



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2998

DATE FILMED 12/1/89 CAMERA NO. 4

CAMERAMAN AS

89040773781

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 22, 1989ANALYST: Cynthia W. Simms

I. COMMITTEE: Santa Clara County United Democratic  
Campaign '88  
(C00231076)  
Ed Hoffman, Treasurer  
P.O. Box 6798  
San Jose, CA 95150

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

## III. BACKGROUND:

Apparent Reimbursements to Non-Federal Account for Federal Activity

The 1988 October Quarterly, 12 Day Pre-General, 30 Day Post-General and Year End Termination Reports filed by the Santa Clara County United Democratic Campaign '88 ("the Committee") disclosed \$44,469.74 in transfers to its non-federal account to "cover federal portion of costs".

The Committee's 1988 October Quarterly Report disclosed transfers-out between August 23 and September 30, 1988 totalling \$13,600 (Attachment 2) and the 12 Day Pre-General Report disclosed transfers-out between October 7 and October 19, 1988 totalling \$14,400 (Attachment 3) to its non-federal account. A Request for Additional Information ("RFAI") referencing the reports was sent on December 28, 1988 which requested greater clarification regarding the purpose of the transfers-out (Attachment 4).

Mr. Ed Hoffman, the Committee's treasurer, phoned the Reports Analysis Division's analyst on January 12, 1989 to explain that a response to the RFAI was being prepared to provide greater clarification of the transfers to the Committee's non-federal account (Attachment 5).

In a response from the Committee which was received January 17, 1989, Mr. Hoffman stated that:

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SANTA CLARA COUNTY UNITED DEMOCRATIC  
CAMPAIGN '88  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

As the [C]ampaign we conducted was coordinated, it was not possible to separate the Federal activities from the non-Federal activities. For this reason, we made most of our expenditures from the non-Federal committee...Our Federal committee served to collect funds for the portion of our activities that were related to Federal candidates and to segregate those funds from contributions that are not allowable for Federal committees. (Attachment 6)

A Second Notice was sent on January 19, 1989 for failure to respond<sup>1/</sup> (Attachment 7).

The Committee's 1988 30 Day Post-General Report disclosed transfers-out between October 26 and November 10, 1988 totalling \$16,000 (Attachment 8). An RFAI referencing the 30 Day Post-General Report was sent to the Committee on February 1, 1989 (Attachment 9). The RFAI requested greater clarification regarding the purpose of the transfers-out. A Second Notice was sent on February 23, 1989 for failure to respond (Attachment 10).

A response from the Committee was received February 27, 1989 regarding the 30 Day Post-General Report. Mr. Hoffman reiterated the Committee's response of January 17, 1989 (Attachment 11). He further stated that, "this clarification also pertains to all other reports filed by our committee in which 'transfers to our non-Federal account' were made".

On March 22, 1989 an RFAI was sent referencing the October Quarterly, 12 Day Pre-General, 30 Day Post-General and the Year End Termination Reports<sup>2/</sup> regarding the Committee's transfers of disbursements totalling \$44,469.74 to its non-federal account (Attachment 12). The Committee was advised that 11 CFR 102.5 prohibits a non-federal account from financing activity in connection with federal elections. Further clarifying information regarding these transactions, including the dates when the original activity was conducted by the non-federal account, was requested. A Second Notice was sent April 13, 1989 for failure to respond (Attachment 13).

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<sup>1/</sup> The Second Notice did not note the response received January 17, 1989.

<sup>2/</sup> The Committee's Year End Termination Report disclosed one transfer-out on December 19, 1988 to its non-federal account totalling \$469.74.

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SANTA CLARA COUNTY UNITED DEMOCRATIC  
CAMPAIGN '88  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

Mr. Hoffman responded to the RFAI in a letter received May 1, 1989 (Attachment 14). Mr. Hoffman stated that, "It is not possible to, as you request, specify the dates of the activity. These activities were conducted on an ongoing basis from the date of our registration in August 1988 through our termination as a committee." The response further stated the following: the Committee "has engaged only in activities exempt from this requirement [exempt activities and voter drive activities] per 11 CFR 106.1(c) and (e). These exempt activities benefitted no specific candidate, but rather the entire Democratic ticket." In addition, Mr. Hoffman cited the instructions in the Campaign Guide for Political Party Committees, October 1985, Page 15 and indicated that the Committee reported the activity in accordance with these instructions.

No further response has been submitted by the Committee.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040775784

FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 1JUNE89

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
SANTA CLARA COUNTY UNITED DEMOCRATIC CAMPAIGN '88				ID #C00231076 PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION: SANTA CLARA CNTY UNITED DEM CAMP '88						
1988 STATEMENT OF ORGANIZATION				11AUG88	2	88FEC/541/4910
REQUEST FOR ADDITIONAL INFORMATION				31AUG88	1	88FEC/543/5088
STATEMENT OF ORGANIZATION - AMENDMENT				13SEP88	3	88FEC/546/0016
REQUEST FOR ADDITIONAL INFORMATION 2ND				22SEP88	2	88FEC/547/3519
OCTOBER QUARTERLY				1AUG88 -30SEP88	5	88FEC/554/2491
OCTOBER QUARTERLY - AMENDMENT				1AUG88 -30SEP88	2	89FEC/578/0811
OCTOBER QUARTERLY - AMENDMENT				1AUG88 -30SEP88	2	89FEC/594/0428
REQUEST FOR ADDITIONAL INFORMATION				1AUG88 -30SEP88	1	88FEC/575/4181
REQUEST FOR ADDITIONAL INFORMATION 2ND				1AUG88 -30SEP88	2	89FEC/578/5173
REQUEST FOR ADDITIONAL INFORMATION				1AUG88 -30SEP88	6	89FEC/589/3825
REQUEST FOR ADDITIONAL INFORMATION 2ND				1AUG88 -30SEP88	7	89FEC/591/1745
PRE-GENERAL				10CT88 -19OCT88	5	88FEC/561/5341
PRE-GENERAL - AMENDMENT				10CT88 -19OCT88	2	89FEC/584/1059
PRE-GENERAL - AMENDMENT				10CT88 -19OCT88	1	89FEC/594/1053
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -19OCT88	1	88FEC/575/4180
1 <sup>ST</sup> LETTER INFORMATIONAL NOTICE				10CT88 -19OCT88	3	89FEC/575/4985
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT88 -19OCT88	2	89FEC/578/5171
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -19OCT88	6	89FEC/589/3819
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT88 -19OCT88	7	89FEC/591/1738
POST-GENERAL				20OCT88 -28NOV88	6	88FEC/574/2441
POST-GENERAL - AMENDMENT				20OCT88 -28NOV88	2	89FEC/586/2024
POST-GENERAL - AMENDMENT				20OCT88 -28NOV88	1	89FEC/594/1052
REQUEST FOR ADDITIONAL INFORMATION				20OCT88 -28NOV88	1	89FEC/582/1389
REQUEST FOR ADDITIONAL INFORMATION 2ND				20OCT88 -28NOV88	2	89FEC/586/1114
REQUEST FOR ADDITIONAL INFORMATION				20OCT88 -28NOV88	6	89FEC/589/3813
REQUEST FOR ADDITIONAL INFORMATION 2ND				20OCT88 -28NOV88	7	89FEC/591/1731
TERMINATION REPORT				29NOV88 -31DEC88	4	89FEC/583/3097
TERMINATION REPORT - AMENDMENT				29NOV88 -31DEC88	1	89FEC/594/1052
REQUEST FOR ADDITIONAL INFORMATION				29NOV88 -31DEC88	6	89FEC/589/3807
REQUEST FOR ADDITIONAL INFORMATION 2ND				29NOV88 -31DEC88	7	89FEC/591/1724
TOTAL		47,540	0	47,540	0	103 TOTAL PAGES

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All Reports have been reviewed.  
Ending Cash on Hand as of 12/31/89: \$0  
Debts/Obligations owed to the Committee: \$0  
Debts/Obligations owed by the Committee: \$0



ATTACHMENT 3

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 01  
OF 1  
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)  
Santa Clara County United Democratic Campaign '88 - Federal Account

a b c d e f g h i j k l m n o p q r s t u v w x y z

A. Full Name, Mailing Address and ZIP Code Santa Clara County United Democratic Campaign '88 P.O. Box 6798 San Jose, CA 95150	Purpose of Disbursement Transfers to cover federal portion of cost Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88 10/14/88 10/19/88	Amount of Each Disbursement This Period \$6000 \$6000 \$2400
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL: \$12400.00  
TOTAL: \$12400.00



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

BQ-2

DEC 28 1988

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: October Quarterly (8/1/88-9/30/88) and 12 Day Pre-  
General (10/1/88-10/19/88) Reports

Dear Mr. Hoffman:

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:

-Please provide greater clarification regarding the purpose of the transfers to your non-federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Cynthia W. Simms  
Reports Analyst  
Reports Analysis Division

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TELECON

**ANALYST:** Cynthia Simms

**CONVERSATION WITH:** Mr. Ed Hoffman, Treasurer

**COMMITTEE:** Santa Clara County United Democratic Campaign '88

**DATE:** January 12, 1989

**SUBJECT(S):** Response to the RFAI sent regarding the purpose of the transfers to its non-federal account.

Mr. Hoffman phoned to say that he was responding to the letter sent to him dated December 28, 1988 from the FEC with a letter of his own providing greater clarification of the transfers to the Committee's non-federal account.

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ATTACHMENT 6

Ms. Cynthia Simms  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

89 JAN 17 PM 12:40

January 11, 1989

Dear Ms. Simms.

This letter is in reply to your letter of December 28, 1988. You asked for me to "provide greater clarification regarding the purpose of the transfers to your non-federal account".

Our committee was formed to campaign for the entire Democratic ticket, including both Federal and non-Federal candidates. Since a portion of our operations were on behalf of candidates for Federal office, we formed the Federal committee.

