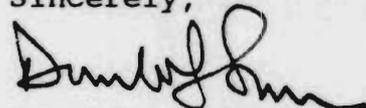
Re: MUR 2727 (Famiglietti)

Dear Mr. Buckley:

On behalf of Richard R. Famiglietti, I am submitting Responses to the interrogatories previously served on him in the above-captioned MUR.

We were not able to file these responses on December 8 due to the closing of the federal government because of adverse weather.

Sincerely,



Donald J. Simon

DJS/cmt
Enclosure

93043514359

BEFORE THE
FEDERAL ELECTION COMMISSION

In the Matter of)
MUR 2727)
)

RESPONSES OF RICHARD R. FAMIGLIETTI TO INTERROGATORIES

1. State whether you wrote one or more checks or caused a check to be issued to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. If so, please provide a copy of both sides of each such check.

1. At the request of Mr. Sandy Habalow, a close friend of mine, I wrote one check to Greenstripe Media on November 5, 1986 for \$2,000.00. I did not know the purpose of the check or that it would be used to pay for a television ad for Ed Vallen.

I do not presently have a copy of my check. It was introduced as evidence in Michael Goland's criminal trial.

2. State whether you received reimbursement for the check(s) identified in response to Question 1. If so, state the date you received such reimbursement, the identity of the individual(s) who provided the reimbursement to you and the form of reimbursement.

2. A few days after I wrote my check, I received reimbursement by a check dated November 7, 1986 on the account of Nash & Co. for \$2,000.00.

3. Provide a copy of both sides of each check received as

93043514360

reimbursements for the check(s) identified in response to Question 1.

3. I do not presently have a copy of the reimbursement check. It was introduced as evidence in Michael Goland's criminal trial.

4. Explain the circumstances under which you wrote or issued the check(s) identified in response to Question 1, identify who suggested that you write or issue such a check and state whether that individual told you that you would receive reimbursement for that check.

4. Sandy Habalow, a close friend of mine, requested that I write a check for \$2,000 for an advertising campaign to be conducted by Michael Goland. Habalow told me that he would get the money back to me. I did not know at the time that my check would be used for, or considered to be, a contribution to the Vallen campaign, the Cranston campaign or any other political campaign.

5. State whether you know of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. Please identify those individuals and state whether they received reimbursement for their checks and, if so, from whom.

5. I do not of my own knowledge know of other individuals who wrote such checks, other than what I have learned as part of the legal proceedings against Michael Goland.

6. Provide copies of your bank statements for the months of October, November and December 1986 and identify the deposit of any cash reimbursement received for the checks identified in response to Question 1.

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CANNOT LOCATE

6. I ~~attach~~ the requested documents. *presently.*

(27)

7. State the nature of your relationship with Michael Goland in 1986 (e.g., employer, employee, business associate, partner, relative, co-member of an organization or political committee).

7. I knew Michael Goland by virtue of real estate business transactions in which we were both involved.

Richard R. Famiglietti
Richard R. Famiglietti

Subscribed to and sworn before me this 8th day of December, 1989



Meryle Nadell
Notary Public

9 3 0 4 3 5 1 4 3 6 2

89 DEC 18 PM 12:22

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2727
Michael Goland, et al.)
)

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT

On August 3, 1989, the Commission found reason to believe that Michael Goland knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(3), 441b and 441f, that Balboa Construction, Inc. violated 2 U.S.C. § 441b, that the Committee to Elect Ed Vallen to Senate and Audrey Barbour, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(ii), 434(b) and 441a(f), and that 68 individuals violated 2 U.S.C. § 441f. At that time the Commission approved orders to submit written answers and subpoenas to produce documents, as well as letters, for each of the respondents.

Notification of the Commission's action was delayed pending the receipt of the addresses for all of the respondents from the Department of Justice. Notifications of the Commission's action were sent out by certified mail on October 5, 1989.

In many instances, this Office has run into difficulty in reaching respondents. In some cases, the respondents are no longer at the addresses to which notification was originally sent. In these cases, requests have been sent out to the various postmasters requesting the current addresses for these individuals. Some of these inquiries have resulted in new addresses being obtained and in notifications being re-sent; other inquiries resulted in the postmasters being unable to

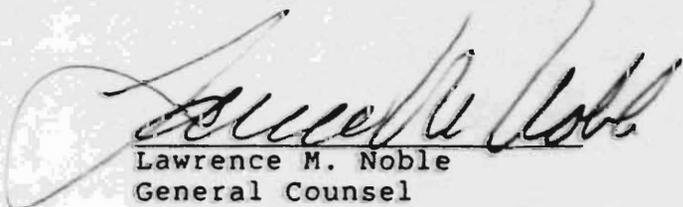
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inform this Office of correct addresses.

In other instances, the respondents either refused to accept the certified mail or simply did not claim it, presumably so as to avoid notification of the Commission's determination. In these instances, this Office is re-sending these notifications by first class mail.

In many other instances, the respondents have been notified and have retained counsel who have requested extensions of time in which to research any potential liability of their clients and to formulate responses to the Commission's orders and subpoenas. In some instances, the respondents have declined to answer the Commission's questions, citing their Fifth Amendment privilege against self-incrimination. It appears that the Assistant U.S. Attorney who is in charge of the criminal aspect of this case has refused to give assurances that certain individuals will not be subject to criminal liability, in spite of what appears to be a lack of inclination to try those particular individuals. Other respondents have provided information regarding their own and others' potential liability which this Office is in the process of evaluating. This Office will keep the Commission informed as to developments in the investigation.

