



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3434

DATE FILMED 4/29/92 CAMERA NO. 1

CAMERAMAN AL

92040391438

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 September 1991

ANALYST: TODD GERLOUGH

I. COMMITTEE: Anita for Congress
(C00243832)
Virginia R. Patterson, Treasurer
P.O. Box 22604
Santa Barbara, CA 93121

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Anita for Congress committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for six (6) contributions/loans totaling \$52,831.07 received prior to the 1990 General Election.

The candidate was involved in the 1990 General Election held on November 6, 1990. Prior Notice was sent to the Committee on October 1, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions."

A preliminary review of the Committee's 1990 30 Day Post-General Report indicated the possibility that four (4) contributions/loans totaling \$52,831.07 which fell within the 48-Hour Notice period, were not reported as last minute contributions (Attachment 3).

On January 2, 1991, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The

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notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

On January 30, 1991, a Reports Analysis Division analyst contacted Ms. Virginia Patterson, the Treasurer of the Committee (Attachment 5). She explained that a 48-Hour Notice for a contribution from the International Union of Operating Engineers was not reported as the contribution was in-kind, and the Committee was not made aware of the receipt until after the 48-Hour Notice period. The treasurer also stated that the \$19,500 loan from the candidate's husband was actually a \$17,500 loan from the candidate and a \$2,000 loan from the candidate's husband.

In an amended 1990 30 Day Post-General Report dated February 6, 1991, the Committee discloses receiving a \$35,500 candidate loan dated October 23, 1990. The Committee accounts for the activity in this way: "Schedule C (Loans) has been amended. The candidate received monies designated as loans from several contributors during this reporting period which were reimbursed to the contributors when it was determined that the loans were excess contributions. The candidate then made an additional personal loan to the campaign, as listed on the Amended Report." (Attachment 6).^{1/}

Because it appeared that the Committee failed to report the receipt of excessive loans from the original source, the analyst called Ms. Patterson on April 12, 1991 for further clarification (Attachment 7). The treasurer promised to research the matter.

A May 8, 1991, telephone conversation with the treasurer yielded the following:

1) The excessive contributions noted in the February 14, 1991 amendment were deposited in the Committee's account.

2) Seven (7) to ten (10) days later, these contributions were determined to be excessive. The candidate wrote refund checks off the Committee's communication account. This account was used for media buys (Attachment 8).

On May 21, 1991, an RFAI was sent to the Committee (Attachment 9). The RFAI asked for further clarification on the receipt and refund of the apparent excessive contributions/loans.

^{1/} The \$2,000 contribution from the candidate's husband was deleted from the amended report (both on the schedules and the receipt totals).

ANITA FOR CONGRESS
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

On May 24, 1991, the Commission received a letter dated May 14, 1991 (Attachment 10). In the letter, the candidate stated that "[C]ontributions totaling \$14,000 were deposited by me directly to the campaign's Communications Account shortly before November 6, 1990. When I was informed that these contributions were in excess of the amount allowed, I informed the contributors and repaid them immediately. The names and amounts are as follows: Jim and Doreen Farr: \$10,000 and Paul Arganbright: \$4,000."

In an attempt to determine if the contributions fell within the 48 Hour Notice reporting period, on July 9, 1991, the analyst contacted the treasurer to determine the receipt dates of the contributions from Mr. and Mrs. Farr and Mr. Arganbright (Attachment 11). The treasurer said that identifying the receipt dates would be difficult. She explained that better records were kept of deposit dates.

On July 16, 1991, the analyst again contacted the treasurer about the receipt dates (Attachment 12). Ms. Patterson stated that she was trying to get the relevant records which were stored in the candidate's office. She promised to call back in a few days.

On July 23, 1991, the treasurer made the following comments about the receipt of the contributions. 1) Both contributions were received on October 28, 1990. The candidate "goofed" by not informing the treasurer of these receipts. She explained that "there were a lot of things going on", and the the Committee was "inexperienced". 2) The receipt date for the \$35,500 candidate loan is correct. She was not aware that loans were considered contributions, and thus neglected to file a 48 Hour Notice (Attachment 13).

On July 24, 1991, the analyst called to ask the treasurer if the receipts from Mr. and Mrs. Farr and Mr. Arganbright were actually contributions or loans (Attachment 14). On July 30, 1991, the treasurer called the analyst and informed him that the receipts were in the form of loans (Attachment 14).

On August 5, 1991 the Commission received an amended 1990 30 Day Post-General Report which provided the Schedules which verify the receipt dates, refund dates, and amounts of the loans from Mr. and Mrs. Farr and Mr. Arganbright. These contributions are listed as two \$5,000 contributions, rather than one \$10,000 contribution as listed in the amendment dated May 14, 1991 (Attachment 15).

On August 28, 1991 the RAD analyst contacted the treasurer to request a written response as to why the in-kind contribution from the International Union of Operating Engineers was not a "last minute" contribution (Attachment 16).

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ANITA FOR CONGRESS
REPORTS ANALYSIS OGC REFERRAL
PAGE 4

On August 29, 1991, the treasurer answered in writing. The treasurer states the following, "I was informed by the campaign manager several days prior to Election Day that there was an in-kind contribution from the Union, but at that time the amount was unknown. I was not informed of the amount of this contribution until November 5."(Attachment 17).

In summing up this referral, the following is a list of the contributions/loans for which the analyst has determined that no 48-Hour Notices were filed:

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Transport Workers Union	11/01/1990	\$ 1,000.00
Anita Perez Ferguson (personal loan)	10/23/1990	\$35,500.00
James Farr (loan)	10/28/1990	\$ 5,000.00
Doreen Farr (loan)	10/28/1990	\$ 5,000.00
Paul Arganbright (loan)	10/28/1990	\$ 4,000.00
Int'l Union of Operating Engineers (in-Kind)	10/30/1990	\$ 2,331.07

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 04/05/91

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGE	MICROFILM LOCATION
	OFFICE SOUGHT/ PART	PRIMARY	GENERAL	PRIMARY			
FERGUSON, ANITA PEREZ	HOUSE 19 DEMOCRATIC PARTY				CALIFORNIA	1990 ELECTION	ID# H00A10030
1. STATEMENT OF CANDIDATE							
1990 STATEMENT OF CANDIDATE					11MAY90	1	90HSE/397/3041
2. PRINCIPAL CAMPAIGN COMMITTEE							
ANITA FOR CONGRESS							ID #C00024363C HOUSE
1990 STATEMENT OF ORGANIZATION - AMENDMENT					11MAY90	1	90HSE/397/3042
48 HOUR CONTRIBUTION NOTICE					11JUN90	1	90HSE/399/1509
48 HOUR CONTRIBUTION NOTICE					29OCT90	1	90HSE/418/3124
48 HOUR CONTRIBUTION NOTICE					31OCT90	1	90HSE/418/5169
APRIL QUARTERLY		7,884		790	4JAN90 -31MAR90	6	90HSE/398/1497
PRE-PRIMARY		10,694		12,218	1APR90 -16MAY90	8	90HSE/398/2537
PRE-PRIMARY - AMENDMENT		10,694		12,218	1APR90 -16MAY90	3	90HSE/404/0992
PRE-PRIMARY - AMENDMENT		10,694		12,218	1APR90 -16MAY90	4	90HSE/406/1888
1 ST LETTER INFORMATIONAL NOTICE					1APR90 -16MAY90	1	90FEC/643/4059
JULY QUARTERLY		19,600		19,174	17MAY90 -30JUN90	10	90HSE/404/3166
JULY QUARTERLY - AMENDMENT		19,151		19,174	17MAY90 -30JUN90	6	90HSE/405/3877
JULY QUARTERLY - AMENDMENT		19,202		19,174	17MAY90 -30JUN90	5	90HSE/426/0800
JULY QUARTERLY - AMENDMENT					-17MAY90 -30JUN90		90HSE/428/1585
REQUEST FOR ADDITIONAL INFORMATION					17MAY90 -30JUN90	2	90FEC/654/1409
REQUEST FOR ADDITIONAL INFORMATION 2ND					17MAY90 -30JUN90	3	90FEC/656/3137
OCTOBER QUARTERLY		77,346		59,372	1JUL90 -30SEP90	19	90HSE/413/1715
OCTOBER QUARTERLY - AMENDMENT		80,346		59,372	1JUL90 -30SEP90	3	90HSE/423/2666
OCTOBER QUARTERLY - AMENDMENT		80,346		59,372	1JUL90 -30SEP90	4	90HSE/426/0565
OCTOBER QUARTERLY - AMENDMENT		80,346		59,372	1JUL90 -30SEP90	10	90HSE/426/0805
REQUEST FOR ADDITIONAL INFORMATION					1JUL90 -30SEP90	2	90FEC/673/3987
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL90 -30SEP90	2	90FEC/679/2119
PRE-GENERAL		40,367		20,517	1OCT90 -17OCT90	15	90HSE/415/1570
PRE-GENERAL - AMENDMENT		35,607		20,767	1OCT90 -17OCT90	6	90HSE/423/2310
PRE-GENERAL - AMENDMENT		35,639		20,767	1OCT90 -17OCT90	6	90HSE/426/0555
PRE-GENERAL - AMENDMENT		35,139		20,767	1OCT90 -17OCT90	5	90HSE/426/4089
PRE-GENERAL - AMENDMENT		40,184		20,767	1OCT90 -17OCT90	13	90HSE/426/0800
REQUEST FOR ADDITIONAL INFORMATION					1OCT90 -17OCT90	2	90FEC/673/4000
REQUEST FOR ADDITIONAL INFORMATION 2ND					1OCT90 -17OCT90	3	90FEC/679/2451
REQUEST FOR ADDITIONAL INFORMATION					1OCT90 -17OCT90	4	90FEC/696/3011
REQUEST FOR ADDITIONAL INFORMATION 2ND					1OCT90 -17OCT90	5	90FEC/698/0507
POST-GENERAL		91,751		140,814	18OCT90 -26NOV90	27	90HSE/421/3874
POST-GENERAL - AMENDMENT		77,751		125,835	18OCT90 -26NOV90	11	90HSE/426/0849
POST-GENERAL - AMENDMENT					-18OCT90 -26NOV90	11	90HSE/426/0814
POST-GENERAL - AMENDMENT					-18OCT90 -26NOV90	7	90HSE/426/2041
POST-GENERAL - AMENDMENT					-18OCT90 -26NOV90	1	90FEC/703/4703
POST-GENERAL - AMENDMENT		91,751		109,835	18OCT90 -26NOV90	6	90HSE/433/2019
REQUEST FOR ADDITIONAL INFORMATION					18OCT90 -26NOV90	9	90FEC/679/3027
REQUEST FOR ADDITIONAL INFORMATION 2ND					18OCT90 -26NOV90	10	90FEC/682/4605
REQUEST FOR ADDITIONAL INFORMATION					18OCT90 -26NOV90	1	90FEC/696/3220
REQUEST FOR ADDITIONAL INFORMATION 2ND					18OCT90 -26NOV90	2	90FEC/698/0512