As the Campaign we conducted was coordinated, it was not possible to separate the Federal activities from the non-Federal activities. For this reason, we made most of our expenditures from the non-Federal committee which is registered with and files disclosure statements to the California Fair Political Practices Commission.

Our Federal committee served to collect funds for the portion of our activities that were related to Federal candidates and to segregate those funds from contributions that are not allowable for Federal committees.

Please contact me if you require further information on this or other issues relating to our Committee. I can be reached at 415/965-5665.

Sincerely,

Ed Hoffman  
Treasurer

Santa Clara County United  
Democratic Campaign '88 - Federal Account  
ID #C10231076  
P.O. Box 6708  
San Jose, CA 95150

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20541

RQ-3

January 19, 1989

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: October Quarterly (8/1/88-9/30/88) and 12 Day Pre-  
General (10/1/88-10/19/88) Reports

Dear Mr. Hoffman:

This letter is to inform you that as of January 18, 1989, the Commission has not received your response to our request for additional information, dated December 28, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Cynthia Simms on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	of Report
	FOR LINE NUMBER	

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

NAME OF COMMITTEE (in Full)

Santa Clara County United Democratic Campaign '88 - Federal Account

0 0 0 4 9 7 4 3 4 7 - 0 2

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Santa Clara County United Democratic Campaign '88 P.O. Box 6798 San Jose, CA 95150	Transfers to cover federal portion of costs	10/26	\$4500
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	10/31	\$4000
	<input type="checkbox"/> Other (specify)	11/4	\$3500
		11/10	\$4000
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

SUBTOTAL (Do not include this Page's entries)	\$16000
TOTAL (Do not include this Page's entries)	\$16000



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

RQ-2

FEB 1 1989

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: 30 Day Post-General Report (10/20/88-11/28/88)

Dear Mr. Hoffman:

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:

-Please provide greater clarification regarding the purpose of the transfers to your non-federal account.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Cynthia W. Simms  
Reports Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

RQ-3

February 23, 1989

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: 30 Day Post-General Report (10/20/88-11/28/88)

Dear Mr. Hoffman:

This letter is to inform you that as of February 22, 1989, the Commission has not received your response to our request for additional information, dated February 1, 1989. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Cynthia Simms on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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ATTACHMENT II

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

09 FEB 27 AM 9:48

Ms. Cynthia Simms  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

February 22, 1989

Dear Ms. Simms,

This letter is in reply to your letter of February 1, 1989. Your letter asked me to "provide greater clarification regarding the purpose of the transfers to your non-federal account".

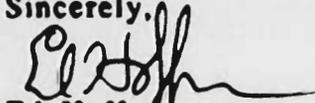
Our organization was formed to campaign for the entire Democratic ticket, including both Federal and non-Federal candidates. Since a portion of our operations were on behalf of candidates for Federal office, we formed a Federal committee.

As the Campaign we conducted was coordinated, it was not possible to separate the Federal activities from the non-Federal activities. For this reason, we made most of our expenditures from the non-Federal committee which is registered with and files disclosure statements to the California Fair Political Practices Commission.

Our Federal committee served to collect funds for the portion of our activities that were related to Federal candidates and to segregate those funds from contributions that are not allowable for Federal committees. This clarification also pertains to all other reports filed by our committee in which "transfers to our non-Federal account" were made.

Please contact me if you require further information on this or other issues relating to our Committee. I can be reached at 415/965-5665.

Sincerely,



Ed Hoffman  
Treasurer

Santa Clara County United  
Democratic Campaign '88 - Federal Account  
ID #C00231076  
P.O. Box 6798  
San Jose, CA 95150

8903458620345



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

20-2

MAR 2: 1988

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: October Quarterly (8/1/88-9/30/88), 12 Day Pre-  
General (10/1/88-10/19/88), 30 Day Post-General  
(10/20/88-11/28/88) and Termination (11/29/88-  
12/31/88) Reports

Dear Mr. Hoffman:

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

-Schedule B supporting Line 20 discloses \$44,469.74 in disbursements to Santa Clara County United Democratic Campaign '88, for federal portion of costs (pertinent portion(s) attached). You are advised that 11 CFR 102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide further clarifying information regarding these transactions including the date(s) when the original activity was conducted. In addition, if any of the disbursements disclosed on Schedule B supporting Line 20 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 21, or as coordinated expenditures on Schedule F supporting Line 23. See 11 CFR 104.3(b)(3) and 106.1.

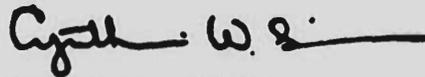
Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the

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date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Cynthia W. Simms  
Reports Analyst  
Reports Analysis Division

3 1 0 3 5 8 9 3 3 8 7 7 7

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	FOR LINE NUMBER	

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

NAME OF COMMITTEE (see Form)

**Santa Clara County United Democratic Campaign '88 - Federal Account**

33040713798  
 33033342491

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>Santa Clara County United Democratic Campaign '88--</b> P.O. Box 6798 San Jose, CA 95150	<b>Transfers to cover federal portion of costs</b>	8/23/88	\$2500
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	9/16/88	\$3000
	<input type="checkbox"/> Other (specify)	9/26/88	\$4500
B. Full Name, Mailing Address and ZIP Code (continued).....	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	9/30/88	\$3600
	<input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code <b>Pacific Bell Political Acct.</b> Sacramento, CA 95887	Purpose of Disbursement <b>Federal portion of telephone costs</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	8/24/88	\$2600
	<input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code <b>Globe Insta Print</b> 1465 South First Street San Jose, CA 95110	Purpose of Disbursement <b>Printing flyers</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	8/29/88	\$459.23
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

TOTAL	\$14,600.00
TOTAL	\$14,600.00

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Santa Clara County United Democratic Campaign '88 - Federal Account

30043713799

A. Full Name, Mailing Address and ZIP Code Santa Clara County United Democratic Campaign '88 P.O. Box 6798 San Jose, CA 95150	Purpose of Disbursement Transfers to cover federal portion of cost Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88 10/16/88 10/19/88	Amount of Each Disbursement This Period \$6000 \$6000 \$2400
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL

TOTAL

\$14400.00

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF Report
	FOR LINE NUMBER	

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

NAME OF COMMITTEE (in Full)

**Santa Clara County United Democratic Campaign '88 - Federal Account**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Santa Clara County United Democratic Campaign '88 P.O. Box 6798 San Jose, CA 95150	Transfers to cover federal portion of costs	10/26	\$4500
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/31 11/4 11/10	\$4000 \$3500 \$4000
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL (This Page only)	\$16000
TOTAL (This Page only)	\$16000

2004378280-0

MODULE B

ITEMIZED DISBURSEMENTS

Use separate statement for each category of the Detailed Summary Page

FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Santa Clara County United Democratic Campaign '88 - Federal Account

3 0 1 7 0 5 4 9 5 / 0 5 9 2 9 0

A. Full Name, Mailing Address and ZIP Code Santa Clara County United Democratic Campaign '88 P.O. Box 6798 San Jose, CA 95150	Purpose of Disbursement Transfers to cover federal portion of costs Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 12/19/88	Amount of Each Disbursement This Period \$469.74
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	\$469.74
TOTAL for this page (the sum of the above)	\$469.74



FEDERAL ELECTION COMMISSION

RO-3

WASHINGTON, D.C. 20541

April 13, 1989

Ed Hoffman, Treasurer  
Santa Clara County United  
Democratic Campaign '88  
P.O. Box 6798  
San Jose, CA 95150

Identification Number: C00231076

Reference: October Quarterly (8/1/88-9/30/88), 12 Day Pre-  
General (10/1/88-10/19/88), 30 Day Post-General  
(10/20/88-11/28/88) and Termination (11/29/88-  
12/31/88) Reports

Dear Mr. Hoffman:

This letter is to inform you that as of April 12, 1989 the Commission has not received your response to our request for additional information, dated March 22, 1989. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Cynthia W. Simms on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

990497178902

09 MAY -1 AM 11:06

Ms. Cynthia Simms  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

April 26, 1989

Dear Ms. Simms,

This letter is in reply to your letter of March 22, 1989. Your letter asked me to "provide further clarifying information regarding these transactions including the date(s) when the original activity was conducted."

Our organization was formed to campaign for the entire Democratic ticket, including both Federal and non-Federal candidates. Since a portion of our operations were on behalf of candidates for Federal office, we formed a Federal committee.

As the Campaign we conducted was coordinated, it was not possible to separate the Federal activities from the non-Federal activities. For this reason, we made most of our expenditures from the non-Federal committee which is registered with and files disclosure statements to the California Fair Political Practices Commission. It is not possible to, as you request, specify the dates of the activity. These activities were conducted on an ongoing basis from the date of our registration in August 1988 through our termination as a committee.

Our Federal committee served to collect funds for the portion of our activities that were related to Federal candidates and to segregate those funds from contributions that are not allowable for Federal committees [11 CFR 102.5 (a) 1 (i)]. We reported this activity in accordance with your instructions-[Campaign Guide for Political Party Committees, October 1985; Page 15 and 11 CFR 106.1(e).]

In reply to your question on "...if any of the disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly.....", we have engaged only in activities exempt from this requirement per 11 CFR 106.1 (c) and (e). These exempt activities benefited no specific candidate, but rather the entire Democratic ticket. In summary, we engaged only in exempt activities and voter drive activities pursuant to your regulations.

Please contact me if you require further information on this or other issues relating to our Committee. I can be reached at 415/965-5665.