9 3 0 4 3 5 1 4 3 6 4
12/15/89
Date


Lawrence M. Noble
General Counsel

Staff assigned: A. Buckley

OGC 4900

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FEDERAL ELECTION COMMISSION
MAIL ROOM

MUR 2727?

LAW OFFICES

HARLAND W. BRAUN 89 DEC 18 AM 10:24

SUITE 1800
TWO CENTURY PLAZA BUILDING

PROFESSIONAL CORPORATION
2049 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067

AREA CODE 213
277-4777

December 11, 1989

Anthony Buckley, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Michael Goland Investigation

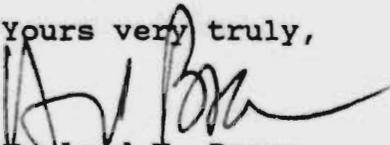
Dear Mr. Buckley:

This letter is a follow up of my letter of August 20, 1989, in which I indicated that I represented the six people I listed.

For the time being, I will be asserting the privilege against self incrimination on behalf of all those clients.

The Goland criminal matter is still pending and Assistant U.S. Attorney Newhouse still has the option of bringing criminal charges.

As soon as the matter of the constitutional rights can be finally concluded, my clients wish to avail themselves of the conciliation offer extended by the commission.

Yours very truly,

Harland W. Braun

HWB/jjk

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GCC 4942
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FEDERAL ELECTION COMMISSION
MAIL ROOM

WILEY, REIN & FIELDING

89 DEC 21 AM 10:43

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

FRED F. FIELDING
(202) 429-7320

December 20, 1989

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Anthony Buckley

Re: MUR 2727
Peter Roff

Dear Mr. Noble:

This response is submitted on behalf of Peter Roff in reply to the interrogatories and request for documents issued by the Federal Election Commission to Mr. Roff on October 5, 1989, and received by Mr. Roff on December 8, 1989. In addition, please find enclosed an executed Statement of Designation of Counsel in this matter.

Enclosed are Mr. Roff's sworn answers to these interrogatories and requests. We trust this responds fully to your request for information on this matter.

At this time, having answered all of the interrogatories, we respectfully request that the Federal Election Commission enter into pre-probable cause conciliation with Mr. Roff concerning this matter.

Sincerely,



Fred F. Fielding

Enclosures
cc: Peter Roff

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89 DEC 21 PM 12:25
OFFICE OF GENERAL COUNSEL

RESPONSE OF PETER ROFF TO THE INTERROGATORIES
OF THE FEDERAL ELECTION COMMISSION IN MUR 2727

Question 1

State whether you wrote one or more checks or caused a check to be issued to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. If so, please provide a copy of both sides of each such check.

Response

I wrote one check to Greenstripe Media in the amount of \$1,000 at the request of Colleen Morrow, who was in charge of the Washington Office of the Balboa Construction Company which is owned by Michael Goland. To the best of my recollection, I wrote this check on my personal account after the 1986 election had taken place. I have been unable to locate a copy of this check, however.

Question 2

State whether you received reimbursement for the check(s) identified in response to Question 1. If so, state the date you received such reimbursement, the identity of the individual(s) who provided the reimbursement to you and the form of reimbursement.

Response

I did receive a \$1,000 cash reimbursement in the following fashion. Colleen Morrow issued a check, payable to cash, in the amount of \$5,000 on Balboa Construction Company's bank account, which she gave to me and asked that I

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cash. After cashing the check at her request, I retained \$1,000 at her direction, and gave the remaining \$4,000 in cash to Ms. Morrow for distribution. These funds were distributed as explained in response to Question 5 below. I do not recall the date of this transaction, but believe that it was in late November or early December, 1986. See Response to Question 4 below for further information.

Question 3

Provide a copy of both sides of each check received as reimbursement for the check(s) identified in response to Question 1.

Response

I do not have a copy of the check issued to cash referred to in Response to Question 2, above.

Question 4

Explain the circumstances under which you wrote or issued the check(s) identified in response to Question 1, identify who suggested that you write or issue such a check and state whether that individual told you that you would receive reimbursement for that check.

Response

Ms. Morrow, who was a friend and former colleague of mine, and, as stated above, had been hired by Michael Goland to run the Washington Office of the Balboa Construction Company, called me into her office and told me that the Vallen Campaign had some debts and asked whether I would be willing to issue a personal check to Greenstripe Media for \$1,000. Ms. Morrow asked me to do this as a favor to her,

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and informed me that I would be reimbursed by Michael Goland, her employer, for making this contribution to help the Vallen Campaign get out of debt. To the best of my recollection, this conversation occurred after the November, 1986 election. Ms. Morrow was also the Founding Executive Director, and a Member of the Board of Directors, for the Foundation to which I was acting as a consultant at that time.

Question 5

State whether you know of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. Please identify those individuals and state whether they received reimbursement for their checks and, if so, from whom.

Response

To my knowledge, in addition to me the following four individuals issued checks to Greenstripe Media: Susan Herbst, Colleen Morrow, Jeff Pandin, and Warren Simms. To the best of my knowledge each individual received \$1,000 in cash from the \$5,000 check issued to cash on the Balboa Construction Company bank account referred to in Response to Question 2 above.

