



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20461

THIS IS THE BEGINNING OF MJR # 3537

DATE FILMED 10/28/93 CAMERA NO. 2

CAMERAMAN MC

93040983932

OGC4747



18 May, 1992

Ms. Joan Aikens, Chairman  
 Federal Election Commission  
 999 "E" Street, NW  
 Washington, DC 20463

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF GENERAL COUNSEL  
 92 MAY 27 PM 12:35

Dear Ms. Aikens,

This letter serves to file a complaint by me and my political committee, Chuck Williams for Congress '92 #C00262188, against Hammock for Congress #C00243196.

Based on Schedule D from his year end 31 Jan 91, mid year 31 July 91, and year end 31 Jan 92 FEC reports, Hammock's committee has \$169,959.16 in corporate debts owed since at least 27 Nov 1990, approximately eighteen months. A list of all fifteen creditors and the amounts owed by each is attached.

My complaint is that virtually no effort has been made by Hammock's political committee to pay, or the creditors to collect these debts. Therefore, they have been converted to corporate contributions, in violation of federal election law. While essentially ignoring his 1990 debts, Mr. Hammock's 1992 campaign committee, Hammock for Congress 1992 #C00251371, has been raising and spending funds in competition with my campaign.

Four explanations should be included with this complaint.

First, the \$169,959.16 figure represents only debts that are owed to companies, and does not include an additional \$2,000 owed to five individuals. These five debts are under \$1,000 each, and are owed to individuals who were not contributors to the campaign. Therefore, even if these debts were converted to contributions, they would not be in violation of contribution limits.

Second, only the amounts owed since 27 Nov 90 are included in this complaint. Approximately \$11,000 in debt has been generated since then, and is not included. This, combined with the \$2,000 mentioned above, accounts for the difference between the \$182,998.58 showing on the 31 Jan 92 year end report, and the \$169,959.16 included in this complaint.

93040983933

Third, some of the companies listed may not be corporations by the FEC's definition. Some may be sole proprietors or partnerships. However, they may be in violation as well if the debt exceeds the amount of money that the owner or partners are permitted to convert to a contribution.

Fourth, this complaint is based on information dated 31 Dec 91, and reported 31 Jan 92. It is almost five months old, and another report is not due until 31 July 92 for activity up to 30 June 92. Some of the debt may have been paid. However, based on his repayment record in calendar 91, it appears to be very unlikely that more than a few thousand dollars, if any, has been paid in 1992.

I request the Commission address this situation, require the creditors to prove they have made a "commercially reasonable attempt" to collect, and require Mr. Hammock's committee to pay off this debt in an expedited manner.

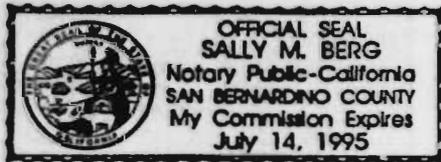
Sincerely,

*Chuck Williams*

Chuck Williams

*19 May 1992*

93040983934



*Sally M Berg*  
*May 19, 1992*

93040983935

Russo, Marsh 770 "L" Street #950 Sacramento, CA 95814 (916) 441-3734	Agency Services	\$ 77,343.09
Pacific West 3345 Wilshire Blvd. Los Angeles, CA (no phn. # avail.)	Consulting Services	57,050.09
Rogers, Anderson, Malody & Scott 290 North "D" Street #300 San Bernardino, CA 92401 (714) 889-0871	Accounting Services	7,601.17
COGS 11343 Stewart St. El Monte, CA 91731 (818) 350-1006	Signs	5,986.00
<del>The Wirthlin Group 1363 Beverly Road McLean, VA 22101 (703) 556-0001</del>	Survey	5,000.00
META Information Services 8649 Kiefer Blvd. Sacramento, CA 95826 (916) 383-5678	Voter File	4,813.37

- - MORE - -

93040983936

GTE One GTE Place Thousand Oaks, CA 91362 (805) 372-6000 (805) 372-6079 public affairs	Telephone	\$ 4,497.48
Red Lion Inn 222 N. Vineyard Ave. Ontario, CA 91764 (714) 983-0909	Fundraiser	2,632.55
Federal Express 2005 Corporate Ave., 1st Flr. Memphis, TN 38194 (901) 395-3460	Overnight Mail	1,360.25
<del>Southern California Electric Utilities 2244 Walnut Grove Avenue Rosemead, CA 91770 (818) 302-1212 (818) 302-1990 public affairs</del>	<del>Utilities</del>	<del>1,166.61</del>
Instant Image Printing 2232 Valencia Avenue San Bernardino, CA 92404 (714) 886-6255	Printing	1,000.00
University Copy System 2805 Barranca Road Irvine, CA 92714 (714) 551-1241	Printing	512.65
Pace Lithographers 18030 Cortney Ct. Industry, CA 91748 (818) 961-5416	Printing	508.10
Phoenix Press 2772 Main Street Irvine, CA 92714 (714) 261-0333	Printing	383.04
A Balloon Affair 105 Cajon Redlands, CA 92375 (714) 798-1928	Fundraiser Event	104.76

TOTAL

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\$169,959.16

OGC4722



21 May, 1992

Ms. Joan Aikens, Chairman  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Aikens,

Please remove the Wirthlin Group and Southern California Edison from my complaint against Hammock for Congress #C00243196 filed 18 May, 1992.

Per attached, it is clear that these two creditors have made significant attempts to collect what is owed to them.

Sincerely,

*Chuck Williams*  
Chuck Williams  
Candidate for Congress  
FEC ID #C00262188

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 MAY 26 AM 11:47

93040983957



**Southern California Edison Company**

P. O. BOX 800  
2844 WALNUT GROVE AVENUE  
ROSEMEAD, CALIFORNIA 91770

KENNETH S. STEWART  
ASSISTANT GENERAL COUNSEL

May 18, 1992

TELEPHONE  
(918) 502-1803  
FACSIMILE  
(918) 502-4383  
(918) 502-4014

"Chuck Williams For Congress '92"  
10570 Foothill Boulevard  
Suite 130-276  
Rancho Cucamonga, CA 91730

Dear Mr. Williams:

Thank you for your letter dated May 12, 1992 concerning a debt owed to Southern California Edison Company by the "Robert Hammock for Congress 1990" committee. I have investigated this matter and found the facts to be as follows:

The Hammock committee became an electrical customer in the ordinary course of Edison's business. After the committee closed its account, there was a remaining balance due to Edison. The account was referred to Edison's internal credit administrators, and at least two contacts were made with Mr. Hammock or representatives of his committee. After payment was still not received, the overdue bill was assigned to an outside collection agency. This is consistent with Edison's customary procedures in dealing with overdue accounts.

We appreciate your concern. However, I believe that Edison has made a "commercially reasonable attempt" to collect the debt owed by the Hammock committee, and accordingly has not made a contribution to the committee under the regulations of the Federal Election Commission. Please remove Edison's name from any complaint you file with the Commission.

I have attached copies of internal Edison computer data that I reviewed. If you have any questions, please feel free to call me at the number appearing above.

Very truly yours,

*Kenneth S. Stewart*

KSS:kss-LW921390.053

Enclosures

93040983938

**The Wirthlin Group**

Decision making information  
for intelligent choices

May 18, 1992

Mr. John C. Williams  
6847 Portofino Court  
Rancho Cucamonga, California 91701

Re: Hammock for Congress

Dear Mr. Williams:

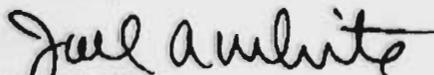
Please be advised that The Wirthlin Group has attempted, and continues to attempt collection of outstanding debt against this committee.

Over the past year we have made numerous attempts to collect the debt by working directly with the committee. We were advised that the committee did not have the funds to pay the debt but we were not dissuaded from continuing our efforts. We have become impatient with waiting for the committee to follow up on any effort to pay bill. In January, 1992 we submitted the account to Dun & Bradstreet Collection service. I have recently forwarded additional documentation of the debt to a lawyer who is working the case for us.

I have attached a copy of correspondence confirming our submission of this account to a collection agency, which is more than a formality on our part. D&B has successfully sought collections on other accounts for us recently, and we are hopeful of receiving full payment on this debt too.

We strenuously object to being named in any lawsuit accusing us of being a contributor to the Hammock for Congress Committee, or any such committee. We have, and will continue to comply with the laws in this matter, and we intend to seek full payment of the debt owed by this committee through our D&B agents. This obviously means that we should not be named in any list of possible contributors to this committee.

Sincerely,



Joel A. White  
Chief Financial Officer

93040983939



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 28, 1992

Chuck Williams  
10570 Foothill Blvd.  
Suite 130-276  
Rancho Cucamonga, CA 91730

Dear Mr. Williams:

This is to acknowledge receipt on May 26, 1992 and May 27, 1992, of your letters dated May 18, 1992 and May 21, 1992. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a 15 day time period during which you may file an amended complaint as specified above. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

*Retha Dixon*

Retha Dixon  
Docket Chief

Enclosure  
cc: Respondents

93040983940



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Jun 8 10 14 AM '92

MUR 3537

1 June, 1992

Ms. Retha Dixon, Docket Chief  
Federal Election Commission  
999 "E" Street, NW  
Washington, DC 20463

92 JUN -8 PM 4:49

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK

Dear Ms. Dixon,

This letter serves to file a legally sufficient complaint regarding my letters of 18 May, 1992 and 21 May, 1992, and your letter of 28 May, 1992.

I swear that the contents of my complaint are true to the best of my knowledge.

Sincerely,

*Chuck Williams*

Chuck Williams

93040983941

Subscribed and sworn to before me on this 1st day of June, 1992.

*Angelita S. Alfonso*  
NOTARY PUBLIC





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

John C. Williams  
c/o Barbara K. Williams, Treasurer  
Chuck Williams for Congress '92  
10570 Foothill Blvd, Suite 130-276  
Rancho Cucamonga, CA 91730

RE: MUR 3537

Dear Mr. Williams:

This letter acknowledges receipt on June 8, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Robert L. Hammock, Bob Hammock for Congress, Hammock for Congress 1992 and Donald L. Rogers, as treasurer, Russo Mansh, Pacific West, Rogers, Anderson, Malody & Scott, COGS, The Wirthlin Group, META Information Service, GTE, Red Lion Inn, Federal Express, Southern California Electric Utilities, Instant Image Printing, University Copy System, Pace Lithographers, Phoenix Press, and A Balloon Affair. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lisa E. Klein  
Assistant General Counsel

Enclosure  
Procedures

93040983942



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Donald L. Rogers, Treasurer  
Bob Hammock for Congress  
Hammock for Congress 1992  
290 North D Street; Suite 300  
San Bernardino, CA 92401

RE: MUR 3537

Dear Mr. Rogers:

The Federal Election Commission received a complaint which indicates that Bob Hammock for Congress and Hammock for Congress 1992 (the "Committees") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

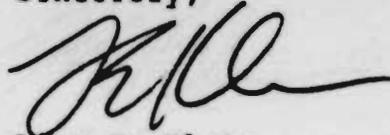
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committees and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983943

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

cc: Robert Hammock

93040983944



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

Robert L. Hammock  
1974 E Lynwood #63  
San Bernardino, CA 92404

RE: MUR 3537

Dear Mr. Hammock:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983945

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983946



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Russo Mansh  
770 L Street, Suite 950  
Sacramento, CA 958142

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Russo Mansh may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

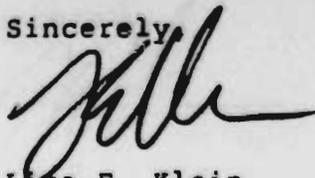
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Russo Mansh in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983947

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983948



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

Pacific West  
3345 Wilshire Boulevard  
Los Angeles, CA 90010

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Pacific West may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Pacific West in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983949

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983950



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

Rogers, Anderson, Malody & Scott  
290 North D Street, Suite 300  
San Bernardino, CA 92401

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Rogers, Anderson, Malody & Scott may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

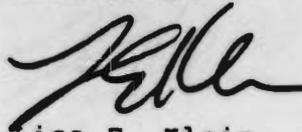
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Rogers, Anderson, Malody & Scott in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983951

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983952



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

COGS  
11343 Stewart Street  
El Monte, CA 91731

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that COGS may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

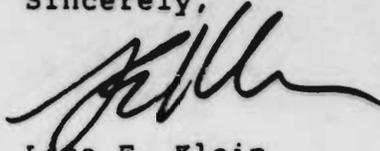
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against COGS in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983953

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983954



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

The Wirthlin Group  
1363 Beverly Road  
McLean, VA 22101

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that The Wirthlin Group may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

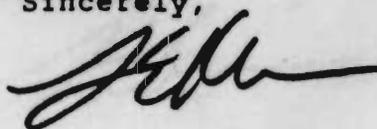
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against The Wirthlin Group in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983955

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983956



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

June 15, 1992

META Information Service  
8649 Kiefer Boulevard  
Sacramento, CA 95826

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that META Information Service may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against META Information Service in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983957

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983958



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

GTE  
One GTE Place  
Thousand Oaks, CA 91362

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that GTE may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

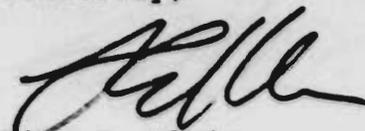
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against GTE in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983959

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983960



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Red Lion Inn  
222 North Vineyard Avenue  
Ontario, CA 91764

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Red Lion Inn may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