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 04/01/91

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERED DATES	PAGE	TYPE OF FILE	
	OFFICE SOUGHT	PARTY	PRIMARY	GENERAL				PRIMARY
YEAR-END			4,198		3,659	27NOV90-03MAY91	11	0-110-425-10
YEAR-END - AMENDMENT			4,198		3,659	27NOV90-03MAY91	0	0-110-425-10
REQUEST FOR ADDITIONAL INFORMATION						27NOV90-03MAY91	1	0-110-425-10
REQUEST FOR ADDITIONAL INFORMATION ON:						27NOV90-03MAY91	1	0-110-425-10
TOTAL			16,576	238,682	16,008	242,807		0-110-425-10
3. AUTHORIZED COMMITTEES								
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN								

All reports have been reviewed.
Cash-on-hand as of 12/31/90: \$604.11
Debts owed by the Committee as of 12/31/90; \$42,542.95^{1/2}

^{1/2} This amount is based on the Committee's amended 1990 Year End Report received August 29, 1991.

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CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT*	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
	OFFICE	HOUSE	GENERAL	PRIMARY			
FERGUSON, ANITA PEREZ							
1. STATEMENT OF CANDIDATE							
2. PRINCIPAL CAMPAIGN COMMITTEE							
ANITA FOR CONGRESS							
1991 MID-YEAR REPORT		1,966		2,347	10JAN91 -31JUL91	10	91HSE/432/3137
TOTAL		1,966	0	2,347		10	TOTAL PAGES
3. AUTHORIZED COMMITTEES							
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN							

Cash on hand as of 07/31/91: \$322.42
 Debts owed by the Committee as of 07/31/91: \$7042.95

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GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL CANDIDATES

October 1, 1990

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

WHO MUST FILE

All 1990 general election principal campaign committees must file the pre- and post-general election reports.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1990 elections (i.e., committees active in past or future elections) and 1990 campaign committees not participating in the general election do not file the pre- and post-general reports.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Candidate committees use FORM 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on FORM 3Z.

WHERE TO FILE

Consult the instructions on the back of the FORM 3 Summary Page. Note State filing requirements also.

LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.



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CONGRESSIONAL CANDIDATES

GENERAL ELECTION

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Correction should be made on the label.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

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FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Qualified Summary Page

PAGE 7 OF 7
FORM LINE NUMBER 11(a)(1)

Contributions from Individuals/Persons

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

NAME OF COMMITTEE (in Full)		Attachment 3 Page 1 of 5	
ARTTA FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code Elizabeth Williams P O Box 849 Santa Ynez, CA 93460	Name of Employer Sel.-employed	Date (month, day, year) 10/24/90 11/20/90	Amount of Each Receipt this Period \$ 300 \$ 100
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Farmer	Aggregate Year-to-Date > \$ 1,100	
B. Full Name, Mailing Address and ZIP Code Andrea Woodward 1720 Loma Street Santa Barbara, CA 93103	Name of Employer Unknown	Date (month, day, year) 10/26/90	Amount of Each Receipt this Period \$ 100
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Unknown	Aggregate Year-to-Date > \$ 215	
C. Full Name, Mailing Address and ZIP Code Participation 2000 691 N. High Street, #200 Columbus, OH 43215	Name of Employer	Date (month, day, year) 11/01/90	Amount of Each Receipt this Period \$ 333.34 In-kind contr.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Campaign (program) staff	Aggregate Year-to-Date > \$ 1,000	
D. Full Name, Mailing Address and ZIP Code Int'l Union of Operating Engineers 150 E. Carson Street/P O Box 7109 Pasadena, CA 91109-7209	Name of Employer AFL-CIO (Local 12)	Date (month, day, year) 10/30/90	Amount of Each Receipt this Period \$ 2,331.07 In-kind contr.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date > \$ 2,331.07	
E. Full Name, Mailing Address and ZIP Code Andy Comacho El Paseo Restaurant East 11 Olvera Street Los Angeles, CA 90012	Name of Employer Self-employed	Date (month, day, year) 9/26/90	Amount of Each Receipt this Period \$ 300 In-kind contr.
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Restaurant owner	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code Lompoc Valley Democratic Club P O Box 974 Lompoc, CA 93438	Name of Employer	Date (month, day, year) 10/31/90	Amount of Each Receipt this Period \$ 300
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date > \$ 300	
G. Full Name, Mailing Address and ZIP Code Democratic Women of S. B. County P. O. Box 40724 Santa Barbara, CA 93140	Name of Employer	Date (month, day, year) 10/31/90	Amount of Each Receipt this Period \$ 500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year-to-Date > \$ 500	
SUBTOTAL of Receipts This Page (optional)			\$ 4,264.41
TOTAL This Period (last page this line number only)			\$ 11,539.41

1990 30 Day Post General Report

SCHEDULE A

ITEMIZED RECEIPTS

Contributions from Other Political Committees

The amount scheduled for each category of the Detailed Summary Page

1	2
FOR LINE NUMBER 11(c)	

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

NAME OF COMMITTEE OR PULL

AJITA FOR CONGRESS

Attachment 3
Page 2 of 5

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Transport Workers Union 80 W. End Avenue New York, NY 10023		11/01/90	\$ 1,000
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000	ATC
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Latina PAC 915 "L" Street, #222 Sacramento, CA 95814		11/01/90	\$ 250
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 250	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ICWU Voluntary Live 1655 W. Market Street Akron, Ohio 44313		10/25/90	\$ 400
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
TEPAC 1730 "K" Street, NW Washington, DC 20006		10/26/90	\$ 500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
United Steelworkers of America/PAF 5 Gateway Center Pittsburgh, PA 15222		10/30/90	\$ 2,500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,500	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Committee on Political Education 815 16th Street, NW Washington, DC 20006	(AFL-CIO)	10/29/90	\$ 1,000
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
California League of Conservation Voters 4207 Encore Drive Santa Barbara, CA 93110		11/01/90	\$ 100
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100	

SUBTOTAL of Receipts This Page (optional)	\$ 5,750
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

Loans Made or Guaranteed by the Candidate

Use separate schedules for each category of the specified Summary Page

Page 11
FOR LINE NUMBER 15(a)

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 committees.

NAME OF COMMITTEE OR FULL

ANITA FOR CONGRESS

Attachment 3

Page 3 of 5

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Anita Perez Ferguson 1100 Laguna Street Santa Barbara, CA 93101	Candidate	10/23/90	\$ 30,000
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 30,000	ATC	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)	\$ 30,000
TOTAL This Period (last page this line number only)	\$ 30,000

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Standard Deduction Page

FORM 1040 FOR LINE NUMBER 15(b)

Other Loans

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 comment on purpose, other than using the name and address of any political candidate to solicit contributions from such candidates.

NAME OF COMMITTEE to Pull

ANITA FOR CONGRESS

Attachment 3 Page 4 of 5

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
G. William Ferguson 1190 Laguna Street Santa Barbara, CA 93101		10/28/90	\$ 19,500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 19,500	AT
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) \$ 19,500

TOTAL This Period (last page this line number only) \$ 19,500



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachment 4
Page 1 of 5

RQ-2

JAN 2 1991

Virginia R. Patterson, Treasurer
Anita for Congress
P.O. Box 22604
Santa Barbara, CA 93121

Identification Number: C00243832

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Ms. Patterson:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make contributions to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution you received exceeds the limit, you should either refund to the donor the amount in excess of \$1,000 or get the donor to redesignate and/or reattribute the contribution in writing. Your report also discloses an apparent contribution from International Union of Operating Engineers which is prohibited unless made from a separate segregated fund established by the organization. If the contribution was prohibited, you should refund the full amount to the donor. The Commission should be notified if a refund is necessary. Refunds, redesignations, and reattributions of excessive contributions must be made within sixty days of the treasurer's receipt of the contribution. Refunds of prohibited contributions must be made within thirty days of the treasurer's receipt of the

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ANITA FOR CONGRESS
Page 2

contribution. Refunds are reported on Line 20 and on Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattributions is received. (2 U.S.C. §441a(a) and (f) and 441b(a); 11 CFR §104.8(d)(2), (3) and (4))

Although the Commission may take further legal steps, prompt action by you to refund the prohibited amount and to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

-Schedule A and C of your report (pertinent portion attached) discloses contribution(s) which appears to exceed the limit set forth in the Act. No political committee other than a qualified multicandidate committee may make contributions to a candidate for federal office in excess of \$1,000 per election. The Cincuentenario, Partido Popular Democratico and Int'l Union of Operating Engineers are not registered with the Commission. The term "contribution" includes any gift, subscription, loan, advance or deposit of money and anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limit, you should either refund to the donor(s) the amount in excess of \$1,000 or get the donor(s) to redesignate the contribution(s) in writing. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of this report covering the period in which the authorization for the redesignation is received. (11 CFR §104.8(d)(2) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amount will be taken into consideration.