Sincerely,

  
Ed Hoffman  
Treasurer

Santa Clara County United  
Democratic Campaign '88 - Federal Account  
ID #C00231076  
P.O. Box 6798  
San Jose, CA 95150

8 0 3 5 9 4 0 1 1 7



FORM 420  
1988

RECIPIENT COMMITTEE  
CAMPAIGN STATEMENT RECEIVED  
(Government Code Section 18600)  
Type or Print in Ink

OGC #086  
PAGE \_\_\_ OF \_\_\_

Statement covers period 10/23/88 - 11/15/88

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

- PRE-ELECTION STATEMENT
- SEMI-ANNUAL STATEMENT
- SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 495 and attach it to this statement.)
- BALLOT MEASURE QUALIFICATION STATEMENT
- SPECIAL ODD-YEAR CAMPAIGN REPORT
- TERMINATION STATEMENT (Attach a Form 415 to this Form 420)

A OFFICIAL USE ONLY

NAME OF COMMITTEE  
Santa Clara County United Democratic Campaign '88

ID NUMBER  
871053

ADDRESS OF COMMITTEE, NO AND STREET CITY STATE ZIP CODE AREA CODE/PHONE NUMBER  
P.O. Box 6798 San Jose CA 95150 408/749-9864

NAME OF TREASURER  
Ed Hoffman

PERMANENT ADDRESS OF TREASURER, NO AND STREET CITY STATE ZIP CODE AREA CODE/BUSINESS PHONE NUMBER  
1471 Hampton Drive Sunnyvale CA 94087 415/965-5665

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

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

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

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

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

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

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

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

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

EXECUTED ON 11/15 AT San Jose BY [Signature]  
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

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

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

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

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

C  
D  
E  
F

FOR INFORMATION RE QUINCY TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE "INFORMATION MANUAL ON CAMPAIGN FINANCIAL DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT."

89040713804

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

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD  
FROM | THROUGH

10/23/88 | 12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

**CONTRIBUTIONS RECEIVED**

	COLUMN A Cumulative total from previous period*	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions.....	\$ 31135.25	\$ 14870.00	\$ 46005.25
2. Loans received.....	0	0	0
3. SUBTOTAL CASH RECEIPTS.....	\$ 31135.25	\$ 14870.00	\$ 46005.25
4. Non-monetary contributions.....	LINES 1 + 2 23234.48	LINES 1 + 2 0	LINES 1 + 2 23234.48
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES.....	54369.73	SCHEDULE C, LINE 3 14870.00	69239.73
6. Enforceable Promises (Except loan guarantees, see Line 18 below).....	LINES 3 + 4 0	LINES 3 + 4 0	LINES 3 + 4 0
7. TOTAL CONTRIBUTIONS.....	LINES 5 + 6 \$ 54369.73	SCHEDULE D, LINE 7 \$ 14870	LINES 5 + 6 \$ 69239.73

**EXPENDITURES MADE**

8. Payments.....	\$ 57253.12	\$ 32705.49	\$ 89958.61
9. Loans Made.....	0	0	0
10. SUBTOTAL.....	57253.12	SCHEDULE EE, LINE 7 32705.49	89958.61
11. Accrued expenses (unpaid bills).....	0	LINES 8 + 9 0	0
12. TOTAL EXPENDITURES.....	LINES 10 + 11 \$ 57253.12	SCHEDULE F, LINE 5 \$ 32705.49	LINES 10 + 11 \$ 89958.61

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

**STATEMENT OF CHANGES IN FINANCIAL CONDITION**

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.).....	\$ 2501	
14. Cash receipts this period (Line 3, Column B above).....	14870	
15. Miscellaneous increases to cash (Schedule G, Line 4).....	16692.50	
16. Cash payments this period (Line 10, Column B above).....	32705.49	
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.).....		\$ 1358.01
18. Amount of loan guarantees received (Schedule B, Part I, Column (b)).....		\$
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse.....		\$
20. Outstanding debts (Line 2 + Line 11 of Column C above).....		\$

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

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

8904077805

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
11/2/88	Alquist Campaign Committee ID #742256 P.O. Box 6475 San Jose, CA 95150	Occupation:		\$500	\$660
		Employer:			
12/1/88	IBEW Educational Committee 1125 15th Street, N.W. Washington, D.C.	Occupation:		\$400	\$400
		Employer:			
11/7/88	Citizens for Jim Beall <i>ID # 800082</i> 5506 Rudy Drive San Jose, CA 95124	Occupation:		\$100	\$120
		Employer:			
11/7/88	Committee to Elect Dom Cortese ID #790829 P.O. Box 5610 San Jose, CA 95150	Occupation:		\$100	\$100
		Employer:			
11/11/88	Committee for Delaine Eastin ID #791904 P.O. Box 732 Union City, CA 94587	Occupation:		\$100	\$300
		Employer:			
11/7/88	Committee to Elect Shirley Lewis ID #791846 2894 Lausanne Court San Jose, CA 95121	Occupation:		\$100	\$100
		Employer:			
11/7/88	Citizens for Zoe Lofgren ID #791120 P.O. Box 326 San Jose, CA 95103	Occupation:		\$100	\$1100
		Employer:			
<b>SUBTOTAL</b>				\$1400	

**SUMMARY**

1. AMOUNT RECEIVED -- CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals) .....	\$ 14640.00
2. AMOUNT RECEIVED -- CONTRIBUTIONS OF LESS THAN \$100 (Not itemized) .....	230.00
3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1, Column B of Summary Page .....	\$ 14870.00

**SCHEDULE A  
MEMORANDUM CONTRIBUTIONS RECEIVED  
(CONTINUATION SHEET)**

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

STATEMENT COVERS PERIOD	
FROM 10/23/88	THROUGH 12/31/88

<b>NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:</b> Santa Clara County United Democratic Campaign '88	<b>I.D. NUMBER (IF COMMITTEE)</b> 871053
---	---

87040715807

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
10/30/88	Unity '88 703 B St., San Mateo, CA	Occupation:		\$167	
11/4/88	Miguel Martinez, Treasurer 304 Kains Ave., San Bruno, CA	Employer:		\$473	\$1147
11/7/88	Committee to Elect Pat Sausedo ID # <u>790852</u> 2911 Queens Estates San Jose, CA 95135	Occupation:		\$100	\$100
		Employer:			
10/25/88	SEIU Local 715 Political Act. Committee ID #782248 180 East Gish Road Suite B San Jose, CA 95112	Occupation:		\$400	\$1400
		Employer:			
11/7/88	Susanne Wilson Committee ID #746330 P.O. Box 5612 San Jose, CA 95150	Occupation:		\$100	\$650
		Employer:			
11/2/88	Democratic State Central Comm. ID #741666 431 J Street, 4th Floor Sacramento, CA 95814	Occupation:		\$5000	\$12000
11/4/88				\$3000	
11/19/88		Employer:		\$4000	
		Occupation:			
		Employer:			
		Occupation:			
		Employer:			
		Occupation:			
		Employer:			
<b>SUBTOTAL</b>				\$13240	

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

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
A Button Factory 14742 Eastview Drive Los Gatos, CA 95030	O		\$900 \$207
ACAR Rent-a-car 4220 El Camino Real Palo Alto, CA 94306	G		\$517.15 \$503.95 \$524.09
Al Roosma 685 S. 9th Street San Jose, CA 95112	G		\$200
American Data Management 1916 Old Middlefield Way Mountain View, CA	G		\$458.15
<b>SUBTOTAL</b>			<b>\$3310.34</b>

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

**SUMMARY**

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD (Include all Schedule E subtotals) .....	\$ 31523.44
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized) .....	1182.05
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS (Schedule B, Part 2, Column (d)) .....	0
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4) .....	0
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of Summary Page .....	\$ 32705.49

3904075208

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

PAGE \_\_\_\_\_ OF \_\_\_\_\_

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Ann Paull, 814 Echo Dr. Los Altos	G	Reimbursement of expenses: Vendor receiving \$100.88: Price Club, 150 Lawrence Station Sunnyvale	\$100.88
Arvey Paper & Supply 1381 North 10th Street San Jose, CA 95112	G		\$211.38 \$270 \$126.88
Better Business Systems 1482 North 4th Street San Jose, CA 95112	G		\$426.95
Browning Ferris Industries P.O. Box 1987 San Jose, CA 95109	G		\$358.52
COGS 1041 Old County Road Belmont, CA 94002	O		\$2752 \$900
Conna McCarthy	G	Reimbursement of expenses: Vendor receiving \$170.56: Kinkos, 481 E. San Carlos, San Jose	\$170.56
Contel of California P.O. Box 992 Manteca, CA 95336	G		\$1308.30
		<b>SUBTOTAL</b>	\$6625.47

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

PAGE 7 OF 12

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

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| *L* - LITERATURE   | *G* - GENERAL OPERATIONS AND OVERHEAD                          |
| *B* - BROADCAST ADVERTISING  | *T* - TRAVEL, ACCOMMODATIONS AND MEALS                         |
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| *O* - OUTSIDE ADVERTISING  |  |

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NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Dolores Sandoval 741 Limerick Court Sunnyvale, CA 94087	G		\$1000
			\$750
Dolores Sandoval 741 Limerick Court Sunnyvale, CA 94087	G	Reimbursement of expenses: No vendor received over \$100	\$155.49
Eileen Hodson 2004 Koopmans Avenue Santa Cruz, CA 95062	G	Reimbursement of expenses: Vendor receiving over \$100: Price Club 1111 Story Rd. San Jose \$130 U.S. Postal Service, San Jose \$100	\$285
El Camino Village, Inc. 867 West Dana Mountain View, CA 94041	G		\$300
El Observador P.O. Box 1990 San Jose, CA 95109	N		\$100
Evelyn Sanchez 776 Concord Ave. San Jose	G	Reimbursement of Expenses: Vendor receiving \$100: U.S. Postal Service, San Jose	\$100
Foxcorp California Inc./FXC 970 South Second Street San Jose, CA 95112	G		\$154.08 \$162.74 \$3344.65
		<b>SUBTOTAL</b>	\$6351.96