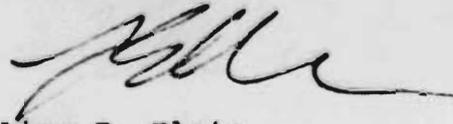
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Red Lion Inn in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983961

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983962



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

Southern California Electric Utilities  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Southern California Electric Utilities may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Southern California Electric Utilities in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983963

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983964



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Federal Express  
2005 Corporate Avenue, First Floor  
Memphis, TN 38194

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Federal Express may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

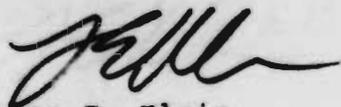
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Federal Express in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983965

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983966



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Instant Image Printing  
2232 Valencia Avunue  
San Bernardino, CA 92404

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Instant Image Printing may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Instant Image Printing in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983967

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983968



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

University Copy System  
2805 Barranca Road  
Irvine, CA 92714

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that University Copy System may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against University Copy System in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983969

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983970



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Pace Lithographers  
18030 Cortney Court  
Industry, CA 91748

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Pace Lithographers may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Pace Lithographers in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983971

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

9 3 0 4 0 9 8 3 9 7 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1992

Phoenix Press  
2772 Main Street  
Irvine, CA 92714

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that Phoenix Press may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

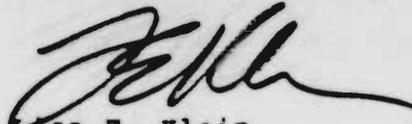
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Phoenix Press in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983973

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983974



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 15, 1992

A Balloon Affair  
105 Cajon  
Redlands, CA 92375

RE: MUR 3537

Dear Sir or Madame:

The Federal Election Commission received a complaint which indicates that A Balloon Affair may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3537. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against A Balloon Affair in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

93040983975

If you have any questions, please contact Noriega James, the staff member assigned to this matter, at (202) 219-3490. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein  
Assistant General Counsel

Enclosures

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

93040983976

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 19 8 31 AM '92

**The Wirthlin Group**  
Decision making information  
for intelligent choices

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE  
92 JUN 19 PM 3:44

June 16, 1992

Lisa E. Klein, Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 3537

Dear Ms. Klein:

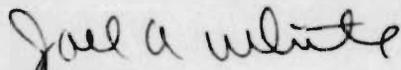
In response to your June 15, 1992 letter to our company, it is unclear what impact, if any, the documents included with the copy of the complaint by Mr. Chuck Williams had on your decision to seek additional information directly from our company. Our response to Mr. Williams, when we were notified of his concern, was as indicated in the copy that is attached to your letter to us. Mr. Williams letter to the commission, dated May 21st suggests that we were not to remain a target of his complaint with the commission. We would have expected the information provided to Mr. Williams on May 18th and his May 21st letter to you to be adequate to clear any doubt about our continuing efforts to collect this campaign debt. Perhaps that correspondence specifically addressing our efforts to collect our account were overlooked and we were included in mailings sent to all the other names listed in the complaint?

If the commission needs additional information to confirm our past and continuing efforts to collect this debt, then we will gladly comply. It would seem that the information provided would satisfy your needs. Please give us guidance on any specific types of additional evidence that would be useful to you in fulfilling your obligations to properly resolve such matters. In any event, the account remains as an active collection account with our collection agency, Dun & Bradstreet Collections, and has been assigned to an attorney in California by D&B to pursue legal action as required. We are pleased to know that Mr. Hammock is raising additional funds because that obviously means his committee should have the resources to make payment to us.

93040983977

I submit the above information and the information contained in our May 18, 1992 letter to Mr. John Williams to be factually accurate to the best of my belief and knowledge and that our collection efforts against this campaign committee remain active as of this writing and our intent is to continue such collection effort as long as it is feasible relative to the size of the debt.

Sincerely,



Joel A. White  
Chief Financial Officer

93040983978

# META

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 22 10 56 AM '92

Federal Election Commission  
999 East Street, N.W.  
Washington, DC 20463  
Attn: Noriega James

RE: MUR3537

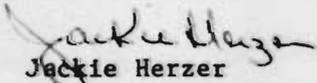
Dear Mr. Noriega,

In response to your letter regarding the "Bob Hammock in 1990" campaign debts owed to Meta Information Services, this letter serves as notice that Meta has been diligently pursuing collection of these funds and we have most certainly not converted said debt into inkind contributions.

Since these debts have occurred we have been in continual contact with the campaign. Our understanding has been that as funds become available, Mr. Hammock shall make payment on all outstanding balances. This has proved to be the case for us as you can see by the attached statement of Mr. Hammock's account as well as the attached check copies which reference previous debt, indicating recent payment activity on his account.

We will continue to make every effort to collect these sums until such time it becomes clear they are unrecoverable, at which point the account will be classified as a bad debt, not an inkind contribution.

Thank you,

  
Jackie Herzer  
Accounting Manager

/jh

enc. (2)

RECEIVED  
FEDERAL ELECTION COMMISSION  
92 JUN 22 PM 3:00

93040983979

BOB HAMMOCK FOR CONGRESS  
I.D. # 134996

590

16-21/1228  
706

APR 8, 19 92

PAY  
TO THE  
ORDER OF

META

\$ 500.00

DOLLARS



First Interstate Bank  
of California # 206  
Vandier Tower, City Hall Plaza  
P.O. Box 1449  
San Bernardino, CA 92402-1449

FOR 107090273  
PAST DEBT PYMNT

*Ray D. ...*  
*World City*

⑆000590⑆ ⑆122000218⑆206662845⑆ 11

93040283981

HAMMOCK FOR CONGRESS '92

#C00251371

290 N. D STREET, SUITE 300  
SAN BERNARDINO, CA 92401

1105

16-21/220

A09090270

5-19 1992

PAY TO THE  
ORDER OF

*Yuta*

\$ *1105*

*Donna Williams & Family*

DOLLARS



First Interstate Bank  
of California #206  
Vandal Tower, City Hall Plaza  
P.O. Box 1440  
San Bernardino, CA 92402-1440

TWO SIGNATURES REQUIRED

*Mid debit card*

*[Handwritten signatures]*

⑆001105⑆ ⑆122000218⑆ 20690851⑆ 11

BOB HAMMOCK FOR CONGRESS  
I.D. # 134996

586

FEB. 12, 19 92

16-21/1220  
226

PAY  
TO THE  
ORDER OF

META

\$ 1,000.00

DOLLARS



First Interstate Bank  
of California # 206  
Vander Tower, City Hall Plaza,  
P.O. Box 1449  
San Bernardino, CA 92402-1449

TWO SIGNATURES REQUIRED

A09090270

FOR PARTIAL PAYMENT ON ACCOUNT

*Richard Hamrick*  
*[Signature]*

⑆000586⑆ ⑆122000216⑆ 206662845⑆ 11

930409839



**University Copy Systems**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Jun 22 1 24 PM '92

June 18, 1992

Ms. Retha Dixon, Docket Chief  
Federal Election Commission  
999 "E" Street NW  
Washington, DC 20463

Certification #P 020 737 747

RE: MUR 3527 *3527*

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
92 JUN 22 PM 3:06

Dear Ms. Dixon:

Please accept the enclosed documents as our defense against the accusation made by "Chuck Williams of Congress '92" #C00262188, regarding University Copy Systems. After your review of these documents, I am confident you will see we are innocent of this accusation.

Thank you for your time, and if I can be of any service to you regarding this matter, please contact me directly at 2805 Barranca Rd, Irvine, Ca 92714.

Sincerely,  
UNIVERSITY COPY SYSTEMS

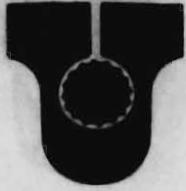
Donna DeCeco  
Manager of Operations and Administration

Enclosure

93040983983

An Exclusive **Canon** Dealer

2805 Barranca Pkwy. • Irvine, California 92714 • (714) 551-2240  
Eight Corporate Park, Suite 110 • Irvine, California 92714 • (714) 551-1241  
2025 Chicago Ave., Suite A-10 • Riverside, California 92507 • (714) 788-8994  
6020 N. Irwindale Ave., Suite B • Irwindale, CA 91702 • (818) 969-9449  
35-325 Date Palm Dr., Suite 208 • Cathedral City, California 92234 • (619) 328-8744



# University Copy Systems

June 18, 1992

"Chuck Williams for Congress '92"  
10570 Foothill Blvd. #130-276  
Rancho Cucumunga, Ca 91730

Certification # P 020 737 746

RE: "Bob Hammock for Congress '90" #C00243196

Dear Mr. Williams:

I am in receipt of your letter dated May 12, 1992 claiming University Copy Systems had made illegal contributions to "Bob Hammock of Congress '90", and I want to assure you we have made every attempt possible to collect the debt owed, including legal action with our corporate attorney, Mr. Jim Bates. In your complaint to the FEC, you state the debt owed to University Copy Systems is \$512.65. The actual debt was \$5,169.23, and as of this date, only \$300.00 has been submitted against this debt.

Enclosed is our proof of the attempt made to collect this debt. After reviewing these documents, I believe you will find University Copy Systems innocent of your accusation, and therefore, remove our name from your complaint to the FEC.

If you should require any additional information regarding this, please contact me directly at 2805 Barranca Rd, Irvine Ca, 92714.

Sincerely,  
UNIVERSITY COPY SYSTEMS

Donna DeCeco  
Manager of Operations and Administration

Enclosure

cc: Federal Election Committee

An Exclusive **Canon** Dealer

2805 Barranca Pkwy. • Irvine, California 92714 • (714) 551-2240  
Eight Corporate Park, Suite. 110 • Irvine, California 92714 • (714) 551-1241  
2025 Chicago Ave., Suite A-10 • Riverside, California 92507 • (714) 788-8994  
6020 N. Irwindale Ave., Suite B • Irwindale, CA 91702 • (818) 969-9449  
35-325 Date Palm Dr., Suite 208 • Cathedral City, California 92234 • (619) 328-8744

93040983984

REMIT TO:

CREDITOR University Copy Systems  
ADDRESS 2805 Banana Road  
rvine CA. 92714  
BY Jayne P. Loring

**FINAL NOTICE**

TO Bob Hamilton Fee Manager  
1101 S E St.  
San Bernardino CA. 92408  
int. # 210646

DATE 11-29-90  
BALANCE DUE \$ 5,119.23

December 21, 1990

EXPIRATION DATE

*Should sign to avoid*

COPY TO:

**Brown & Bitterman, Inc.**  
Commercial Collections  
National Headquarters  
21243 Ventura Boulevard  
Woodland Hills, California 91364  
(818) 716-7902

93040983985

INVOICE DISPLAY

Version 2.28

Invoice: 124626

Location BOB HAMMOCK FOR CONGRESS  
1101 S E ST  
SAN BERNARDINO CA 92404

Date  
9/18/90

Customer	Model/Serial	Lease ID	Rep	Prog Type	Sale Type	Dist
206546	3525 CCJ01888	RT		RTS		DD

Date	Previous Meter	Date	Current Meter
		9/28/90	119421
	Invoice Period	8/20/90 to	9/20/90

Quantity	Code No	Description	Amount
1	5801	MONTHLY RENTAL (BLACK)	250.00

Late Chg	12.01	Tax	16.88	Invoice Total	266.88
		Account Bal	5169.23	Total Bal	5181.24

Bill BOB HAMMOCK FOR CONGRESS  
to 1101 S E ST  
SAN BERNARDINO CA 92404

Comments RENTAL INCLUDES PARTS AND LABOR

930409883986

INVOICE DISPLAY

Version 2.28

Invoice: 124799

Location BOB HAMMOCK FOR CONGRESS  
1101 S E ST  
SAN BERNARDINO CA 92404

Date  
9/20/90

Customer	Model/Serial	Lease ID	Rep	Prog Type	Sale Type	Dist
206546	3525 CCJ01882	RT		RTS		DD

Date 8/28/90 Previous Meter 119421 Date 9/20/90 Current Meter 119421  
 Invoice Period 9/20/90 to 10/20/90

Quantity	Code No	Description	Amount
1	5801	MONTHLY RENTAL (BLACK)	250.00

Late Chg	12.01	Tax	16.88	Invoice Total	266.88
		Account Bal	5169.23	Total Bal	5181.24

Bill BOB HAMMOCK FOR CONGRESS Comments RENTAL INCLUDES PARTS AND LABOR  
 to 1101 S E ST  
 SAN BERNARDINO CA 92404

93040983987

INVOICE DISPLAY

Version 2.28

Invoice: 126748

Location BOB HAMMOCK FOR CONGRESS  
1101 S E ST  
SAN BERNARDINO CA 92404

Date  
10/22/90

Customer	Model/Serial	Lease ID	Rep	Prog Type	Sale Type	Dist
206546	3525 CCJ01888	RT		RTS		DD

Date 9/20/90 Previous Meter 119421 Date 10/03/90 Current Meter 193298  
Invoice Period 10/20/90 to 11/20/90

Quantity	Code Ac	Description	Amount
1	5601	MONTHLY RENTAL (BLACK)	250.00

Late Chg	12.01	Tax	16.88	Invoice Total	266.88
	Account Bal	5169.23	Total Bal	5181.24	

Bill BOB HAMMOCK FOR CONGRESS  
to 1101 S E ST  
SAN BERNARDINO CA 92404  
Comments RENTAL INCLUDES PARTS AND LABOR

93040983988

INVOICE DISPLAY

Version 2.28

Invoice: 129106

Ship to BOB HAMMOCK FOR CONGRESS  
1101 S E ST  
SAN BERNARDINO CA 92404

Date  
11/29/90

Customer	Cust Order #	Date Ord	Date Ship	Via	Rep	Sale Type	Dist
206546		11/29/90	11/29/90		205A43 SERV	TM	CA

Ordered	Pkg	Shipped	Prod No	Description	Price	Amount
102309	EA	102309	5802	RENTAL COPY CHARGE (BLK)	.0400	4092.36
			900000	3525 CCJ01888		

COPY CHARGES ARE TO COVER EXECSS ALLOWABLES OVER 4 MONTH PERIOD.