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-Line 11(a)(i), Column A, of the Detailed Summary Page discloses \$11,539.41 in receipts. Schedule A supporting Line 11(a)(i) itemizes \$13,404.11 in receipts. These figures should be the same. Please amend your report to explain the difference. (11 CFR §104.3(a))

-Line 11(c), Column A, of the Detailed Summary Page discloses \$14,000 in receipts. Schedule A supporting Line 11(c) itemizes \$14,400 in receipts. These amounts should be the same. Please explain the discrepancy and amend your report(s). (11 CFR §104.3(a))

-Line 10 of the Summary Page of your report discloses \$37,827.98 in outstanding loans/debts. The sum of Schedule C loans and Schedule D debts indicates \$40,934.66 in outstanding obligations. Please explain the discrepancy and amend your report. (11 CFR §104.3(d))

-Please provide a Schedule B to support the amount reported on Line 19(b), Column A, of the Detailed Summary Page. Each loan repayment made by the committee must be itemized on a supporting Schedule B, regardless of the amount of the repayment. (11 CFR §104.3(b)(4)(iii) and (iv))

-Your report discloses a negative ending cash balance of \$7,520.91. This suggests that you have overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please itemize this debt on Schedule D, show a zero balance on Line 8 of the Summary Page and reflect the amount on Line 10. If the negative ending cash balance is a result of an overdraft, it may constitute a prohibited bank contribution unless it is made on an account subject to automatic overdraft protection with usual and customary interest rates and a definite repayment schedule. 2 U.S.C. §434(b)(8) and 11 CFR §100.7(b)(11)

-Schedule D of your report itemizes a debt to Kinko's with an outstanding beginning balance; however, this debt was not included on your previous report. Please refer to Section 104.11(b) of the FEC Regulations and amend your report(s).

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for

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the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration must describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation. Under 11 CFR §104.7(b), the solicitation shall consist of a clear request for the required information (i.e., name, mailing address, occupation, and name of employer). The request should also inform the contributor that the reporting of such information is required by law. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

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contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



R. Todd Gerlough
Reports Analyst
Reports Analysis Division

922824803914357

DATE 1/30/91

MEMORANDUM TO FILES

Attachment 5
Page 1 of 1

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: - Reporting problems

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson, treasurer

-
- 1) I told her that the figure on line 11c was incorrect.
 - 2) A 48 hour notice for Operating Engineers PAC was not reported because it was an in-kind which the committee was not made aware of until after the 48 hour notice period.
 - 3) The loan for \$19,500 from candidate's husband was actually a \$17,500 loan from the candidate, and a \$2000 loan from spouse.

92040391458

FILE A

AMENDED ITEMIZED RECEIPTS (for 30 Day Post-General Rpt)

Receipts Made and/or Guaranteed by Candidate

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 13(a)

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)

ANITA FOR CONGRESS

Attachment 6
Page 1 of 3

92040531459

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Anita Perez Ferguson 1100 Laguna Street Santa Barbara, CA 93101		10/23/90	\$ 35,500
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Candidate		Aggregate Year-to-Date > \$
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:		Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional) \$ 35,500

TOTAL This Page (optional) (this line number only) \$ 35,500

(for 30 Day Post-General Report)

State of California (in Full)

ANTIA FOR CONGRESS (#135445)

A. Full Name, Mailing Address and ZIP Code of Loan Source Anita Perez Ferguson 1110 Laguna Street Santa Barbara, CA 93101	Original Amount of Loan \$ 35,500.00	Cumulative Payments To Date -0-	Balance Outstanding at Close of This Period \$ 35,500.00
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Election: Primary General Other (specify)

Terms: Date Incurred 10-23-90 Date Due _____ Interest Rate _____ % (year) Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code (candidate above- personal funds)	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
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Election: Primary General Other (specify)

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (year) Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		

SUBTOTALS This Period This Page (optional)	\$ 35,500.00
TOTALS This Period (last page in this line only)	\$ 35,500.00

For more information, see Schedule D for this line. If on Schedule D, carry forward to appropriate line of Summary.

22040391450

Clerk, House of Representatives
February 6, 1991
Page 2

9. There was no information with which to file a required 48-hour notice; I was told only that an in-kind contribution of \$2,331.07 was being made and did not receive any further information until November 5.
10. An envelope is enclosed which we use for contributors to give us the required information about employer/occupation along with their contribution; many of them do not comply, but when we have this information, it is included. Please see the Amended Reports which have additional contributors' employer/occupation information.
11. Schedule C (Loans) has been amended. The candidate received monies designated as loans from several contributors during this reporting period which were reimbursed to the contributors when it was determined that the loans were excess contributions. The candidate then made an additional personal loan to the campaign, as listed on the Amended Report.

I apologize in getting all of this information to you in a more timely manner; however, shortly after filing the year-end report, I became ill with a virus that no one should have to contend with! Hopefully, this information will resolve your questions.

Sincerely,

Virginia Patterson

Virginia Patterson
Treasurer, ANITA FOR CONGRESS

Enclosures

92040391461

DATE 4/12/91

MEMORANDUM TO FILES

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: 2/14/91 amendment

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson

---Treasurer will research matter of refunds of excessive contributions and candidate loan.

92540391462

DATE 5/8/91

MEMORANDUM TO FILES

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)
SUBJECT: Excessive contributions from individuals
FEC REP: Todd Gerlough
COMMITTEE REP: Virginia Patterson

- 1) Excessive contributions (noted in 2/14/91 amendment) were deposited into committee account.
- 2) 7 to 10 days later, they were determined to be excessive. Candidate wrote refund checks off committee's communication account. This account was used for media buys.

92040391463



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

Attachment 9
Page 1 of 1
RQ-2

MAY 21 1991

Virginia R. Patterson, Treasurer
Anita for Congress
P.O. Box 22604
Santa Barbara, CA 93121

Identification Number: C00243832

Reference: Amended 30 Day Post-General Report (10/18/90-
11/26/90) dated 2/14/91

Dear Ms. Patterson:

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:

-You state that "the candidate received monies designated as loans from several contributors during this reporting period which were reimbursed to the contributors when it was determined that the loans were excessive contributions." If these loans were deposited in the committee account, they should be reflected on Line 13(b) and supporting Schedules A and C. Further, the activity surrounding the refunds is not clear. Please amend your report.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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,

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

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REGULAR MAIL

MAY 21 1991



ANITA for CONGRESS

California 18th Congressional District
Anita Perez Ferguson
P. O. Box 22004
Santa Barbara, CA 93121

Attachment: 10
Page 1 of 1
FEC ID: C00243832

91 MAY 26 AM 10:51

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REC'D
MAY 28 AM 11:05
U.S. HOUSE OF REPRESENTATIVES

May 14, 1991

R. Todd Gerlough
Reports Analysis Division
FEDERAL ELECTION COMMISSION
Washington, DC 20463

Re: Anita for Congress, FEC ID C00243832

Dear Todd:

In response to your requests, I am providing the following information:

1. The campaign committee was informed by Partido Popular Democratico that their contribution of \$5,000 to the campaign was not acceptable to the FEC and therefore, the committee must reimburse them the entire amount of \$5,000. At this time we are attempting to raise the money to do so as soon as possible.

2. The \$5,000 contribution by DRIVE Political Fund as listed on the June report was to repay a primary debt.

3. Contributions totaling \$14,000 were deposited by me directly to the campaign's Communications Account shortly before November 6, 1990. When I was informed that these contributions were in excess of the amount allowed, I informed the contributors and repaid them immediately. The names and amounts are as follows:

Jim and Doreen Farr:	\$10,000
Paul Arganbright:	\$ 4,000

NPC

Sincerely,

Anita Perez Ferguson

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DATE 7/7/91

MEMORANDUM TO FILES

TELECON
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: . Excessive contributions

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson

Treasurer said that it was difficult to determine receipt dates of excessive contributions. The deposit date is probably the best that can be done.

22040391436

DATE 7/18/91

MEMORANDUM TO FILES

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)
SUBJECT: . Excessive contributions and 48 hour notices
FEC REP: Todd Gerlough
COMMITTEE REP: Virginia Patterson

Ms. Patterson said that she is trying to get records in candidate's office which could answer some of my questions. She will call back on Wednesday or Thursday.

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DATE 7/23/91

MEMORANDUM TO FILES

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: Excessives

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson

As for \$10,000 and \$4,000 excessives, treasurer stated:

- 1) Both were received on 10/28/90. Candidate "goofed" by not informing the treasurer that these were received. There were a "lot of things going on." Further, committee was inexperienced.
- 2) The contributions were deposited, and refunded less than a week later. She reiterated that refund was from a committee account, not candidate.