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
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NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Globe Insta Print 1465 South First Street San Jose, CA 95110	L		\$314.31
Grantree Furniture Rental 3530 Stevens Creek Blvd. San Jose, CA	G		\$444 \$323.59
Irving Hemingway 3641 Adrich Way San Jose, CA 95121	G		\$1500
Julie Starr 2798 Lantz Avenue San Jose, CA 95124	L	Reimbursement of expenses: Vendor receiving \$220.69 Copy Place, 1715 El Camino, Santa Clara	\$220.69
Just Deserts 1970 Carroll Avenue San Francisco, CA 95124	G		\$327
Knights Catering 550 Alabama Street San Francisco, CA 94110	G		\$1600
Linda Brandt 5403 Russo San Jose, CA	G	Reimbursement of child care expenses	\$250
		<b>SUBTOTAL</b>	\$4979.59

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
--	--------------------------------------

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LOGO 1380 Piper Drive Milpitas, CA 95035	O		\$903.10
M.A.D. Stakes and Panels 2294 Senter Road San Jose, CA 95112	O		\$269.64 \$404.46 \$269.64 \$269.64
Magnolia Jazz Band P.O. Box 9798 Stanford, CA 94305	G		\$280
Maple Press 412 East Santa Clara San Jose	L		\$150
Mary Ruth Gross 666 Gelleon Court San Jose, CA 95133	G	Reimbursement of expenses: Vendors Receiving \$100+: Price Club, 1111 Story, San Jose \$685.09, \$277.62	\$275.47 \$277.62 \$685.09
		Arvey's Paper & Supply, 1381 N. 10th San Jose, \$179.93	
McKee La-Pala Liquors 3750 McKee Road San Jose	F		\$334.42
		<b>SUBTOTAL</b>	\$4119.08

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/23/88	12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
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✓ Melanie Kimbel 1758 Ewer Drive San Jose, CA 95124	G		\$375
✓ Novak Business Service P.O. Box 532 Half Moon Bay, CA 94019	G		\$750
✓ Palo Alto Unitarian Church 505 East Charleston Road Palo Alto, CA 94306	G		\$364.61
✓ P.G. & E. 111 Almaden Blvd. San Jose, CA	G		\$185
Pick Your Part, Inc. 1050 South Third Street San Jose, CA 95112	G		\$243.80
Porter Rents 2485 Old Middlefield Way Mountain View, CA 94043	G		\$226.71
San Jose Office Supply 52 South First Street San Jose, CA 95113	G		\$113.70
		<b>SUBTOTAL</b>	\$916.77
			\$3175.59

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

PAGE 1 OF 1

STATEMENT COVERS PERIOD  
FROM 10/23/88 THROUGH 12/31/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

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NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
San Jose Teachers Association Political Action Committee 2476 Almaden Expressway San Jose, CA 95125	G	Reimbursement of phone bills from phone banks.	\$722.68 \$257.32
Sharon Cooper 320-B Curtner Palo Alto, CA 94306	G	Reimbursement of expenses: Vendor receiving \$144.40: Access Communications, 10300 W. Office Houston, TX 77042	\$188.26
Teri Train 101 Middlefield Road Atherton, CA 94025	G	Reimbursement of expenses: No vendor recieved over \$100	\$127.21
The Office Club 3951 Stevens Creek Blvd. Santa Clara, CA 95051	G		\$151.48
U.S. Postmaster San Jose, CA	L		\$157.85 \$800 \$125
Kinko's Copies 481 E. San Carlos Street San Jose, CA 95112	L		\$131.61
U.S. Postmaster Sacramento, CA 95814	L		\$300
		<b>SUBTOTAL</b>	2961.41





FORM 420  
1988

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

Statement covers period 10/1/83 through 10/22/88

OCT 26 1988

GEORGE A. MANK  
REGISTRAR OF VOTERS

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

- PRE-ELECTION STATEMENT
- SEMI-ANNUAL STATEMENT
- SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 495 and attach it to this statement.)
- BALLOT MEASURE QUALIFICATION STATEMENT
- SPECIAL ODD-YEAR CAMPAIGN REPORT
- TERMINATION STATEMENT (Attach a Form 415 to this Form 420)

OFFICIAL USE ONLY

NAME OF COMMITTEE: Santa Clara County United Democratic Campaign '83  
I.D. NUMBER: 871053

ADDRESS OF COMMITTEE: NO AND STREET: P.O. Box 6798  
CITY: San Jose, CA  
STATE: CA  
ZIP CODE: 95150  
AREA CODE/PHONE NUMBER: 408/998-3366

NAME OF TREASURER: Ed Hoffman

PERMANENT ADDRESS OF TREASURER: NO AND STREET: 1471 Hampton Drive  
CITY: Sunnyvale  
STATE: CA  
ZIP CODE: 94087  
AREA CODE/BUSINESS PHONE NUMBER: 415/965-5665

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

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

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

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

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

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

Attach additional information on appropriately labeled continuation sheets.

VERIFICATION

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

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

EXECUTED ON 10/26/88 AT San Jose, CA BY [Signature]  
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

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

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

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

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

EXECUTED ON \_\_\_\_\_ AT \_\_\_\_\_ BY \_\_\_\_\_  
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE, OFFICEHOLDER OR PROPONENT)

FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE "INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT."

300407/3810

**CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE  
FORM 420 OR 490**  
(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD  
FROM 10/1/88 THROUGH 10/22/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871053

CONTRIBUTIONS RECEIVED	COLUMN A Cumulative total from previous period	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions.....	\$ 25735.37	\$ 5399.88 <small>SCHEDULE A, LINE 3</small>	\$ 31135.25
2. Loans received.....	3250	(\$3250) <small>SCHEDULE B, LINE 7</small>	0
3. SUBTOTAL CASH RECEIPTS.....	\$ 28985.37 <small>LINES 1 + 2</small>	\$ 2149.88 <small>LINES 1 + 2</small>	\$ 31135.25 <small>LINES 1 + 2</small>
4. Non-monetary contributions.....	19037.98	4196.50 <small>SCHEDULE C, LINE 3</small>	23234.48 <small>LINES 1 + 2</small>
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES.....	48023.35 <small>LINES 3 + 4</small>	6346.38 <small>LINES 3 + 4</small>	54369.73 <small>LINES 3 + 4</small>
6. Enforceable Promises (Except loan guarantees, see Line 18 below).....	0	0 <small>SCHEDULE D, LINE 7</small>	0 <small>LINES 3 + 4</small>
7. TOTAL CONTRIBUTIONS.....	\$ 48023.35 <small>LINES 5 + 6</small>	\$ 6346.38 <small>LINES 5 + 6</small>	\$ 54369.73 <small>LINES 5 + 6 (SHOULD EQUAL LINE 7, COLUMNS A + B)</small>
<b>EXPENDITURES MADE</b>			
8. Payments.....	\$ 40651.97	\$16601.15 <small>SCHEDULE E, LINE 5</small>	\$ 57253.12 <small>LINES 5 + 6</small>
9. Loans Made.....	0	0 <small>SCHEDULE EE, LINE 7</small>	0 <small>LINES 5 + 6</small>
10. SUBTOTAL.....	40651.97 <small>LINES 8 + 9</small>	16601.15 <small>LINES 8 + 9</small>	57253.12 <small>LINES 8 + 9</small>
11. Accrued expenses (unpaid bills).....	4052.75	-4052.75 <small>SCHEDULE F, LINE 5</small>	0 <small>LINES 8 + 9</small>
12. TOTAL EXPENDITURES.....	\$ 44704.72 <small>LINES 10 + 11</small>	\$ 12548.40 <small>LINES 10 + 11</small>	\$ 57253.12 <small>LINES 10 + 11 (SHOULD EQUAL LINE 12, COLUMNS A + B)</small>

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

**STATEMENT OF CHANGES IN FINANCIAL CONDITION**

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.).....	\$ 2553	
14. Cash receipts this period (Line 3, Column B above).....	2149.88	
15. Miscellaneous increases to cash (Schedule G, Line 4).....	14400	
16. Cash payments this period (Line 10, Column B above).....	16601.15	
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.).....		\$ 2501
18. Amount of loan guarantees received (Schedule B, Part I, Column (b)).....		ENDING CASH ON HAND SHOULD NOT BE A NEGATIVE AMOUNT
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse.....		\$ 0
20. Outstanding debts (Line 2 + Line 11 of Column C above).....		\$ 0

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

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

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: <b>Santa Clara County United Democratic Campaign '88</b>	I.D. NUMBER (IF COMMITTEE) <b>871053</b>
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DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION	AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	RECEIVED THIS PERIOD	CUMULATIVE TO DATE
10/4/88	National Association of Letter Carriers Branch 193 PAC I.D. # 1715 Mt. Pleasant Road San Jose, CA 95148	Occupation: #870199 Employer:	\$500	\$1330
10/4/88	Stanislaus County Democratic Central Committee ID #742328 120 McHenry Modesto, CA 95354	Occupation: Employer:	\$200	\$200
10/6/88	Friends of Rod Diridon I.D. # 742497 P.O. Box 621 Santa Clara, CA 95052	Occupation: Employer:	\$500	\$800
10/7/88	18th Assembly District Voter Registration Committee 39143 Civic Center Drive Fremont, CA 94538	Occupation: ID #881415 Employer:	\$100	\$100
10/11/88	Building and Construction Trades Council of Santa Clara & San Benito Counties 2102 Almaden Road #208 San Jose, CA 95125	Occupation: Employer: ID # 743618	\$200	\$450
10/7/88	Robin Yeamans for Assembly ID # S80698 P.O. Box 834 Saratoga, CA 95071	Occupation: Employer:	\$119.95	\$119.95
10/8/88	Friends of Andrea Leiderman ID # 3117 Middlefield Road Palo Alto, CA 94306	Occupation: Employer:	\$35	\$100
<b>SUBTOTAL</b>			\$1654.95	