Discount	4092.3600	Freight		Tax	276.23	Invoice Total	4368.59
Late Chg	12.01	Account Bal				Total Bal	5181.24

Bill BOB HAMMOCK FOR CONGRESS  
to 1101 S E ST  
SAN BERNARDINO CA 92404

Comments PAYMENT DUE 10 DAYS FROM DATE OF  
THIS INVOICE. THANK YOU!

93040983989

**Brown & Bitterman, Inc.**

Licensed & Bonded Commercial Collection Agency

(818) 716-7902 • FAX (818) 716-7846

21243 Ventura Boulevard, Woodland Hills, California 91364

March 13, 1991

Ms. Laurie Cieszinski  
University Copy Systems  
2805 Barranca Road  
Irvine, CA 92714

# 5,169.23

RE: Our file #18235  
Bob Hammock For Congress - Customer #206546

Dear Laurie:

Please be advised, through our efforts we have been unable to contact the above-mentioned debtor. All phone numbers are disconnected and all mail is being returned.

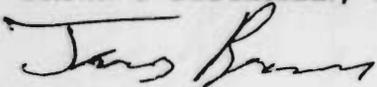
Laurie, this credit was based on Mr. Bob Hammock individually, and a detailed skip-tracing needs to be conducted so we may locate Mr. Hammock and his assets. I have contacted Mr. C. D. Gonzalez, who is a skip-tracer and an asset search person whom our office uses. He has informed me that he would require a fee of \$200.00 to conduct such an investigation.

If you wish to have this detailed investigation made, kindly forward to our office a check for the sum of \$200.00 made payable to C. D. Gonzalez so that we may retain his services in hopes of locating Mr. Bob Hammock and his assets.

Thank you for your anticipated quick response.

Sincerely,

BROWN & BITTERMAN, INC.



James Brown

JB/SS

93040983990

James A. Bates  
Attorney at Law

1651 E. Fourth Street, Suite 108 • Santa Ana, California 92701  
Telephone: (714) 971-0904 • FAX: (714) 541-0849

3-20-91

MEMO-----

TO: LAURIE CIESZINSKI

FROM: JIM BATES

RE: HAMMACK FOR CONGRESS ACCOUNT

I LOCATED THE CAMPAIGN TREASURER THROUGH THE REGISTRAR OF VOTERS. UNIVERSITY'S PREVIOUS INVOICES HAVE BEEN ROUTED TO THEM. THEY INTEND TO PAY AS SOON AS MORE MONEY IS RAISED AT A FUND-RAISER. CALENDAR FOR ONE MONTH FOR FOLLOW-UP. HAMMACK'S TREASURER IS AL ROGERS. ADDRESS FUTURE BILLS TO "ROGERS, ANDERSON, MALODY & SCOTT", 290 NORTH "D" STREET, #300, SAN BERNARDINO (zip?). "Attn "LIZ". THEIR PHONE NUMBER IS (714) 889-0871.

93040983991

**BOB HAMMOCK FOR CONGRESS**  
I.D. # 134996

557

PAY TO THE ORDER OF

University Copy Systems

Apr. 4, 19 91

16 21/1220  
205

\$ 300.00

THREE HUNDRED DOLLARS

DOLLARS

FOR



First Interstate Bank  
of California # 205  
Vann Tower, City Hall Plaza  
P.O. Box 1445  
San Bernardino, CA 92402-1449

⑆000557⑆ ⑆122000218⑆2066628⑆5⑆ 11

2 6 6 2 8 6 0 4 0 3 6

MUR 3537

0604 4930  
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

# ROGERS, ANDERSON, MALODY & SCOTT

CERTIFIED PUBLIC ACCOUNTANTS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

VANIR TOWER, SUITE 300

290 NORTH "D" STREET

SAN BERNARDINO, CALIFORNIA 92401

(714) 888-0871 • (714) 824-8738  
FAX (714) 888-5361

JUN 23 9 07 AM '92

MEMBERS

AMERICAN INSTITUTE OF  
CERTIFIED PUBLIC ACCOUNTANTS  
PRIVATE COMPANIES PRACTICE SECTION  
OF THE DIVISION FOR CPA FIRMS

CALIFORNIA SOCIETY OF  
CERTIFIED PUBLIC ACCOUNTANTS

DONALD L. ROGERS, C.P.A.  
RICHARD D. ANDERSON, C.P.A.  
DENNIS H. MALODY II, C.P.A.  
JACK C. SCOTT, C.P.A.  
JAY H. ZERCHER, C.P.A.  
WILLIAM E. REINEKING, C.P.A.  
ROBERT B. MEMORY, C.P.A.  
THOMAS V. HESS, C.P.A.  
PHILLIP H. WALLER, C.P.A.  
ACCOUNTANCY CORPORATION

MARILYN J. SELLFORS, C.P.A.  
TERRY P. SHEA, C.P.A.  
NANCY O'RAFFERTY, C.P.A.  
CYNTHIA L. SAKS, C.P.A.  
BRIAN W. TOMPKINS, C.P.A.  
LINDA M. HERNANDEZ, C.P.A.  
BRENDA L. ODLE, C.P.A.  
LEENA SHANBHAG, C.P.A.

June 19, 1992

Ms. Lisa E. Klein, Assistant General Counsel  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

RE: MUR 3537

Dear Ms. Klein:

I am responding to your letter of June 15, 1992 wherein you indicate that a complaint has been filed against our accounting partnership.

The complaint alleges that amounts due to our partnership were "corporate contributions in violation of Federal Election Law".

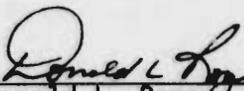
Our first response is that our accounting partnership is not a corporation and therefore the assertion is, on its face, invalid. Although our letterhead still indicates that one of our partners (Anderson) practices as a professional corporation, Mr. Anderson's professional corporation terminated its interest in our partnership in June 1991.

Our second response is that the liability owed to our Firm from the Hammock Campaign is for accounting services which were provided. As you know, there is a special exception to the \$1,000 limit for persons providing accounting services to campaigns, so that should we desire to cancel our debt, it would be permissible. We have not determined to cancel the debt.

If additional information is required, please advise.

Very truly yours,

Rogers, Anderson, Malody & Scott

  
Donald L. Rogers, Managing Partner

DLR:1a

93040983993

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 JUN 23 PM 4:09

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 26 10 23 AM '92



*Southern California Edison Company*

P. O. BOX 800

2244 WALNUT GROVE AVENUE

ROSEMEAD, CALIFORNIA 91770

KENNETH S. STEWART  
ASSISTANT GENERAL COUNSEL

June 25, 1992

TELEPHONE  
(818) 302-1883

FAX  
(818) 302-4393  
(818) 302-4014

Federal Election Commission  
General Counsel's Office  
Washington, D. C. 20463  
Attention: Lisa E. Klein  
Assistant General Counsel

Re: MUR 3537

Dear Ms. Klein:

I received today your letter dated June 15, 1992 concerning a complaint filed with the Federal Election Commission by Chuck Williams and his campaign committee. The complaint alleged that Southern California Edison Company had not made a "commercially reasonable attempt" to collect an electric bill owed to Edison by the "Robert Hammock for Congress 1990" committee. Mr. Williams notified me during May 1992 that he had filed the complaint. I responded directly to him by letter and described the efforts made by Edison to collect the debt. Mr. Williams responded that he would request the Commission to delete Edison from the complaint.

The Hammock committee became an electrical customer of Edison in the ordinary course of Edison's business. After the committee stopped receiving electric service from Edison, there was a balance of slightly more than \$1,000 owed to Edison. The matter was referred to Edison's internal credit administrators, and at least two contacts were made with Mr. Hammock or representatives of his committee seeking payment of the bill. After payment was still not received, the overdue bill was assigned to an outside collection agency. This is consistent with Edison's customary procedures in dealing with overdue accounts. I have attached copies of internal Edison computer printouts showing the actions taken.

It is my opinion that Edison has made a "commercially reasonable attempt" to collect the debt owed by the Hammock committee, and accordingly has not made a contribution to the committee under the regulations of the Commission. I respectfully request that the Office of the General recommend, and the Commission find, that there is no reason to believe that the complaint filed by Mr. Williams in MUR 3537 sets forth a possible violation by Southern California Edison Company of the Federal Election Campaign Act of 1971.

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL  
92 JUN 26 PM 3:42

93040983994

Federal Election Commission  
Page 2  
June 25, 1992

If you have any questions or need any additional information, please feel free to call me at (818) 302-1863.

Very truly yours,



Kenneth S. Stewart  
Assistant General Counsel

KSS:kss:LW921770.028

Enclosures



93040983995

9 3 0 4 0 9 8 3 9 9 6

*United States Credit*

RBT HAMMOCK FR CNGR  
1101 S E ST  
SAN BDNO CA 92408

54 31 020 6450 00

COLL AGCY 6

CC LUA CBI 077  
FSR 00 RATE NON-DOMESTIC  
GACI NONE PENDING

\* \* \* \* \* BILLING INFORMATION AND CURRENT BALANCE \* \* \* \* \*  
BILLING DATES READS MULT BASELINE N-BASELINE TOTALS

USAGE  
'BIL2'  
TOTALS

DAILY USAGE X FACTOR

X  
X  
X  
X  
X

STATE TAX  
TOTAL CURRENT BILL

NO OF DAYS- BL ALLOC-

DAILY AVG COST-  
USAGE-  
YR AGO-

PREVIOUS BALANCE  
PAST PREVIOUS BALANCE  
ACCTS RECEIVABLE 00/00/00  
ACCOUNT BALANCE

1044.35

CHECK DIGIT- 6 BILL CODE-  
ENTER TRANSACTION CODE-

05/15/92 13.38.44 OPID=EI , USER=#CEI16D, TERM=AUN6, VTAM=D017812 , APPLID=CICSTOR2

92 JUN 26 PM 3 42  
RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL

9 3 0 4 0 9 8 7 9 9 7

ACCT NO 54 31 028 6450

\*\*\* HISTORICAL ORDER \*\*\*

HIST FOR CUST NO- 04 \* \* GENERAL PURPOSE REQUEST \* \* \* \* \* \* \* \* \* \*

CANCEL ORDER- EFF DATE- 04/01/91 OPR- CBF DATE- 03/29/91 TIME- 09:21  
TYPE OF REQUEST- SR/WHITT LAST CHANGE: OPR- TSD DATE- 04/05/91 TIME- 07:42  
SAN BDND REG OFFICE WHO HANDLES COUNTY OFFICIALS...HE STATES TO SEND CUST  
A BILL AT 825 E 3RD ST. SAN BDND 92415...IF ANY QUESTIONS PLS CALL ME.,  
JUNE JARMAN/ CREDIT ADMIN....24217  
ACCESS- TELE #- 000 - 002 - 4217 EXT-  
REQUESTED BY- JUNE/CREDIT INST CODE-  
ASSIGNED TO- DIVISION DOG- 0 RETURN ORDER TO ACTG-  
COMPLETED-INFO- CLOS BILLS

CUSTOMER NOTIFIED- FCOM- \*\*\* DATE- \*\*/\*\*/\*\* TIME- \*\* \*\*  
COMPL BY- LF DATE- 04/05/91 KWH RD- DEM RD- KVAR RD-

ENTER TRANSACTION CODE-

05/15/92 13.39.12 OPID=EI...USER=#CEI160,TERM=AUN6,VTAN=D017812 APPLID=CICSTOR2

9 3 0 4 0 9 8 7 9 9 8

ACCT NO 54 31 028 6450

\*\*\* HISTORICAL ORDER \*\*\*

\* \* \* \* \* APPLICATION CREDIT INFORMATION \* \* \* \* \*

EFFECTIVE DATE- 06/12            TYPE ORDER- TURN ON            OPER- C4A DATE- 06/11  
CUST NAME- RBT HAMMOCK FR CNGR    SPOUSE NAME-  
BUYING HOME-                      RESD TELE NO- 999-999-9999  
PREV SCE SERV-                    CITY-                      HOW LONG-  
PREV SCE SERV-                    CITY-                      HOW LONG-  
TYPE/BUS- OFFICE                   ADDR-                      CITY-  
DETAIL/BUS- POLITICAL CAMPAIGN    HOW LONG-                   DEPOSIT- 0200  
BUS TELE NO- 714-889-9058 EXT-    CREDIT CODE- 2            SE CHARGE- 5  
TAX I.D. #- 00-0134996  
COMPLETED BY- 08 DATE- 06/13 READ- 6074 DEM RD- 000    REQ FROM-  
MEMO INFO-                                FROM OPER ID- EI

ENTER TRANSACTION CODE-

05/15/92 13.39.50 OPID=EI ,USER=#CEI16D,TERM=AUN6,VTAM=D017812 ,APPLID=CICSTOR2

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 29 12 14 PM '92

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

MUR 3537

NAME OF COUNSEL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

TELEPHONE: \_\_\_\_\_

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

6/23/92  
Date

Cathy Beiman  
Signature  
A Balloon Affair

RESPONDENT'S NAME: A Balloon Affair

ADDRESS: 225 Westpark  
Redlands, Ca. 92373

HOME PHONE: (714) 794-5060

BUSINESS PHONE: \_\_\_\_\_

I have  
never  
closed the  
business.  
This is  
my home  
address.