In related matters:

- 1) Date for \$35,500 is correct on report. She was not aware that loans were considered contributions.
- 2) She will check to see if dates for PAC contributions where a 48 hour notice was not filed were correct.
- 3) She will send for a amendment with Mid Year 1991 report.

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DATE 7/24/91
7/30/91

MEMORANDUM TO FILES

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: Excessive loans

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson

I asked if the excessives for \$10,000 and \$4000 were actually loans, or regular contributions. She said she would research my query.

On 7/30/91, the treasurer stated that these contributions were actually loans.

92040391469

SCHEDULE A

ITEMIZED RECEIPTS

Department of the Treasury Page 1041-1042-1043-1044

OMB No. 1545-0047

This information should be reported on Form 1041 and should be attached to the return. It may not be used by any person for the purpose of collecting contributions or for any other purpose. Do not check this box unless the recipient's address of record is different from the address on the return.

Amount of contributions to full-time member of Congress (0135449) Attachment 15
Page 1 of 4

91014332821

<p>A. Full Name, Mailing Address and ZIP Code James Fatt 5270 Paseo Comero Santa Barbara, CA 93111</p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer K&L Radio</p> <p>Occupation Sales representative</p> <p>Aggregate Year-to-Date > \$ 7,000</p>	<p>Date (month, day, year) 10/28/90</p>	<p>Amount of Each Receipt this Period \$ 5,000 (see Sch. C)</p>
<p>B. Full Name, Mailing Address and ZIP Code Doreen Fatt 5270 Paseo Comero Santa Barbara, CA 93111</p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation Housewife</p> <p>Aggregate Year-to-Date > \$ 7,000</p>	<p>Date (month, day, year) 10/28/90</p>	<p>Amount of Each Receipt this Period \$ 5,000 (see Sch. C)</p>
<p>C. Full Name, Mailing Address and ZIP Code Paul Arganbright 812 Arguello Road Santa Barbara, CA 93103</p> <p>Receipt For <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self-employed</p> <p>Occupation Businessman</p> <p>Aggregate Year-to-Date > \$ 4,484</p>	<p>Date (month, day, year) 10/28/90</p>	<p>Amount of Each Receipt this Period \$ 4,000 (see Sch. C)</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

<p>SUB TOTAL of Receipts This Page (optional)</p>	<p>\$ 14,000</p>
<p>TOTAL This Period (last page this line number only)</p>	<p>\$ 14,000</p>

Attachment to 2nd Interest Report
ITEMIZED DISBURSEMENTS

Repayments of Other Loans

Use column attached for each category of the Detailed Summary Page
 FOR LINE NUMBER 19(b)

Any information reported from such Reports and Statements shall not be sold or used by any person for the purpose of collecting contributions or for otherwise obtaining other data with the name and address of any political committee to obtain contributions from such committee.

NAME OF COMMITTEE in Full **ANITA FOR CONGRESS (0115445)** Attachment 15
 Page 2 of 4

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
James Ferr 5270 Paseo Cameo Santa Barbara, CA 93111	Loan repayment Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	11-21-90	\$ 5,000
Doreen Ferr 5270 Paseo Cameo Santa Barbara, CA 93111	Loan repayment Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	11-21-90	\$ 5,000
Paul Argerbright 812 Arguello Road Santa Barbara, CA 93103	Loan repayment Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	11-21-90	\$ 4,000
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General 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 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 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 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 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 Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			\$ 14,000
TOTAL This Period (last page this line number only)			\$ 14,000

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0101A332324

Name of Borrower (If Self) ARITA FOR CONGRESS (0325'95)		Attachment 15 Page 3 of 4	
A. Full Name, Mailing Address and ZIP Code of Loan Borrower James Park 5270 Paseo Cameo Santa Barbara, CA 93111		Original Amount of Loan \$ 5,000	Complete Payment To Date \$ 5,000
Station (Priority General Other (specify)) Terms Date Incurred <u>10/28/90</u> Date Due _____ Interest Rate _____ (Specify) _____ <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Borrower Doreen Fair 5270 Paseo Cameo Santa Barbara, CA 93111		Original Amount of Loan \$ 5,000	Complete Payment To Date \$ 5,000
Station (Priority General Other (specify)) Terms Date Incurred <u>10/28/90</u> Date Due _____ Interest Rate _____ (Specify) _____ <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional)			0
TOTALS This Period (last page in this line only)			\$35,500
Carry outstanding balance only to LINE 3, Schedule B, for this line. If no Schedule B, carry forward to appropriate line of Summary.			

Addendum to 2nd Amended Rnt

Attachment 15
Page 4 of 4

Name of Debtor UNITA FOR CONGRESS (0135445)		Original Amount of Loan \$ 35,500	Cumulative Payments To Date -0-	Balance Outstanding at Close of This Period \$ 35,500
A. Full Name, Mailing Address and ZIP Code of Debtor Marta Perez Ferguson 1110 Laguna Street Santa Barbara, CA 93101				

Primary General Other (specify) _____
 Terms: Date Incurred 10/23/90 Date Due _____ Interest Rate _____ % Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		

B. Full Name, Mailing Address and ZIP Code of Loan Source Paul Arganbright 812 Arguello Road Santa Barbara, CA 93101	Original Amount of Loan \$ 4,000	Cumulative Payments To Date \$ 4,000	Balance Outstanding at Close of This Period -0-
Election: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) _____			

Terms: Date Incurred 10/28/90 Date Due _____ Interest Rate _____ % Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		

SUBTOTALS This Period This Page (optional)	\$ 35,500
TOTALS This Period (last page in this file only)	

Carry outstanding balance only to LINE 3, Schedule D, for this file. If on Schedule D, carry forward to appropriate line of Summary.

0 1 2 3 4 5 6 7 8 9

MEMORANDUM TO FILES:

DATE 8/28/91

TELECON X
VISIT

NAME OF COMMITTEE: Anita for Congress (CA)

SUBJECT: In-kind contribution from Operating Engineers PAC

FEC REP: Todd Gerlough

COMMITTEE REP: Virginia Patterson

The analyst asked the treasurer to send in a written response for the in-kind contribution from the Operating Engineers PAC. The treasurer agreed to send in a response as soon as possible.

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ANITA for CONGRESS

Attachment 17
Page 1 of 2

California 19th Congressional District
Anita Perez Ferguson
P. O. Box 22604
Santa Barbara, CA 93121
August 28, 1991

R. Todd Gerlough
Reports Analysis Division
FEDERAL ELECTION COMMISSION
999 "E" Street, NW
Washington, DC 20463

Re: Anita for Congress, #135445

Dear Todd:

Enclosed are corrections to specific pages of the following reports, as we discussed last week:

1. 30-Day Post General Report:

Summary Page, Line 10 (previously \$43,695.63)

Schedule D, Line 4 (previously \$43,695.63)

Consolidation Report, Column (aa) for Line No. 10

2. January 31 Year-End Report:

Summary Page, Line 10 (previously \$7,042.95)

Schedule C, Line B (info added re previous loan; previously \$2,000)

Schedule D, Line B (correction re Corporate Colour Printing in third column, previously \$1,042.95);
Lines 3 and 4 (previously \$2,000 and \$7,042.95 respectively)

Consolidation Report, Column (aa) for Line 10

3. July 31 Mid-Year Report:

Summary Page, Line 10 (previously \$7,042.95)

Schedule C, Line B (info added re previous loan; previously \$1,100)

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R. Todd Gerlough
Reports Analysis Division/FEC
August 28, 1991
Page 2

Schedule D, Lines 3 and 4 (previously \$1,100 and \$5,850 respectively)

Consolidation Report, Column (aa) for Line No. 10

AC
Finally, in response to your question regarding the 48-hour notice of an in-kind contribution from the International Union of Operating Engineers in the amount of \$2,331.07, the invoice was dated October 30, 1990, and was reflected on Schedule A, page 2, of the Amended 30 Day Post-General Report (see enclosed copy). I was informed by the campaign manager several days prior to Election Day that there was an in-kind contribution from the Union, but at that time the amount was unknown. I was not informed of the amount of this contribution until November 5.

I hope this information will finalize the "saga" of these amended reports and we can look forward to the year-end report due in 1992!

Sincerely,



Virginia R. Patterson
Treasurer, ANITA FOR CONGRESS

Enclosures

VIA FACSIMILE AND BY MAIL

cc: California Secretary of State,
Political Reform Division
(w/encls)

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RECEIVED
F.E.C.
SECRETARIAT

OCT 10 PM 1:01

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #91L-83
Staff Member: Richard Denholm

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Anita for Congress and Virginia R. Patterson,
as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)
11 C.F.R. § 104.5(f)

INTERNAL REPORTS
CHECKED: Referral Materials
Committee Reports

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred Anita for Congress (the "Committee") and Virginia R. Patterson, as treasurer, to the Office of the General Counsel on September 3, 1991 for failure to file a forty-eight hour notification ("48 Hour Notices") for six (6) contributions totaling \$52,831.07. Attachment 1. Anita Perez Ferguson was a candidate in the 1990 general election for the U.S. House of Representatives from California's Nineteenth Congressional District.

II. FACTUAL AND LEGAL ANALYSIS

For the Factual and Legal Analysis, see Attachment 2.

92540391477

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

9 2 6 4 0 3 9 1 4 7 8

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Anita for Congress and Virginia R. Patterson, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) and enter into conciliation prior to a finding of probable cause to believe.