**SUMMARY**

1. AMOUNT RECEIVED -- CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals) .....	\$ 5027.88
2. AMOUNT RECEIVED -- CONTRIBUTIONS OF LESS THAN \$100 (Not itemized) .....	372.00
3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1, Column B of Summary Page .....	\$ 5399.88

**SCHEDULE A  
MONETARY CONTRIBUTIONS RECEIVED  
(CONTINUATION SHEET)**

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88

<b>NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:</b> Santa Clara County United Democratic Campaign '88	<b>I.D. NUMBER (IF COMMITTEE)</b> 871053
---	---

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
10/14/88	Citizens for Zoe Lofgren P.O. Box 326 San Jose, CA 95103 ID # 791120	Occupation:		\$1000	\$1000
		Employer:			
10/12/88	Santa Clara Semiconductor 1992 Junction Avenue San Jose, CA 95131	Occupation:		\$150	\$150
		Employer:			
10/17/88	Eric Hartman 1425 Park Avenue San Jose, CA 95126	Occupation: Attorney		\$200	\$200
		Employer: Self			
10/19/88	Unity '88 703 B Street, San Mateo, CA Miguel Martinez, Treasurer 304 Kains Ave., San Bruno, CA	Occupation:		\$125	\$507
		Employer:			
10/21/88	Santa Clara County Democratic Central Committee ID #744307	Occupation:		\$1000	
10/21/88	P.O. Box 4926 San Jose, CA 95150	Employer:		\$397.93	\$8447.42
		Occupation:			
		Employer:			
		Occupation:			
		Employer:			
		Occupation:			
		Employer:			
<b>SUBTOTAL</b>				\$3372.93	

**SCHEDULE B -- LOANS RECEIVED (PART 1)**  
**FORM 420 OR 490**  
 (Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM 10/1/88	THROUGH 10/22/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
--	--------------------------------------

**PART I: LOANS RECEIVED**

DATE REC'D.	FULL NAME AND ADDRESS OF LENDER <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION	INT. RATE	DUE DATE	AMOUNT OF LOAN	CUMULATIVE TO DATE
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>				
		Occupation:				
		Employer:				
		Occupation:				
		Employer:				
<b>SUBTOTAL</b>					(a)	

FULL NAME AND ADDRESS OF GUARANTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION	AMOUNT GUARANTEED
	EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>	
NAME OF LENDER	Occupation:	
	Employer:	
NAME OF LENDER	Occupation:	
	Employer:	
<b>SUBTOTAL</b> <small>DO NOT CARRY THIS AMOUNT TO THE SUMMARY BELOW. ENTER ON LINE 18 OF THE SUMMARY PAGE.</small>		(b) \$

**SUMMARY**

1. LOANS OF \$100 OR MORE RECEIVED THIS PERIOD (Part 1 (a))	\$	
2. LOANS UNDER \$100 RECEIVED THIS PERIOD (Not itemized)		
3. TOTAL LOANS RECEIVED THIS PERIOD (Line 1 + 2)		
4. LOANS OF \$100 OR MORE REPAID, FORGIVEN OR PAID BY A THIRD PARTY THIS PERIOD (Part 2, Column (c))	3250	
5. LOANS UNDER \$100 REPAID, FORGIVEN OR PAID BY A THIRD PARTY (not previously itemized) (If forgiven or paid by a third party, also enter amount on Line 2 of the summary section of Schedule A)	0	
6. TOTAL LOANS REPAID, FORGIVEN OR PAID BY A THIRD PARTY THIS PERIOD (Line 4 + 5)		\$ 3250
7. NET CHANGE THIS PERIOD (Subtract Line 6 from Line 3) Enter the difference here and on Line 2, Column B of Summary Page		\$ - 3250

(May be negative figure)



**SCHEDULE C  
NON-MONETARY CONTRIBUTIONS RECEIVED  
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88
I.D. NUMBER (IF COMMITTEE)	
871053	

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '38

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		DESCRIPTION OF GOODS OR SERVICES	FAIR MARKET VALUE RECEIVED	CUMULATIVE AMOUNT
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>				
10/1/88	George Tsukagawa 454 Marich Way Los Altos, CA 94022	Occupation: Retired		use of office space at 333 Bryant Street Mt. View, CA	\$2000	12000
10/1/88	Phil Ball Pick-Your-Part, Inc. 13211 Garden Grove Bl Suite 100 Garden Grove, CA 92643	Occupation:		use of office space at 1050 S. Third St. San Jose, CA	\$1800	\$10800
10/8/88	Mike Olmstead 3825 Middlefield Road Palo Alto, CA 94303	Occupation: Entertainment Dir.		Tickets to 49'ers games	\$100	\$100
10/8/88	Luella McFarland 13661 La Paloma Road Palo Alto, CA 94303	Occupation:		Weekend stay at house at Inverness	\$120	\$120
		Occupation:				
		Employer:				
		Occupation:				
		Employer:				
		Occupation:				
		Employer:				
<b>SUBTOTAL</b>					\$4020	

820407622

**SUMMARY**

1. NON-MONETARY CONTRIBUTIONS OF \$100 OR MORE RECEIVED THIS PERIOD.....	\$ 4020
2. NON-MONETARY CONTRIBUTIONS UNDER \$100 RECEIVED THIS PERIOD (Not itemized).....	176.50
3. TOTAL NON-MONETARY CONTRIBUTIONS RECEIVED THIS PERIOD (Line 1 + Line 2) Enter here and on Line 4 Column B of Summary Page.....	\$ 4196.50

**SCHEDULE E  
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOAN) MADE  
FORM 420 OR 490**

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88
I.D. NUMBER (IF COMMITTEE)	
871053	

(Amounts May Be Rounded To Whole Dollars)

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

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

R 0 0 4 0 7 / 3 8 2 3

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
A Button Factory 14742 Eastview Drive Los Gatos, CA 95030	O		\$621 \$569
Arvey Paper & Supply 1381 North 10th Street San Jose, CA 95112	G		\$132.06 \$105.20 \$132.79
Button King 2355 Old Oakland Road #2 San Jose, CA 95131	O		\$204.46 \$200.00
Dolores Sandoval 741 Limerick Court Sunnyvale, CA 94087	G		\$750
<b>SUBTOTAL</b>			\$2714.51

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

**SUMMARY**

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD (Include all Schedule E subtotals) .....	\$ 11448.86
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized) .....	1099.54
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS (Schedule B, Part 2, Column (d)) .....	0
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4) .....	4052.75
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of Summary Page .....	\$ 16601.15

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
--	--------------------------------------

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Eileen Hodson 2004 Koopmans Ave Santa Cruz, CA 95062	G	Reimbursement of expenses No vendor received \$100 or more.	\$137.20
Elizabeth Milrod 1151 Lisa Lane Los Altos, CA 94022	G	Reimbursement of expenses No vendor received \$100 or more.	\$125.42
Fidelity Printing 90 North 25th Street San Jose, CA 95116	L/O		\$1440.30 \$700
Logo 1380 Piper Drive Milpitas, CA 95035	O		\$416.05 \$543.55
M.A.D. Stakes & Panels 2294 Senter Road San Jose, CA 95112	G		\$121.34 \$112.35 \$269.64
Mary Ruth Gross 666 Galleon Court San Jose, CA 95133	G	Reimbursement of expenses: Vendor receiving \$100 +: Price Club 1111 Story Road, San Jose \$139.48 and \$181.51	\$234.54 \$181.51
Melanie Kimbel 1758 Ewer Drive San Jose, CA 95124	G		\$750 \$750
		<b>SUBTOTAL</b>	\$5781.90

**SCHEDULE E  
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE  
CONTINUATION SHEET)**

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
10/1/88	10/22/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
--	--------------------------------------

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Melanie Milrod 1151 Lisa Lane Los Altos, CA 94022	F	Vendor receiving \$100 or more: Price Club, 150 Lawrence Station, Sunnyvale \$337	\$519.71
The Office Club 3951 Stevens Creek Blvd. Santa Clara, CA 95051	G		\$257.40 \$127.43
Pacific Bell Political Accounts Sacramento, CA 95887	G		\$630.16 \$456.70
Rome Enterprises 1133 South Sixth Street San Jose, CA 95112	O		\$256.80
U.S. Postmaster San Jose, CA 95101	G		\$200 \$150 \$125
Waste Management, Inc. 715 Comstock Santa Clara, CA 9505x	G		\$120
Globe Insta Print 1465 South First Street San Jose, CA 95110	L		\$109.25
		<b>SUBTOTAL</b>	\$2952.45







RECIPIENT COMMITTEE  
CAMPAIGN STATEMENT

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

FORM 420  
1988

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

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

- PRE ELECTION STATEMENT
- SEMI-ANNUAL STATEMENT
- SUPPLEMENTAL PRE-ELECTION STATEMENT (If filing a Supplemental Pre-Election Statement, you must complete Form 495 and attach it to this statement.)
- BALLOT MEASURE QUALIFICATION STATEMENT
- SPECIAL ODD-YEAR CAMPAIGN REPORT
- TERMINATION STATEMENT (Attach a Form 415 to this Form 420)

OFFICIAL USE ONLY

NAME OF COMMITTEE: Santa Clara County United Democratic Campaign '88  
ID NUMBER: 371350

ADDRESS OF COMMITTEE: P.O. Box 6798, San Jose, CA 95150  
AREA CODE/PHONE NUMBER: 408/998-3366

NAME OF TREASURER: Ed Hoffman

PERMANENT ADDRESS OF TREASURER: 1471 Hampton Drive, Sunnyvale, CA 94087  
AREA CODE BUSINESS PHONE NUMBER: 415/965-5665

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

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

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

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

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

NAME OF CANDIDATE OR MEASURE	SUPPORT	OPPOSE	OFFICE OF CANDIDATE OR	BALLOT MEASURE NUMBER OR LETTER AND JURISDICTION
All Democratic candidates--	XX			