Re: MUR 3537

A Balloon Affair was paid in  
full the \$104.76 owed for imprinted latex  
balloons. It took us several months to  
collect the money due, but it was paid.

Sincerely,  
Cathy Beiman  
A Balloon Affair

Please call if you have further questions.

93040983999

County Supervisor  
**ROBERT L. HAMMOCK**  
Candidate

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

JUN 29 11 52 AM '92

**Congress of the United States**  
**House of Representatives**

June 23, 1992

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 JUN 29 PM 3:48

Ms. Lisa E. Klein, Assistant General Counsel  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

RE: Your letter of June 15, 1992  
MUR 3537

Dear Ms. Klein:

My campaign committee has, and is still trying to make partial payments to all creditors.

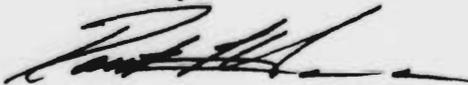
No creditor, to my knowledge, has cancelled the committee debt to them nor made a contribution of any portion of the debt.

I have planned a fall fundraiser and will repay all debts possible when money becomes available.

Mr. Williams' claims are inappropriate, completely unfounded, and offensive to me and to the campaign committee.

Please advise if I can be of any further assistance.

Sincerely,



ROBERT L. HAMMOCK

Campaign Headquarters: 10470 Foothill Blvd., Suite 200 • Rancho Cucamonga, CA 91730  
Mailing Address: 10570 Foothill Blvd., Suite 130-143 • Rancho Cucamonga, CA 91730

Office: (714) 483-1393

Paid for and authorized by Bob Hammock for Congress

24 Hours: (714) 625-7087

93040984000

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COMMISSION  
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JUN 29 11 35 AM '92



*A Tradition of  
Quality Printing  
and Service*

June 22, 1992

Federal Election Commission  
ATTN: Noriega James  
Washington, D.C. 20463

Re: MUR 3537

Dear Mr. James,

When Chuck Williams' certified letter of 12 May 1992 (copy enclosed) was first received, it was taken with a grain of amazement and disbelief! It seemed ludicrous to me that anyone would have taken the time, or gone to the expense, to suggest Pace Lithographers, Inc. would have made any illegal contribution to any federal election campaign, but specifically one of \$508.10 to Robert Hammock for Congress 1990.

I chose not to make a response to Mr. Williams' suggestion that Pace Lithographers would not be included in his formal complaint to the Federal Election Commission if Pace "could provide my committee with evidence that you have made a 'commercially reasonable attempt' to collect this debt".

(In my humble opinion that was a very ill-advised effort to intimidate and threaten; I am not sure it doesn't provide the basis for a complaint and suit against Mr. Williams and his committee.)

It was my feeling Pace Lithographers did not owe Mr. Williams' committee any such evidence at all, but rather to you, Mr. James, and the Federal Election Commission if the matter ever went that far.

And it has.

Enclosed you will find copies of the "Fund Raiser Invitation" material Pace printed for the Hammock For Congress Committee with a copy of the invoice for that material.

Pace received a \$300. payment on September 20, 1990. Reminders of the balance due were subsequently mailed and phone calls were made until, sometime after the election when, the phone number was no longer in service and mail was being returned marked "NO LONGER AT THIS ADDRESS-UNABLE TO FORWARD".

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OFFICE OF GENERAL COUNSEL

92 JUN 29 PM 3:48

93040984001

Federal Election Commission  
ATTN: Noriega James  
Page 2

The election was over. Mr. Hammock was not successful and the committee was dissolved; the unpaid balance of \$508.10 was charged to "Bad Debts"...it most obviously was not a contribution to the campaign; every reasonable effort was made to collect before there was no one left to collect from.

There is an old printer's axiom: "Always get money in advance when doing printing for a political campaign". I ignored that to my chagrin and dismay.

What more can I say?

Respectfully,

For the firm...

*Carl Bennett*

Carl Bennett

CB:sm

Enclosure

93040984002

**INVOICE**

PLEASE REMIT TO:  
 PACE LITHOGRAPHERS, INC.  
 POST OFFICE BOX 3328  
 CITY OF INDUSTRY, CALIFORNIA 91744  
 TELEPHONE: (818) 961-5416 • (213) 886-0897 • (714) 774-5111



A Tradition of  
 Quality Printing  
 and Service  
**RECEIVED**  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF GENERAL COUNSEL  
 92 JUN 29 PM 3:48

SHIPPED TO: HAMMOCK

HAMMOCK FOR CONGRESS  
 1101 SOUTH E STREET  
 SAN BERNARDINO  
 CA 92408

SOLD TO:

HAMMOCK FOR CONGRESS  
 POST OFFICE BOX 5310  
 SAN BERNARDINO  
 CA 92412  
 ATTN: LINDA SAVAGE

INVOICE NO. : 44961  
 INVOICE DATE : 08/30/90  
 SHIP DATE : 08/20/90  
 P.O. NUMBER :  
 SALESMAN : III  
 JOB NUMBER : 38607  
 SHIP VIA : DUP DELIVERY  
 TERMS : Net 10th prox.

DESCRIPTION	QUANTITY	AMOUNT PAYABLE
INVITATIONS PRINTED ONE COLOR	1000	757.00
THE ONTARIO CIRCLE		
MATCHING NO. 89-4 ENVELOPES	1000	
PRINTED RETURN ADDRESS		
R.S.V.P. CARDS	1000	
MATCHING NO. 5-1/2 ENVELOPES	1000	
TICKETS	1000	
		-----
	SUB TOTAL	757.00
	TAX	51.10
		-----
	TOTAL INVOICE	808.10
		-----
	AMT DUE	808.10

93040984003

County Supervisor  
**ROBERT L. HAMMOCK**  
Candidate

**Congress of the United States**  
**House of Representatives**

June 19, 1992

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COMMISSION  
MAIL ROOM

JUN 29 10 29 AM '92

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF FEDERAL COUNSEL  
92 JUN 29 PM 3:47

Ms. Lisa E. Klein, Assistant General Counsel  
FEDERAL ELECTION COMMISSION  
Washington, D.C. 20463

RE: MUR 3537

Dear Ms. Klein:

I am responding to your letter of June 15, 1992 wherein you advise us that a complaint has been received that the Hammock Campaign Committee may have violated the Federal Election Campaign Act of 1971. The complaint alleges that illegal corporation contributions were received in violation of Federal Election Law.

As Treasurer for the Campaign I can assure you that the creditors of that campaign have continued to diligently seek payment on their claims against the Committee. Attached is a sworn statement from the Assistant Treasurer for the Campaign setting forth her activities in connection with those collection procedures.

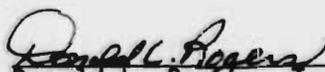
The Campaign has continued to make partial payments as funds have become available to the various creditors.

The Candidate intends to have an additional fundraising activity in October or November of 1992 to raise funds to retire, or partially retire, the debts owed by the Campaign Committee.

To my knowledge, none of the creditors have agreed to contribute or cancel their debts and the assertion that they have been "converted to corporate contributions" is without foundation.

As Treasurer, I swear under penalty of perjury that the above representations are true and would be pleased, if necessary, to discuss these matters further directly by telephone or to provide additional information by mail at your request.

Very truly yours,

  
Donald L. Rogers, Treasurer

DLR:la

Campaign Headquarters: 10470 Foothill Blvd., Suite 200 • Rancho Cucamonga, CA 91730  
Mailing Address: 10570 Foothill Blvd., Suite 130-143 • Rancho Cucamonga, CA 91730

Office: (714) 483-1393

24 Hours: (714) 625-7087

Paid for and authorized by Bob Hammock for Congress

93040984004

JUNE 22, 1992

AS ASSISTANT TREASURER, I SWEAR UNDER PENALTY OF PERJURY THAT I HAVE REVIEWED THE LIST OF CREDITORS IN THE COMPLAINT. THE FOLLOWING HAVE HAD PARITAL SUBSEQUENT PAYMENTS:

<u>COGS</u>	\$5,986.00	<u>META INFORMATION SERV.</u>	\$4,813.37
LESS PAYMENT	(1,450.00)	LESS PAYMENT	(3,250.00)
	-----		-----
BALANCE	\$4,536.00	BALANCE	\$1,536.37
	=====		=====
<u>BALLOON AFFAIR</u>	\$ 104.76		
LESS PAYMENT	(104.76)		
	-----		
BALANCE	0.00		
	=====		

OF THE REMAINING CREDITORS NONE HAVE INDICATED VERBALLY OR IN WRITING THAT THEY ARE CANCELLING THE OBLIGATION. IN FACT ALL CONTINUE TO MAKE REGULAR COLLECTION EFFORTS AND WRITTEN REQUESTS FOR PAYMENT.

*Liz Dominick*  
\_\_\_\_\_  
LIZ DOMINICK, ASSISTANT TREASURER

93040984005

**FEDERAL EXPRESS**

FEDERAL ELECTION COMMISSION HAIL ROOM

Jul. 8 10 05 AM '92

July 6, 1992

Ms. Lisa E. Klein  
Office of the General Counsel  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Government Affairs Department  
2005 Corporate Avenue  
Memphis, TN 38132  
901 395-3841  
U.S. Mail Box 727  
Memphis, TN 38194-1853  
FAX 901-395-3456

Subject: MUR 3537

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 JUL - 8 PM 3: 20

Dear Ms. Klein:

In response to the complaint registered with the Federal Election Commission by Chuck Williams dated June 1, 1992 against Hammock for Congress referenced by MUR 3537, Federal Express contends that the debt of \$1,360.25 owed to Federal Express by Bob Hammock for Congress cannot be considered a corporate contribution because a commercially reasonable attempt was made by Federal Express to collect this outstanding debt.

An inter-office memorandum is attached addressed to me from the Federal Express Credit Operations department that outlines the steps that Federal Express followed in order to collect this debt. In addition to these steps, please consider the following information.

During the second week of February 1992 the Federal Express Revenue Recovery department submitted the account to an outside collection agency, Financial Collection Agency of Atlanta Georgia. The Financial Collection Agency has been unsuccessful in their attempts to collect this debt from Bob Hammock for Congress.

Again, Federal Express contends that the debt of \$1,360.25 owed to Federal Express by Bob Hammock for Congress cannot be considered a corporate contribution because a commercially reasonable attempt was made by Federal Express to collect this outstanding debt.

If you have any questions, please call me at 901-395-3805.

  
A. J. Sain  
FEPAC Administrator  
Federal Express Corporation  
2005 Corporate Plaza  
Memphis, TN 38134-1853  
901-395-3805

93040984006



**INTER-OFFICE MEMORANDUM**

**DATE:** July 1, 1992

**TO:** A.J. Sain

Credit Department  
2650 Thousand Oaks Blvd  
Suite 4400  
Memphis, TN 38118  
800 238-5355  
U.S. Mail Box 727  
Memphis, TN 38194-5741

**FROM:** Vicki Windham

**cc:** Cameron Frechette

**SUBJECT:** MUR: 3537

Please find attached a copy of the Federal Election Commission inquiry requesting credit and collection information on account number #1364-5785-4, Bob Hammock For Congress.

The account in question was opened on May 4, 1990. The last ship date activity on this account was November 13, 1990. The account was placed on a 'delinque' cash only status on December 4, 1990. Collection attempts began on this account in November 1990 and continued until January 1991. The balance of this account \$1,360.00 was written off to bad debt in January 1991. The account is still currently on a rejected credit/cash only status.

If you have any questions, please give me a call.

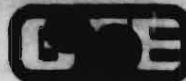
Sincerely,

Vicki Windham  
Credit Coordinator  
Credit Operations  
360-7377

Attachment

93040984007

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FEDERAL ELECTION  
COMMISSION  
MAIL ROOM



JUL 10 10 15 AM '92

**GTE Telephone Operations  
West Area**

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6000

Reply To

CA500LB

July 9, 1992

Fran Hagan  
General Counsel's Office  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

Re: MUR 3537

Dear Ms. Hagan:

This letter constitutes the response of GTE California Incorporated ("GTEC") to the above-referenced complaint filed by Chuck Williams for Congress ("Williams") against Hammock for Congress ("Hammock").

The basis of Williams' complaint insofar as it involves GTEC is that GTEC provided telephone services to Hammock in 1990 for which the amount due and unpaid is \$4,497.48. Williams alleges that Hammock has not paid, and GTEC has not attempted to collect, this past due amount, thereby converting it into an illegal campaign contribution on the part of GTEC.

As the enclosed correspondence from GTEC to Williams indicates, however, GTEC has made commercially reasonable efforts to collect the past due balance on Hammock's account. These efforts are in accord with GTEC's normal business practices applicable to past due accounts. Apparently this correspondence did not reach Williams in time for the complaint to be amended, as occurred with other creditors who informed Williams of their similar attempts to collect past due balances (e.g., The Wirthlin Group and Southern California Edison, who were requested to be removed from the complaint by Williams based on their collection efforts).