Susan Herbst: I spoke with Susan Herbst, a close friend of mine at that time, about whether she would be willing to issue a check to Greenstripe Media. Although I made the initial contact with Ms. Herbst, she also conferred with Colleen Morrow about issuing a check to Greenstripe Media,

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and at some point did in fact decide to issue a check for \$1,000 to Greenstripe Media.

Colleen Morrow: Ms. Morrow informed me that she had also written a check to Greenstripe Media which was reimbursed.

Jeff Pandin and Warren Simms: Jeff Pandin and Warren Simms were also former colleagues of Ms. Morrow. I am aware that they issued checks to Greenstripe Media because Ms. Morrow asked that I deliver to each of them \$1,000 in cash which was a payment for the \$1,000 checks which they had issued.

Question 6

Provide copies of your bank statements for the months of October, November and December 1986 and identify the deposit of any cash reimbursement received for the checks identified in response to Question 1.

Response

I have not retained copies of the bank statements requested.

Question 7

State the nature of your relationship with Michael Goland in 1986 (e.g., employer, employee, business associate, partner, relative, co-member of an organization or political committee).

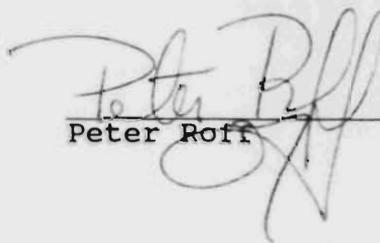
Response

I had no relationship with Michael Goland in 1986, nor do I have a relationship with Mr. Goland now, although I have met him briefly on two occasions. As explained above, he was

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Colleen Morrow's employer at the time, and Ms. Morrow was an officer of one of my employers at that time.

The above statements are true to the best of my knowledge and belief.


Peter Roff

Washington, D.C.

Subscribed to and sworn before me this 20th day of December, 1989.


Notary Public

My Commission Expires: 1-31-93

93043514371

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2727

NAME OF COUNSEL: Fred F. Fielding

ADDRESS: Wiley, Rein & Fielding

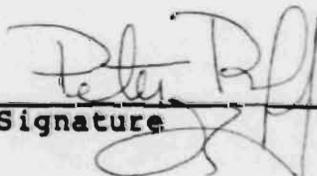
1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202) 429-7000

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

12/20/89
Date


Signature

RESPONDENT'S NAME: Peter Roff

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

9 3 0 4 3 5 1 4 3 7 2

EPSTEIN BECKER & GREEN, P.C.
ATTORNEYS AT LAW

1227 25TH STREET, N.W.
WASHINGTON, D.C. 20037-1156

(202) 661-0900

TELECOPIER: (202) 296-2882

DIRECT LINE

250 PARK AVENUE
NEW YORK, NEW YORK 10177-0077
(212) 351-4500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067-2501
(213) 556-8861

SIX LANDMARK SQUARE
STAMFORD, CONNECTICUT 06901-2704
(203) 348-3737

212 CARNEGIE CENTER
PRINCETON, NEW JERSEY 08540-6212
(609) 452-2445

27 SCHOOL STREET
BOSTON, MASSACHUSETTS 02108-4303
(617) 720-3555

FOUR EMBARCADERO
SAN FRANCISCO, CALIFORNIA 94111-5954
(415) 398-3500

12201 MERIT DRIVE
DALLAS, TEXAS 75251-2213
(214) 490-3143

116 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32301-1530
(904) 681-0596

2400 SOUTH DIXIE HIGHWAY, SUITE 100
MIAMI, FLORIDA 33133
(305) 856-1100

510 KING STREET, SUITE 301
ALEXANDRIA, VIRGINIA 22314-3132
(703) 684-1204

January 3, 1990

F.R.C. NEW YORK, WASHINGTON, D.C.
CONNECTICUT, VIRGINIA AND
TEXAS ONLY

93043514373

HAND DELIVERED

Anthony Buckley, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Room 657
Washington, D.C. 20463

RE: M.U.R. 2727: Respondent, Todd Silver

Dear Mr. Buckley:

Enclosed please find the response of Respondent Todd Silver to the Federal Election Commission Subpoena to Produce Documents and Order to Submit Written Answers in the above-referenced matter.

As the enclosed response clearly demonstrates, Respondent has not violated 2 U.S.C. §441f or any other provision(s) of the Federal Election Campaign Act of 1971, as amended ("the Act"), and, accordingly, this enforcement action should be dismissed forthwith.

Specifically, as set forth in the response, Respondent lacked the requisite statutory knowledge that his name was being used, as alleged, to effect a contribution in the name of another. Neither Joseph Nash, the individual to whom Respondent gave the check at issue, nor Greenstripe Media, Inc., the payee designated by Mr. Nash, ever indicated to Respondent that his check would be used for

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OFFICE OF THE GENERAL COUNSEL
90 JAN -3 PM 3:25

Anthony Buckley, Esquire
January 3, 1990
Page 2

political purposes. Absent such knowledge by the Respondent, the Commission has no basis to find probable cause to believe a violation of §441f has occurred, and thus this matter should be dismissed.

If you have any further questions in this matter, please do not hesitate to call me at 202/861-1877.