Attach additional information on appropriately labeled continuation sheets

VERIFICATION

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

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.  
EXECUTED ON 7/5/88 AT San Jose BY [Signature]  
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER)

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

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

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

FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977 SEE "INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT"

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

(Amounts May Be Rounded To Whole Dollars)

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Santa Clara County United Democratic Campaign '88

ID NUMBER (IF COMMITTEE)

371053

**CONTRIBUTIONS RECEIVED**

	COLUMN A Cumulative total from previous period	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
1. Monetary contributions.....	\$ 3204.44	\$ 17530.93	\$ 25735.37
2. Loans received.....	0	SCHEDULE A, LINE 3 3250.00	3250.00
3. SUBTOTAL CASH RECEIPTS.....	\$ 8204.44	SCHEDULE B, LINE 7 \$ 20780.93	\$ 28985.37
4. Non-monetary contributions.....	LINES 1 + 2 7657.98	LINES 1 + 2 11400.00	LINES 1 + 2 19037.98
5. TOTAL CONTRIBUTIONS WITHOUT ENFORCEABLE PROMISES.....	\$15842.42	SCHEDULE C, LINE 3 32180.93	48023.35
6. Enforceable Promises (Except loan guarantees, see Line 18 below).....	LINES 3 + 4 0	LINES 3 + 4 0	LINES 3 + 4 0
7. TOTAL CONTRIBUTIONS.....	\$15842.42	SCHEDULE D, LINE 7 \$ 32180.93	\$ 48023.35
	LINES 5 + 6	LINES 5 + 6	LINES 5 + 6 (SHOULD EQUAL LINE 7, COLUMNS A + B)

**EXPENDITURES MADE**

8. Payments.....	\$ 6650.57	\$ 34001.40	\$ 40651.97
9. Loans Made.....	0	SCHEDULE E, LINE 5 0	0
10. SUBTOTAL.....	6650.57	SCHEDULE EE, LINE 7 34001.40	40651.97
11. Accrued expenses (unpaid bills).....	LINES 8 + 9 207.37	LINES 8 + 9 3844.88	LINES 8 + 9 4052.75
12. TOTAL EXPENDITURES.....	\$ 6358.44	SCHEDULE F, LINE 5 \$ 37846.28	\$ 44704.72
	LINES 10 + 11	LINES 10 + 11	LINES 10 + 11 (SHOULD EQUAL LINE 12 COLUMNS A + B)

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

**STATEMENT OF CHANGES IN FINANCIAL CONDITION**

13. Cash on hand at the beginning of this period. (Enter "Cash on hand at end of reporting period" from previous statement filed.).....	\$ 2173.77	
14. Cash receipts this period (Line 3, Column B above).....	20780.93	
15. Miscellaneous increases to cash (Schedule G, Line 4).....	13600.00	
16. Cash payments this period (Line 10, Column B above).....	34001.40	
17. Cash on hand at end of reporting period (Lines 13 + 14 + 15 - 16 above) (If this is a Termination Statement, Line 17 must be Zero.).....		\$ 2553
18. Amount of loan guarantees received (Schedule B, Part I, Column (b))......		0
19. Cash equivalents (other assets held including outstanding loans made to others). Important: See instructions on reverse.....		0
20. Outstanding debts (Line 2 + Line 11 of Column C above).....		\$ 7302.75

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

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

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

PAGE    OF   

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
871050

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
7/23/88 8/12/88	Alquist Campaign Committee I.D. # 742256 P.O. Box 6475, San Jose, 95150	Occupation:		\$60	\$160
		Employer:		\$100	
8/24/88	Building and Construction Trade Council of Santa Clara & San Benito 2102 Almaden Road #208 San Jose, CA 95125	Occupation:		\$100	\$250
		Employer: I.D. #743613			
8/1/88	California Planners and Consultants P.O. Box 1183 San Jose, CA 95108	Occupation:		\$100	\$100
		Employer:			
8/18/88	Campaign California 1337 Santa Monica Mall #301 Santa Monica, CA 90401 Carolyn Somers, Treasurer. 3700 Sepulveda	Occupation:		\$100	\$100
		Employer: L.A., CA 90034			
8/3/88	Central Labor Council of Santa Clara County-COPE ID#744711 2102 Almaden Road San Jose, CA 95125	Occupation:		\$100	\$100
		Employer:			
7/14/88 8/18/88	Committee for Delaine Eastin P.O. Box 732 Union City, CA 94587 ID # 791904	Occupation:		\$10	\$210
		Employer:		\$50	
8/7/88	Democratic Organization Assistance Club, Russell Valley 215 Avenida Espana San Jose, CA 95139	Occupation: Treasurer		\$100	\$100
		Employer:			
<b>SUBTOTAL</b>				\$720	

**SUMMARY**

1. AMOUNT RECEIVED -- CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals) .....	\$ 13851.49
2. AMOUNT RECEIVED -- CONTRIBUTIONS OF LESS THAN \$100 (Not itemized) .....	3679.44
3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1, Column B of Summary Page .....	\$ 17530.93

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

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Santa Clara County United Democratic Campaign '83

I.D. NUMBER (IF COMMITTEE)

871953

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
7/14/88	Don Edwards Congressional Campaign Fund FEC # 052531 P.O. Box 28127 San Jose, CA 95159	Occupation:		\$100	\$250
		Employer:			
7/13/88 8/12/88	Friends of Rod Diridon P.O. Box 621 Santa Clara, CA 95052 I.D. #742497	Occupation:		\$100 \$200	\$300
		Employer:			
7/29/88 9/26/88	McCorquodale Committee P.O. Box 6464 San Jose, CA 95150 I.D. #745328	Occupation:		\$1000 \$1000	\$2000
		Employer:			
7/14/88 7/29/88	National Association of Letter Carriers Branch 193 P.A.C. ID 1715 Mt. Pleasant Road San Jose, CA 95148	Occupation:	#870199	\$30 \$500	\$830
		Employer:			
8/23/88	Operating Engineers Local 3 474 Valencia Street San Francisco, CA 94103 ID # 743063	Occupation:		\$100	\$190
		Employer:			
8/12/88	Plumbers Local 193 Seperate-Segregated Political Fund 370 Umbarger Road San Jose, CA 95111	Occupation:		\$500	\$800
		Employer:			
7/7/88 8/13/88 8/30/88 9/3/88	Santa Clara County Democratic Central Committee ID # 744307 P.O. Box 4926	Occupation:		\$1735.00 \$1500.19 \$1500.00 \$1100.00	
9/3/88	San Jose, CA 95150	Occupation:		\$714.30	\$6549.49
		Employer:			
8/29/88	Santa Clara County Democratic Registration '88 ID#870890 P.O. Box 6798, San Jose, 95150	Occupation:		\$800	\$800
		Employer:			
<b>SUBTOTAL</b>				\$10879.49	

**SCHEDULE A  
MONETARY CONTRIBUTIONS RECEIVED  
(CONTINUATION SHEET)**

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

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Santa Clara County United Democratic Campaign '83

ID NUMBER (IF COMMITTEE)

871053

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT	
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		RECEIVED THIS PERIOD	CUMULATIVE TO DATE
8/8/88 8/29/88	SEIU Local 535 Political Action Committee I.D. # 830173 661 27th Street Oakland, CA 94612	Occupation:		\$100 \$50	\$200
		Employer:			
7/11/88 9/29/88	Supervisor Wilson Committee I.D. # 746330 P.O. Box 5612 San Jose, CA 95150	Occupation:		\$50 \$500	\$550
		Employer:			
8/26/88	United Food & Commercial Workers Active Ballot Club 1775 K Street N.W. Washington, D.C. 20006	Occupation:		\$500	\$650
		Employer:			
9/24/88	Unity '88 703 B Street San Mateo, CA 94401 Miguel Martinez, Treasurer 304 Kains Ave., San Bruno, CA 94066	Occupation:		\$382	\$382
		Employer:			
8/1/88	Rob Bettencourt P.O. Box 8241 San Jose, CA 95155	Occupation: Retired Dairy Farmer		\$100	\$250
		Employer:			
8/1/88	Frank Biehl 7 Eagle Hill Terrace Redwood City, CA 94063	Occupation:		\$100	\$100
		Employer:			
7/14/88 7/29/88	Paul and Jean Garrett 890 California Palo Alto, CA 94306	Occupation: Retired		\$20 \$150	\$480
		Employer:			
8/25/88	Robert Muellely 710 Rose Lane Los Altos, CA 94022	Occupation: Consultant/investor		\$100	\$100
		Employer: Self			
8/2/88	Cheryl Page 5266 Estrade Drive San Jose, CA 95118	Occupation: Mkt. Engineer		\$100	\$100
		Employer: Software Publishing			
<b>SUBTOTAL</b>				\$2152	



**SCHE B -- LOANS RECEIVED (PART 1)**  
**FORM 420 OR 490**  
 (Amounts May Be Rounded To Whole Dollars)

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
 Santa Clara County United Democratic Campaign '83

I.D. NUMBER (IF COMMITTEE)  
 871053

**PART I: LOANS RECEIVED**

DATE REC'D	FULL NAME AND ADDRESS OF LENDER <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		INT RATE	DUE DATE	AMOUNT OF LOAN	CUMULATIVE TO DATE
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>					
9/22/88	Greg Larson 572 North Second Street San Jose, CA 95112	Occupation: Budget Director				\$3250	\$3250
		Employer: City of San Jose					
		Occupation:					
		Employer:					
<b>SUBTOTAL</b>						(a) \$3250	

FULL NAME AND ADDRESS OF GUARANTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		AMOUNT GUARANTEED
	EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>		
NAME OF LENDER	Occupation:		
	Employer:		
NAME OF LENDER	Occupation:		
	Employer:		
<b>SUBTOTAL</b> <small>DO NOT CARRY THIS AMOUNT TO THE SUMMARY BELOW. ENTER ON LINE 1B OF THE SUMMARY PAGE.</small>			(b) \$