Because "commercially reasonable" attempts to collect a balance owed for services rendered to an official seeking

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OFFICE OF GENERAL COUNSEL

92 JUL 14 AM 11:58

93040984008

F. Hagan - 07/09/92

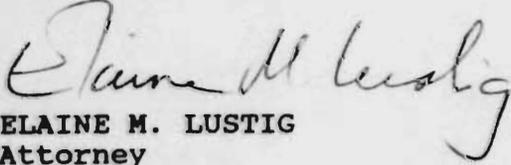
Page 2

public office preclude any finding that such amount is a "contribution" in violation of the federal election law, 11 C.F.R. 100.7(b), GTEC requests that the complaint be dismissed insofar as it relates to GTEC.

In support of the referenced correspondence, I will be sending you the sworn statement of the GTEC employee who documented GTEC's efforts to collect the balance due on this account. As we discussed on the telephone, however, I will be unable to obtain that statement until next week. I am therefore sending you the enclosed information so as not to delay your processing of the complaint. I will send you the additional statement by overnight mail as soon as I receive it.

If you should require anything further, please feel free to contact me at (805) 372-6233. Thank you very much.

Very truly yours,

  
ELAINE M. LUSTIG  
Attorney

EML0708a.eml

cc: H.C. Allen - CA500GB

M. Moody - CAE37KD

D. Duranceau-Sellers - CAE37KD

93040984009



**GTE California Incorporated**

H. C. Allen  
State Director  
Governmental Affairs

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6540

June 4, 1992

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF COMPLIANCE  
92 JUL 14 AM 11:58

Mr. Chuck Williams  
6847 Portofino Court  
Rancho Cucamonga, CA 91701

Dear Mr. Williams:

As indicated in my letter to you dated May 21, 1992 we have investigated the account for Robert Hammock for Congress 1990.

The following attempts for collection of this account were made:

- Calls were made on the following dates to request payment:  
November 9, 16 and 28, 1990  
December 7 and 18, 1990
- A request for payment was mailed on March 13, 1991 and the deposit collected on installation was applied to the account.
- The account was assigned to Telecredit for letter service on April 14, 1991.
- The account was assigned to internal collection department on June 9, 1991.
- The account was assigned to outside collection agency on August 8, 1991.

I believe GTE California has made a "commercially reasonable attempt" to collect the debt owed by the Hammock Committee and accordingly has not made a contribution to the committee as defined by the regulations of the Federal Election Commission. We are still pursuing efforts at collection of this debt through the collection agency.

Sincerely,

H. C. Allen

93040984010



**GTE California Incorporated**

H. C. Allen  
State Director  
Governmental Affairs

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6540

May 21, 1992

Mr. Chuck Williams  
Candidate for Congress  
6847 Portofino Court  
Rancho Cucamonga, CA 91701

Dear Mr. Williams:

We received your letter concerning the formal complaint against Robert Hammock for Congress 1990, FEC #C00243196 that you plan to file with the FEC.

We will investigate your claim that an amount of \$4,497.48 is owed GTE by Mr. Hammock's campaign committee from 1990. I can assure you we make a "commercially reasonable attempt" to collect all monies due us and are well aware of the federal law that prohibits corporate contributions to Federal candidates.

For your information GTE Corporation also has a policy of not making corporate contributions to candidates for State elected positions even though is legal in many states including California. We do have Employee Political Action Committees which legally give to Federal candidates and to state candidates.

I will follow-up with you after the investigation is completed. Thank you for your letter.

Sincerely,

H. C. Allen  
Regional Director -  
Governmental Affairs

93040984011



12 May 1992

GTE  
1 GTE Place  
Thousand Oaks, CA 91362

Dear Chairman,

This week my campaign committee, FEC # C00262188, will file a formal complaint with the Federal Election Commission against Robert Hancock for Congress 1990, FEC #C00243196.

This matter will involve acceptance of corporate contributions from fifteen creditors, of which you are one. Corporate contributions are illegal in federal elections.

FEC regulations state, "If a political committee fails to pay a debt in a timely fashion consistent with normal business or trade practices, the debt in effect becomes a contribution made by the creditor to the committee, unless the creditor has made a 'commercially reasonable attempt' to collect the debt."

Mr. Hancock's FEC report states that his 1990 campaign committee has a debt to your company incurred 27 November 1990 or earlier in the amount of \$ 4,497.48.

If you have not made a "commercially reasonable attempt" to collect this debt, you may be in violation of federal law. If you can provide my committee with evidence that you have made a reasonable effort to collect this debt, I will remove your company from the complaint.

Sincerely,

*Chuck Williams*

Chuck Williams  
Candidate for Congress

93040984012

Bob Hammock for Congress  
1101 South 9th Street  
San Bernardino, CA

Telephone: (714) 889-9058

Owes: \$4497.48

Service In: 4/6/90

Service Out: 1/4/91

First Bill Date: 4/25/90

Treatment Summary:

All bills were paid in full through bill dated 9/10/90.

- . Calls were made to customer on 11/9 and 11/16 regarding delinquent bills
- . TD issued 11/27 due to no payments
- . 11/28 TD not worked, called office again, LWTC for office manager Linda
- . 12/7 called again for payment. "Elaine" said Linda responsible for payments, said the office is no longer used
- . 12/18 called office - advised Elaine to call BSOC to place out order
- . 1/3 follow up for out, not worked, referred to supervisor
- . 1/4 out no need of service - completed 1/4/91
- . 3/13 Final Accounts mailed a req. of payment letter (\$471.00 deposit applied to bill)
- . 4/24 account assigned to Telecredit for letter service
- . 6/9 account assigned to GTCD
- . 8/8 account assigned to outside collection agency

93040984013

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3537

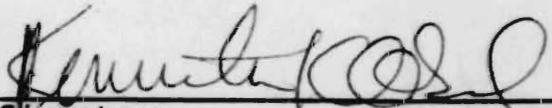
NAME OF COUNSEL: ELAINE M. LUSTIG

ADDRESS: GTE CALIFORNIA INCORPORATED  
ONE GTE PLACE - CA500LB  
THOUSAND OAKS, CA 91362

TELEPHONE: (805) 372-6233

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.

7/9/92  
Date

  
Signature

RESPONDENT'S NAME: KENNETH K. OKEL

SECRETARY - VICE PRESIDENT  
GTE CALIFORNIA INCORPORATED  
ONE GTE PLACE - CA500LB  
THOUSAND OAKS, CA 91362

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: (805) 372-6676

93040984014



OGC 5249

# COGS

## CANDIDATES' OUTDOOR GRAPHIC SERVICE

11343 Stewart St., El Monte, California 91731 (818) 350-1006 Fax # (818) 350-1427

7/13/92

General Counsel's Office,  
Federal Election Commission,  
Washington, D.C. 20463

RE: MEUR 3537  
92 JUL 20 10 38 29 AM '92  
RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE GENERAL COUNSEL

Dear Sir or Madame:

I have personally made reasonable attempts to collect on debt owed to us by the Hammock for Congress campaign and the campaign has made a reasonable attempt to pay us. I have been in regular and persistent contact with Mr. Hammock himself and have been kept informed of cash flow details. This has allowed us to demand payments when money has become available to the campaign. The campaign has responded by making payments when money has come available. A detail of payments since October of 1990 and current balance accompanies this letter.

We continue to pursue the collection of the outstanding debt owed to us by the campaign.

We object to the allegations made by Mr. Chuck Williams, and believe them to be election tactics. COGS engages in sign making and distribution for hundreds of political campaigns throughout California, Arizona and Nevada and have virtually no political bias or partisanship policies for obvious professional reasons. We often engage in business with several campaigns all running in the same race and must remain absolutely neutral politically to preserve our professional relationship with each of the campaigns. Therefore, we should not be named in any lawsuit regarding this matter and should not be considered a contributor to the Hammock campaign.

I swear this to be true to the best of my knowledge.

Sincerely,

Greg Hummel, V.P.

JUL 20 10 39 AM '92  
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

93040984015



# COGS

## CANDIDATES' OUTDOOR GRAPHIC SERVICE

11343 Stewart St., El Monte, California 91731 (818) 350-1006 Fax # (818) 350-1427

10/3/90

### INVOICE

The Committee to Elect  
HAMMOCK for CONGRESS

Candidates' Outdoor Graphic Service . . . COGS, in consultation with the Campaign, will design, will silk screen, will fabricate with sturdy post and frame assembly, and will ppost prominently and intelligently in major population centers and along principal thoroughfares of the **36th Congressional district** on schedule and with such area emphasis as the Campaign may direct and will promptly remove after the election,

**COGS' SIGNS.** 15" x 44", in two colors,  
4,000 faces posted and removed as above and . . .  
2,000 faces assembled for the campaign's distribution . . .

	= \$12,152.	
TAX	= \$820.26	
TOTAL	= \$12,972.26	
paid	= \$6,486.	check #409 10/2/90
paid	= \$500.	check #? 4/4/91
paid	= \$600.	check #585 2/7/92
paid	= \$350.	check #588 3/28/92
paid	= \$500.	check #1081 5/6/92
BALANCE	= \$4,536.26	

Thank you,

Greg Hummel, V.P.

93040984016

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL



OGC 5918

92 JUL 28 PM 3:19

GTE Telephone Operations  
West Area

VIA OVERNIGHT

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6000

Reply To

CA500LB

July 27, 1992

Fran Hagan  
General Counsel's Office  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

JUL 28 9 50 AM '92

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Re: MUR 3537

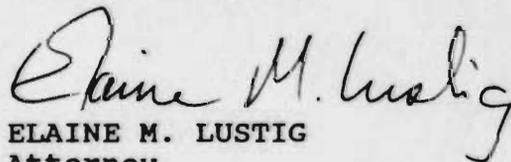
Dear Ms. Hagan:

Enclosed is a sworn statement from the Director of Governmental Affairs of GTE California Incorporated ("GTEC") regarding GTEC's attempts to collect the debt owed to it by Robert Hammock for Congress. I apologize for the delay, but I have been away from the office on another business matter for the past two weeks.

I am in the process of preparing a second sworn statement attesting to the facts underlying Mr. Allen's letter of June 4, 1992. I expect to have that completed this week and will send it to you by overnight mail.

Thank you for your consideration.

Very truly yours,

  
ELAINE M. LUSTIG  
Attorney

EML0727A.pgh  
cc: H.C. Allen - CA500GB  
M. Moody - CAE37KD  
D. Duranceau-Sellers - CAE37KD

93040984017



12 May 1992

GTE  
1 GTE Place  
Thousand Oaks, CA 91362

Dear Chairman,

This week my campaign committee, FEC # C00262188, will file a formal complaint with the Federal Election Commission against Robert Hammock for Congress 1990, FEC #C00243196.

This matter will involve acceptance of corporate contributions from fifteen creditors, of which you are one. Corporate contributions are illegal in federal elections.

FEC regulations state, "If a political committee fails to pay a debt in a timely fashion consistent with normal business or trade practices, the debt in effect becomes a contribution made by the creditor to the committee, unless the creditor has made a 'commercially reasonable attempt' to collect the debt."

Mr. Hammock's FEC report states that his 1990 campaign committee has a debt to your company incurred 27 November 1990 or earlier in the amount of \$ 4,497.48.

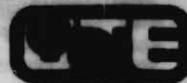
If you have not made a "commercially reasonable attempt" to collect this debt, you may be in violation of federal law. If you can provide my committee with evidence that you have made a reasonable effort to collect this debt, I will remove your company from the complaint.

Sincerely,

*Chuck Williams*

Chuck Williams  
Candidate for Congress

93040984018



**GTE California Incorporated**

H. C. Allen  
State Director  
Governmental Affairs

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6540

**May 21, 1992**

**Mr. Chuck Williams  
Candidate for Congress  
6847 Portofino Court  
Rancho Cucamonga, CA 91701**

**Dear Mr. Williams:**

We received your letter concerning the formal complaint against Robert Hammock for Congress 1990, FEC #C00243196 that you plan to file with the FEC.

We will investigate your claim that an amount of \$4,497.48 is owed GTE by Mr. Hammock's campaign committee from 1990. I can assure you we make a "commercially reasonable attempt" to collect all monies due us and are well aware of the federal law that prohibits corporate contributions to Federal candidates.

For your information GTE Corporation also has a policy of not making corporate contributions to candidates for State elected positions even though is legal in many states including California. We do have Employee Political Action Committees which legally give to Federal candidates and to state candidates.

I will follow-up with you after the investigation is completed. Thank you for your letter.

Sincerely,

H. C. Allen  
Regional Director -  
Governmental Affairs

93040984019



**GTE California Incorporated**

H. C. Allen  
State Director  
Governmental Affairs

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6540

June 4, 1992

Mr. Chuck Williams  
6847 Portofino Court  
Rancho Cucamonga, CA 91701

Dear Mr. Williams:

As indicated in my letter to you dated May 21, 1992 we have investigated the account for Robert Hammock for Congress 1990.

The following attempts for collection of this account were made:

- Calls were made on the following dates to request payment:  
November 9, 16 and 28, 1990  
December 7 and 18, 1990
- A request for payment was mailed on March 13, 1991 and the deposit collected on installation was applied to the account.
- The account was assigned to Telecredit for letter service on April 14, 1991.
- The account was assigned to internal collection department on June 9, 1991.
- The account was assigned to outside collection agency on August 8, 1991.

I believe GTE California has made a "commercially reasonable attempt" to collect the debt owed by the Hammock Committee and accordingly has not made a contribution to the committee as defined by the regulations of the Federal Election Commission. We are still pursuing efforts at collection of this debt through the collection agency.