Sincerely,



Leslie J. Kerman
Counsel for Respondent,
Todd Silver

Enclosures

93043514374

**FEDERAL ELECTION COMMISSION
MATTER-UNDER-REVIEW 2727**

RESPONDENT: TODD SILVER

**SUBPOENA TO PRODUCE DOCUMENTS
AND
ORDER TO SUBMIT WRITTEN ANSWERS**

RESPONSE

INTERROGATORY NO. 1: State whether you wrote one or more checks or caused a check to be issued to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. If so, please provide a copy of both sides of each such check.

RESPONSE:

Respondent did not knowingly write any checks in 1986 to pay for any television advertisements featuring Ed Vallen. Respondent did, however, issue the attached personal check in the amount of \$2,000 on November 3, 1986. (Attachment 1). As described in the answer to Question 4, the Respondent did not fill in the payee's name, and lacked any knowledge that the eventual payee would be Greenstripe Media, Inc. ("Greenstripe"), or that the funds, as alleged, would be used for political purposes. Moreover, as the Respondent was unfamiliar with Greenstripe, the eventual receipt by the Respondent of a cancelled check with Greenstripe named as payee did not indicate to the Respondent that his check was used, as alleged, to pay for a political advertisement.

Respondent did not write any checks, or cause any to be issued, to either Mark Barnes or Political Advertising and Consulting.

INTERROGATORY NO. 2: State whether you received reimbursement for the check(s) identified in response to Question 1. If so, state the date you received such reimbursement, the identity of the individual(s) who provided the reimbursement to you and the form of reimbursement.

RESPONSE:

As described in the answer to Question 4, the attached check for \$2,000 was issued to Respondent on November 3, 1986 by Mr. Joseph Nash, as reimbursement for the check identified in Question 1. (Attachment 2).

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INTERROGATORY NO. 3: Provide a copy of both sides of each check received as reimbursement for the check(s) identified in response to Question 1.

RESPONSE:

(Attachment 2).

INTERROGATORY NO. 4: Explain the circumstances under which you wrote or issued the check(s) identified in response to Question 1, identify who suggested that you write or issue such a check and state whether that individual told you that you would receive reimbursement for that check.

RESPONSE:

Respondent visited the Beverly Hills office of Joseph Nash, a certified public accountant, on November 3, 1986 to discuss non-political business matters with Mr. Nash -- matters which are entirely unrelated to the transactions of interest to the Federal Election Commission. Mr. Nash was not the Respondent's accountant.

During the course of their conversation, Mr. Nash asked Respondent if he would do him a favor by writing a \$2,000 check for which Respondent would be immediately reimbursed. Mr. Nash never identified any political purpose for the favor, nor did their conversation involve political matters. Respondent, who had several personal checks with him at the time, signed a blank check and handed it to Mr. Nash. (Attachment 1). In Respondent's presence the check was dated and \$2,000 was typed in; however, the payee was not filled in at this time. Mr. Nash's firm, Nash & Co. issued a check for \$2,000 to Respondent on the same day. (Attachment 2).

INTERROGATORY NO. 5: State whether you know of any other individuals who wrote or issued checks to Greenstripe Media, Mark Barnes or Political Advertising and Consulting in 1986 to pay for a television advertisement featuring Ed Vallen. Please identify those individuals and state whether they received reimbursement for their checks and, if so, from whom.

RESPONSE:

Respondent does not have knowledge of any such transactions.

INTERROGATORY NO. 6: Provide copies of your bank statements for the months of October, November and December 1986 and identify the deposit of any cash reimbursement received for the checks identified in response to Question 1.

9 3 0 4 3 5 1 4 3 7 6

RESPONSE:

(Attachments 3 and 4).

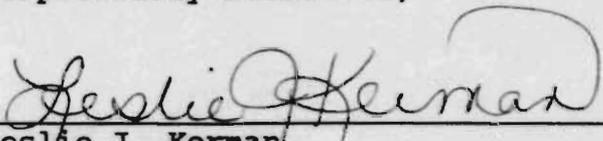
INTERROGATORY NO. 7: State the nature of your relationship with Michael Goland in 1986 (e.g., employer, employee, business associate, partner, relative, co-member of an organization or political committee).

RESPONSE:

Respondent has never had any type of relationship with Mr. Goland.

Respondent reserves the right to supplement his answers to these questions and requests for documents if additional information come into his possession.

Respectfully submitted,



Leslie J. Kerman
Counsel for Respondent, Todd Silver

93043514377

TODD SILVER
216 NORTH FOOTHILL ROAD
BEVERLY HILLS, CA 90210

924

16-24/645
1220(7)

PAY
TO THE
ORDER OF

Nov. 3 1986

GREEN STRIPE MEDIA, INC.

\$ 2,000.00

*****Two Thousand and no/100's***** DOLLARS

BEVERLY HILLS OFFICE
WELLS FARGO BANK..
9800 SANTA MONICA BLVD. BEVERLY HILLS, CA 90210
FOR

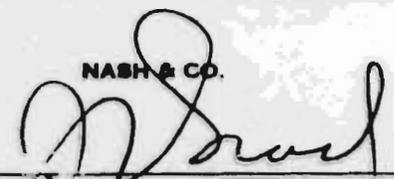


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PAID TO THE ORDER OF
WELLS FARGO BANK
FOR GREEN STRIPE MEDIA, INC.
10011078 01

WELLS FARGO BANK
NOV 3 1986
70 C.1

ATTACHMENT 2

Beverly Hills Regional Head Office UNION BANK 9440 Wilshire Blvd Beverly Hills, CA 90212	NASH & CO. CERTIFIED PUBLIC ACCOUNTANTS 449 S. BEVERLY DR. (213) 557-2400 BEVERLY HILLS, CA 90212	No 2768	10.77/200 1220 November 3 19 86
PAY *****Two Thousand and no/100'***** \$ <u>2,000.00</u>			
TO THE ORDER OF <input type="checkbox"/> TODD SILVER		NASH & CO. 	