**SUMMARY**

1. LOANS OF \$100 OR MORE RECEIVED THIS PERIOD (Part 1 (a))	\$ 3250.00	
2. LOANS UNDER \$100 RECEIVED THIS PERIOD (Not itemized)	0	
3. TOTAL LOANS RECEIVED THIS PERIOD (Line 1 + 2)		\$ 3250.00
4. LOANS OF \$100 OR MORE REPAYED, FORGIVEN OR PAID BY A THIRD PARTY THIS PERIOD (Part 2, Column (c))	0	
5. LOANS UNDER \$100 REPAYED, FORGIVEN OR PAID BY A THIRD PARTY (not previously itemized) (If forgiven or paid by a third party, also enter amount on Line 2 of the summary section of Schedule A)	0	
6. TOTAL LOANS REPAYED, FORGIVEN OR PAID BY A THIRD PARTY THIS PERIOD (Line 4 + 5)		0
7. NET CHANGE THIS PERIOD (Subtract Line 6 from Line 3) Enter the difference here and on Line 2, Column B of Summary Page		\$ 3250.00

(May be negative figure)

**SCHEDULE C  
NON-MONETARY CONTRIBUTIONS RECEIVED  
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM 7/1/88	THROUGH 9/30/88
I.D. NUMBER (IF COMMITTEE) 071053	

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:

Santa Clara County United Democratic Campaign '88

DATE REC'D.	FULL NAME AND ADDRESS OF CONTRIBUTOR <small>(IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)</small>	OCCUPATION		DESCRIPTION OF GOODS OR SERVICES	FAIR MARKET VALUE RECEIVED	CUMULATIVE AMOUNT
		EMPLOYER <small>(IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)</small>				
7/1/88 8/1/88 9/1/88	George Tsukagawa 454 Marich Way Los Altos, CA 94022	Occupation:		Use of office space at 333 Bryant Street Mt. View, CA	\$2000.00 \$2000.00 \$2000.00	\$10000.00
		Employer:				
7/1/88 8/1/88 9/1/88	Phil Ball Pick-Your-Part, Inc. 13211 Garden Grove BL Suite 100 Garden Grove, CA 92643	Occupation:		Use of office space at 1050 S Third St. San Jose, CA	\$1800.00 \$1800.00 \$1800.00	\$9000.00
		Employer:				
		Occupation:				
		Employer:				
		Occupation:				
		Employer:				
		Occupation:				
		Employer:				
<b>SUBTOTAL</b>					\$11400.00	

**SUMMARY**

- |  |                    |
|--|--------------------|
| 1. NON-MONETARY CONTRIBUTIONS OF \$100 OR MORE RECEIVED THIS PERIOD .....  | <u>\$ 11400.00</u> |
| 2. NON-MONETARY CONTRIBUTIONS UNDER \$100 RECEIVED THIS PERIOD (Not itemized).....   | <u>0</u>           |
| 3. TOTAL NON-MONETARY CONTRIBUTIONS RECEIVED THIS PERIOD<br>(Line 1 + Line 2) Enter here and on Line 4 Column B of Summary Page..... | <u>\$ 11400.00</u> |

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

PAGE 9 OF 17

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD

FROM 7/1/88 THROUGH 9/30/88

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

ID NUMBER (IF COMMITTEE)  
871050

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER ID NUMBER OR, IF NO ID NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
A Button Factory 14742 Eastview Drive Los Gatos, CA 95030	0		\$347
			\$207
			\$207
			\$207
			\$414
			\$569
			\$414
			\$414
Amanda Kemp P.O. Box 10266 Stanford, CA 94309		Grant/gift for Democratic Convention travel	\$100
<b>SUBTOTAL</b>			\$2379

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

**SUMMARY**

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD (Include all Schedule E subtotals) .....	\$ 30707.40
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized) .....	3086.13
3. TOTAL INTEREST PAID THIS PERIOD ON OUTSTANDING LOANS (Schedule B, Part 2, Column (d)) .....	0
4. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Schedule F, Line 4) .....	207.87
5. TOTAL PAYMENTS THIS PERIOD (Line 1 + 2 + 3 + 4) Enter here and on Line 8, Column B of Summary Page .....	\$ 34001.40

**SCHEDULE E  
PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE  
(CONTINUATION SHEET)**

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
7/1/03	9/30/06
I.D. NUMBER (IF COMMITTEE)	
571053	

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '08

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

37040715837

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Arthur Lynch 520 Benvenue Los Altos, CA 94022 VENDOR RECEIVING \$100 OR MORE	G	Reimbursement of Expenses	\$234.30
Sclavo, Inc. \$138 1240 Elko Drive Sunnyvale, CA 94089			
Arvey Paper and Supply 1381 North 10th Street San Jose, CA 95112	G		\$106.68
Carol El-Shaieb 5023 Wilma Way San Jose, CA 95124		Grant/gift for Democratic convention travel	\$100
Cecelia Arroyo 1049 Hillview Drive Milpitas, CA 95035		Grant/gift for Democratic convention travel	\$100
Dolores Sandoval 741 Limerick Court Sunnyvale, CA 94087	G		\$750 \$750
Dorene Giacomini 999 Rawlings Drive San Jose, CA 95136		Grant/gift for Democratic	\$100
		<b>SUBTOTAL</b>	\$2140.98

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

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER OF COMMITTEE: 871053
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**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

3 2 0 4 0 7 5 8 3 8

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
El Camino Village Inc. 867 W. Dana Mountain View, CA 94041	G		\$325.00 \$300.00 \$331.00
Elizabeth Milrod 1151 Lisa Lane Los Altos, CA 94022		Grant/gift for Democratic convention travel	\$100
Elizabeth Milrod 1151 Lisa Lane Los Altos, CA 94022	G	Reimbursement of expenses	\$158.46
VENDOR RECEIVING \$100 or MORE: Price Club \$158.46 150 Lawrence Station Sunnyvale, CA 94086			
Fidelity Printing 90 North 26th Street San Jose, CA 95116	L		\$1034.69 \$1080.70 \$192.60
Francisca Vargas 65 Sunol Street San Jose, CA 95126		Grant/gift for Democratic convention travel	\$100
Globe Insta Print 1465 South First Street San Jose, CA 95110	L		\$450.48 \$119.30 \$127.60 \$364.45
		<b>SUBTOTAL</b>	<b>\$ 4684.45</b>

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
7/1/83	9/30/83

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 871053
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**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

939  
839  
139  
071  
040  
071  
040  
071

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Hyatt San Jose 1740 North First Street San Jose, CA 95112	F		\$500 \$1598.50
Irving Hemingway 1641 Adrich Way San Jose, CA 95121	G	Reimbursement of expenses	\$257.90
<del>VENDOR RECEIVING \$100 or MORE:</del> Foster Brothers Security 555 South Murphy Avenue Sunnyvale, CA 94086			\$209.23
Katherine Moberley 5198 Alan Avenue San Jose, CA 95124		Grant/gift for Democratic Convention travel	\$100
Keith Archuleta 427 Mirrielees Stanford, CA 94305		Grant/gift for Democratic convention travel	\$100
Logo 1380 Piper Drive Milpitas, CA 95035	G		\$416.05
Melanie Kimbel 1758 Ewer Drive San Jose, CA 95124	G		\$750 \$750 \$750 \$750
		<b>SUBTOTAL</b>	\$5972.45

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

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '88	I.D. NUMBER (IF COMMITTEE) 071053
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**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

930407/380

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Mostafa Khosroshami-Mofagh 679 Catala Court Santa Clara, CA 95050		Grant/gift for Democratic convention travel	\$100
Orchard Supply Hardware 3000 Alum Rock San Jose, CA 95127	G		\$211.49
Pacific Bell Political Accounts Sacramento, CA 95887	G		\$132.56 \$1060.00 \$148.51 \$232.48
			\$3200.00
Palo Alto Unitarian Church 505 East Charleston Road Palo Alto, CA 94306	F		\$200
Pick Your Part, Inc. 1050 South Third Street San Jose, CA 95112	G		\$930.00 \$568.00
Repo Depo 1585 North Fourth Street San Jose, CA 95112	G		\$213.73
		<b>SUBTOTAL</b>	\$6996.77

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

STATEMENT COVERS PERIOD	
FROM	THROUGH
7/1/83	9/30/83

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE: Santa Clara County United Democratic Campaign '83	ID. NUMBER (IF COMMITTEE) 571053
--	-------------------------------------

**CODES FOR CLASSIFYING EXPENDITURES**

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER ID NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
San Jose Office Supply 52 South First Street San Jose, CA 95113	G		\$207.58
Santa Clara County Registrar of Voters 1553 Berger Drive San Jose, CA	G		\$129
Sign Technology 3380 Victor Court Santa Clara, CA 95054	G		\$347.75
The Office Club 3951 Stevens Creek Blvd. Santa Clara, CA 95051	G		\$126.42
Tom Martinez 1069 Locust San Jose, CA 95110	G	Carpet cleaning service	\$120.00
U.S. Postmaster San Jose, CA 951xx	L		\$150, \$720
			\$300
			\$100
			\$375
			\$200
			\$100
			\$400
			\$250
			\$208
		<b>SUBTOTAL</b>	\$3733.75



**SCHEDULE F  
ACCRUED EXPENSES  
(UNPAID BILLS)  
FORM 420 OR 490**

(Amounts May Be Rounded To Whole Dollars)

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

NAME OF CANDIDATE, OFFICEHOLDER OR COMMITTEE:  
Santa Clara County United Democratic Campaign '88

I.D. NUMBER (IF COMMITTEE)  
S71053

**CODES FOR CLASSIFYING ACCRUED EXPENSES**

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

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

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

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER OR, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME AND ADDRESS)	CODE OR	DESCRIPTION OF OUTSTANDING PAYMENT	AMOUNT ACCRUED
FXC/Foxcorp California, Inc. 970 South Second Street San Jose, CA 95112		Telephone installation and rental charges for Mt. View and San Jose offices.	\$2310.75 \$1742.00
		<b>SUBTOTAL</b>	\$4052.75

**IMPORTANT:** Do not itemize the payment of accrued expenses on Schedules E or F. Report the lump sum of these payments on Schedule F, Line 4 and on Schedule E, Line 4. Do not re-itemize accrued expenses which have been reported in a previous period.