Sincerely,

H. C. Allen

93040984020



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM



RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

JUL 30 10 14 AM '92

92 JUL 30 AM 11:08

**GTE Telephone Operations  
West Area**

One GTE Place  
Thousand Oaks, CA 91362-3811  
805 372-6000

Reply To

July 29, 1992

CA500LB

VIA OVERNIGHT

Fran Hagan  
General Counsel's Office  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

Re: MUR 3537

Dear Ms. Hagan:

Enclosed is a sworn statement from Doris Duranceau-Sellers, Customer Billing Supervisor - Business Collection, GTE California Incorporated ("GTEC") in Mentone, regarding GTEC's attempts to collect the debt owed to it by Robert Hammock for Congress. Again, I apologize for the delay caused by my being away from the office for the past two weeks.

I am sending this package via overnight mail and will be looking forward to hearing from you soon.

Thank you for your consideration.

Very truly yours,

ELAINE M. LUSTIG  
Attorney

EML0729B.pgh  
Enclosures

cc: H.C. Allen - CA500GB (w/enclosures)  
M. Moody - CAE37KD  
D. Duranceau-Sellers - CAE37KD

93040984022

92 JUL 30 AM 11: 00

STATEMENT OF DORIS DURANCEAU-SELLERS

I, Doris Duranceau-Sellers, declare as follows:

1. I am employed by GTE California Incorporated ("GTEC") as Customer Billing Supervisor - Business Collections. My business address is P.O. Box 136, Mentone, California 92359-0136.

2. I requested preparation of the attached summary of GTEC's billing and collection activities regarding the account for Bob Hammock for Congress. (Exhibit A) The initial telephone calls referred to in this summary were made by members of my staff at my direction. The listing of remaining calls made by the General Telephone Collection Department and the Orange Credit Service Collection Agency is based on information contained in my department files.

3. Based on my information and belief, this summary accurately reflects the collection efforts made with respect to this account.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Mentone, California on July 28, 1992.

*Doris Duranceau-Sellers*  
Doris Duranceau-Sellers

93040984023

9 3 0 4 0 9 8 4 0 2 4

EXHIBIT A

ACCOUNT SUMMARY  
BOB HAMMOCK FOR CONGRESS

The customer's first bill was dated April 25, 1990. All bills were paid in full through the bill dated September 10, 1990.

- 11/10/90 A Notice of Payment Due was mailed to the customer in the amount of \$4,003.28.
- 11/09/90 A message was left for Linda to contact the company's Customer Billing Center (CBC). Collection attempt was being made for the past due September 25 and October 10 bills.
- 11/16/90 A message was left for Linda to contact the CBC. Collection attempt was being made for the past due September 25, October 10 and October 25 bills.
- 11/27/90 Linda did not respond to the messages left November 9 and November 16. The telephone service was ordered temporarily disconnected.
- 11/28/90 Due to mechanical difficulties, the disconnection order did not take effect. Rather than putting through the disconnect order again, additional collection attempts were made. A message was left for the office manager to contact the CBC. Collection attempt was being made for the past due September 24, October 10, October 25 and November 10 bills.
- 12/07/90 A message was left with Elaine for Linda to call the CBC concerning payment of the account and that service will be temporarily disconnected for nonpayment. Elaine stated the office was no longer being used and that Linda was responsible for the bills.
- 12/10/90 A Notice of Payment Due was mailed to the customer in the amount of \$4,790.60.
- 12/18/90 Elaine was contacted again as there was no response to the previous messages. Elaine was advised to contact the business service order center to place an order to remove the service.
- 01/04/91 The service was removed as "no further need" effective January, 2, 1991.
- 01/10/91 The customer's closing statement was mailed in the amount of \$4,482.80. The customer's deposit credit of \$450.00 and associated interest credit of \$21.00 reflected on this statement.

93040984025

ACCOUNT SUMMARY  
BOB HAMMOCK FOR CONGRESS  
(Cont.)

02/10/91 The customer's final statement was mailed in the amount of \$4,497.48.

03/13/91 Correspondence was mailed to the customer with the following information:

- \* The unpaid balance.
- \* Location of service and telephone number.
- \* Dates of service connection and disconnection.
- \* Requesting immediate attention in paying the balance owing.
- \* Providing the CBC final accounts department telephone number for inquiries.

04/24/91 The unpaid final account of \$4,497.48 was referred to Telecredit Letter Service for further collection effort. Note: Telecredit sends a series of three letters on referred accounts.

06/09/91 The unpaid final account was referred to General Telephone Collection Department (GTCD) for further collection effort on the unpaid balance of \$4,497.48.

06/13/91 GTCD mailed correspondence to the customer requesting payment of \$4,497.48. The correspondence included the following information:

- \* Failure to pay \$4,497.48 will result in assignment of the account to a collection agency and possible litigation.
- \* To contact GTCD if there are any questions concerning this matter.

06/20/91 A message was left at a can be reached number, (714) 387-4565 (noted on the customer's original installation order) to contact GTCD.

06/21/91 GTCD mailed additional correspondence to the customer requesting payment of \$4,497.48. The correspondence included the following information:

- \* There has been no response to requests for payment and the account has been scheduled for assignment to a collection agency.

93040984026

ACCOUNT SUMMARY  
BOB HAMMOCK FOR CONGRESS  
(Cont.)

\* Providing a final opportunity for payment of \$4,497.48 to avoid the collection agency referral and possible litigation.

\* To contact GTCD if there are any questions concerning this matter.

06/26/91 GTCD contacted the can be reached number, (714) 387-4565, and was advised to contact Mr. Hammock's treasurer, Liz, at (714) 889-0871.

06/16/91 A message was left for Liz to contact GTCD.

06/28/91 A message was left for Liz to contact GTCD.

07/08/91 GTCD contacted Liz concerning payment of the customer's final account of \$4,497.48. Liz stated she had no idea when the bill would be paid; they were waiting for a fund raiser in order to get the money. Liz further stated she had no idea when the fund raiser would be and commented that GTE was not the only creditor awaiting payment. Liz was advised if payment was not received by the end of the month, the account would be referred to a collection agency.

07/17/91 GTCD mailed correspondence to the customer requesting payment of \$4,497.48 and that the account would be referred to a collection agency.

08/08/91 GTCD contacted the can be reached number, (714) 889-0871, and was advised Liz was on vacation and no one was taking her place to discuss this matter.

08/12/91 GTCD referred the unpaid final account of \$4,497.48 to Orange Credit Service Collection Agency. The following is a summary of the collection agency attempts made from August 26, 1991 - December 3, 1991:

09/09/91 Collection notice mailed

10/09/91 Collection notice mailed

11/09/91 Collection notice mailed

12/09/91 Collection notice mailed

08/16/92 through 12/03/91 numerous attempts were made to contact (714) 287-4665; there was no answer in each attempt.

93040984027

Aug 11 12 53 PM '92

August 6, 1992

Ms. Lisa E. Klein  
Assistant General Counsel  
Federal Election Commission  
999 "E" Street, NW  
Washington, DC 20463

RE: MUR 3537

Dear Ms. Klein:

I apologize for any delay in our response to your letter dated June 15, 1992, however, the letter was not received by Pacific/West Communications Group, Inc. (Pacific/West) until August 3, 1992. The delay appeared to be caused by the use of an incorrect address.

I have investigated the matter and found the facts to be as follows:

•"Bob Hammock for Congress Campaign" became a client of Pacific/West in April 1990 in the ordinary course of our business. The committee retained Pacific/West to develop fundraising strategies, to develop a research/solicitation data base, provide pre-event planning and logistics, provide event planning and operations management, etc. I have attached a copy of our contract with Mr. Hammock, which outlines the scope of our services.

•After the committee closed its account, there remained a balance due to Pacific/West. Collection of the remaining balance due was pursued by senior members of Pacific/West, where at least two contacts were made with Mr. Hammock or his representatives (correspondence attached). Although payment still has not been made, we

3435 Wilshire Boulevard  
Suite 2850  
Los Angeles  
CA 90010  
(213) 487-0830  
FAX (213) 487-1850

93040984028

92 AUG 11 PM 3:17

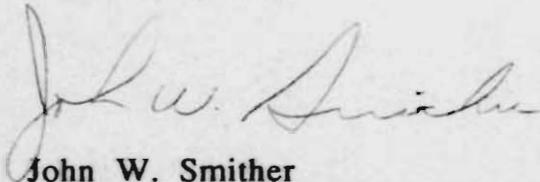
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF THE  
CHIEF COUNSEL

continue to pursue the collection matter with Mr. Hammock and representatives of his committee. These procedures are consistent with Pacific/West's policies on collection matters.

We believe Pacific/West has made and continues to make a "commercially reasonable attempt" to collect amounts due from Mr. Hammock's committee. Accordingly, I do not believe Pacific/West has made a corporate contribution to Mr. Hammock's campaign under the Federal Election Campaign Act of 1971.

If you have any questions, please don't hesitate to contact me.

Sincerely yours,



John W. Smither  
Senior Vice President  
Finance and Administration

Enclosures

93040984029

CONTRACT

I. INTRODUCTION

The purpose of this contract is to formalize an agreement and working relationship between the "Bob Hammock for Congress Campaign" (hereafter referred to as "the Campaign") and Pacific/West Communications Group, Inc. (hereafter referred to as "Pacific/West"). The nature of the agreement and working relationship is for the provision of fundraising management consulting services to candidate Bob Hammock, who is seeking California's 36th Congressional seat.

II. SCOPE OF SERVICES TO BE PROVIDED

Pacific/West has been requested to fulfill the specific function of fundraising management for the Campaign.

Specifics services include:

- Development of comprehensive fundraising strategy, schedule and information system
- Development of research/solicitation data base
- Support in selecting and motivating the financial advisory committee/honorary chairpersons
- Pre-event planning and logistics
- Design and staff support of dinner/event committees
- Solicitation
- Event planning and operations management
- Candidate briefings, fundraising updates and daily call sheets
- Information reporting to campaign manager and treasurer
- Design and production of related collateral materials (solicitation letters, event invitations, RSVP, etc.)

93040984031

**III. DURATION OF CONTRACT**

The duration of the contract shall be from April 5, 1990 through November 30, 1990, inclusive of both the primary and general elections.

**IV. COMPENSATION SCHEDULE FOR FUNDRAISING MANAGEMENT SERVICES**

The compensation for fundraising management services is based upon the following elements:

- A fee of \$7,500 for services rendered in April related to data base design, and completion, and support of the Pledge Luncheon.
- A fixed fee of \$2,500 per month from May through November.
- A guaranteed fee of \$2,500 per month from May through November that will be advanced against the gross fundraising commissions earned by Pacific/West on gross campaign fundraising receipts.
- Commissions based upon a graduated scale as outlined below.

<u>% Commission</u>	<u>Amount Raised</u>
8%	Up to \$149,999
9%	\$150,000-249,999
10%	\$250,000-349,999
11%	\$350,000-449,999
12%	\$450,000-549,999
13%	\$550,000-649,999
14%	Above \$650,000

The commission rates indicated above are to be applied to the "gross fundraising receipts" of the Campaign, effective April 5, 1990, excluding those funds raised via political action committees solicited directly by the candidate or other fundraising consultants. Should Pacific/West become involved in the strategy, planning and solicitation of political action committee funds, the amounts raised will become part of the "gross fundraising receipts", and the above commission rates shall apply.

9 3 0 4 0 9 8 4 0 3 2

V. FUNDRAISING AND PRODUCTION RELATED EXPENSES

The Campaign shall bear the cost of all expenses related directly to fundraising inclusive of the following:

- Telephone lines
- Fundraising reporting computer software
- Design, production and printing and printing of event invitations and other collateral materials (a 17.75% standard agency mark-up is included in the amount billed)
- Other event related expenses such as decorations, audio visual equipment, entertainment, etc.

At this time, event related expenses have not been estimated. After the desired events are selected, and details finalized in consultation with the candidate and campaign management (date, location, number of attendees, ticket prices, etc.), we shall present precise event budgets for approval by the candidate and campaign manager.

VI. OUT-OF-POCKET EXPENSES

Customary out-of-pocket expenses will be billed to the Campaign. These include telephone calls, postage, mileage (\$0.26 per mile), out of town travel and lodging, fundraising related meals, copying, faxing, etc.

VI. PAYMENT POLICIES

Pacific/West policies on fee, commission and expense payments are as follows:

- Invoices are submitted during the month in which services are rendered. Fees, commissions and out-of-pocket expenses are invoiced in mid-month and are payable by the last day of the month.
- All major production expenses including printing, photography, hotel rental, food/beverage, entertainment, etc. are either pre-billed or require a deposit based upon estimated costs. These invoices are due and payable within 10 days of receipt. Pacific/West will not authorize and/or proceed with contractual arrangements with vendors until such deposits and/or payments are made by the campaign committee.

**VII. CANCELLATION OF THIS CONTRACT**

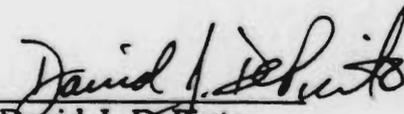
This contract may be cancelled by either party upon 60 days notice with the full terms of this contract remaining in effect until the 60 day cancellation period has elapsed. Notification of cancellation must be provided by registered mail.

We, the undersigned, agree to all of the terms and conditions set forth in this contract. By virtue of the signatures below, this contract is effective from April 5, 1990 through November 30, 1990.

For, "Bob Hammock for  
Congress Campaign"

For, Pacific/West  
Communications Group, Inc.