3. Approve the attached Factual and Legal Analysis and proposed conciliation agreement.
4. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

10/9/21
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement

Staff Member: Richard Denholm

92540391479

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Anita for Congress and)
Virginia R. Patterson, as treasurer.)

RAD Referral #91L-83

MUR
8-4-34

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 15, 1991, the Commission decided by a vote of 4-0 to take the following actions in RAD Referral #91L-83:

1. Open a MUR.
2. Find reason to believe that Anita for Congress and Virginia R. Patterson, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and proposed conciliation agreement, as recommended in the General Counsel's Report dated October 9, 1991.

Commissioners Aikens, Elliott, McDonald, and Thomas voted affirmatively for the decision; Commissioners Josefiak and McGarry did not cast votes.

Attest:

10-15-91
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., Oct. 10, 1991 1:01 p.m.
Circulated to the Commission: Thurs., Oct. 10, 1991 4:00 p.m.
Deadline for vote: Tues., Oct. 15, 1991 4:00 p.m.

dr

92540391430



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Virginia R. Patterson, Treasurer
Anita for Congress
P.O. Box 22604
Santa Barbara, CA 93121

RE: MUR 3434
Anita for Congress and
Virginia R. Patterson,
as treasurer

Dear Ms. Patterson:

On October 15, 1991, the Federal Election Commission found that there is reason to believe the Anita for Congress committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

92040391481

Virginia R. Patterson, Treasurer

Page 2

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Richard M. Denholm II, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

22040391482

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Anita for Congress and Virginia **MUR:**
R. Patterson, as treasurer

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The Federal Election Campaign Act of 1971, as amended (the "Act"), requires principal campaign committees of candidates for federal office to notify the Clerk of the House of Representatives, the Secretary of the Senate, or the Federal Election Commission (as appropriate) and the Secretary of State, in writing, of each contribution totaling \$1,000 or more received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires the notification to be made within 48 hours after receipt of the contribution and to include the name of the candidate and the office sought by the candidate, the identification of the contributor, the date of receipt and the amount of the contribution. Id.

Notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

Further, the Act defines contribution as including any gift, subscription, loan, advance or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C. § 431(8)(A)(i).

Anita for Congress is the authorized principal campaign committee of Anita Perez Ferguson, a candidate for the U.S.

House of Representatives from California's 19th Congressional District in the 1990 general election. Virginia R. Patterson is the treasurer of the Committee.

Prior to the 1990 general election, a notice dated October 1, 1990 was sent to Respondents reminding them of upcoming committee report filing deadlines. This reminder stated that the Committee must file notices for contributions of \$1,000 or more received during the period of October 18, 1990 through November 3, 1990 within 48 hours of the Committee's receipt of such contributions.

The Committee's 30 Day Post-General Report and amendments thereto indicated that it had received six (6) contributions totaling \$52,831.07 within the 48-Hour Notice period. However, the Committee failed to file 48 Hour Notices for these contributions.

Specifically, on December 6, 1990, the Committee filed its 1990 30 Day Post-General Report. The Committee disclosed that it had received one (1) \$2,331.07 contribution from the International Union of Operating Engineers on October 30, 1990. In addition, the Committee disclosed that it had received one (1) \$1,000 contribution from the Transport Workers Union on November 1, 1990. The Committee received the contributions within the 48 Hour Notice Period but failed to file a 48 Hour Notice for either contribution.

On February 6, 1991, the Committee filed an Amended 1990 30 Day Post-General Report. In the amendment, the Committee disclosed that it received a \$35,500 loan on October 23, 1990

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from the candidate. The candidate contribution was received within the 48-Hour Notice Period, but the Committee did not file a 48-Hour Notice for the contribution.

On August 5, 1991, the Committee filed a Second Amended 1990 30 Day Post-General Report. The Committee disclosed the receipt of three (3) personal loans on October 28, 1990 from James Farr in the amount of \$5,000, Doreen Farr in the amount of \$5,000, and Paul Arganbright in the amount of \$4,000. The Committee disclosed that the contributions were received on October 28, 1990, which was within the 48-Hour Notice Period, but the Committee did not file a 48-Hour Notice for any of the contributions.

In summary, the Committee failed to file 48 Hour Notices for the following contributions:

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Anita Perez Ferguson (personal loan)	10/23/1990	\$35,500.00
James Farr (loan)	10/28/1990	\$ 5,000.00
Doreen Farr (loan)	10/28/1990	\$ 5,000.00
Paul Arganbright (loan)	10/28/1990	\$ 4,000.00
Int'l Union of Operating Engineers (in-kind)	10/30/1990	\$ 2,331.07
Transport Workers Union	11/01/1990	\$ 1,000.00
		Total \$52,831.07

The Committee did not file a 48 Hour Notice for any of the above contributions, and the Commission was not fully informed of these last minute contributions until the Committee filed

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its 30 Day Post General Report on December 6, 1990, its Amended 30 Day Post-General Report on February 6, 1991, and its Second Amended Post-General Report on August 5, 1991. Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that the Anita for Congress committee and Virginia R. Patterson, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

Nov. 12, 1991

91 NOV 18 AM 11:43

Mr. Richard M. Denholm II
Federal Election Commission
Washington, D.C. 20463

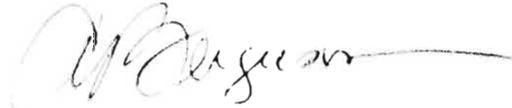
RE: MUR 3434
Anita for Congress and
Virginia R. Patterson,
as treasurer

Dear Mr. Denholm,

Enclosed please find the Statement of Designation of Counsel form as promised in our telephone conversation. A copy of this document was faxed to our office on 11/14/91.

Due to the fact that my designated counsel, Judith L. Corley, will be out of town until next week, I am requesting a time extension of atleast 10 days. Ms. Corley or her associate, Mr. Bauer, will be in direct contact with you concerning MUR 3434.

Sincerely,



Anita Perez Ferguson
Anita For Congress
P.O. Box 22604
Santa Barbara, CA 93121
805 963-3799
805 962-3152 FAX

91 NOV 18 PM 3:34

RECEIVED
FEDERAL ELECTION COMMISSION

2040591437

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3434
 NAME OF COUNSEL: JUDITH L. CORLEY or ROBERT F. BAUE
 ADDRESS: PERKINS COIE
607 14TH ST. N.W., STE. 800
WASHINGTON, D.C. 20005
 TELEPHONE: 202 434-1622

The above-named individual is hereby designated as my
 counsel and is authorized to receive any notifications and other
 communications from the Commission and to act on my behalf before
 the Commission.

Nov 12, 1991
 Date

[Signature]
 Signature

RESPONDENT'S NAME: ANITA PEREZ FERGUSON
 ADDRESS: P.O. Box 22604
SANTA BARBARA CA 93121
 HOME PHONE: 805 965-6905
 BUSINESS PHONE: 805 963-3799

22040391438



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 1991

Ms. Judith L. Corley
Perkins Coie
607 14th St. N.W., Suite 800
Washington, D.C. 20005

RE: MUR 3434
Anita for Congress and
Virginia R. Patterson,
as treasurer

Dear Ms. Corley:

This is in response to a letter from Anita Perez Ferguson dated November 14, 1991, which we received on November 14, 1991, requesting an extension to respond to the Commission's finding that there is reason to believe that Anita for Congress and Virginia R. Patterson, as treasurer, violated 2 U.S.C. § 434(a)(6)(A). It is our understanding that the Anita for Congress committee and Virginia R. Patterson, as treasurer, received notification of the Commission's reason to believe finding on October 25, 1991 thereby making the original response due on November 9, 1991. After considering the circumstances presented in the letter, I have granted an extension until November 25, 1991. Accordingly, your response is due by the close of business on that date.

If you have any questions, please contact Richard M. Denholm II, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Anne Weissenborn".

BY: Anne Weissenborn
Assistant General Counsel *Witten*

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Doc 3534

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

November 26, 1991

Richard M. Denholm
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3434

91 NOV 26 PM 4:00

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

Dear Mr. Denholm:

This is the response of Anita for Congress ("the Committee") and Virginia R. Patterson, as treasurer (collectively referred to as "Respondents") to the Commission's letter finding reason to believe that Respondents had violated the federal campaign laws by failing to file certain 48-hour reports.

The six contributions identified by the Commission as not having been disclosed on the 48-hour reports fall into the following categories:

- a \$2,331.07 contribution in-kind;
- a \$35,500 loan from the candidate and three loans totalling \$14,000 from individuals;
- a \$1,000 contribution.

In the case of the contribution in-kind, the Treasurer has already informed the Commission, through responses to requests for additional information, that she was not given any information on the value of the contribution until November 5, after the 48-hour reporting period. Only then did she learn that the contribution in-kind was valued in excess of \$1,000. In accordance with Commission regulations, once information as to the value of the contribution in-kind was known, it was reported as received on October 30, the date the services were actually rendered. The result of this compliance, however, was to make it appear that the Committee had knowledge of the value of the contribution in-kind during the 48-hour reporting period. This was not the case, and the

[09901-9700 DA913260.054]

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Richard M. Denholm
November 26, 1991
Page 2

Treasurer had no way of knowing during this period that the contribution in-kind was in excess of the 48-hour reporting threshold.

The candidate loan and the loans from the individuals were not disclosed for a simple reason: Respondents were unaware that loans were required to be disclosed as contributions for purposes of the 48-hour reports. Respondents were new at the FEC reporting requirements. Ms. Ferguson had never before sought federal office and her campaign committee began the campaign unfamiliar with the federal campaign laws.