DATE	DESCRIPTION	AMOUNT	DISCOUNT		OTHER DEDUCTIONS		NET AMOUNT
			%	AMOUNT	FOR	AMOUNT	

WHEN DE CASHED AND PAID, THIS CHECK BECOMES A RECEIPT IN FULL PAYMENT OF THE ABOVE. NO OTHER RECEIPT NECESSARY.

NASH & CO.

93043514379



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE END OF MUR # 2727

DATE FILMED 11-30-99 CAMERA NO. 2

CAMERAMAN JMH

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Microfilm
 Public Recs
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 2727.

12/10/93

93043542065

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

93043542066



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Audrey M. Barbour, Treasurer
Committee to Elect Ed Vallen
to Senate
123 Palm
Rialto, CA 92376

RE: MUR 2727

Dear Ms. Barbour:

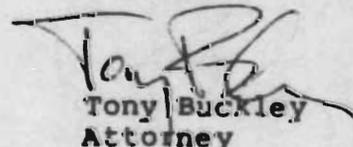
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe the Committee to Elect Ed Vallen to Senate ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(ii), 434(b) and 441a(f). On October 23, 1989, Mr. Vallen submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against the Committee and you, as treasurer. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(2) 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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542067



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Michael Goland
Balboa Construction, Inc.
20221 Prairie Street
Chatsworth, CA 91311

RE: MUR 2727

Dear Mr. Goland:

On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441b, 441a(a)(3) and 441f, and that your company, Balboa Construction, Inc., violated 2 U.S.C. § 441b.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you and Balboa Construction, Inc.. Accordingly, the Commission closed its file in this matter.

The Commission reminds you, however, that 2 U.S.C. § 441a(a)(1)(A) prohibits an individual from making contributions to any candidate or his authorized political committee with respect to a Federal election which, in the aggregate, exceed \$1,000; that 2 U.S.C. § 441b prohibits a corporation from making a contribution in connection with a Federal election or for any officer or director of such corporation from consenting to any such contribution; that 2 U.S.C. § 441a(a)(3) prohibits an individual from making contributions aggregating more than \$25,000 in a calendar year; and that 2 U.S.C. § 441f prohibits a person from making contributions in the names of others. Therefore, you should take steps to ensure future compliance with these statutory provisions.

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

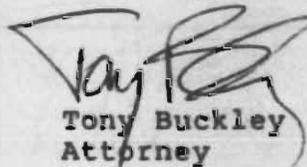
93043542068

Michael Goland
MUR 2727
Page 2

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley
Attorney

DEC 09 1993

Date the Commission voted to close the file: _____

93043542069



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Tom Kindle
1127 1/2 Kenmore Avenue
Los Angeles, CA 90004

RE: MUR 2727

Dear Mr. Kindle:

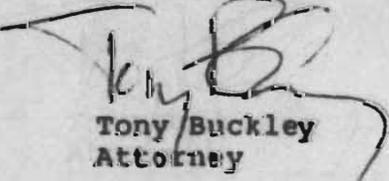
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

DEC 09 1993

Date the Commission voted to close the file: _____

93043542070



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Sandy Katz
11645 Wilshire Boulevard
Suite 800
Los Angeles, CA 90025

RE: MUR 2727

Dear Ms. Katz:

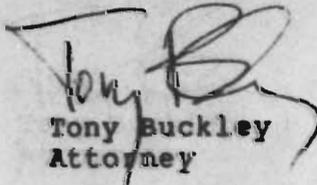
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542071



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Maurice and Paula Hyman
10415 Ravenwood Court
Los Angeles, CA 90077

RE: MUR 2727

Dear Mr. and Mrs. Hyman:

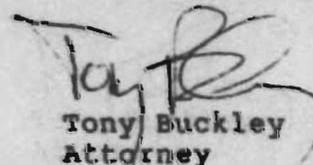
On October 10, 1989, you were each notified that the Federal Election Commission had found reason to believe you each violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against either of you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542072



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

David M. Civilette, Esq.
Anthony J. Spann, P.C.
427 Central Avenue
Dunkirk, NY 14048-0262

RE: MUR 2727
Susan Herbst

Dear Mr. Civilette:

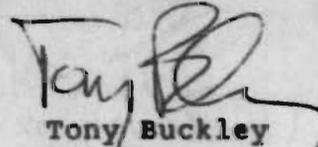
On October 10, 1989, your client, Susan Herbst, was notified that the Federal Election Commission had found reason to believe she violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542073



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Richard Lloyd Sherman, Esq.
Carlsmith, Wichman, Case, Mukai and Ichiki
515 South Figueroa Street
Manulife Building, Ninth Floor
Los Angeles, CA 90071

RE: MUR 2727
Michael Katz

Dear Mr. Sherman:

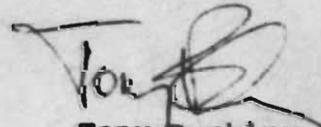
On October 10, 1989, your client, Michael Katz, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On November 20, 1989, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542074



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Donald J. Simon, Esq.
Sonosky, Chambers & Sachse
Suite 1000
1250 Eye Street, N.W.
Washington, D.C. 20005

RE: MUR 2727
Richard Famiglietti

Dear Mr. Simon:

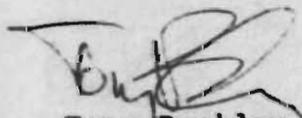
On October 10, 1989, your client, Richard Famiglietti, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On December 11, 1989, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542075



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

James A. Twitty, Esq.
9533 Brighton Way, 2nd Floor
Beverly Hills, CA 90210

RE: MUR 2727
Ernestine Crowe
Calvin Crowe
Kelly Bixby
Robert Frank

Dear Mr. Twitty:

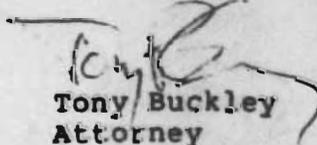
On October 10, 1989, your clients in the above-captioned matter were each notified that the Federal Election Commission had found reason to believe that each individually violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

DEC 09 1993

Date the Commission voted to close the file: _____

93043542076



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1983

Milton Zarachoff
10445 Wilshire Boulevard
Apartment 306
Los Angeles, CA 90212

RE: MUR 2727

Dear Mr. Zarachoff:

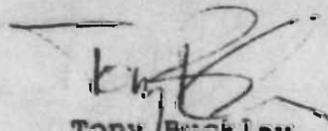
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 03 1983

93043542077



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Keith C. Monroe, Esq.
1428 North Broadway
Santa Ana, CA 92706

RE: MUR 2727
Sloania Hoebeke

Dear Mr. Monroe:

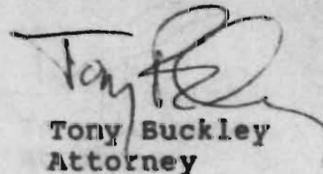
On October 10, 1989, your client, Sloanie Hoebeke, was notified that the Federal Election Commission had found reason to believe she violated 2 U.S.C. § 441f. On November 20, 1989, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542078



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Allen H. Zelon, Esq.
1740 Broadway
24th Floor
New York, NY 10019

RE: MUR 2727
Marc Massioreck
David Zelon

Dear Mr. Zelon:

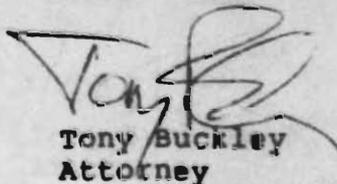
On October 10, 1989, your clients, Marc Massioreck and David Zelon, were notified that the Federal Election Commission had found reason to believe each violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 9 1993

93043542079



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Sheldon I. Lodmer, Esq.
2049 Century Park East, #3080
Los Angeles, CA 90067

RE: MUR 2727
Patti Bridges

Dear Mr. Lodmer:

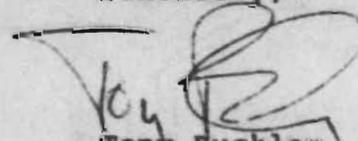
On October 10, 1989, your client, Patti Bridges, was notified that the Federal Election Commission had found reason to believe she violated 2 U.S.C. § 441f. On November 1, 1989, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: DEC 9 1993

93043542080



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Daniel Nash
429 South Beverly Drive
8th Floor
Beverly Hills, CA 90212

RE: MUR 2727

Dear Mr. Nash:

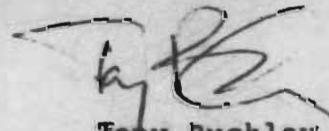
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley
Attorney

DEC 09 1993

Date the Commission voted to close the file: _____

93043542081



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Joseph Nash
429 South Beverly Drive
8th Floor
Beverly Hills, CA 90212

RE: MUR 2727

Dear Mr. Nash:

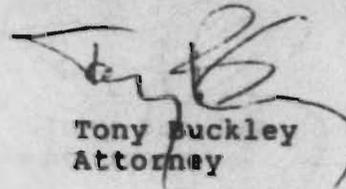
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542082



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Leslie J. Kerman, Esq.
Epstein, Becker & Green, P.C.
1227 25th Street, N.W.
Washington, D.C. 20037-1156

RE: MUR 2727
Todd Silver

Dear Ms. Kerman:

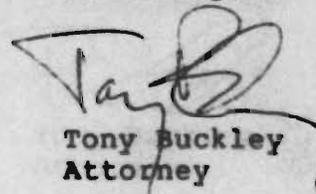
On October 10, 1989, your client, Todd Silver, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On January 3, 1990, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542083



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Mark Cohen
9454 Wilshire Boulevard
Suite 201
Beverly Hills, CA 90212

RE: MUR 2727

Dear Mr. Cohen:

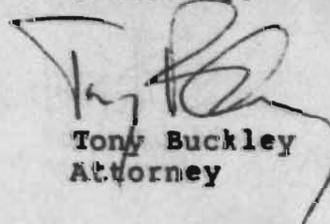
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On October 30, 1989, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542084



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

A. Bruce Adams
16055 Ventura Boulevard
Suite 433
Encino, CA 91436

RE: MUR 2727

Dear Mr. Adams:

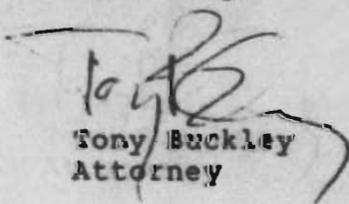
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: DEC 09 1993

93043542085



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Mary Siebuhr
2002 Kerwood Avenue
Los Angeles, CA 90025

RE: MUR 2727

Dear Ms. Siebuhr:

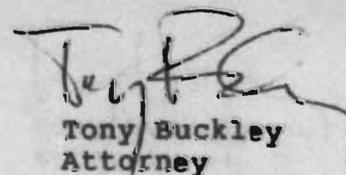
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542086



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Leslie Lindenblatt
17003 Ventura Boulevard
Encino, CA 91436

RE: MUR 2727

Dear Ms. Lindenblatt:

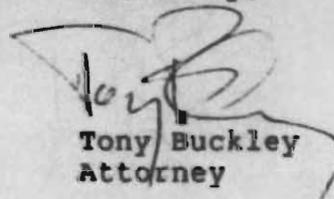
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542087



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Alan Setlin
449 South Beverly Drive
Suite 210
Beverly Hills, CA 90212-4460

RE: MUR 2727

Dear Mr. Setlin:

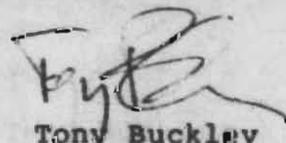
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On October 17, 1989, you submitted a response to the Commission's finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542088



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

James White
P.O. Box 10334
Beverly Hills, CA 90213

RE: MUR 2727

Dear Mr. White:

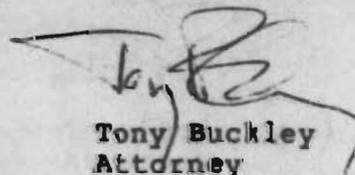
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542089



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

George Korz
9454 Wilshire Boulevard
Suite 201
Beverly Hills, CA 90212

RE: MUR 2727

Dear Mr. Korz:

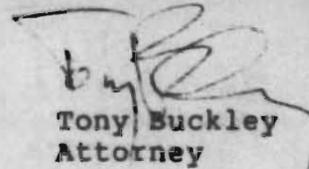
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542090



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1989

Michael Berger
9454 Wilshire Boulevard
Suite 302
Beverly Hills, CA 90212-2904

RE: MUR 2727

Dear Mr. Berger:

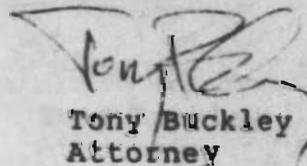
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

DEC 10 1989

Date the Commission voted to close the file: _____

93043542091



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1989

Melvin D. Honowitz, Esq.
One Embarcadero Center
27th Floor
San Francisco, CA 94111

RE: MUR 2727
Clifton Sherwood

Dear Mr. Honowitz:

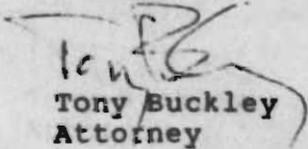
On October 10, 1989, your client, Clifton Sherwood, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On October 23, 1989, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

DEC 09 1989

Date the Commission voted to close the file: _____

93043542092



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Victor B. Kenton, Esq.
2400 Broadway, 5th Floor
Santa Monica, CA 90404

RE: MUR 2727
Zvi Sperling
Jacob Sperling
Miri Sperling
Shelly Sperling

Dear Mr. Kenton:

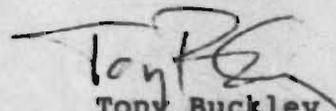
On October 10, 1989, your clients in the above-captioned matter were each notified that the Federal Election Commission had found reason to believe they had each individually violated 2 U.S.C. § 441f. On October 25, 1989, you submitted responses to the Commission's reason to believe findings against Miri Sperling and Shelly Sperling.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542093



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Conrad Lee Klein, Esq.
14001 Ventura Boulevard
Sherman Oaks, CA 91423

RE: MUR 2727
Renee Lang Burg
Jules Burg

Dear Mr. Klein:

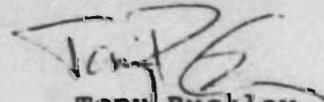
On October 10, 1989, your clients in the above-captioned matter were each notified that the Federal Election Commission had found reason to believe they had each individually violated 2 U.S.C. § 441f. On November 20, 1989, you submitted a response to the Commission's reason to believe finding against Renee Lang Burg.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542094



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Nachman and Tova Shatz
Schauli's Carbide
9745 Washburn Road
Downey, CA 90241

RE: MUR 2727

Dear Mr. and Mrs. Shatz:

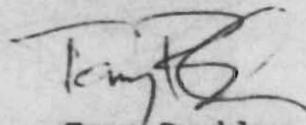
On October 10, 1989, you were each notified that the Federal Election Commission had found reason to believe you each violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against either of you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542095



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Mark E. Victor
Pacific Rim Equities
1880 Century Park East
Suite 811
Los Angeles, CA 90067

RE: MUR 2727

Dear Mr. Victor:

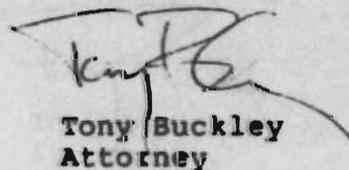
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On November 1, 1989, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542096