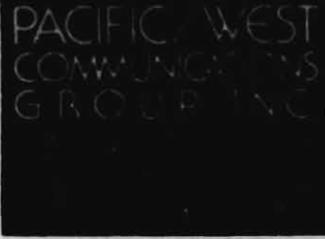
  
Robert A. Hammock

  
David J. DeFinto

4/18/90  
Date

4/25/90  
Date

93040984033



December 17, 1990

*Jaques -  
Pls c me  
for dictation  
on this  
idea*

Bob Hammock  
Hammock for Congress  
P.O. Box 5310  
San Bernardino, CA 92412

Dear Bob:

On behalf of the entire company, I wanted to personally congratulate you for conducting such an outstanding campaign and to express our disappointment with the outcome. It was a tremendous honor for Pacific/West to assist you on the campaign and we are confident that your "star" will continue to rise!

As we discussed throughout the campaign, Pacific/West was willing to continue work on the campaign despite its cash flow difficulties. While you may have other financial obligations outstanding, we would appreciate knowing of payment plans with respect to our account.

Toward that end, attached is a summary of our invoices to your campaign. We have voided Invoice #000336 and issued Invoice #000454 (attached) in its place. We are still awaiting the final campaign report. When this is received, we will forward the final invoice to you.

Again, thank you for this opportunity to assist you.

Sincerely,

Stephen F. Tobia, Jr.  
President

enclosures

cc: David DePinto

93040984034

June 11, 1991

Supervisor Bob Hammock  
San Bernardino County  
385 N. Arrowhead Ave.  
San Bernardino, CA 92415-0110

Dear Bob;

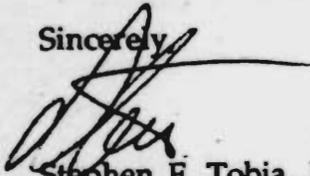
It was good to see you last week. We understand and appreciate the difficulties you have had raising funds since the campaign ended. As we discussed regarding the outstanding campaign invoices, we would like to work with you to prioritize "hard expenses" for reimbursement, as you have done with other campaign vendors.

Attached, please find a previously submitted summary of outstanding invoices (page 1), along with a summary of all expenses totalling \$19,030.13 (page 2).

We would appreciate you addressing this expense total as we have already made payment to vendors utilized by Pacific/West in support of your campaign. Also, we would appreciate periodic updates as to the status of efforts to retire the remaining funds owed to Pacific/ West.

Once again, we reiterate our understanding and support for you. Please let us know if we may be of assistance to you in planning or executing any fundraising activity. Thank you.

Sincerely,



Stephen F. Tobia, Jr.  
President

SFT/mc  
Attachments

cc: D. DePinto

3435 Wilshire Boulevard  
Suite 2850  
Los Angeles  
CA 90010  
(213) 487-0630  
FAX (213) 487-1850

93040984035

HAMMOCK SUMMARY

INVOICES TO DATE

Inv. #000216	Dated 4/25	7,500.00 (paid in full)
Inv. #000252	Dated 5/29	8,996.96 (paid in full)
Inv. #000272	Dated 6/19	10,182.30 (paid in full)
[REDACTED]	[REDACTED]	[REDACTED]
Inv. #000336	Dated 8/15	VOID
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] (replace Inv. #000336)
[REDACTED]	[REDACTED]	[REDACTED]
	TOTAL	89,685.62

PAYMENTS RECEIVED TO DATE

Check # NA	Dated NA	7,500.00
Check #147	Dated 5/29	8,996.96
Check #235	Dated 7/23	4,000.00
Check NA	Dated NA	6,182.30 (recv'd 8/13)
Check NA	Dated NA	2,500.00 (recv'd 9/27)
Check #456	Dated 10/12	2,500.00
	TOTAL	31,679.26

TOTAL OWED

58,006.36

RECAP

MANAGEMENT FEES

COMMISSION

EXPENSES

25,000.00

38,253.63

26,331.99

9304084036

HAMMOCK FOR CONGRESS  
OUTSTANDING EXPENSES,

Postage	3,175.97
Photocopies	287.88
Telephone	3,604.10
FAX	682.00
Parking	397.50
Production	8,191.99
Supplies	605.11
Travel	340.58
Outside Labour	1,745.00

TOTAL DUE

-----  
19,030.13  
=====

93040984037

August 6, 1992

Ms. Lisa E. Klein  
Assistant General Counsel  
Federal Election Commission  
999 "E" Street, NW  
Washington, DC 20463

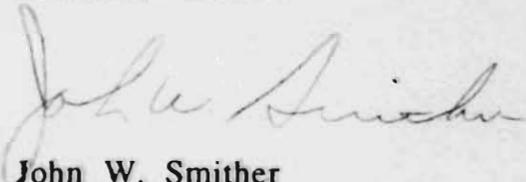
RE: MUR 3537

Dear Ms. Klein:

Our letter dated August 6, 1992 (attached) responds to a complaint indicating Pacific/West Communications Group, Inc. may have violated the Federal Election Campaign Act of 1971, as amended.

I swear that the contents of my response are true to the best of my knowledge.

Sincerely yours,



John W. Smither  
Senior Vice President  
Finance and Administration

Enclosures

92 AUG 11 PM 3:18  
RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE

93040984038

**LL-PURPOSE ACKNOWLEDGMENT**

No 5179

State of California  
County of Los Angeles }

On 8/7/92 before me, Mimi-Diana Yan, Notary Public  
DATE NAME, TITLE OF OFFICER - E.G., "JANE DOE, NOTARY PUBLIC"

personally appeared John W. Smith, Sr. Vice President  
NAME(S) OF SIGNER(S)

personally known to me - OR -  proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

**CAPACITY CLAIMED BY SIGNER**

- INDIVIDUAL
- CORPORATE OFFICER(S) Sr. Vice President TITLE(S)
- PARTNER(S)  LIMITED  GENERAL
- ATTORNEY-IN-FACT
- TRUSTEE(S)
- GUARDIAN/CONSERVATOR
- OTHER: \_\_\_\_\_

**SIGNER IS REPRESENTING:**

NAME OF PERSON(S) OR ENTITY(IES)  
Pacific/West  
Communications  
Group, Inc.

Witness my hand and official seal.  
Mimi-Diana Yan  
SIGNATURE OF NOTARY



9  
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9

ATTENTION NOTARY: Although the information requested below is OPTIONAL, it could prevent fraudulent attachment of this certificate to an unauthorized document.

**THIS CERTIFICATE MUST BE ATTACHED TO THE DOCUMENT DESCRIBED AT RIGHT:**

Title or Type of Document Letter Confirmation that all facts stated in response to Complaint w/ attached records are true & correct.  
Number of Pages 11 Date of Document 8/6/92  
Signer(s) Other than Named Above \_\_\_\_\_

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

SEP 29 10 49 AM '92

Paul E. Sullivan, Esq.  
*Attorney-at-Law*

The Singletary Mansion  
1565 The Alameda  
San Jose, CA 95126

September 28, 1992

Mr. Noriega James  
Federal Election Commission  
General Counsel's Office  
999 E Street, N.W.  
Washington, D.C. 20463

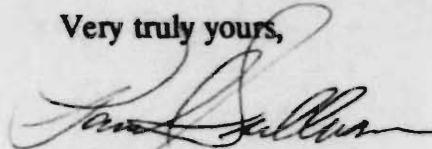
Re: MUR 3537

Dear Mr. James:

Please find enclosed the executed Designation of Counsel form in the above-referenced matter.

I have just received this case and I would request a two week extension during which to file a response. Your cooperation is appreciated.

Very truly yours,



Paul E. Sullivan

cc: Sal Russo

92 SEP 29 PM 3:23  
FEDERAL RECEIVED  
FEDERAL ELECTION COMMISSION

93040984040

**STATEMENT OF DESIGNATION OF COUNSEL**

**NO.** 3537

**NAME OF COUNSEL:** Paul E. Sullivan, Esq.

**ADDRESS:** The Singletary Mansion

1565 The Alameda

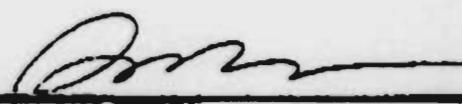
San Jose, California 95126

**TELEPHONE:** \_\_\_\_\_

RECEIVED  
FEDERAL ELECTION COMMISSION  
92 SEP 29 PM 3:25

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.

9-22-92  
**Date**

  
**Signature**

**RESPONDENT'S NAME:** Russo Marsh & Associates, Inc.

**ADDRESS:** 770 L Street, Suite 950

Sacramento, CA 95814

**HOME PHONE:** \_\_\_\_\_

**BUSINESS PHONE:** 916-441-3834

93040984041

RECEIVED  
FEDERAL ELECTION COMMISSION  
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FEDERAL ELECTION COMMISSION  
COUNSEL  
MAY 17 9 51 AM '93  
93 MAY 17 PM 3:57

**Paul E. Sullivan, Esq.**  
*Attorney-at-Law*

The Singletary Mansion  
1565 The Alameda  
San Jose, CA 95126

May 14, 1993

Re: MUR 3537

Ms. Lisa Klein  
Federal Election Commission  
General Counsels Office  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Ms. Klein:

Enclosed, please find the RTB Response in the above referenced MUR.

Thank you for your attention to this matter.

Very truly yours,



Paul E. Sullivan  
Counsel for Respondents

cc: Chairman Thomas  
Vice-Chairman Potter  
Commissioner Aikens  
Commissioner Elliott  
Commissioner McDonald  
Commissioner McGarry

93040984042

93 MAY 17 PM 3:57

BEFORE THE FEDERAL ELECTION COMMISSION

In re: )  
 )  
Russo-Marsh and Associates, Inc. )  
\_\_\_\_\_ )

MUR 3537  
RTB RESPONSE

INTRODUCTION

Pursuant to 2 U.S.C. §437g(a)(1) this Response is filed with the Federal Election Commission ("Commission" or "FEC") on behalf of Russo-Marsh and Associates, Inc. ("Respondents" or "Russo-Marsh").

By letter dated June 15, 1992, Respondents were notified that the Commission had received a complaint filed by one Mr. Chuck Williams against Respondents. The Complaint essentially alleges that by virtue of the fact that the Hammock for Congress Committee had a debt outstanding to Russo-Marsh from the 1990 and 1992 election cycle, such debt constituted an excessive and prohibited contribution in violation of 2 U.S.C. §§441a and 441b respectively. For the reasons stated below, Respondents deny that any such excessive or prohibited contribution occurred and hereby pray that the Commission make a finding of no reason to believe and dismiss this matter.

PROCEDURAL BACKGROUND

From a procedural perspective, Respondents' desire to initially explain the rather lengthy delay in the submission of this Response. By letter dated September 28, 1992, Respondents submitted a statement of designation of counsel and counsel then requested a two-week extension in which to file a response. During that time, questions arose relative to the precise amount of debt which was outstanding by the Hammock for Congress Committee, ("HCC") to Russo-Marsh and the specific services to which this debt was attributed. Due to this ambiguity, Respondents undertook a complete review of the financial records associated with the HCC account. That information was forwarded to counsel in January of 1993. At approximately that time, counsel contacted the general counsel's office to discuss the reasons for the delay. Counsel was informed at that time that the initial report had been written up and was being submitted to the Commission for a determination of a reason to believe finding.

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On the assumption that Respondents would be receiving notice of a determination by the Commission, no correspondence was forwarded to the Commission pending receipt of the Commission's RTB determination. However, to date, Respondents have not received any such notification from the Commission and are hereby submitting this document in response to the Complaint.

FACTUAL SUMMARY

Respondents obviously do not deny the fact that there is a substantial debt owing by HCC to Russo-Marsh. However, the fact of the matter is that this debt was incurred as a result of an arms-length business relationship between Russo-Marsh and HCC. This was evidenced by several indicia.

First, written contracts were tendered by Respondents to HCC for signing during the 1990 and the 1992 campaigns. The vast amount of the debt which is presently outstanding to Russo-Marsh by HCC was a result of the 1990 election.<sup>1</sup> A contract for the 1990 campaign was tendered by Russo-Marsh to HCC and Mr. Hammock individually. HCC executed the contract but Mr. Hammock did not in his individual capacity. Though this point is still being disputed today, Russo-Marsh contends that they subsequently contacted Mr. Hammock and informed him that in accordance with their business practice, in order for Russo-Marsh to extend credit to HCC, Mr. Hammock would individually have to enter into the contract in addition to HCC.

Russo-Marsh contend that at that time Mr. Hammock agreed to personally enter into the agreement and to forward the signed contract to Russo-Marsh. That contract was never received, however, Russo-Marsh contend that in reliance upon his statement of a personal guarantee for the HCC debts, they proceeded to extend credit to HCC. After the campaign, the numerous requests by Russo-Marsh to obtain payment from Mr. Hammock individually failed and it is presently the matter of an ongoing dispute between Mr. Hammock, HCC and Russo-Marsh.

In 1992, Mr. Hammock again sought election to Congress and requested to retain the services of Russo-Marsh. A personal guarantee contract for fees and expenses was again submitted to Mr. Hammock which he did not sign. As an alternative, a second agreement between Russo-Marsh and HCC was signed by the respective parties. However, due to the fact that Mr. Hammock did not sign individually, Russo-Marsh has indicated they required cash up front for the vast amount of the services which they provided to HCC.

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<sup>1</sup> Per the records of Russo-Marsh, as of February 1, 1993 the 1990 campaign debt is \$96,522.83 and the 1992 campaign, \$3,825.60. In regard to the 1990 campaign, HCC paid to Russo-Marsh a total of \$201,476.93.