As the Commission is aware, this is not an uncommon misunderstanding of the Commission's regulations. A quick review of the 48-hour MURs already released to the public makes it clear that many campaigns shared this misunderstanding. Loans, including those from a candidate, are reported on the FEC forms in a location and in a manner different from contributions. While included within a committee's receipts, they are not referred to as contributions on the face of the forms or in the instructions.

Further, the nondisclosure of candidate loans is consistent with the statutory intent of the 48-hour reporting requirements -- to provide the public with prompt identification of large contributors to a candidate who might thereby obtain undue influence over that candidate. See, e.g., Buckley v. Valeo, 424 U.S. 1 (1976) ("The source of a candidate's financial support . . . alert the voter to the interest to which a candidate is most likely to be responsive and thus facilitate predictions of future performance in office.").

The only remaining contribution identified by the Commission is a single contribution for \$1,000. The contribution in question was inadvertently reported as having been received by the Committee on November 1, 1990. In fact, the contribution was dated November 1, but was actually received by the Committee on November 4 or 5, as shown by the fact that the check was not deposited by the Committee until after this date. The Committee had a standing policy to deposit all checks within as quickly as possible after their receipt, generally within 24 hours. The contribution was actually received, therefore, outside of the 48-hour reporting

Richard M. Denholm
November 26, 1991
Page 3

window and the Committee had no obligation to file a 48-hour report for this contribution.

The Committee has shown its good faith in complying with the 48-hour requirements through the prompt and complete filing of the necessary 48-hour reports for all other contributions of \$1,000 or more in both the primary and the general election periods.

If you have any questions or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,


Judith L. Corley
Counsel to Respondents

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FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6000

91 DEC 10 AM 11:59

December 10, 1991

91 DEC 11 AM 11:03

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

Richard M. Denholm
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3434 - Anita for Congress and Virginia R. Patterson, as Treasurer

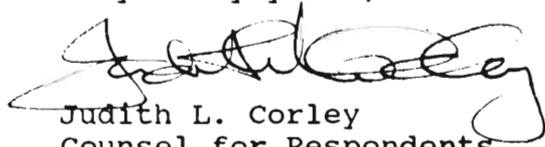
Dear Mr. Denholm:

As we discussed on the phone yesterday, please find enclosed an executed conciliation agreement in the above-referenced Matter Under Review.

As we discussed this morning, I have also enclosed a copy of the check and deposit slip related for the contribution from the Transportation Workers Union. As our original report mentioned, the report for this contribution inadvertently used the date of the check as the date of receipt, rather than the actual date of receipt.

If you have any questions or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,


Judith L. Corley
Counsel for Respondents

enclosures

3 4 9 1 4 9 3 2 0 4 2 2

FOR DEPOSIT TO THE ACCOUNT OF

ANITA FOR CONGRESS
COMMUNICATION ACCOUNT
P. O. BOX 22604
SANTA BARBARA, CA 93121

CASH	CURRENCY		
	COIN		
1-12	1000	-	
TOTAL FROM OTHER SIDE			
TOTAL	1000	-	
NET DEPOSIT	1000	-	

30-7200/3222

DATE 11-13 1990
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

USE OTHER SIDE FOR ADDITIONAL LISTING

SIGN HERE FOR LESS CASH IN TELLER'S PRESENCE

BE SURE EACH ITEM IS PROPERLY ENDORSED

COUNTY BANK
22 NORTH FAIRVIEW AVENUE
COLETA, CA 95111

NOT GOOD FOR LESS THAN \$250.00
MONEY FUND ACCOUNT

⑆322272008⑆ 011904769409⑈ 9978

92040321474

**TRANSPORT WORKERS UNION
POLITICAL CONTRIBUTIONS COMMITTEE**
10 WEST END AVENUE
NEW YORK, N.Y. 10022

NOV 13 1990

PAY TO THE ORDER OF Anita for Congress \$ 1,000.00

One Thousand and 00/100 DOLLARS

CHEMICAL BANK
1834 Broadway
New York, N.Y. 10023

FOR George [Signature]

CUSTOMER
TRANSACTION
RECEIPT

COUNTY BANK

Account Type Savings Checking
 LOC Loan

Date	Withdrawal/ Payment Amount	Account No.	Deposit/ Advance Amount	Balance
NOV1390		119047694	1000.00	11765.27

Additions permitted to our short term CDs.

CB 12104
NOV 17 1990

This memo of transaction shown above will be entered on your record

RECEIVED
F.E.C.
SECRETARIAT

NOV 15 PM 3:33

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Anita for Congress and) MUR 3434
Virginia R. Patterson, as)
treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

On October 15, 1991, the Commission decided to enter into conciliation with the Anita for Congress committee and Virginia R. Patterson, as treasurer prior to a finding of probable cause to believe, concerning a violation of 2 U.S.C. § 434(a)(6)(a). On October 18, 1991, the proposed conciliation agreement was mailed to the Committee. Based on negotiations with Committee counsel, it appears that the matter can be resolved through conciliation. Accordingly, this Office will continue conciliation for another 30 days.

Lawrence M. Noble
General Counsel

Date 12/13/91

BY: 
Lois G. Lerner
Associate General Counsel

Staff assigned: Richard Denholm

72540391495

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Anita for Congress and
Virginia R. Patterson, as
treasurer

)
)
)
)
)

MUR 3434

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement, signed by
Judith L. Corley, counsel for the Anita for Congress Committee
and Virginia R. Patterson, as treasurer ("Respondents").

Attachment 1.

22040391496

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Therefore, this Office recommends that the Commission accept the attached agreement with the Anita for Congress Committee and Virginia R. Patterson, as treasurer.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Anita for Congress Committee and Virginia R. Patterson, as treasurer.
2. Approve the appropriate letter.
3. Close the file.

Lawrence M. Noble
General Counsel

December 23, 1991
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. Proposed conciliation agreement
2. Letter from Judith L. Corley
3. Photocopy of Transport Workers Union check and committee deposit receipt

Staff Assigned: Richard Denholm

92040391498

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Anita for Congress and Virginia R.) MUR 3434
Patterson, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 30, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 3434:

1. Accept the conciliation agreement with the Anita for Congress Committee and Virginia R. Patterson, as treasurer, as recommended in the General Counsel's Report dated December 23, 1991.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 23, 1991.

(continued)

22040391499

3. Close the file.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Josefiak and Thomas did not cast votes.

Attest:

1-2-92
Date


Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Dec. 24, 1991 10:39 a.m.
Circulated to the Commission: Thurs., Dec. 26, 1991 11:00 a.m.
Deadline for vote: Mon., Dec. 30, 1991 11:00 a.m.

bjf

22540391500



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECORDED

January 21, 1992

Ms. Judith Corley
Perkins Coie
607 14th Street N.W. Suite 800
Washington, D.C. 20005

RE: MUR 3434
Anita for Congress and
Virginia R. Patterson,
as treasurer

Dear Ms. Corley:

On December 30, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

92540891501

Judith Corley
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Richard M. Denholm II
Attorney

Enclosure
Conciliation Agreement

22040391502

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Anita for Congress and) MUR 3434
Virginia R. Patterson,)
as Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Anita for Congress Committee and Virginia R. Patterson, as Treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(6)(A).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this Agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

92040591503

1. Mrs. Anita Perez Ferguson was a candidate for the United States House of Representatives from California's Nineteenth (19th) Congressional District in the 1990 General Election. Anita for Congress is the authorized principal campaign committee for Mrs. Ferguson's campaign. See 2 U.S.C. § 431(5).

2. Ms. Virginia R. Patterson is the treasurer of Anita for Congress.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify either the Clerk of the House, Secretary of the Senate or the Commission (as appropriate) and the Secretary of State, in writing, of each contribution totalling \$1,000 or more received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires this notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and the office sought by the candidate, identification of the contributor, the date of receipt and the amount of the contribution. Id.

4. Timely disclosure of these contributions, pursuant to 2 U.S.C. § 434(a)(6)(A), is in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

22040391504

5. Pursuant to 2 U.S.C. § 431(8)(A), a "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C. § 431(8)(A)(i).

6. The Act further defines a "person" to include an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. 2 U.S.C. § 432(11).

7. Pursuant to 2 U.S.C. § 434(a)(6)(A), Respondents were required to notify the Clerk of the House, Secretary of the Senate of the Commission (as appropriate) and the Secretary of State, in writing, of all contributions of \$1,000 or more received from October 18, 1990 through November 3, 1990 within 48 hours of receipt.

8. During the period of October 18, 1990 to November 3, 1990, Respondents received five (5) contributions totalling \$51,831.07 which required 48-Hour Notices.

9. On the 1990 30-Day Post-General Report, Respondents disclosed the receipt of one (1) \$2,331.07 contribution from the International Union of Operating Engineers on October 30, 1990. Respondents were required to file a 48-Hour Notice for this contribution no later than November 1, 1990.

22040521505

10. On the Amended 1990 30-Day Post-General Report, Respondents disclosed the receipt of one (1) \$35,500 contribution from Anita Perez Ferguson on October 23, 1990. Respondents were required to file a 48-Hour Notice for this contribution no later than October 25, 1990.

11. On the Second Amended 1990 30-Day Post-General Report, Respondents disclosed the receipt of one (1) \$5,000 personal loan from James Farr on October 28, 1990. Respondents were required to file a 48-Hour Notice for this contribution no later than October 30, 1990.