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1989

Fred F. Fielding, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2727
Peter Roff

Dear Mr. Fielding:

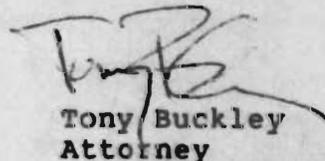
On October 10, 1989, your client, Peter Roff, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f. On December 20, 1989, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 10 1989

93043542097



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1989

Jeffrey Pandin
220 G Street, N.E.
Washington, D.C. 20002

RE: MUR 2727

Dear Mr. Pandin:

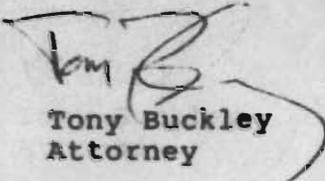
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1991

93043542098



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Joseph R. Noriega
901 West Whittier Boulevard
Montebello, CA 90640

RE: MUR 2727

Dear Mr. Noriega:

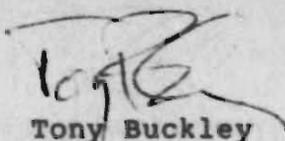
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542099



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Monte Morrow
13900 Panmay Way
Marina Del Ray, CA 90292

RE: MUR 2727

Dear Mr. Morrow:

On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Steven J. Lee
The Mortgage Capital Group
9701 Wilshire Boulevard
Suite 1010
Beverly Hills, CA 90035

RE: MUR 2727

Dear Mr. Lee:

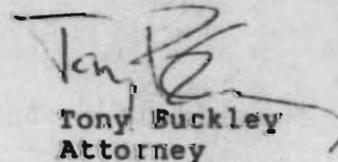
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542101



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1989

Russell F. Maginnis, Esq.
Maginnis & Erwin
11973 San Vincente Boulevard
Suite 219
Los Angeles, CA 90049

RE: MUR 2727
Robert Krause
Mollie Krause

Dear Mr. Maginnis:

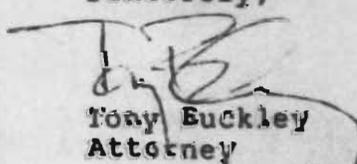
On October 10, 1989, your clients, Robert and Mollie Krause, were notified that the Federal Election Commission had found reason to believe each of them violated 2 U.S.C. § 441f. On November 3, 1989, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1989

93043542102



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Harlan W. Braun, Esq.
2049 Century Park East
Los Angeles, CA 90067

RE: MUR 2727
Michael Altman
Richard Horowitz
Ann Ives
Beverly Horowitz
Judy Altman
Robert Ives

Dear Mr. Braun:

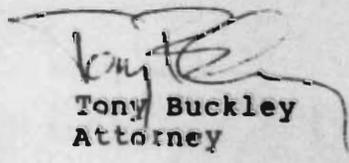
On October 10, 1989, your clients in the above-captioned matter were each notified that the Federal Election Commission had found reason to believe they had each individually violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file: _____

DEC 09 1993

93043542103



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Sandor Habalow
11645 Wilshire Boulevard
Suite 800
Los Angeles, CA 90025

RE: MUR 2727

Dear Mr. Habalow:

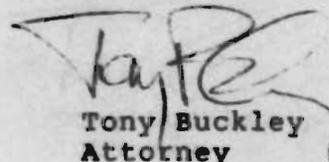
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f. On November 20, 1989, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542104



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

David Hultquist
4702 Baywind Drive
Pensacola, FL 32514

RE: MUR 2727

Dear Mr. Hultquist:

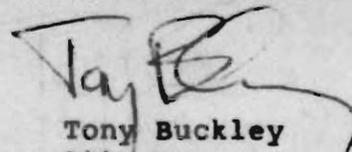
On October 10, 1989, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1993

93043542105



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Henry H. Rossbacher, Esq.
Sullivan, Walsh, Rossbacher & Wood
Biltmore Tower, 18th Floor
500 South Grand Avenue
Los Angeles, CA 90071

RE: MUR 2727
Samir Mobassaly

Dear Mr. Rossbacher:

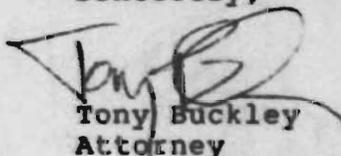
On October 10, 1989, your client, Samir Mobassaly, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441f.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your client. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 8 1993

93043542106



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Mitchell W. Egers, Esq.
Hanson & Egers
205 South Broadway, Suite 902
Los Angeles, CA 90012

RE: MUR 2727
Lyle R. Weisman
Shifra Weisman Hastings
David Weisman

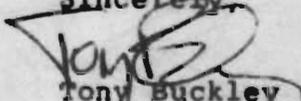
Dear Mr. Egers:

On October 10, 1989, your clients in the above-captioned matter were notified that the Federal Election Commission had found reason to believe that they had each individually violated 2 U.S.C. § 441f. On November 6, 1989, you submitted responses to the Commission's reason to believe findings on behalf of David Weisman and Shifra Weisman Hastings. On November 7, 1989, Lyle Weisman submitted a response on his own behalf to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

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 receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Tony Buckley
Attorney

Date the Commission voted to close the file:

DEC 09 1989

93043542107