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Second, the policy of Russo-Marsh, as discussed above, is to extend credit only in those situations in which a candidate signs an agreement for which he individually or in conjunction with the principle campaign committee, accepts responsibility for the payment of fees and expenses. As was the case in 1992, if the candidate refuses to execute a contract within his individual capacity, then the vast amount of fees and expenses are required to be paid prior to rendering service.

Third, the contracts tendered for 1990 and the one executed in 1992 provide for an interest payment of one and one-half percent (1½%) per month up to the maximum eighteen percent (18%) per annum on all amounts which are not paid within thirty (30) days of date of billing. Relative to the 1990 committee, invoices reflecting that monthly interest on the outstanding debt were sent on a monthly basis to the HCC. According to Russo-Marsh records, from December of 1990 through December of 1992, the period in which interest was charged to the HCC, a total of \$28,790.10 was charged as interest owing. This amount is part of the previously stated debt of \$96,522.83 for the 1990 campaign.

Fourth, after the 1992 campaign, in addition to continuing to invoice HCC on a monthly basis, various phone calls from representatives of Russo-Marsh to HCC were made to inquire and to request payment of the debt, though to no avail.

Fifth, Mr. Hammock's attorney, in response to letters from legal counsel of Russo-Marsh, indicates that they do not consider Mr. Hammock to be personally responsible for any of the debts to Russo-Marsh. In addition, HCC is presently approximately \$177,000 in debt and he stated, should HCC somehow obtain funds to retire that debt, the Russo-Marsh portion would also be retired.

### LEGAL ANALYSIS

The Commission's regulatory standards for extension of credit by commercial vendors to political committees requires only that the vendor extend such credit in a fashion so as to meet the ordinary course of the corporation's business and on terms which are substantially similar to extensions of credit to non-political debtors that are of similar risk and size of obligation.<sup>2</sup> Further, the regulations set out three (3) indicia of determining whether such credit was extended in the ordinary course of business.

1. Whether the commercial vendor followed its established procedures and its past practice in approving the extension of credit;
2. Whether the commercial vendor received prompt payment in full if it previously extended credit to the same candidate or political committee; and

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<sup>2</sup> 11 C.F.R. §116.3(b)

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3. Whether the extension of credit conformed to the usual and normal practice in the commercial vendor's trade or industry.<sup>3</sup>

Respondents submit that they complied with the applicable provisions of the Commission's regulation for the extension of credit. First, it was the practice of Russo-Marsh to extend credit only when an individual candidate signed their services contract rather than merely the political committee. The dispute which is presently ongoing is the contention by Russo-Marsh that Hammock agreed to execute the contract in his individual capacity in addition to that as an authorized agent for HCC. The fact that this matter is still presently being disputed by Russo-Marsh and legal counsel for Mr. Hammock, further comment is inappropriate at this point and time. However, the fact that the contracts were tendered which were the standard contracts issued by Russo-Marsh, including a requirement for interest payments, it clearly evidences the fact that Russo-Marsh was following their standard procedure and no special advantages were being provided to Mr. Hammock.

With regard to the second criteria, the fact that Mr. Hammock was not granted credit for the 1992 campaign due to his failure to pay the 1990 debt and his failure to sign the 1992 contract in his personal capacity, indicated that Russo-Marsh did in fact comply with the second provision with the regulation as outlined above.

Clearly, the terms and conditions upon which Mr. Hammock was extended credit not only conformed to the usual normal practice of commercial vendors in the political consulting industry, but I would submit went much further in adhering to standard and arms-length transactions. This is evidenced by the interest which was charged for outstanding debts, the ongoing monthly billing of those debts for two years after the end of the campaign and the fact that Russo-Marsh continues to pursue this matter presently.

As a last comment, Respondents contend that they have made all commercially reasonable attempts at collecting this debt and in fact continue to do so. Given the fact that Russo-Marsh is strictly a political consulting firm, it is clearly in their business interest to assess the method by which they seek to have such debt retired.

For example, the ability to work with the candidate and the campaign on a subsequent election with a reasonable expectations that the candidate will be successful, makes good business sense. In addition, the Commission should be dispelled of the concept that litigation is a mandatory course in order to evidence a good faith effort to collect on a debt. A judgement against a political committee is essentially worthless when it is made against a committee that is substantially in debt, such as HCC. The time and legal fees for seeking a judgment from a judgement-proof political committee itself often is not a good business judgment. This is a situation where the Commission is not in a position to second-guess vendors simply because they are not privy to the various business factors which must be considered in making such a judgment. Secondly, given the relationship between a

<sup>3</sup> 11 C.F.R. §116.3(c)

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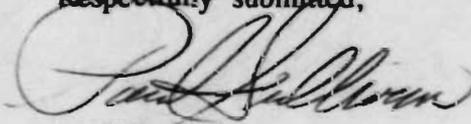
candidate and the principal campaign committee, absent a verbal commitment or a written contract with the candidate directly, it is difficult to often obtain a judgment against an individual candidate while acting in the capacity of an agent for the principal campaign committee.

Respondents submit that they have complied with the regulatory requirements for the extension of credit at the time they undertook the campaigns of Mr. Hammock in 1990 and in 1992. That is the single issue which is pending before the Commission. However, to underscore the fact that the initial agreements in 1990 and 1992 with Mr. Hammock and his principal campaign committee were in fact in an arms-length transaction, Respondents have submitted evidence that they have continued to pursue this matter for payment in accordance with their understanding of the contract, and continued to bill the HCC for interest which was outstanding.

CONCLUSION

For the reasons stated above, Respondents contend that there was not an improper extension of credit by Russo-Marsh to HCC in 1990 nor 1992 and as a result, the debt which remains outstanding to Russo-Marsh by Mr. Hammock and the Hammock for Congress committee should not be considered to be a prohibited contribution nor one which exceeds the contribution limits. For these reasons, Respondent respectfully requests that the Commission make a finding of no reason to believe and close this matter.

Respectfully submitted,



Paul E. Sullivan  
Counsel for Respondents

93040984047

MUR # 3537

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY  
BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM  
LOCATIONS.

93040984048



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3537

DATE FILMED 10/28/93 CAMERA NO. 2

CAMERAMAN MC

93040984049



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Microfilm  
 Public Records  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3537.

12/10/93

23043542871

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS  
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

23043542872



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

John C. Williams  
c/o Barbara K. Williams, Treasurer  
Chuck Williams for Congress '92'  
6847 Portofino Court  
Rancho Cucamonga, CA 91701

RE: MUR 3537

Dear Mr. Williams:

On June 8, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Robert L. Hammock, Bob Hammock for Congress and Donald L. Rogers, as treasurer, Hammock for Congress 1992 and Tricia Runzel, as treasurer, Russo Marsh & Associates, Inc., Pacific/West Communications Group, Inc., Rogers, Anderson, Malody & Scott, Candidates' Outdoor Graphics Service, the Wirthlin Group, META Information Services, GTE, the Red Lion Inn, Federal Express Corporation, Southern California Edison Company, Instant Image Printing, University Copy Systems, Pace Lithographers, Inc., Phoenix Press, and A Balloon Affair. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043542873

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542874



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

Robert L. Hammock  
c/o Hammock for Congress 1992  
290 North "D" Street Suite 300  
San Bernadino, CA 92401

RE: MUR 3537  
Robert L. Hammock

Dear Mr. Hammock:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against you in this matter. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1992

93043542875

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542876



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

Tricia Runzel, Treasurer  
Hammock for Congress 1992  
290 North "D" Street Suite 300  
San Bernadino, CA 92401

RE: MUR 3537  
Hammock for Congress 1992 and  
Tricia Runzel, as treasurer

Dear Ms. Runzel:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Hammock for Congress 1992 and Tricia Runzel, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

DEC 10 1992

93043542877

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542878



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Donald L. Rogers, Treasurer  
Bob Hammock for Congress  
290 North "D" Street Suite 300  
San Bernadino, CA 92401

RE: MUR 3537

Dear Mr. Rogers:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Bob Hammock for Congress, and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1993

930.43542879

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542880



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Instant Image Printing  
2232 Valencia Avenue  
San Bernadino, CA 92404

RE: MUR 3537

Dear Sir or Madam:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Instant Image Printing. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

23043542881

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542882



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Phoenix Press  
2772 Main Street  
Irvine, CA 92714

RE: MUR 3537

Dear Sir or Madam:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Phoenix Press. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542883

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542884



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Joel A. White  
Chief Financial Officer  
The Wirthlin Group  
1363 Beverly Road  
McLean, VA 22101

RE: MUR 3537  
The Wirthlin Group

Dear Mr. White:

On June 15, 1992, the Federal Election Commission notified The Wirthlin Group of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against The Wirthlin Group. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542885

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542886



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Jackie Herzer  
META Information Services  
8649 Kiefer Boulevard  
Sacramento, CA 95826

RE: MUR 3537  
META Information Services

Dear Ms. Herzer:

On June 15, 1992, the Federal Election Commission notified META Information Services of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against META Information Services. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 01 1993

23043542887

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542888



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Donna DeCeco  
Manager of Operations and Administration  
University Copy Systems  
2805 Barranca Parkway  
Irvine, CA 92714

RE: MUR 3537  
University Copy Systems

Dear Ms. DeCeco:

On June 15, 1992, the Federal Election Commission notified University Copy Systems of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against University Copy Systems. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1993

23043542889

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542890



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Donald L. Rogers, Managing Partner  
Rogers, Anderson, Malody & Scott  
Vanir Tower, Suite 300  
290 North "D" Street  
San Bernadino, CA 92401

RE: MUR 3537  
Rogers, Anderson, Malody & Scott

Dear Mr. Rogers:

On June 15, 1992, the Federal Election Commission notified Rogers, Anderson, Malody & Scott of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Rogers, Anderson, Malody & Scott. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043542891

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542892



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

Kenneth S. Stewart, Esquire  
Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

RE: MUR 3537  
Southern California Edison Company

Dear Mr. Stewart:

On June 15, 1992, the Federal Election Commission notified Southern California Edison Company of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Southern California Edison Company. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

23043542893

**MUR 3537**  
**HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542894



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Cathy Borman  
A Balloon Affair  
225 Westpark  
Redlands, CA 92373

RE: MUR 3537  
A Balloon Affair

Dear Ms. Borman:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against A Balloon Affair. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specilaist

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

93043542895

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542896



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Carl Bennett  
Pace Lithographers, Inc.  
18030 Cortney Court  
City of Industry, CA 91744

RE: MUR 3537  
Pace Lithographers, Inc.

Dear Mr. Bennett:

On June 15, 1992, the Federal Election Commission notified Pace Lithographers, Inc. of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Pace Lithographers, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1993

93043542897

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542898



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

DEC 10 1993

A. J. Sain  
Federal Express Corporation  
2005 Corporate Plaza  
Memphis, TN 38134-1853

RE: MUR 3537  
Federal Express Corporation

Dear Mr. Sain:

On June 15, 1992, the Federal Election Commission notified Federal Express Corporation of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Federal Express Corporation. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 9 1993

23043542899

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542900



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 15 1993

Elaine M. Lustig, Esquire  
GTE California Incorporated  
One GTE Place - CA500LB  
Thousand Oaks, CA 91362

RE: MUR 3537  
GTE

Dear Ms. Lustig:

On June 15, 1992, the Federal Election Commission notified your client of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against GTE. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043542901

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542902



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Greg Hummel, Vice President  
Candidates' Outdoor Graphic Service  
11343 Stewart Street  
El Monte, CA 91731

RE: MUR 3537  
Candidates' Outdoor Graphic Service

Dear Mr. Hummel:

On June 15, 1992, the Federal Election Commission notified Candidates' Outdoor Graphic Service of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Candidates' Outdoor Graphic Service. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

93043542903

**MUR 3537  
HAMMOCK FOR CONGRESS**

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

93043542904



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

John W. Smither  
Senior Vice President  
Pacific/West Communications Group, Inc.  
3435 Wilshire Boulevard  
Los Angeles, CA 90010

RE: MUR 3537  
Pacific/West Communications  
Group, Inc.

Dear Mr. Smither:

On July 30, 1992, the Federal Election Commission notified Pacific/West Communications Group, Inc. of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Pacific/West Communications Group, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542905

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542906



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Paul E. Sullivan, Esq.  
The Singletary Mansion  
1565 The Alameda  
San Jose, CA 95126

RE: MUR 3537  
Russo Marsh & Associates, Inc.

Dear Mr. Sullivan:

On June 15, 1992, the Federal Election Commission notified your client of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Russo Marsh & Associates, Inc. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: DEC 10 1993

23043542907

MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

23043542908



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Red Lion Inn  
222 North Vineyard Avenue  
Ontario, CA 91764

RE: MUR 3537

Dear Sir or Madam:

On June 15, 1992, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Red Lion Inn. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Frances B. Hagan  
Paralegal Specialist

Attachment  
Narrative

Date the Commission voted to close the file: \_\_\_\_\_

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MUR 3537  
HAMMOCK FOR CONGRESS

Complainant Chuck Williams, candidate Robert L. Hammock's primary election opponent (36th C.D., CA) alleged that respondents' failure to pay outstanding debts to vendors resulted in corporate contributions. Respondents state that some vendors have been paid in full, others have received partial payment, and that the Committee intended to repay debts in full with receipts from a Fall '92 fundraiser. The Year End '92 Report shows no influx of funds; however the Committee continues to report the outstanding debt. Many vendors documented their efforts to collect debts: by repeatedly sending letters and invoices, through direct telephone contact with the candidate, and by using internal or independent collection agencies.

This case has no significant issue relative to the other issues pending before the Commission, and there appears to have been no serious intent to violate the FECA.

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