12. On the Second Amended 1990 30-Day Post-General Report, Respondents disclosed the receipt of one (1) \$5,000 personal loan from Doreen Farr on October 28, 1990. Respondents were required to file a 48-Hour Notice for this contribution no later than October 30, 1990.

13. On the Second Amended 30-Day Post-General Report, Respondents disclosed the receipt of one (1) \$4,000 personal loan from Paul Arganbright on October 28, 1990. Respondents were required to file a 48-Hour Notice for this contribution no later than October 30, 1990.

14. None of the contributions discussed in subparagraphs 9 - 13 were reported until the Committee filed its 1990 30-Day Post-General Report on December 6, 1990, its Amended 30-Day Post-General Report on February 6, 1991, and

0 2 0 4 0 5 9 1 5 0 6

its Second Amended 30-Day Post-General Report on August 6, 1991.

V. Respondents failed to file 48-Hour Notices for five (5) contributions in violation of 2 U.S.C. § 434(a)(6)(A).

VI. Respondents contend that the violations identified by the Commission were the result of a misunderstanding of the requirements of the law.

VII. Respondents will pay a civil penalty to the Commission in the amount of two thousand dollars (\$2,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One (1) initial payment of five hundred dollars (\$500) due thirty (30) days after the date this Agreement becomes effective;

2. Beginning thirty (30) days after the date of the initial payment, five (5) consecutive monthly installment payments of three hundred dollars (\$300) each;

3. Each such installment payment shall be paid no later than thirty (30) days after the previous payment;

4. In the event that any installment payment is not received by the Commission by the fifth (5th) day after it would otherwise be due under subparagraph 3 above, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten (10) days written notice to the Respondents. Failure by the

Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

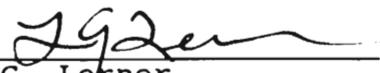
X. Except as provided in Paragraph VII above, Respondents shall have no more than 30 days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

92040321508

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Date: 1-21-92

FOR THE RESPONDENTS:


Judith L. Corley
Counsel for Respondents

Date: 12/9/91

92040321509



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3434

DATE FILMED 4/29/92 CAMERA NO. 1

CAMERAMAN AL

22040321510



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3434.

2/21/92

92040392154



ANITA for CONGRESS

California 19th Congressional District

Anita Perez Ferguson

P. O. Box 22604

Santa Barbara, CA 93121

RECEIVED
FEDERAL ELECTION COMMISSION
92 FEB 10 PM 12:16

PLEASE

February 7, 1992

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, NW
Washington, DC 20463

92 FEB 11 PM 5:01

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

Re: Anita for Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$500.00 payable to the Federal Election Commission. This check is the initial payment stipulated under Subparagraph 1 of Paragraph VII of the Conciliation Agreement between the Commission and the Anita for Congress Committee and myself as Treasurer dated January 21, 1992.

As further agreed, five consecutive payments of \$300.00 each shall be made to the Commission in settlement of the above-referenced matter.

Sincerely,

Virginia R. Patterson

Virginia R. Patterson
Treasurer

Enclosure

cc: Anita Ferguson
Judith Corley, Esq.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Feb. 11, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 FEB 11 PM 5:01

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks *PB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita for Congress, check number 100-98, dated Feb 6, 1992, and in the amount of \$ 500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 500.00, the MUR number is 3434 and in the name of Anita for Congress. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

2/13/92
Date

22040892156

RECEIVED
FEDERAL ELECTION COMMISSION

92 FEB 11 PM 5:01

1000-Q

NAME ANITA FOR CONGRESS

ACCOUNT NO. _____

2/6 10 92 90-7099/3222

PAY TO THE ORDER OF Federal Election Commission | \$ 500.00

Five hundred and 00/100 DOLLARS

COUNTY BANK 
52 NORTH FAIRVIEW AVENUE
GOLETA, CA 93117

MEMO MUR 3434 Virginia R. Patterson

⑆322272008⑆ 011904509409⑆ 70204



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3434.

4/15/92

92040901095



ANITA for CONGRESS

California 23rd Congressional District

Anita Perez Ferguson

P.O. Box 7437, Oxnard, CA 93030

(805) 963-3799

92 APR 14 AM 11:31

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

April 3, 1992

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, NW
Washington, DC 20463

Re: Anita for Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$300.00 payable to the Federal Election Commission. This check is the second installment payment stipulated in the Conciliation Agreement dated January 21, 1992.

Sincerely,

Virginia R. Patterson
Treasurer

Enclosure

cc: Anita Perez Ferguson

92040901096

Apr 13 9 16 AM '92

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1992

92 APR 14 AM 10:41

RECEIVED
FEDERAL ELECTION COMMISSION

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita for Congress, check number 1038, dated April 3, 1992, and in the amount of \$ 300.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted JOB
OGC, Docket

In reference to the above check in the amount of \$ 300.00, the MUR number is 3434 and in the name of Anita for Congress. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Abner D. Brinson
Signature

April 14, 1992
Date

92040901097

9 2 0 4 0 9 0 1 0 9 8 1038
ANITA PEREZ FERGUSON FOR CONGRESS

P. O. BOX 7437
OXNARD, CA 93030

90-7200/3222

4/3 1992

PAY TO THE ORDER OF FEC

\$ 300.00

Three hundred and no/100 DOLLARS

COUNTY BANK

52 NORTH FAIRVIEW AVENUE
GOLETA, CA 93117

f.s.b.

MEMO

MUR 3434

Virginia R. Patterson

⑆322272008⑆ 011904509409⑈ 1038

92 APR 14 AM 11:31

RECEIVED
FEDERAL ELECTION COMMISSION
U.S. HOUSE OF REPRESENTATIVES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3434.

4/2/92

92040901117

OGC4377



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

Mar. 11, 1992

92 MAR 11 AM 11:37

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita Perez -
Ferguson for Congress, check number 1007, dated
March 5, 1992 and in the amount of \$ 300.00.
Attached is a copy of the check and any correspondence that
was forwarded. Please indicate below the account into which
it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of
\$ 300.00, the MUR number is 3434 and in the name of
Anita Perez Ferguson for Congress. The account into
which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16**
- Civil Penalties Account, 95-1099.160**
- Other: _____**

Virginia Whitted
Signature

March 12, 1992
Date

9204090118

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAR 10 10 55 AM '92

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF THE
GENERAL COUNSEL

March 5, 1992

92 MAR 11 AM 11:37

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
GENERAL COUNSEL

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, NW
Washington, DC 20463

Re: Anita for Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$300.00 payable to the Federal Election Commission. This check is the first installment payment stipulated under the Conciliation Agreement between the Commission and the Anita for Congress Committee and myself as Treasurer dated January 21, 1992.

Sincerely,

Virginia R. Patterson
Virginia R. Patterson
Treasurer

Enclosure

cc: Anita Ferguson

92040901119

ANITA PEREZ FERGUSON FOR CONGRESS

P. O. BOX 7437
OXNARD, CA 93030

1007

90-7200/3222

3/5 1992

PAY TO THE
ORDER OF

Federal Election Commission

\$ 300.00

Three hundred two /

DOLLARS

COUNTY BANK

52 NORTH FAIRVIEW AVENUE
GOLETA, CA 93117

l.s.b.

MEMO *MUR 3434*

Virginia R. Patterson

⑆322272008⑆ 011904509409⑆ 1007

SAFE IN DEPOSIT

SIGN

FEDERAL RESERVE

92 MAR 11 2:11:37

9 2 0 4 0 9 0 1 1 2 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3434.

4/28/92

2040903054



ANITA for CONGRESS

California 23rd Congressional District

Anita Perez Ferguson

P.O. Box 7437, Oxnard, CA 93030

(805) 963-3799

92 APR 14 AM 11:31

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

April 3, 1992

CLOSED

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, NW
Washington, DC 20463

Re: Anita for Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$300.00 payable to the Federal Election Commission. This check is the second installment payment stipulated in the Conciliation Agreement dated January 21, 1992.

Sincerely,

Virginia R. Patterson

Virginia R. Patterson
Treasurer

Enclosure

cc: Anita Perez Ferguson

2040903055

Apr 13 9 16 AM '92

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 APR 14 AM 10:41

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita for Congress, check number 1038, dated April 3, 1992, and in the amount of \$ 300.06. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted JOB
OGC, Docket

In reference to the above check in the amount of \$ 300.00, the MUR number is 3434 and in the name of Anita for Congress. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Abner D. Brunson
Signature

April 14, 1992
Date

2040903056

2 2 0 4 0 9 0 3 0 5 / 1038
ANITA PEREZ FERGUSON FOR CONGRESS

P. O. BOX 7437
OXNARD, CA 93030

4/3 1972

90-7200/3222

PAY TO THE ORDER OF FEC \$ 300.00

Three hundred and _____ DOLLARS

COUNTY BANK
82 NORTH FAIRVIEW AVENUE
GOLETA, CA 93117

MEMO MUR 3434

Virginia R. Patterson

⑆322272008⑆ 011904509409⑈ 1038

RECEIVED
FEDERAL ELECTION COMMISSION
APR 14 AM 11:31



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3434.

6/25/92

92040905037

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Jun 23 12 24 PM '92

CLOSED

ANITA
U.S. Congress

June 19, 1992

Federal Elections Committee
Office of the General Counsel
999 "E" St. NW
Washington, DC 20463

Attn: Mr Richard M. Denholm

Re: MUR 3434

Dear Mr. Denholm:

Enclosed is a check for \$600.00 for payment for June and July. July was the last payment that we owe. If you have any questions please call me.