**SUMMARY**

1. ACCRUED EXPENSES OF \$100 OR MORE THIS PERIOD .....	\$ 4052.75	
2. ACCRUED EXPENSES OF UNDER \$100 THIS PERIOD (Not itemized) .....	0	
3. TOTAL ACCRUED EXPENSES INCURRED THIS PERIOD (Line 1 + 2) .....		\$4052.75
4. ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) (Enter here and on Schedule E, Line 4) .....		\$207.87
5. NET CHANGE THIS PERIOD (Subtract Line 4 from Line 3) Enter difference here and on Line 11, Column B of Summary Page .....		\$3844.88

(May be negative figure)



89 OCT 13 AM 11:59

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

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

RAD Referral #: 89L-25  
STAFF MEMBER: R. Raich

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

RESPONDENTS: Santa Clara United Democratic Campaign '88  
(federal/non-federal accounts) and Ed  
Hoffman, as treasurer

RELEVANT STATUTES: 11 C.F.R. § 102.5  
2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: Committee's

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter is the result of a referral from the Commission's Reports Analysis Division, in the normal course of carrying out its supervisory responsibilities.

II. FACTUAL AND LEGAL ANALYSIS

Santa Clara United Democratic Campaign '88 (federal/non-federal accounts) (the "Committee") is a political committee that has established separate federal and non-federal accounts. The Committee's federal reports indicate that on twelve occasions from August through December 1988 the federal account made transfers to the non-federal account totaling \$44,469.74. The Committee reported the purpose of those transactions as "Transfers to cover federal portion of costs."

Title 2 U.S.C. § 441b(a) prohibits the use of corporate and

890407 / 6845

labor union monies in connection with federal elections. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), a political committee wishing to use federally impermissible funds to influence non-federal elections must set up a non-federal account, to segregate those funds from amounts received subject to the limitations and prohibitions of the Act. A committee which establishes separate federal and non-federal accounts, may not make any transfers to its federal account from its non-federal account. Such a transfer could inject impermissible funds into a federal election. By the same token, all disbursements, contributions, expenditures, and transfers by the committee in connection with any federal election must be made only from the committee's federal account. Consequently, a non-federal account may not make disbursements in connection with federal elections, whether or not a federal account reimburses the non-federal account for those disbursements. Such disbursements could allow impermissible funds to be advanced on behalf of a federal election. Nevertheless, the Commission's 1985 Campaign Guide for Political Party Committees, at page 15, states that a federal account may reimburse a non-federal account for its share of federal expenses. In the past, the Commission has limited this to administrative expenses.

The Committee apparently made payments from its non-federal account in connection with federal elections.<sup>1</sup> The General

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1. The Office of the General Counsel notes that under California law, corporations and labor unions may legally make contributions to non-federal committees.

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Counsel's Office cannot now determine whether the Committee's transfers to its non-federal account were payments for anticipated federal spending or reimbursements for completed federal spending. Similarly, this Office cannot determine whether the transfers were for administrative expenses or candidate activity. The Committee's treasurer states that the Committee relied on the language in the Campaign Guide in making the transfers. Although the Committee's reliance may be a mitigating factor, it does not negate the violation.

In accordance with the foregoing discussion, this Office recommends that the Commission find reason to believe the Committee and its treasurer violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a).

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Santa Clara United Democratic Campaign '88 (federal/non-federal accounts) and Ed Hoffman, as treasurer, violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a).
3. Approve the attached Factual and Legal Analysis.
4. Approve and send the attached letter.

Lawrence M. Noble  
General Counsel

10-12-89  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments

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

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FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

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

DATE: OCTOBER 18, 1989

SUBJECT: RAD REFERRAL 89L-25  
FIRST GENERAL COUNSEL'S REPORT DATED OCTOBER 12,  
1989

The above-captioned document was circulated to the Commission on Monday, October 16, 1989 at 11:00 a.m.

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

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

This matter will be placed on the meeting agenda for Tuesday, October 24, 1989 at 10:00 a.m.

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

89040775248

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Clara United Democratic ) RAD Referral 89L-25  
Campaign '88 (federal/non- )  
federal accounts) and )  
Ed Hoffman, as treasurer )

(MUR)  
2998

CERTIFICATION

I, Marjorie W. Emmons, recording secretary of the Federal Election Commission executive session of October 24, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to RAD Referral 89L-25:

1. Open a MUR.
2. Find reason to believe Santa Clara United Democratic Campaign '88 (federal/non-federal accounts) and Ed Hoffman, as treasurer, violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a).
3. Direct the Office of General Counsel to amend the Factual and Legal Analysis in accord with the meeting discussion and circulate the amended analysis for Commission approval on a tally vote basis.

(continued)

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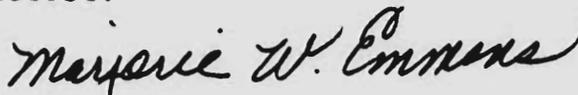
Federal Election Commission  
Certification for RAD Referral 89L-25  
October 24, 1989.

Page 2

4. Direct the Office of General Counsel to send an appropriate letter.
5. Take no further action and close the file in this matter.

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

Attest:



Marjorie W. Emmons  
Secretary of the Commission

October 27, 1989

890407/8850



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 16 1989

Ed Hoffman, Treasurer  
Santa Clara County United Democratic Campaign '88  
P.O. Box 6798  
San Jose, California 95150

**CLOSED**

RE: MUR 2998  
Santa Clara County United  
Democratic Campaign '88  
(federal/non-federal  
accounts) and Ed Hoffman, as  
treasurer

Dear Mr. Hoffman:

On October 24, 1989, the Federal Election Commission found reason to believe Santa Clara County United Democratic Campaign '88 (federal/non-federal accounts) (the "Committee") and you, as treasurer, violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended and Regulations promulgated pursuant thereto. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that reimbursements by a federal account to a state account for spending in connection with a federal election appear to be in violation of 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a). Because of your reliance on language in the Commission's Campaign Guide, the Commission, in this instance only, is taking no further action against the Committee and you, as treasurer. This letter serves as your notice that all federal activity must be paid for by a federal account. You should take immediate steps to insure that similar activity does not occur in the future.

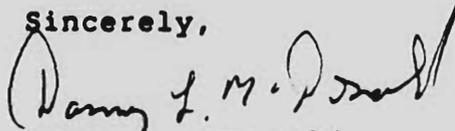
The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days after your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

890407/5851

Ed Hoffman, Treasurer  
Page 2

If you have any questions, please direct them to Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,



Danny L. McDonald  
Chairman

Enclosure  
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Santa Clara United Democratic  
Campaign '88 (federal/non-  
federal accounts) and Ed  
Hoffman, as treasurer

MUR: 2998

This matter is the result of a referral from the Commission's Reports Analysis Division, in the normal course of carrying out its supervisory responsibilities.

Santa Clara United Democratic Campaign '88 (federal/non-federal accounts) (the "Committee") is a political committee that has established separate federal and non-federal accounts. The Committee's federal reports indicate that on twelve occasions from August through December 1988 the federal account made transfers to the non-federal account totaling \$44,469.74. The Committee reported the purpose of those transactions as "Transfers to cover federal portion of costs."

Pursuant to 2 U.S.C. § 441b(a), corporate and labor union monies are prohibited from use in connection with federal elections. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), a political committee wishing to use federally impermissible funds to influence non-federal elections must set up a non-federal account, to segregate those funds from amounts received subject to the limitations and prohibitions of the Act. A committee which establishes separate federal and non-federal accounts may not make any transfers to its federal account from its

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non-federal account. Such a transfer could inject impermissible funds into a federal election. By the same token, all disbursements, contributions, expenditures, and transfers by the committee in connection with any federal election must be made only from the committee's federal account. Consequently, a non-federal account may not make disbursements in connection with federal elections, whether or not a federal account reimburses the non-federal account for those disbursements. Such disbursements could allow impermissible funds to be advanced on behalf of a federal election. Nevertheless, the Commission's 1985 Campaign Guide for Political Party Committees, at page 15, states that a federal account may reimburse a non-federal account for its share of federal expenses. In the past, the Commission has limited this to administrative expenses.

The Committee apparently made payments from its non-federal account in connection with federal elections.<sup>1</sup> The Commission cannot now determine whether the Committee's transfers to its non-federal account were payments for anticipated federal spending or reimbursements for completed federal spending. Similarly, the Commission cannot determine whether the transfers were for administrative expenses or candidate activity. Under these circumstances, the Commission will assume the payments were reimbursements from the federal

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1. The Commission notes that under California law, corporations and labor unions may legally make donations to non-federal committees.

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account to the state account for completed federal spending, and that such spending was not for administrative expenses. The Committee's treasurer states that the Committee relied on the language in the Campaign Guide in making the transfers. Although the Committee's reliance may be a mitigating factor, it does not negate the violation.

In accordance with the foregoing discussion, there is reason to believe Santa Clara United Democratic Campaign '88 (federal/non-federal accounts) and Ed Hoffman, as treasurer, violated 11 C.F.R. § 102.5 and 2 U.S.C. § 441b(a). Due to the Committee's stated reliance on the Campaign Guide, however, the Commission, in this instance only, will take no further action and will close the file.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2998

DATE FILMED 12/1/89 CAMERA NO. 4

CAMERAMAN AS

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