Sincerely,

Marcy Curran

Marcy Curran, Treasurer

22040905038

Folder copy
OGC 4743



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1992

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita Perez Ferguson for Congress, check number 1098, dated June 19, 1992, and in the amount of \$ 600.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

.....

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 600.00, the MUR number is 3434 and in the name of ANITA FOR CONGRESS. The account into which it should be deposited is indicated below:

- XX Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

June 24, 1992
Date

92040905039

1098

ANITA PEREZ FERGUSON FOR CONGRESS

P.O. BOX 24351 908-643-0985
VENTURA, CA 95003

8-371/222

June 19, 1992

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 600.00

Six hundred no/100

DOLLARS

Atory

DATE OF A LEVY

FOR

ms 3434

Marshall C. ...

⑆001098⑆ ⑆122203727⑆ 1640-929⑆

9204



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED PUR 3434.

7/2/92

92040905375



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1992

MEMORANDUM

TO: Richard Pullen
Accounting Officer

FROM: Lois G. Lerner *LL*
Associate General Counsel

Teresa Hennessy *TH*
Assistant General Counsel

Richard Denholm *RD*
Attorney

SUBJECT: Refund of Civil Penalty Overpayment in Connection
With MUR 3434

Please issue a refund check payable to Anita for Congress
in the amount of \$300.

On June 19, 1992, Marcy Curran, treasurer, submitted a
check in the amount of \$600 as the final installment payment in
connection with the civil penalty assessed in MUR 3434.
However, based on past installment payments made by the
Committee, it owed only \$300.

Please provide the Office of the General Counsel with the
refund check which we will send to Ms. Curran. Thank you.

92040905376

PUBLIC VOUCHER FOR REFUNDS

Voucher No.

Schedule No.

Federal Election Commission

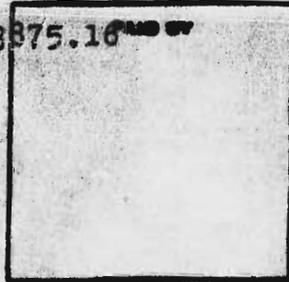
U. S.

999 E Street, N.W. Washington, D.C. 20463

Location:

Appropriation or Fund: Budget Clearing Account (OGC)95P3875.16 ^{Paid by}

To Anita for Congress
Address



Deposit received from the above-named depositor on June 23, 19 92
for civil penalty installment payment

has been applied as herein stated and the balance indicated is returned herewith:

Amount of deposit.....	\$ 600
Applied as explained in "Remarks" below.....
.....
Balance authorized to be refunded.....	\$ 300

Remarks

See attached memorandum for further explanation.

(Sign original only)

Title Associate General Counsel

Refund by

Check No.

Cash \$ on (Signature of payee)

Other method, \$ (Date)

92040905377



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3434.

6/10/92

92040910130



ANITA for CONGRESS

California 23rd Congressional District

Anita Perez Ferguson

P.O. Box 7437, Oxnard, CA 93030

(805) 963-3799

RECEIVED
FEDERAL ELECTION COMMISSION
MAY -6 AM 10:18

April 28, 1992

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, NW
Washington, DC 20463

Re: Anita for Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$300.00 payable to the Federal Election Commission. This check is the third installment payment stipulated in the Conciliation Agreement dated January 21, 1992.

Sincerely,

Virginia R. Patterson

Virginia R. Patterson
Treasurer

Enclosure

cc: Anita Perez Ferguson

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
MAY 4 11 07 AM '92

22040910131

OGC 4609 copy



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

92 MAY -6 AM 10:18

RECEIVED
FEDERAL ELECTION COMMISSION

May 5, 1992

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks *JB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita For Congress, check number 1091, dated April 28, 1992, and in the amount of \$ 300.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 300.00, the MUR number is 3434 and in the name of ANITA FOR CONGRESS. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

MAY 6, 1992
Date

92040910132

ANITA PEREZ FERGUSON FOR CONGRESS

P. O. BOX 7437
OXNARD, CA 93030

1097

4/28 1992

90-7200/3222

PAY TO THE
ORDER OF

FEC

\$ 300.00

Three hundred and 00/100

DOLLARS

COUNTY BANK

82 NORTH FAIRVIEW AVENUE
GOLETA, CA 93117

Inc.

MEMO

MUR 3434 (395)

Virginia R. Patterson

⑆32227 2008⑆ 10 8 904600 0409 01097

SAFETY PAPER



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

May 29, 1992

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Judith Corley
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005

RE: MUR 3434

Dear Ms. Corley:

On January 21, 1992, the Federal Election Commission and your clients, Anita for Congress and Virginia Patterson, as treasurer, entered into a conciliation agreement in settlement of a violation of 2 U.S.C. § 434(a)(6)(A). According to the agreement, your clients were required to pay a civil penalty of \$2,000. The conciliation agreement provided for installment payments, with your first payment of \$500 due 30 days after the execution of the agreement, and additional payments of \$300 due 30 days after each prior installment for 5 months.

According to Commission records, the check for your client's third installment payment was returned because the bank account from which the check was drawn had been closed. Please be advised that, pursuant to Section VII, paragraph 4 of the conciliation agreement, the Commission may accelerate the remaining payments and cause the entire amount to become due upon ten (10) days written notice. In addition, pursuant to 2 U.S.C. § 437g(a)(5)(D), further violations of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court.

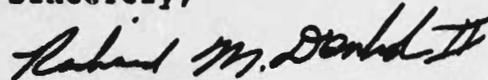
Based on our recent telephone conversation, this Office understands that the Committee has been informed that a certified check is required for the third installment. This Office also understands that the Committee has mailed that check. However, unless we receive the third installment payment within five days from the date of this letter, this Office will recommend that the Commission accelerate the remaining installments and may recommend that the Commission file suit to remedy this violation.

92040910134

Ms. Judith Corley
Page 2

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3690.

Sincerely,



Richard M. Denholm II
Attorney

cc: Marcelline I. Curran, Treasurer
Anita for Congress
P.O. Box 7437
Oxnard, CA 93030

92040910135



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1992

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Marcelline I. Curran, Treasurer
Anita for Congress
P.O. Box 7437
Oxnard, CA 93030

RE: MUR 3434

Dear Ms. Curran:

You will find enclosed a copy of the letter sent to your attorney regarding your third installment payment. If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script that reads "Richard M. Denholm II".

Richard M. Denholm II
Attorney

92040910136

ANITA

U.S. Congress

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Jun 8 9 58 AM '92
June 4, 1992

Richard M. Denholm II, Esq.
Federal Elections Commission
Office of the General Counsel
999 "E" Street, N.W.
Washington, D.C. 20463

CLOSED

Re: Anita For Congress, MUR 3434

Dear Mr. Denholm:

Enclosed is a check in the amount of \$300.00. Now that the new account is established there should be no more problem with returned checks.

Sincerely,

Marcy Curran
Marcy Curran,
Treasurer

92 JUN -9 PM 03:31

92040910137



Folder Cep 9
OGC 4808



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 9, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM
92 JUN -9 PM 3:30

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks *PP*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Anita Peres
Jerguson for Congress, check number 456157218, dated
and in the amount of \$ 600.00.
Attached is a copy of the check and any correspondence that
was forwarded. Please indicate below the account into which
it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of
\$ 600.00, the MUR number is 3434 and in the name of
ANITA FOR CONGRESS. The account into
which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

June 9, 1992
Date

92040910138

OFFICIAL CHECK

VENTURA, CALIFORNIA

16-2068
1220

PURCHASER: ANITA PEREZ FERGUSON
FOR CONGRESS

A Levy

09AM
OFFICE

456757278

An indemnity bond or similar agreement may be required before this check will be replaced if it is lost, stolen, or destroyed.

PAY

BANK OF A. LEVY 600 DOLLARS 00 cts

TO THE ORDER OF

*****FEDERAL ELECTION COMMISSION*****
DATE: 6-4-92 AMOUNT: \$600.00*****

DRAWER: BANK OF A. LEVY

[Signature]
AUTHORIZED SIGNATURE

PRODUCT OF THE FEDERAL RESERVE SYSTEM AND THE BANK OF AMERICA

⑆122029587⑆ 8#054128 456757278

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM
92 JUN -9 PM 3:30



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3434.

7/27/92

92040914598



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

CLOSED

Marcelline I. Curran, Treasurer
Anita for Congress
P.O. Box 7437
Oxnard, CA 93030

RE: MUR 3434

Dear Ms. Curran:

You will find enclosed a copy of the letter sent to your attorney regarding your final installment payment. If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script that reads "Richard M. Denholm II".

Richard M. Denholm II
Attorney

92040914599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Judith Corley, Esquire
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005

RE: MUR 3434

Dear Ms. Corley:

On June 19, 1992, Anita for Congress submitted a check in the amount of \$600 as the final installment payment in connection with the civil penalty assessed in MUR 3434. However, based on past installment payments made by the Committee, it owed only \$300. Accordingly, enclosed please find a refund check in the amount of \$300.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Denholm II
Attorney

cc: Marcelline I. Curran, Treasurer
Anita for Congress
P.O. Box 7437
Oxnard, CA 93030

92040914600

United States Treasury ¹⁵⁻⁵¹ W 065,383,362
₀₀₀



Pay to
the order of

07 16 92 13 WASHINGTON, DC
769381 0 ANITA FOR CONGRE
F E C WASH DC
ANITA FOR CONGRESS

Check No.

3007 82975500
95350001

\$****300*00
VOID AFTER ONE YEAR

PO NO 2AH906
PUBLIC YOU REFUND
FED ELEC COMM